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Geauga Hospital NOV 19 P7:01

November 16, 1992

Secretary, U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

ATTN: Docketing and Service Branch

RE: Docket Number: PRM-170-3

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

We agree "The NRC should:

1. Provide an exemption for a medial 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 costs.

This comment is submitted to the commission on November 16, 1992.

Robert B. Harman

Robert Harman
Administrative Representative

David Wymer

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Radiation Safety Officer

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