

NOV 2 1983

MEMORANDUM FOR: Patricia Norry, Director, ADM  
Michael Springer, Deputy Director, ADM

FROM: William O. Miller, Chief, License Fee Management Branch, ADM

SUBJECT: SUMMARY OF INTEROFFICE COMMENTS REGARDING THE JULY 11, 1983  
FEE PAPER WHICH WERE NOT USED IN THE FINAL RULE

IE (DeYoung)

Comments:

1. In computing inspection fees eliminate safety and safeguards inspections and use higher of proposed fees for safety or safeguards.  
  
(We did combine safety and safeguards costs into one fee but it is the sum of safety and safeguards).

Comment:

2. In September 29, 1983 memorandum requested that all responses to "events and incidents be excluded from fees."  
  
(See no justification to exclude non-routine inspection activities such as incidents from fees).

NRR (J. Funches)

Comment:

1. Disagrees with proposed billing procedures for facilities. Wants periodic billing to occur at six-month intervals and eliminate the provision "or when review is complete, whichever is earlier".  
  
(Period billing will occur at six-month intervals but we will collect fee when review is complete).

NOV 2 1983

Comment:

2. Suggests elimination of application fees.

(Application fees serve as deterrent to frivolous applications).

Region II (O'Reilly)

Comment:

1. Disagrees with assessment of fees based on actual or full cost per inspector per inspection (for power reactors). Prefers use of average fee or fixed and very few classes of applications/ licensees. Use of variable system inefficient and would generate conflicts with licensees.
2. Does not want to hold up licensing actions and inspections until fee is paid.

(LFMB is not involved in scheduling inspection activities. Fixed fees for large program unfair. Experience shows that costs vary widely for both licensing and inspection activities).

Region III (Keppler)

Comments:

1. Use flat rate (fee) to recover approximate expense of performing inspections at various types of licensed facilities. "Would simplify process, require less manpower and will not penalize licensees for difference in efficiencies of various inspectors and may eliminate potential criticism by licensees with regard to their perception of efficiency of inspection program."

(See response to O'Reilly comment)

Region I (Murley)

Comment:

1. Need revised procedures for program.

(Procedures will be revised and furnished to interested offices).

Comment:

2. Separate billing rates should be established for each programatic function performed in regions.

(Rates based on FY 1981 cost data and at that time the regions did not have separate budgets, etc). This issue must be addressed in next revision to Part 170).

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Office of Administration

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