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PETITION RULE PRM 170-3  
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MOUNTAIN STATES TUMOR INSTITUTE

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December 1, 1992

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

Attention: Docketing and Service Branch  
Docket No., PRM-170-3

Dear Sir:

The Mountain States Tumor Institute is located in Boise, Idaho. Until recently Idaho was an agreement state to the NRC. During the period of radioactive materials (RAM) control by the State of Idaho there were no direct costs to MSTI associated with any radioactive materials licensing. Now that we are responsible to the NRC for RAM licensing there are considerable fees levied. In our charge structure system there does not exist a mechanism to pass these fees along to the patient. This can only have a negative effect on MSTI and its ability to offer quality medical support to its' patients.

The Quality Management Program that is in existence at MSTI will also be a burden from an economic standpoint. The cost of operating a program such as this adds to the overhead component of MSTI's operation. In addition, the cost associated with the review of each Q.M. program tendered to the NRC will be substantial. This cost will no doubt be passed back to MSTI in the form of some fee. MSTI finds this potential fee and overhead objectionable in view of the fact there exists an operational radiation safety program in which no employee or patient has been harmed.

Therefore, MSTI supports the ACNP petition that the NRC provide an exemption for medical licensee's similar to the exemption provided for non-profit educational institutions, adopt some form of a sliding fee schedule, consider each licensee individually when fees are under consideration and most importantly allow all licensees and MSTI a voice in the NRC's decision making process whenever an economic impact is under consideration.

Sincerely,

*Roger Stano*

Roger G. Stano, M.S., FACR  
Medical Physicist

RGS/sep

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Affiliated with St. Luke's Regional Medical Center

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