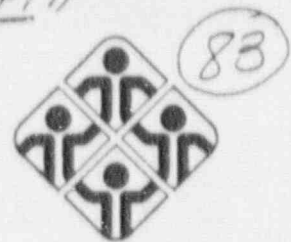


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OFFICE OF SECRETARY
DOCKETING & SERVICE
BRANCH

MOUNT CLEMENS GENERAL HOSPITAL

May 1, 1991

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

ATTN: Docketing and Service Branch

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

This communication is in response to the proposed revisions to license fee regulations in 10 CFR Parts 170 and 171. We at Mount Clemens General Hospital feel that the annual fees and existing fee increases are excessive in light of the recent increases in July 1990.

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.

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 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 in on top of a 43% increase in renewal fees and a 73% increase in inspection fees last July.

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,

Greg D. Sutherland
Director, Diagnostic Imaging