

**JUSTIFICATION FOR CHANGE IN AN OMB CLEARANCE PACKAGE  
FORM 4  
(3150-0005)**

The Nuclear Regulatory Commission (NRC) amended its regulations to include jurisdiction over discrete sources of radium-226, accelerator-produced radioactive materials, and discrete sources of naturally occurring radioactive material, as required by the Energy Policy Act of 2005 (EPAct), which was signed into law on August 8, 2005. This provides a regulatory framework by which to license and regulate byproduct material in accordance with the new, expanded definition. The amended regulations impacted numerous existing information collections. The NRC packaged all of the impacted information collections into one new information collection which OMB approved and assigned control number 3150-0203. One of the areas of existing Nuclear Regulatory Commission (NRC) regulations revised was Form 4.

NRC Form 4 is used by licensees to maintain a cumulative summary of personnel occupational exposure history. The recordkeeping burden of licensees that use this form will increase as a result of the final rule. On an annual basis, 8 extra records are expected to be generated by NRC licensees. The recordkeeping burden to NRC licensees associated with effort to complete NRC Form 4 is a total of 4 hours as shown in the NRC Form 4 table at the end of this section. The estimated equivalent additional recordkeeping burden for Agreement State licensees is a total of 17 hours as shown in the table at the end of this section, for a total of 21 hours.

**The currently approved burden for Form 4 is as follows:**

Responses:	227 responses (56 for NRC Licensees plus 171 for Agreement State Licensees).
Burden Hours	43 hours (11 hours for NRC Licensees plus 33 hours for Agreement State Licensees)

**Burden Hour increase as a result of the final rule (see Tables 1-4):**

Responses:	30 (6 NRC recordkeepers + 24 Agreement State recordkeepers)
Burden Hours:	21 hours (4 NRC + 17 Agreement State)

**TOTAL REQUESTED BURDEN HOURS (Currently approved burden plus final rule)**

Responses:	257 responses (64 for NRC Licensees plus 193 for Agreement State Licensees).
Burden Hours	64 hours (14 hours for NRC Licensees plus 50 hours for Agreement State Licensees)

## NRC Form 4 Recordkeeping Burden (3150-0005)

### Annual Recordkeeping Requirements for NRC Licensees

Section	No. Of Rcdkprs	Records Per Rcdkpr	Number of Records	Brdn Hrs per Record	Total Annual Burden Hours
Materials	6	1.39	8	0.5	4
<b>Form 4 Recordkeeping</b>			8		4

### NRC Form 4 NRC Licensee Totals:

Number of Responses: 6 recordkeepers  
Total Burden Hours: 4 hours

## NRC Form 4 Equivalency Agreement State Recordkeeping Burden (3150-0005)

### Annual Recordkeeping Requirements for Agreement State Licensees

Section	No. Of Rcdkprs	Records Per Rcdkpr	Number of Records	Brdn Hrs per Record	Total Annual Burden Hours
Materials	24	1.39	33	0.5	17
<b>Form 4 Recordkeeping</b>			33		

### NRC Form 4 Agreement State Licensee Totals:

Number of Responses: 24 recordkeepers  
Total Burden Hours: 17 hours

### NRC Form 4 Totals

Number of Responses: 30 (6 NRC recordkeepers + 24 Agreement State recordkeepers)  
Total Burden Hours: 21 hours (4 NRC + 17 Agreement State)