

License Fee Structure Working Group

Observations based upon Stakeholder Feedback:

- Less than 10% of licensees responded to the RAM survey; of those responding, more than half were involved in the medical use of RAM, followed by portable and fixed gauges. Those responding on the medical side may not have fully understood all the fee categories.
- Most stakeholders (>50%) claimed that the fee categories were consistent and understandable and could be calculated. However, 52% thought that the fee rule needed to be changed or updated, indicating potential opportunities for improvement.
- There is no definition for a broad scope license or what is included in the license fee; notes from DSHS indicate that the items covered in a broad scope license are in the draft rules and are soon up for review.
- Several broad scope licensees commented that they are getting charged usage fees that they thought should be covered under the Broad Scope fee.
- Confusion existed related to charges that apply for multiple sites under one license and why additional sites listed as “low risk” under a Broad Scope license require a 25% surcharge.
- Some stakeholders claimed that there were no categories which fit their licensed use of RAM; they stated fee schedule does not list Portable Gauges or Sealed Source Special Form
- Some stakeholders identified that no definition exists in the rule for “General License Acknowledgement-Gauge” or “Other Specific License” or “Neutron Generator Target.”

Recommendations to the TRAB and DSHS based upon Stakeholder Feedback:

DSHS should:

- Define and itemize what is covered under a Broad Scope Authorization. Specifically, what use categories are included within the Broad Scope authorization? What other use categories might incur additional costs that are not already included within the Broad Scope fee?
- Define what is considered a new site under a license. What is the radius or distance from an existing site that would require a new site to be added? Would multiple sites within the same city, county or inspection district be considered contiguous as a single site? What is considered another facility? What characteristics of the site will dictate the separate fee?
- Provide justification for the 25% surcharge for additional sites added onto a license. Consideration should be given to a risk-based cost approach when adding additional sites to a license.
- Consider adding fees for Portable Gauges and Sealed Source Special Form.
- Provide definitions in the rule for “General License Acknowledgement-Gauge” or “Other Specific License” or “Neutron Generator Target.”
- Provide a definition for each fee/use category and how they correlate or align with the NRC fee categories (a crosswalk between DSHS and NRC fee/use types).
- Adjust billing practices to provide a fully itemized statement with the associated fees per item.
- Include on the mailed invoices a telephone number and email address for licensees to contact the state for any questions/clarifications related to their license billing.
- At least 2-3 years after making any changes to the licensing fee rule, licensees should be surveyed to determine the impact of these changes. Results of this survey should be provided to the TRAB License Fee Structure Working Group.