

DEPARTMENT OF RADIOLOGY AND RADIOLOGICAL SERVICES DEC -7 PM 12:05

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December 2, 1992

U.S. Nuclear Regulatory Commission
Washington, D.C. 20555
ATTN: Docketing and Service Branch

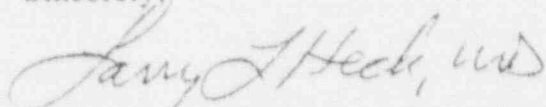
Dear Sirs:

I am writing to express my concerns in regard to proposed regulations on "Revision of Fee Schedules" under 10 CFR Parts 52, 71, 170 and 171. The new regulations will greatly increase our hospital's expenses. As director of radiation safety, my assessment indicates that our hospital fees will exceed \$17,000 a year under these new proposed regulations.

The fee schedule exempts reactors operated by nonprofit educational institutions from user fees, because, "These nonprofit institutions have limited means by which to pass these costs through to others." Under new Medicare restrictions, hospitals and physicians are generally precluded from passing costs on to patients. It seems that one federal agency should not work totally independently from others, i.e., these fees should first be accepted by HCFA and reflected in the Medicare fee schedule.

Also, I would encourage you to evaluate closely the adverse effects on many smaller institutions before promulgating this very significant change in the fee structure.

Sincerely,



Larry L. Heck, M.D.
Nuclear Medicine

LLH:fs

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