

DOCKET NUMBER
PROPOSED RULE **PR** 71, 170, 171
(56 FR 14870)

753

'91 JUN 28 A9:47

OFFICE OF SECRETARY
DOCKETING & SERVICE
BRANCH

Mr. Samuel J. Chilk
Secretary
US Nuclear Regulatory Commission
Washington, D.C. 20555

Attn: Docketing and Service Branch
Ref: Federal Register Notice Vol. 56, No. 71 - FR Doc. 91-8161

Dear Mr. Chilk:

I am writing to protest the proposed NRC fee schedules referenced above. These will have a negative impact on users of radioactive materials both by increasing the fees assessed on users and by increasing costs to manufacturers, which will be passed on to users. In addition to the cost impact, a secondary effect will be a reduction in the number of manufacturers of radioactive products and the range of products they offer.

I propose that NRC should take the following actions:

- 1) Extend the comment period for at least 180 days. The 30 day comment period is entirely insufficient. More time is required to ensure that fee schedules are reasonable and equitable.
- 2) Reconsider the assumption that 100% cost recovery is appropriate, in view of the enormous negative cost impact this will have on US industry.
- 3) The concept of annual fees for Certificates of Compliance and Device Registrations is inappropriate. Fees for amendment and renewal already cover actual costs. Annual fees should be eliminated from the schedule.

Signed: Shirley Winston

Name: Shirley Winston

Date: June 13, 1991

Organization: DMI-RESEARCH

Address: 100 MINERAL ROAD
BROUSSARD, LA. 70518

DOCKET NUMBER PR 71,170,171
PROPOSED RULE
(56FR14870)

686

RECEIVED
NRC

'91 JUN 28 A9:32

Mr. Samuel J. Chilk
Secretary
US Nuclear Regulatory Commission
Washington, D.C. 20555

DEPT. OF COMMERCE
NUCLEAR REGULATORY COMMISSION
DOCKETING & SERVICE
BRANCH

Attn: Docketing and Service Branch
Ref: Federal Register Notice Vol. 56, No. 71 - FR Doc. 91-8161

Dear Mr. Chilk:

I am writing to protest the proposed NRC fee schedules referenced above. These will have a negative impact on users of radioactive materials both by increasing the fees assessed on users and by increasing costs to manufacturers, which will be passed on to users. In addition to the cost impact, a secondary effect will be a reduction in the number of manufacturers of radioactive products and the range of products they offer.

I propose that NRC should take the following actions:

- 1) Extend the comment period for at least 180 days. The 30 day comment period is entirely insufficient. More time is required to ensure that fee schedules are reasonable and equitable.
- 2) Reconsider the assumption that 100% cost recovery is appropriate, in view of the enormous negative cost impact this will have on US industry.
- 3) The concept of annual fees for Certificates of Compliance and Device Registrations is inappropriate. Fees for amendment and renewal already cover actual costs. Annual fees should be eliminated from the schedule.

Signed: *Ken M. DMI*

Name: DMI

Date: 6/24/91

Organization: DMI

Address: 118 Thruway PK

Bronson, LA

70518

9107030151 910624
PDR PR
170 56FR14870 PDR

DMO