

October 11, 2006

JUSTIFICATION FOR CHANGE IN AN OMB CLEARANCE PACKAGE

This OMB Form 83-C package represents a change in burden hours for NRC Forms 313 and 313A, from 70,022 to 69,866 hours. Since the last renewal clearance request (which was approved on October 19, 2005), NRC replaced the currently used single form NRC Form 313A, with a series of six distinct forms for medical use training and experience and preceptor attestation. The replacement forms are easier to complete and provide clearer guidance for each licensee type to complete as well as align with the requirements of 10 CFR Part 35, Medical Use of Byproduct Material – Recognition of Specialty Boards Final Rule (70 FR 16335), which became effective April 29, 2005.

The burden for NRC licensees is expected to decrease by 807 hours from 13,526 to 12,719 hours because the actual number of licensing actions received decreased by 116 from 3,074 to 2,958 with a decrease in burden to complete an application from 4.4 to 4.3 hours because of the improved forms and guidance.

The burden for Agreement State licensees is expected to increase by 651 hours from 56,496 to 57,147 because of an increase in the number of Agreement State licensees, which resulted in an increase of 450 licensing actions received from 12,840 to 13,290. Although the burden increased, the burden to complete an application decreased from 4.4 to 4.3 hours due to the improved forms and guidance.

The total net estimated burden for completing NRC Forms 313 and 313A decreased by 156 hours, from 70,022 to 69,866 hours (12,719 hours for NRC Licensees plus 57,147 hours for Agreement State Licensees) and the total net number of responses increased from 15,914 to 16,248 (2,958 for NRC Licensees plus 13,290 for Agreement State Licensees).

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