



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

ATT: Docketing and Service Branch
RE: docket Number: PRM-170-3

We the administration of Saint Francis Hospital, 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 costs."

This comment is submitted to the commission on November 9, 1992.


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