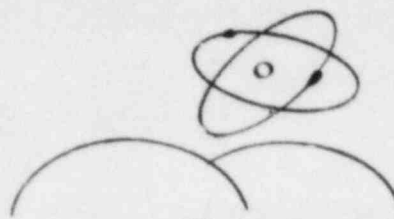


543 company



"Ecology Through Technology"

Rt. 8, Box 228E, Morgantown, WV 26505 304-292-9729

Robert F. Stewart
Nuclear Chemist

Glenda Jackson
License Fee Management Branch
Office of Administration
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

June 17, 1985

Ref. License SNM-1872

Dear Mr. Jackson:

Referring to the increase in fee of your June 11, 1985 letter and our phone discussion of June 11, 1985, I request reconsideration on the following basis:

1. Only leak testing of source is conducted by the 543 Company and all additional services are for accident and emergency conditions, never yet required. It is necessary to remove, wipe test and reinstall the source in the Sartex Ash Meter because of its design, rather than merely wipe testing in place as with conventional density gauges.

2. Plutonium sources are no longer wipe tested, having been replaced with curium sources some years ago. Thus plutonium could be deleted from the license except at the request of NRC inspector Robert Brown and NRC licensing that capability for plutonium disposal be retained for the several remaining companies. The Inspection Findings of 5/18/82 on SNM-1872 and license letter of July 13, 1983, renewal application of SNM-1872 of March 4, 1985. The alternate procedure of plutonium deletion and reinstatement if needed was determined to be time inappropriate.

3. A ten-fold increase in fee exceeds the total company profit for the past two years (see IRS Tax Return for 1983+1984, I.D. No 420-28-8176) and would result in a net operating loss. The 543 company has only two customers left, the Pittston Company, Lebanon Va and South East Coal Company, Irvine, Ky, with one meter at each company.

4. I phoned you on 12/4/84 to verify fees of \$120 and quoted contract prices for 1985 to the two coal companies on that basis.

For these reasons I request reduction of the fee increase.

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Sincerely,
R F Stewart, Pres.