DOCKET NUMBER
PETITION RULE PRM 170-3
(57 FR 46818)

(50)

Metropolitan Hospital

701 West Grace Street • Richmond, Virginia 23220
(804) 775-4100

DOCKETED USNRC

'92 DEC -7 P12:06

OFFICE OF SECRETARY DOCKETING & SERVICE BRANCH

December 3, 1992

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

Dear Sir or Madam,

I am writing this letter in support of the petition filed by the American College of Nuclear Physicians (ACNP) and the Society of Nuclear Medicine (SNM) for rulemaking with the Nuclear Regulatory Commission (NRC) requesting that the NRC amend its regulations governing the annual fees charged to its licensees to cover the NRC's costs (Federal Register, October 13, 1992, page 46818).

As a health care professional I am concerned that the additional fees required of licensees are ultimately passed onto patients and further increase health care costs. Particularly at this facility where our Nuclear Medicine Department performs less than 600 studies annually. Metropolitan Hospital is an inner city facility with a high payor mix of medicare and medicaid patients. Let there by no mistake, additional costs to our nuclear medicine program can jeopardize the financial viability and continued operation of the service. The medical staff require and patients must have access to nuclear medicine services.

I fully support the petition and further recommend that the NRC provide an exemption for medical service licensees similar to the exemption provided for non-profit educational institutions, i.e., in recognition of our unique contribution to society.

Sincerely,

Don Morrison

Don Morrison
Operations Director
Metropolitan Hospital
Richmond, Virginia

9212110041 921203
PDR PRM
170-3 PDR

DS10