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PETITION FILE PRM 170-3
(57 FR 46818)

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BARNESVILLE HOSPITAL ASSOCIATION

USNRC

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November 13, 1992

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Secretary, U.S. Nuclear Regulatory Commission
Washington, DC 20555


ATTN: Docketing and Service Branch
RE: Docket Number: PRM-170-3

We the administration of Barnesville Hospital Association, Inc., a medical institution, agree with the petition submitted to the NRC by the American College of Nuclear Physicians and the Society of Nuclear Medicine.

We agree "The NRC should:

1. Provide an exemption for a medical service similar to the exemption provided for a non-profit institution.
2. Provide for uniform consideration of each licensee's particular circumstances. For example, the petitioners suggest that the NRC develop a simple template for structuring exemption requests.
3. Adopt a sliding scale of fees depending on the size of an entity and not just providing a fee cap for those entities who qualify as "small entities."
4. Allow licensees a greater voice in the NRC's decision-making process for developing new programs where the development costs could have substantial economic impacts. The petitioners believe that if the NRC proposes to develop a regulation which is not necessary for the adequate protection of the public health and safety, the NRC should be required to show that the regulations would result in a substantial increase in safety and that the benefits exceed the cost."

This comment is submitted to the commission on November 13, 1992.


Chief Executive Officer


Radiation Safety Officer

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