

**PR 170 and 171
(76FR14748)**



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March 18, 2011

Secretary
U.S. Nuclear Regular Commission,
Attn: Rulemakings and Adjudications Staff
Washington, DC 20555-0001
Fax: 301-415-1101

DOCKETED
USNRC

March 21, 2011 (10:00 am)

OFFICE OF SECRETARY
RULEMAKINGS AND
ADJUDICATIONS STAFF

Dear Secretary

RE: Proposed License and other Fee increases for FY 2011

I am writing on behalf of Delaware Cardiovascular Associates which is a cardiology practice in the state of Delaware. We believe that the present fees (\$7,600), assessed in February 2011 are already excessive for a small healthcare entity, after they were increased significantly by 22.6% from the previous year (\$6,200). We believe that setting the fees based on gross receipts is both erroneous and unfair to entities which do not have a significant fraction of their gross receipts derived from activities that have nuclear isotopes, etc. that are under the purview of NRC.

We would like to request that small healthcare entities with less than 100 employees with a small portion of their activities related to nuclear isotopes be assessed a smaller annual fee similar to the current categories of Small Business or a Manufacturing Industry. Perhaps the current subcategory in Small Business based on gross-receipts could be changed to only include the gross-receipts related to nuclear activity, or a separate subcategory could be added to the Small Business category based on the number of employees. We believe that a fee of \$1,900 similar to some of the existing subcategories would be reasonable for cardiology practices.

Please contact me at 302-661-1661, ext. 2 if you have any questions. Thank you for your consideration.

Sincerely,

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