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PETITION RULE PRM 170-3  
(57FR 46818)

THE GRADUATE HOSPITAL

DOCKETED  
USNRC

December 18, 1992 DEC 24 11:06

One Graduate Plaza  
1800 Lombard Street  
Philadelphia, PA 19146  
215.893.2000

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

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Attention: Docking and Service Branch

Dear Mr. Chilk:

I am writing in support of the petition by the American College of Nuclear Physicians and the Society of Nuclear Medicine assigned Docket #PRM-170-3. I am the Director of Nuclear Medicine at a 320-bed tertiary care hospital.

I believe that the licensure fees that are presently charged by the NRC are extremely onerous to the medical community and very difficult for many institutions to handle. Because of the squeeze that departments of nuclear medicine are finding themselves in at this time, it is my great fear that such fees will only make it more and more difficult for many institutions to continue the practice of nuclear medicine. Furthermore, I believe that hospitals should be treated similar to other non-profit educational organizations in that there is an overriding public interest in seeing that good health care is available at an affordable price. Therefore, I strongly support the ACNP/SNM position that hospitals be provided an exemption from the licensure fees. In the absence of such an exemption, I believe that a sliding scale of fees, depending on the size of the entity, is much more appropriate than a fee cap as is now in place.

I am also support the ACNP/SNM's request for uniform consideration of each licensee's particular circumstances. I believe that such a standard assessment process would be more just and would minimize burdens to the greatest extent possible.

I am also greatly concerned about the degree of regulation that is being imposed upon the nuclear medicine community. It appears to me that the quantity of regulation and the costs associated with that regulation are excessive in comparison to the risks involved to the public from nuclear medicine procedures and from the handling of isotopes used for diagnostic and therapeutic purposes. I strongly support a better balance between the expected benefits to be derived from regulation and the costs of those regulations to the institutions involved. I agree with the ACNP/SNM's position that the NRC be required to demonstrate that any new regulation would result in a substantial increase in safety and that the benefits would exceed the costs.

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Mr. Samuel Chilk

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In my opinion, the practice of nuclear medicine is, at this time, in serious danger because of the excess weight and burden of the regulations that are imposed upon us. If these regulations were necessary to protect the public well being, then this could reasonably be considered to be a justifiable cost of doing business. However, in my view, the regulations and the costs are far out of proportion to the minimal risks associated with the practice of nuclear medicine.

I hope that the NRC sees fit to modify its position on these issues so that the practice of nuclear medicine does not have to continue to bear the burden of excessive regulation and the associated costs that it now must bear.

Thank you very much.

Sincerely yours,

Libby Cone, M. D.  
Director  
Division of Nuclear Medicine

LC:dmj