

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

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

The DOE/NRC Form 742C is used to report a facility's inventory as of a specified date. The report lists, for each material type category, the amount of material in the facility's possession or in-transit to the facility at the time of the inventory process. The form can show each individual batch or summarize totals of "like" batches. The totals for each material type category must match the ending balance in the corresponding material balance report (DOE/NRC Form 742).

Each DOE/NRC Form 742C form includes data on multiple batches of nuclear material. In the past, licensees who wanted to submit corrections to a single batch had to resubmit the entire form. By adding a "process code" (new column q), licensees now designate whether each batch listed on the form is an initial submission (code A), a correction (code C) or a deletion (code D). For example, on the initial submission of a form, the process code for all batches would be "A". On a subsequent revision of a single batch, the batch would be listed with a process code of "C". This allows licensees to submit a single line correction for a batch, rather than resubmitting the entire form containing multiple batches.

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.

NRC does not request a change in burden hours for this form change. Licensees submitting form 742C will spend slightly longer completing an initial submission (because they will input the code "A" in each line of the process code column); 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 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.