

RADIOLOGY PROFESSIONALS, P.A.

144 State Street, Portland, Maine 04101

DOCKETED
USNRC

RADIOLOGY & NUCLEAR MEDICINE

J. DON D. KILGALLEN, M.D., Chief Radiologist
PAYSON A. ADAMS, M.D.
LESLIE W. ROUB, M.D.
STEPHEN T. AUSTIN, M.D.

91 MAY 13 P4:21

DATE: May 10, 1991

OFFICE OF SECRETARY
DOCKETING & SERVICE
BRANCH

TO: Secretary of The United States Nuclear Regulatory Commission
Washington, D.C. 20555

ATT: Docketing and Service Branch

FROM: John D. Kilgallen, M.D.
Radiology Professionals, PA
Mercy Hospital

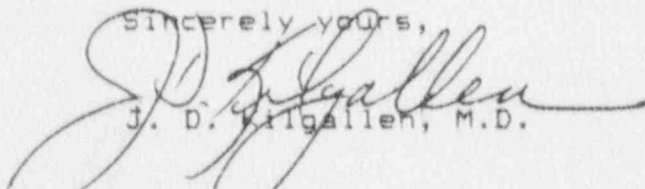
SUBJECT: Comments on Proposed NRC Fee Increases

We would like to submit the following questions regarding the proposed NRC fee increases.

1. Will licencees receive full benefit of all NRC operation to justify full payment?
2. Why is there an enormous cost increase with no increase in benefits or service?
3. We question the generic allocation of "unidentified costs" contained in the annual fee. Is it properly subdivided among disciplines or is the bulk of that unidentified effort concentrated in one area such as nuclear power?
4. Is the full cost truly justified?
5. Is the enormous staff necessary?
6. Why are the hourly costs plus overhead much greater than many large law firms charge?
7. Why is the licencing process so inefficient with such a large, expensive staff supposedly dedicating such an enormous effort in our behalf?

Thank you for your attention to these matters.

Sincerely yours,



J. D. Kilgallen, M.D.

9105160047 910510
PDR PR
170 56FR14870 PDR

D.S. 10