

INSDC

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WAYNE STATE
DEVELOPMENTAL CENTERSecretary
U.S. Nuclear Regulatory Commission
Docketing and Service Branch
Washington, DC 20555U.S. Nuclear Regulatory Commission
DOCKETING AND SERVICE BRANCH
WASHINGTON, D.C. 20555

Dear Sir:

In response to the request for comments on PRM-170-3, we also are being severely penalized by the new fee structure. Since 1963 I have been in charge of a small biochemical research program in our facility. Down's syndrome is one of the two major, clearly diagnosed causes of mental retardation. Because vitamin B-6 is involved with the proper function of both the immune and nervous systems, both of which are abnormal in Down's syndrome, our program has focused on vitamin B-6. Since the metabolic defects in Down's syndrome are most likely to be associated with changes in metabolic rates, we have used radioactive tracers in animals and stable isotope tracers in humans to examine the kinetics of vitamin B-6 metabolism. We have developed the most thoroughly validated assay for vitamin B-6 compounds. We have identified new metabolites. The reviewers of one of our grant applications stated, "Loss of this project would mean loss of a great pioneering effort and resource." In summarizing developments in vitamin B-6 research over the period 1960-1984 one book noted, "In the intervening four years, there have been two methodological advances worth noting." Both came from our laboratory. This past August we received a telephone call from the USDA stating that they were developing a report on some of their programs and upon reviewing their records for projects which had been supported for a long time and were very productive our program really stood out.

However, our State budget for items other than salaries is about \$8,000/y. Obviously, we can not absorb an annual license fee in excess of \$5,000/y plus additional periodic renewal and inspection fees in excess of \$2,000. It is unrealistic to expect our budget to double in response to these fees. We hope to complete the major project currently in progress by terminating one staff member and using the salary money for license fees. If there is no change in the fee schedule, we expect to terminate our license in June 1994. This will destroy one of the major aspects of a very productive research program that we have been developing for 30 years. I consider it grossly unfair that if I were conducting exactly the same research under the auspices of a state university I would have no license fee. However, because I am located in another branch of state government, I am assessed a very high fee even though both organizations receive their funds from exactly the same source. Therefore, I strongly agree with the petitioners that the fee structure is creating severe hardship on many users of small amounts of radioactive materials in health care facilities.

Sincerely,



Stephen P. Coburn, Ph.D.

DS/0

cc: Senator Lugar, Senator Coats, Rep. Long

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