



Brandywine Hospital

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Office of the President

**The
Better
Health People**

AUCRES NUMBER
PROPOSED RULE **PR-3040, 61 et al.**
(50 FR 23960) (33)

DOCKETED
USNRC

'85 AUG 15 A10:09

OFFICE OF SECRETARY
DOCKETING & SERVICE
BRANCH

Secretary of the Commission
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Dear Sir:

I have reviewed the provisions of the advanced notice of proposed rulemaking (ANPRM) outlined in the June 7, 1985 Federal Register. This ANPRM concerns the financial responsibility of licensees for the cleanup of accidental releases of radioactive materials.

After reviewing the ANPRM, I have a few comments. Primarily, I believe that Brandywine Hospital and similar facilities should be exempt from any ruling that would require them to set aside funds for the cleanup of accidental spills. Our hospital does not perform radiation therapy or research. Therefore, we do not store or use any long half-life, high activity materials.

In addition, all used materials are decayed for ten to fifteen half-lives. After this time they are considered safe for disposal. All radioactive materials are disposed of in this manner; none are sent by carrier to a waste site.

Brandywine Hospital also currently has the financial resources to cleanup any spill that may occur. Although we do not have a specific insurance policy or cash deposit, funds could be made available in the event of a spill. The likelihood of a spill and it's probable size, however, do not warrant extensive protection.

Thank you for the opportunity to comment on this proposal. If I may be of any assistance or provide additional information, please do not hesitate to contact me.

Sincerely,

Norman A. Ledwin
President
Brandywine Hospital

cc: P. Ouellette
D. Ward
M.J. Freeman
D. Taylor

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Acknowledged by card.....

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William Alonstad, 9604 MBB
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