

## RulemakingComments Resource

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**From:** Richard, Mack L <mrichar@iu.edu>  
**Sent:** Wednesday, April 16, 2014 8:21 AM  
**To:** RulemakingComments Resource  
**Cc:** Swank, Eric David; Nagel, Debbie (IU Health); Pelke, Patricia  
**Subject:** Comments on Revision of Fee Schedules: Fee Recovery for Fiscal Year 2014 - Docket ID NRC-2013-0276

Our institution holds two (2) NRC licenses, one of which is for devices containing sealed sources that fall under the 7.A. fee category in the "Schedule of Materials Annual Fees and Fees for Government Agencies License by NRC" table. The other license is a "broad medical license" which falls under the 7.B. category in the aforementioned table. These licenses have both been renewed with the past 2.5 years. During the renewal process, representatives from the Region III NRC Office asked if we would be interested in melding those two licenses into a single license since the radiation safety program (and the Radiation Safety Officer) is the same for both licenses. We opted not to combine the licenses for various reasons, one of which relates to these annual fees.

In March of this year, I emailed the NRC and requested clarification of what fees we would be expected to pay if the licenses were combined into one – essentially, the license that falls under the 7.A. category would be incorporated into the broad scope medical license in the 7.B. category. A License Fee Analyst responded to my request and indicated that based upon her review of our licenses, we would be expected to pay the requisite annual fees in both categories, even if the licenses were combined into one.

This year, the proposed annual fees for categories 7.A. and 7.B are \$23,800 and \$35,700 respectively. There would no doubt be some savings of administrative costs, both for the NRC and our institution if the two licenses were combined. It is my opinion (and the main point of this comment) that licensees should be provided some type of relief from a portion of these fees if two medical licenses such as these were combined. Since the broad medical license drives most of the radiation safety program (e.g. administrative processes, approval of Authorized Users, review of incidents, etc.), it would seem that maintaining the annual fee for category 7.B. and reducing the fee for category 7.A. by at least 50% would be reasonable and provide an incentive for licensees such as ours to combine NRC licenses.

Respectfully submitted,

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