



INDUSTRIAL INSPECTION AND TESTING SERVICE

P. O. Box 311, Rt. 84, Fulton, Illinois 61252 - Phone (815) 589-2412 - 24 Hrs.

Non-destructive Testing, ASME, API, and other specifications



JULY 18, 1985

SECRETARY OF THE COMMISSION
U.S. NUCLEAR REGULATORY COMMISSION
WASHINGTON D.C. 20555

ATTN: DOCKETING AND SERVICE BRANCH

GENTLEMEN:

THIS IS IN REGARD TO YOUR PROPOSED RULE FOR DEFINING A SMALL BUSINESS
AMONG N.R.C. LICENSEES.

WE AGREE THAT THIS SHOULD BE DONE AND SUCH A DEFINITION USED TO HELP
ALLEVIATE THE BURDENSOME COSTS OF MAINTAINING AN N.R.C. LICENSE.
WITH LICENSE FEES, INSPECTION FEES, TRANSPORT LICENSE FEES AND THE
ASSOCIATED ADMINISTRATIVE COSTS, THE ABILITY OF A SMALL BUSINESS TO
MAKE A PROFIT IS SEVERLY HAMPERED.

YOUR CUT OFF POINT OF \$1,000,000.00 ANNUAL RECEIPTS SEEMS APPROPRIATE,
HOWEVER, THE DEFINITION SHOULD BE MODIFIED TO READ "\$1,000,000.00 IN
ANNUAL RECEIPTS OR GROSS INCOME GENERATED BY THE USE OF THE LICENSED
MATERIAL." IN MANY CASES, THE USE OF THE ISOTOPE MATERIAL ONLY PROVIDES
A SMALL MARGIN OF PROFIT OR SAVINGS TO THE USER. AS AN EXAMPLE, OUR
TESTING IS PERFORMED BY A DIVISION OF A LARGER COMPANY. WHILE THE
PARENT COMPANY MAY GROSS OVER \$1,000,000.00, THE TESTING DIVISION
MAY ONLY GROSS \$100,000.00 OR LESS. ALL OF THE N.R.C. ADMINISTRATIVE
COST MUST BE COVERED BY THE TESTING DIVISION ALONE. IT IS NOT RIGHT
TO TAKE THAT EXPENSE OUT OF THE PROFIT FOR THE REST OF THE COMPANY.

I HOPE THIS MODIFICATION CAN BE INCORPORATED IN AT LEAST THE CASES
WHERE THE USE OF THE ISOTOPE IS A STAND-ALONE FUNCTION.

SINCERELY,

INDUSTRIAL INSPECTION AND TESTING SERVICE

REX H. WINGET
RSO

RHW/RG

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