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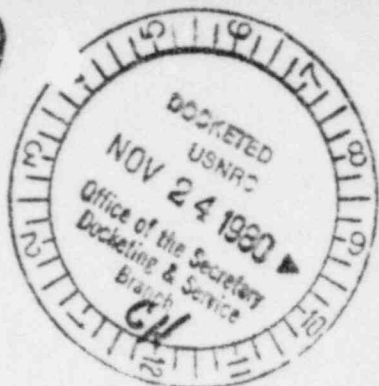
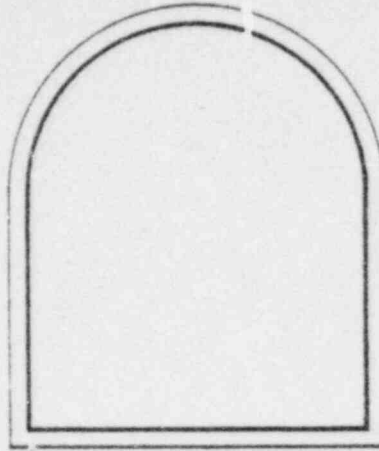
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PROPOSED RULE

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R. J. REITENMAIER, M.D.
G. R. ZIMMERMAN, M.D.
D. R. SAMUELSON, M.D.

November 18, 1980

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

RE: Proposed General Statement of Policy and Procedure for
Enforcement Actions, Dated October 28, 1980

Dear Sir:

With reference to the above published proposed regulations to be considered at public hearings in several cities, I am concerned with the escalation of civil penalties which apparently under this proposed change would be more liberally regulated against medical use licensees. The time for comment regarding these changes, which may have considerable impact on many small medical facilities, is very brief, thereby limiting adequate study and review of these proposals regarding future impact.

At first glance one would wonder whether or not the proposed modifications represent escalated intervention without demonstrated need. I would certainly be interested in any available feasibility study regarding the expected impact on not only frequency of violations, but also severity.

In conclusion I would strongly urge you to delay the proposed public meetings to permit ample time for indepth review by affected licensees of these proposals. Thank you for your consideration.

Sincerely,

D. R. Samuelson
D. R. Samuelson, M.D.

DRS/mc

~~Approved by card~~ *W. J. [unclear]*

2-4-1, Pt. 2