

Lansing General
Hospital

DOCKET NUMBER
PROPOSED RULE PR 71,170+171
(56FR14870) JUNE 1991
USNRC

(413)

91 MAY 16 P3:29

May 13, 1991

OFFICE OF SECRETARY
DOCKETING & SERVICE
BRANCH



Secretary
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

ATTN: Docketing and Service Branch

SUBJECT: N.R.C. LICENSE NO. 21-04073-01

The following information is submitted in response to the proposed revision in the fee schedule in 10CFR170 and 171.

In question is Section 171.16 regarding the fee to be imposed on all category 7C licensees of \$570.00 per annum for low-level radioactive waste activities. This fee is to be imposed across the board without exception.

This section assumes that all category 7C licensees generate and dispose of radioactive waste through a broker to a licensed disposal facility. This is not the case at our facility. Radioactive waste that is generated is held for decay and disposed of either by incineration, release to regular trash, returned to the radiopharmacy or, in the case of generators, returned to the manufacturer. Complete and comprehensive records are kept regarding the dates and method of disposal. Therefore, we feel that this fee is inappropriate.

We hope this information is helpful in removing this added fee from the final rule for those facilities in our situation or allowing for an exemption or exception to the policy.

Sincerely,

Pat Munshaw

Patricia K. Munshaw
Senior Vice President, Operations

PKM/mdk

cc: Robert E. Miller, President

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