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OFFICE OF SECRETARY
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BRANCH

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

Attention: Docketing and Service Branch

Dear Secretary Chilk:

NRC user fees for clinical nuclear medicine laboratories have increased dramatically over the past several years. These fees definitely make an impact upon our hospital. This increase in fees comes at a time when revenues are being reduced as part of the attempt to reduce the cost of health care. This move towards increasing the NRC fees is counteracting attempts to reduce cost and is serving to increase health care cost. The American College of Nuclear Physicians and the Society of Nuclear Medicine have filed a petition to the NRC to re-evaluate NRC fees.

Some type of an exemption or significantly reduced fee structure would be helpful for medical service. These increased fees cannot be recovered by the hospital by charging them to the patient. Some small facilities may close, reducing availability of care to patients because of the increased fees. Another method to consider to make the fees more reasonable is some type of sliding scale of fees relating to the size of the laboratory. Small laboratories as mentioned above are barely able to meet costs as they are currently. The nuclear medicine community also needs a greater voice in NRC decision making processes, particularly at this time, because unnecessary regulation increases the cost of medical care. Therefore, the cost of regulation must be weighed against the benefits of that regulation. These types of costs (such as NRC fees and the regulatory costs) cannot be recovered by the hospital from the patient.

In summary, our hospital here at Sacred Heart Medical Center pays thousands of dollars now for NRC fees and this is not a recoverable cost and does not directly benefit our patients or change the practice of how we perform Nuclear Medicine studies in a quality way. This increase in NRC fees is coming at a time in medicine when costs need to be reduced rather than increased.

Sincerely,

Edwin R. Holmes M.D.

Edwin R. Holmes, M.D.
Director, Nuclear Medicine



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