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PETITION RULE PRM 170-3
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Secretary
U.S. Nuclear Regulatory Commission
Washington, DC 20555

ATTN: Docketing and Service Branch

SUBJECT: Docket No. PRM-170-3, 10CFR170,171.
Petition By American College of Nuclear
Medicine and the Society of Nuclear Medicine

Dear Secretary:

The annual fees imposed as a result of Public Law 101-508 have been a disaster for NRC licensees. However, for as long as the fees exist, there must be no exemptions granted to medical licensees or any other group. I could make a good case for exempting LFE and similar companies. Many of our competitors are located in or have moved to Agreement States. They do not pay NRC annual fees, giving them an unfair competitive advantage.

The excessive and unjustified annual fees have become a real hardship for many NRC licensees. In fact, approximately 25% of NRC licensees have cancelled their licenses. Many have gone out of business adding to the unemployment in the United States. Others have retained their licenses but have reduced products and services. The annual fees are imposed without the performance of any service which may be illegal.

NRC exists not for approximately 7,000 licensees but for the general public. Public Law 101-508 must be repealed and the NRC budget must be supported by general taxation. In addition, the NRC budget must be reduced. With far fewer licenses to administer, the NRC workload has been reduced. In April, 1992, Maine became an Agreement State. In 1993, at least two additional states will probably become Agreement States thereby decreasing the NRC workload still further. Of course, the number of licensees supporting NRC will be decreased making it absolutely essential that NRC decrease its budget.

Very truly yours,

William R. Prendergast

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