

Flint Nuclear Diagnostic Center

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Secretary

U.S. Nuclear Regulatory Commission
Washington, D.C. 20555OFFICE OF SECRETARY
DOCKETING & SERVICE
BRANCH

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ATTN: Docketing and Service Branch

Re: Revisions of Fee Schedules, 10 CFR Parts 170 and 171.

NRC License No. 21-15723-01

This communication is in response to the proposed revisions to license fee regulations in 10 CFR Parts 170 and 171. We at Flint Nuclear Diagnostic Center feel that the annual fees are excessive and do not accurately reflect the complexity of our operation.

In these times of slashed reimbursements, the proposed increase of the existing fees and the introduction of additional fees will have significant impact on our budget. In addition, these fees do not reflect the scope of our activities versus those of a hospital.

The current license renewal fee is \$830 and is required once every five years. The frequency of inspections is once every three years and is \$830 per inspection. Assuming that we file no amendments and have no non-routine inspections, the current fee schedule results in a cost of a minimum of \$1660 over the five years.

The proposed fee schedule raises this cost to \$2000 (\$1000 per license renewal and \$1000 per routine inspection). This 25% increase is on top of a 43% increase in renewal fees and a 73% increase in inspection fees last July.

In addition, the annual fee for our facility does not accurately reflect the scope of our licensed activities. We are assessed the same annual fee of \$3400 as a large hospital performing diagnostic nuclear medicine and radiopharmaceutical therapies. In fact, the NRC recognizes this difference in level of use by not requiring a radiation safety committee for private practice licensees.

It is proposed that the first annual fee will be due on approximately August 31, 1991. We function on yearly budgets prepared prior to the start of the fiscal year. We have already entered our fiscal year. This insufficient notice of additional fees due within such a short period of time will present a significant financial hardship to our facility.

We ask that you please reconsider these revisions and their impact on the medical community.

Sincerely,

*Marysue Edwards*Marysue Edwards
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