

North Idaho Cancer Center

A service of Kootenai Medical Center-

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December 4, 1992

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

Attention: Docketing and Service Branch Docket No. PRM-170-3

DOTINGT NUMBER

(57 FR 46818)

Dear Secretary Chilks

On behalf of the Radiation Safety Committee of Kootenai Medical Center of Coeur d'Alene, Idaho, and in conjunction with the Department of Radiation Therapy at the North Idaho Cancer Center, I am writing in support of the petition filed by the American College of Nuclear Physicians and Society of Nuclear Medicine regarding regulations governing the annual fee charged to licensees.

The new increase in annual license fees is excessive and incongruous with the abilities of the hospital system to recuperate this expense. Smaller hospitals and clinics such as the North Idaho Cancer Center and Kootenai Medical Center have far fewer patients to have this fee distributed over. We are a rural referral center and have a much smaller base to be able to justify these licensing expenses.

We unge you to reconsider this level of the fee increases. We would also like to see some level of exemption from medical service li ensees for nonprofit hospital settings. In fairness a sliding fee scale would minimize the impact on smaller institutions.

We feel that the NRC is aware and appreciative of the work that is performed in smaller institutions, and should recognize the problems and the potential impact of this excessive fee increase.

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Radiation Therapy - A joint service of Kootenai Medical Center and Sacred Heart Medical Center



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David E. Davenport, M.D., Chairman, Radiation Safety Committee, Kootenai Medical Center

Director, Radiation Therapy North Idaho Cancer Center

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