

SEP 24 1980

MEMORANDUM FOR: Files

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

SUBJECT: FEE FOR APPLICATIONS FOR AMENDMENT TO MANUFACTURING LICENSES

The NMSS Licensing staff has received a number of applications from licensed manufacturers which requested that their licenses be amended to authorize the picking up of sealed sources and devices from their customers for packaging and transfer to authorized recipients; specifically those sources and devices manufactured by another manufacturer. In our June 17, 1980 memorandum to the NMSS technical staff, we requested information concerning the amount of time required to process these applications for amendment and whether the Licensing staff considered the applications as requests for waste disposal authorization. The purpose of our request was to help us determine whether these applications for amendments should be subject to either a waste disposal application fee under fee Category 4B for \$1,100 or an amendment fee of \$110 per Category 3A.

NMSS, in its July 21, 1980 response informed us that, for licensing purposes the subject amendments (1) are written in the form of service licenses rather than as a waste disposal authorization, (2) are for the purpose of making sure the license specifies the activities being performed under the license, since for years most licensed distributors of devices have been picking up and transferring to licensed recipients devices other than their own as a service to their customers only, and (3) the amendments require a processing time comparable to that for the processing of simple license amendments, such as the time required to add an additional user to a license.

Based on the above, we decided that applications for amendment to manufacturing licenses to allow the pick up, packaging and transfer of sealed sources and devices from licensed customers would be subject to the amendment fee in fee Category 3A.

Original Signed by  
Wm. O. Miller

William O. Miller, Chief  
License Fee Management Branch  
Office of Administration

DISTRIBUTION:

License Fee File

Fee File 5-3

Matls. Fee File (DW)

GJackson, ADM

FBrown, ADM

8903130703 890118  
REG3 LIC30  
34-00255-03 PNU

OFFICE	LFMB:ADM	LFMB:ADM	LFMB:ADM			
SURNAME	ACabell:ba	UCJHolloway	WOMiller			
DATE	9/23/80	9/23/80	9/24/80			