

Research and Development

Rev'd 4/5/94
Turner-Fairbank Highway
Research Center
1100 Georgetown Pike
McLean, Virginia 22101-1219

AUG 02 1991

Refer to: HNR-30

Director
Office of Nuclear Material Safety and Safeguards
U.S. Nuclear Regulatory Commission
Washington, DC 20555

Cancelled
4/6/91
AM03445-91
AM03446-91

Re: Termination of Registration Certificate Nos.
NR-643-D-101-S and NR-643-D-102-S

Dear Sirs:

Please terminate the subject registrations as of September 30, 1991, or earlier, as necessary in order to have the FY 1991 annual fee (of \$3100 per device) waived for these registrations. It is our understanding that we will no longer be able to transfer the devices covered by these registrations to other licensees for use in their programs, but that we can maintain the devices and sources for our own use under our materials license.

We do have two comments about the new fee program which we hope will be forwarded to the appropriate office at the NRC. First, the fees for annual registration seem to be quite out of line with any services provided. Once a device is registered (a service which is charged for separately, and at a considerably lower fee), as far as we can see the NRC has nothing further to do to maintain that registration except file it. What does the NRC do to justify an annual \$3100 charge per registration?

Second, the unreasonably high fees will have a stifling effect on small research and development efforts such as ours. Although one of the two devices covered by these registrations has been a substantial stimulus on commercial nuclear gauge manufacturing, the annual charge is leading us to end our technology transfer programs with these particular gauges. And it is likely to inhibit future R&D efforts. We suggest the NRC take another look at these fee schedules.

Sincerely yours,

for *Ronald G. Foks*
Thomas J. Pasko, Jr., P.E.
Director, Office of Engineering and
Highway Operations Research and
Development

Research and Development

200d 4/5/94
Turner Facility Highway
Research Center
100 Georgetown Pike
McLean, VA 22101-1100

AUG 02 1991

Refer to: HNR-30

Director
Office of Nuclear Material Safety and Safeguards
U.S. Nuclear Regulatory Commission
Washington, DC 20555

Cancelled
2/16/91
[AMO 3445-91
[AMO 3446-91

Re: Termination of Registration Certificate Nos.
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