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February 24, 2000

VIA FEDEX

United States Nuclear Regulatory Commission
Office of International Programs
Mail Stop 04E9
11555 Rockville Pike
Rockville, MD 20852-2738

Re: Submission of NRC Form 7

Dear Sir or Madam:

I enclose the Application for License to Export Nuclear Material and Equipment on NRC Form 7 made by Harper International Corporation, for the export of nuclear equipment comprising pusher type furnaces for sintering of UO₂ pellets to the People's Republic of China. In conversations with Ms. Betty Wright of the NRC Division of Non-Proliferation, Exports and Multilateral Relations, I was informed that this application required Executive review and hence the filing fee would be \$5,600 under Category K.2. on the Schedule to 10 CFR 170.21. Accordingly, I enclose a check for that amount payable to "U.S. Nuclear Regulatory Commission".

However, it appears that the instant application more properly should be considered under 10 CFR 110.42(b) as this equipment is not for a production or utilization facility but rather is of the type stated in 10 CFR 110.8(e). This would mean that Executive review would not be required and that the appropriate filing fee would be either \$1,700 or \$1,100 under Category K.3. or K.4. under the Schedule to 10 CFR 170.21. If you concur, kindly issue an appropriate refund in the name of Harper International Corporation which should be sent to my attention.

200 FEB 28 AM 7:56

RECEIVED OIP

United States Nuclear Regulatory Commission
Office of International Programs
February 24, 2000

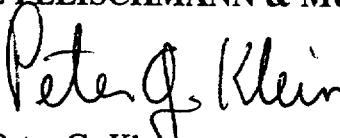
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Please contact the undersigned should you require anything further.

Very truly yours,

JAECKLE FLEISCHMANN & MUGEL, LLP

By


Peter G. Klein

PGK/rad

Enclosures

cc: Mr. Charles W. Miller, Jr.
Mr. Thomas Haggerty