

From: [Ullrich, Betsy](#)
To: [Cahill, Christopher](#); [Ayala, Juan](#)
Subject: Expired license for Army MRICD FW: does anyone know if annual fees are assessed for licenses that have expired but are not yet terminated?
Date: Thursday, October 21, 2021 3:46:00 PM

From: Ullrich, Betsy
Sent: Tuesday, June 08, 2021 10:08 AM
To: Riner, Kelly <Kelly.Riner@nrc.gov>
Cc: Villar, Sheryl <Sheryl.Villar@nrc.gov>; Cahill, Christopher <Christopher.Cahill@nrc.gov>
Subject: FW: does anyone know if annual fees are assessed for licenses that have expired but are not yet terminated?

Kelly,

The licensee is Army, Medical Research Institute of chemical Defense (MRICD) at Aberdeen, LN 19-00294-24 The RSO told me that they just paid an invoice.

- They notified us of their intent to decommission and terminate the license in November 2020, we accepted (Package ML20322A356
- They submitted information to release Bldg E3244 in April 2021. (ADAMS Package ML21130A606) I thought this was the last building they were using, and today asked the RSO to submit 314 requesting that the license be terminated. That's when I became aware that there is still another building to be decommissioned, the license expires June 30, and they did not submit a renewal request because they did not budget for future licensing costs. FYI it is very simple decommissioning that meets the 51.22(c)(20) exemption and will not require us to do anything except review their final results.
- We will have to release the remaining building (really, a couple of labs in the building) later under a separate amendment, probably will be when we formally terminate the license.

At this point, I think they have to continue as an expired license (so Sheryl, maybe we will need to open an inspection and licensing action in WBL before WBL shuts down that file?).

Will they be assessed any fees as an expired license?

From: Villar, Sheryl <Sheryl.Villar@nrc.gov>
Sent: Tuesday, June 08, 2021 9:43 AM
To: Ullrich, Betsy <Elizabeth.Ullrich@nrc.gov>; Lanzisera, Penny <Penny.Lanzisera@nrc.gov>; DeBoer, Briana <Briana.DeBoer@nrc.gov>; Masnyk Bailey, Orysia <Orysia.MasnykBailey@nrc.gov>; Hammann, Stephen <Stephen.Hammann@nrc.gov>; Reichard, Michael <Michael.Reichard@nrc.gov>; Ayala, Juan <Juan.Ayala@nrc.gov>; Cahill, Christopher <Christopher.Cahill@nrc.gov>
Cc: Riner, Kelly <Kelly.Riner@nrc.gov>
Subject: RE: does anyone know if annual fees are assessed for licenses that have expired but are not

yet terminated?

Betsy,

Per Kelly Riner, Fees...

It would depend. She said, If the invoice went out before the license expired, then yes. She thinks that when the license expires, an "end date" is transmitted from WBL into FAIMIS. If you have more questions on this you can reach out to her.

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From: Ullrich, Betsy <Elizabeth.Ullrich@nrc.gov>

Sent: Tuesday, June 8, 2021 9:37 AM

To: Lanzisera, Penny <Penny.Lanzisera@nrc.gov>; DeBoer, Briana <Briana.DeBoer@nrc.gov>; Masnyk Bailey, Orysia <Orysia.MasnykBailey@nrc.gov>; Hammann, Stephen <Stephen.Hammann@nrc.gov>; Reichard, Michael <Michael.Reichard@nrc.gov>; Ayala, Juan <Juan.Ayala@nrc.gov>; Villar, Sheryl <Sheryl.Villar@nrc.gov>; Cahill, Christopher <Christopher.Cahill@nrc.gov>

Subject: does anyone know if annual fees are assessed for licenses that have expired but are not yet terminated?

I have an Army license that will expire June 30, and they still have another building that they need to survey before they can demonstrate that it is suitable for release for unrestricted use. However, they intend to terminate the license (did send in a notification of that) and did not submit a renewal request because they have not budgeted annual fees for a renewed license.

This will be a nuisance to keep track of an expired license that cannot be terminated for a while (they expect "soon" and I am issuing an amendment releasing a different building today) so I would have preferred that they renew. The licensee believes that if the license expires, they will not be assessed annual fees.

FYI it is a simple release of facilities that mostly used H3, C14 and <120 day half-life materials... and lots of serious biological agents not under our jurisdiction. The radioactives is trivial by comparison.

Betsy