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Secretary
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555
Attn: Docketing and Service Branch

Dear Secretary,

While the community of science educators still awaits a final decision on the restoration of the generic exemption from annual fees for nonprofit educational institutions (reference the Important Notice dated September 24, 1993), I submit for your consideration some points related specifically to our institution and our programs.

We are a four-year, undergraduate university of about 8500 students. Although our current by-product materials license includes the use of isotopes such as P-32, C-14 and S-35 in biological experiments by faculty and students, the trend in our Biology and Chemistry programs over the past few years has been toward the substitution of nonradioactive methods for applications that previously involved the use of radioisotopes. We now employ nonradioactive methods for virtually all biological applications, including DNA sequencing, *in vitro* protein synthesis, and hybridization techniques with nonradioactive probes. In terms of convenience and safety, our faculty and students alike are very pleased with this trend.

We have great hope that the NRC will restore license-exempt status to the educational institutions charged with the responsibility of training individuals who enter the workforce in the diverse areas of industry and science that employ the use of radioisotopes. When we apply for renewal of our license in 1995, we will reduce and restrict our use to the four licensed and several license-exempt sealed sources used by students in our Physics program. The continued use of these sealed sources in the teaching for our nuclear physics course is vital to the quality and accreditation of our physics program. The only individuals who currently work with radioisotopes on our campus are the Physics Department faculty involved in teaching nuclear physics (currently two professors), the students who take the nuclear physics course (about 25 students per year), and the radiation safety officer. The fee that we were assessed (\$9,560.00) seems to me to be at great odds with our current use. While our university administrators have agreed to pay a fee if this is the only way to preserve our Physics program, to do so would place a burden on other programs.

Thank you very much for your attention to my comments. I am anxiously awaiting the final decision from the NRC on this matter, with great hope that institutions like ours will regain their fee-exempt status.

Sincerely,

C. Edward Gasque
Professor of Biology
Radiation Safety Officer

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