



DOCKET NUMBER
PROPOSED RULE PR 170 + 171
(59FR 24065)

DOCKETED
USNRC

14

June 9, 1994

'94 JUN -9 P3:46

Secretary Samuel Chilk
U.S. Nuclear Regulatory Commission
Washington, DC 20555

OFFICE OF SECRETARY
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Dear Secretary Chilk:

On behalf of the over 29,000 physician and physicist members of the American College of Radiology, the following are comments on the proposed rule concerning the FY 1994 Revision to NRC Fee Schedules.

The ACR has been quite concerned with the dramatic increases in licensing and inspection fees since the NRC was required by Congress to capture 100 percent of its budget authority through the imposition of user fees. While the ACR understands that the NRC was not responsible for establishing the 100 percent fee recovery policy, we remain concerned about the impact of the fee increases on the practice of nuclear medicine and radiation oncology.

Since the fee increases were established in 1991, there have been reductions in the number of facilities holding NRC medical licenses. While many reasons may exist for this decrease, the ACR is troubled by the possible role that NRC fee increases have played on the decision to drop licenses. For instance, the ACR is aware of a licensee who dropped a Cobalt-60 unit used for medical research because of the prohibitive cost increase. Small, rural nuclear medicine practices also seem susceptible to these increases in fees. The ACR is worried that these recent NRC fee increases may indirectly limit access to critical radiological care and limit necessary cancer research.

The ACR is also concerned that as the number of those dropping licenses has dramatically increased, the amount of inspection and licensing fees continues to increase for the remaining licensees. This disconnect results from a formula that continues to call for greater resources while the number of those inspected and processed does not keep pace. The ACR is hopeful that the NRC-supported NAS-IOM study will look at the cost effectiveness of the medical uses program and make some recommendations concerning the exacerbating effect of continuous fee increases on medical licensees.

The ACR appreciates this opportunity to comment on the proposed rule. If you have any questions, please call me at (703) 648-8939.

Sincerely,

Ann Rösser Wieseneck
Director
Government Relations

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