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PROVIDENCE HOSPITAL, Inc.

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JURAT NUMBER PR-30,40,61 et al
PROPOSED RULE (50 FR 23960) (21)

Sisters of St. Francis

July 26, 1985

DOCKETING
BRANCH

Secretary of Commission
U S Nuclear Regulatory Commission
Washington D C 20555
Attention: Docketing and Service
Branch

'85 JUL 31 A11 29

OFFICE OF THE
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Dear Mr. Secretary:

This letter is in response to a request for comment on a proposed ruling by the NRC concerning the acquiring of "clean up" insurance for Nuclear "spills".

While the basic concept is a good one, as it would apply to handlers of significant quantities of isotopes, however, we would suggest that the licensees obtaining small quantities of isotopes for medical diagnostic or research procedures, in precalibrated doses, be exempted from the ruling.

I am deeply concerned that the cost of such insurance would certainly make it impossible for many small medical facilities to continue to offer their patients radionuclide studies and would severely jeopardize the early diagnosis of pulmonary embolus as well as acute and chronic cholecystitis, for example.

We would hope in solving a definite problem by the means proposed, the NRC would consider far reaching and long range consequences of making the ruling all-inclusive.

Sincerely,

W.E. Birmingham
W.E. Birmingham M.D.
Chief of Radiology Department

WEB/adg
cc

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10/10/85
Sent via 62355

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AUG - 1 1985 *pd*