

## **JUSTIFICATION FOR CHANGE IN AN OMB CLEARANCE PACKAGE DOE/NRC FORM 742**

This OMB nonsubstantive change package represents a request for a change to the DOE/NRC Form 742, Material Balance Report. NRC seeks to revise this form from the version currently approved by OMB to simplify correction of licensee errors.

The DOE/NRC Form 742 is used to report a summary of activity for a specified material within a certain time period. The report conveys activities such as the beginning balance, shipments and receipts involving other facilities, how much material has decayed, how material has been down-blended, and the ending balance. This information is useful to validate a facility's ending inventory.

Two columns have been added to the left side of the form. A process code has been added as a column to allow licensees to indicate whether each line is an initial submission (code A), a correction (code C) or a deletion (code D). In addition, a column with a sequence number has been added. Any line containing data will have a sequence number, beginning with the number 1. Lines not containing data will not include a sequence number. Licensees will use the sequence column, in conjunction with the submission code, to identify the line of data to be submitted, corrected or deleted. For example, in an initial submission, all lines of data would have a process code of A, and the lines containing data would be numbered sequentially in the sequence number column.

In the past, a licensee would have filled out the lines on DOE/NRC Form 742 and submitted the form. If the licensee discovered an error, the licensee would have had to call the database operator and request the deletion of the entire DOE/NRC Form 742. The licensee would then have prepared a new DOE/NRC Form 742, filling out all of the lines of data again. The proposed revision would allow the licensee to submit only the lines of data that need to be corrected. For example, a correction to the line previously coded as process code A with a sequence of 1 could be resubmitted with a process code of C (for correction) and a sequence of 1. Unchanged lines of data would not need to be resubmitted.

In addition, NRC plans to remove a block indicating whether a DOE/NRC Form 740M is attached. The NMMSS database to which the DOE/NRC forms are sent is currently being reprogrammed. The programming will allow the database to receive a DOE/NRC Form 740M from a licensee without it being attached to a DOE/NRC Form-741, 742 or 742C. The programming is scheduled to be completed and the database (NMMSS) capable of receiving a DOE/NRC Form-740M by itself starting January 1, 2009. As a result, the block indicating whether a DOE/NRC Form 740M is attached is no longer needed.

The NRC does not seek to change the burden associated with this form. NRC does not request a change in burden hours for this form change. Licensees submitting form 742 will spend slightly longer completing an initial submission (because they will input the code "A" in the process code column and sequentially number lines of data); however, this is balanced by the time savings for licensees submitting revisions to the form who will be able to make single line corrections rather than resubmitting the entire form.

In addition to simplifying licensee revisions, this form change will greatly simplify the processing of resubmissions of this form within the database that houses them. Rather than deleting all lines for the form and re-entering all lines of data, the NRC contractor processing data submissions can simply replace the erroneous line of data.