

**From:** Langhorst, Susan  
**To:** Kennedy, Erin  
**Cc:** Houts, Todd A.  
**Subject:** [External\_Sender] RE: Potential Impacts of NRC 2019 Fee Rule Revisions for Curators of the University of Missouri - Columbia  
**Date:** Thursday, June 27, 2019 8:12:10 AM

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Dear Ms. Kennedy,

Based the location definition you provided, the University of Missouri NRC License No. 24-00513-32 currently had three (3) locations of use.

Sue

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**From:** Kennedy, Erin <Erin.Kennedy@nrc.gov>  
**Sent:** Friday, June 14, 2019 10:29 AM  
**To:** Langhorst, Susan <langhorsts@missouri.edu>  
**Subject:** Potential Impacts of NRC 2019 Fee Rule Revisions for Curators of the University of Missouri - Columbia

Dear Ms. Langhorst:

On May 24, 2019, the NRC amended Title 10 of the Code of Federal Regulations (10 CFR) Sections 170.31 and 10 CFR 171.16 to add new subcategories for fee Category 7C. The NRC staff determined that additional resources are required for licenses with six or more locations of use compared to licenses in the same fee category with fewer than six locations. The NRC revised fee Category 7C to include new subcategories, to more accurately reflect the cost of services provided by the NRC. Based on this revision, the Region III Materials Licensing Branch needs to confirm the locations of use listed on your NRC Material License No. 24-00513-32, based on the "location of use" guidance below.

A location of use has been defined as the following:

1. An individual building or facility at one address.
2. A contiguous licensee-controlled geographic area, such as a campus or licensee- owned/operated/controlled business campus or park, is considered a single "location of use" and only one address is listed on the license. Sites that are not contiguous but are located in separate parts of a city, different city or state, are separate "locations of use" and separate addresses are listed on the license.

3. A temporary job site is not a "location of use." In addition, use of licensed materials at sea or on board a ship may be a separate location, specifically listed on the license, if it is a permanent job site. If use at sea is not a permanent location but is a temporary job site, then it is not a separate location and its address will not be listed on the license

Although Condition 10. of your license has seven separate locations of use listed, an evaluation by the staff has identified that some of those locations may be in one individual building or on one contiguous campus. Please review the locations of use on your materials license and provide clarification as to which locations should be considered one individual building or a contiguous campus. Please respond via email at your earliest convenience and no later than June 26.

If you have any questions concerning this assessment, please contact Erin Kennedy at 630-829-9876

Thank you,

*Erin Kennedy*

U.S. Nuclear Regulatory Commission, Region III

Health Physicist- Materials Licensing

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License No. 24-00513-32

Docket No. 030-02278