

# ABBOTT NORTHWESTERN HOSPITAL

DOCKET NUMBER  
PROPOSED RULE PR 71,170 +17/  
(56 FR 14870)

229

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'91 MAY 13 AM 12:21

Secretary  
U S Nuclear Regulatory Commission  
Washington DC, 20555

Attn: Docketing and Services Branch

5/8/91

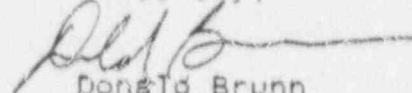
Dear Secretary,

The following comments are in response to the NRC proposed rule on the revision of fee schedules (100% fee recovery) as published in the Federal Register on April 12, 1991 (56 FR 14870).

Abbott Northwestern Hospital has both an NRC cobalt teletherapy license and a human use byproduct nuclear medicine license. Under the proposed rule, the hospital will be hit with two large annual fees ( \$9600 for teletherapy and \$3400 for nuclear medicine). In addition, there is a proposed twenty-five percent increase in inspection and licensing fees. The annualized financial burden is estimated to be \$15,000. This increased cost must be recovered from only a few hundred patients. The cost per patient could be as much as \$150. There is NO way to fully recover this cost. Medicare and other third party payers have and will continue to limit procedural reimbursement. There will be a strong incentive to eliminate these services and discontinue the NRC licensed activity. Cobalt teletherapy can be easily replaced with a 4 MV linear accelerator, which will probably be done in light of the high cost of a 5 year cobalt program ( \$25,000 Co-60 source, \$55,000 in NRC costs for 5 yr for a total of \$80,000 ).

The proposed new NRC fees cannot possibly be recovered from third party patient reimbursement. The proposed annual fees should be eliminated.

Sincerely,



Donald Brunn  
Senior Administrator  
Radiology Services

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