



McKENNAN Hospital

DOCKET NUMBER
PETITION RULE PRM 170-3
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Physicians Laboratory Ltd.
An Independent Group
of Pathologists

Aired E. Hartmann, M.D.
Jeffrey B. Hagen, M.D.
Steven P. Olson, M.D.
Henry Travers, M.D.
Kara K. Murphy, M.D.
Diane L. Coppock, M.D.
Charles E. Burns, M.D.

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800 East 21st Street, PO Box 5045
Sioux Falls, SD 57117-5045

605-339-8000

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November 10, 1992

Secretary
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555
ATTENTION: Docketing and Service Branch

Dear Sirs:

This is to comment on the petition filed by the American College of Nuclear Physicians and the Society of Nuclear Medicine (docket #PRM-170-3). This petition relates to NRC fees for licensing and inspection.

Because of Congressional requirement, the NRC was required to substantially raise its fees to authorized users of byproduct material. This increase was dramatic for medical users. Prior to the change in license fees, our institution paid only a few hundred dollars every few years for license renewal, and only \$200-300 for license amendment. We are now paying over \$2000 a year just to maintain our license, let alone a fee of \$1000 for license renewal and fees of \$450 for license amendments.

An institution such as ours is able to pay this type of fee without excessive hardship. This may not be the case in the future, as these fees will almost certainly increase. This is particularly troublesome in an environment where the government continues to decrease the amount of reimbursement for medical care. I am particularly concerned about small hospitals in our state which may find it necessary to discontinue nuclear imaging. Our state is rural, and currently has very few nuclear medicine facilities as it is. Any further decrease in nuclear medicine facilities will worsen an already serious problem with access to care.

Thank you for the opportunity to comment. At the time these fees were initially proposed, there was very little opportunity for medical practitioners to comment. I hope the NRC will consider changes in the fee structure which will decrease the burden to medical facilities, particularly smaller hospitals and clinics.

Sincerely,

SP Olson MD

STEVEN P. OLSON, M.D.
Pathologist/Nuclear Medicine Physician

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SPO/bmp

cc: Congressman Tim Johnson
Senator Thomas Daschle
Senator Larry Pressler

DSIO

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