

ACNP/SNM

American College of Nuclear Physicians/Society of Nuclear Medicine

GOVERNMENT RELATIONS OFFICE

'00 SEP -5 P4 07

DOCKET NUMBER

PETITION RULE PRM 30-64

(65FR 49207)

August 30, 2000

Secretary
U. S. Nuclear Regulatory Commission
Attn: Rulemakings and Adjudications Staff
Washington, DC 20555-0001

Re: Docket No. PRM-30-64

Dear Sir/Madam:

The American College of Nuclear Physicians and the Society of Nuclear Medicine are professional organizations that represent over 12,000 practicing nuclear medicine health care providers, including nuclear medicine physicians, nuclear pharmacists, nuclear medicine technologists, nuclear and medical physicists, radiochemists, radiation biologists and other scientific specialists associated with the practice of nuclear medicine. Our members provide quality nuclear medicine diagnostic and therapeutic services, as well as perform research and development in nuclear medicine, radiopharmacy, and radiobiology.

ACNP and SNM are united in their opposition to that portion of the petition of Gammatron, Inc., (Docket No. PRM-30-64), requesting that the NRC modify its financial assurance and record keeping requirements for decommissioning to require financial assurance for all licensees. ACNP and SNM have no comment on the balance of the petition.

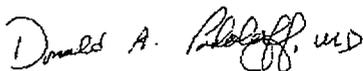
The NRC and agreement states promulgated the requirements for establishing decommissioning funds long ago. The Petitioner had ample opportunity at the time of promulgation or at license renewal to comment on the requirements and their impact on the Petitioner.

To impose new financial assurance and record keeping requirements on nuclear medicine facility licensees that are now exempt would have a severe fiscal impact on them without a concurrent reduction in risk or public benefit. Currently exempt nuclear medicine facilities cannot afford to divert their already limited funds away from their primary purposes—the delivery of quality medical care.

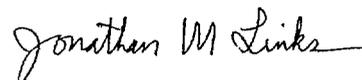
If you have any questions or need additional information about this matter, please contact William R. Uffelman, Director of Public Affairs and General Counsel for both ACNP and SNM. He can be reached at 703-708-9773 or by email at wuffelman@snm.org.

Thank you for your consideration.

Sincerely,



Donald A. Podoloff, MD
President
American College of Nuclear Physicians



Jonathan M. Links, PhD
President
Society of Nuclear Medicine