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'94 JUN -8 A11:44

May 24, 1994

DOCKET NUMBER
PROPOSED RULE PR 1702171
(59FR 24065)

OFFICE OF SECRETARY
DOCKETING & SERVICE
BRANCH

U.S. Nuclear Regulatory Commission
Washington, D.C. 20555
Attention: Office of the Controller

Dear Mr. Scroggins:

It is to my understanding that the Nuclear Regulatory Commission (N.R.C.) proposes revisions to fee requirement.

It is my opinion that the fee adjustment to my institution will be a substantial increase. My license fee will go from \$5,220 to \$6,075 or a 16% increase.

I do understand that the N.R.C. must be self-supporting due to congress mandating that N.R.C. recover approximately 100% of their budget.

My institution must contain costs, give quality care to patients, meet regulatory compliance, etc., but still remain self-sufficient. We can only increase our pricing a small percentage, but get reimbursement for less than 100% of our pricing. This depends on what third party is reimbursing this institution. When you come to think of it, we can not recover our loss by increasing our charges, because our facility has not increased its patient load.

It would be of great interest to me, to know what my return on investment would be for spending \$6,075. It is my opinion that for this amount of dollars we are just able to keep our doors open to our Nuclear Department. To recover our pay-out we must do approximately 30 Cardia Nuclear studies based on using radiopharmaceuticals, technical component, material and overhead cost. When you consider third party reimbursement, that number of studies may go as high as 50, because of recovery.

I thank you for giving me the opportunity to submit my written comments for your consideration.

Sincerely,

Robert M. Alban

Robert M. Alban
Administrative Director Radiology/Nuclear Medicine

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