

FINAL OMB SUPPORTING STATEMENT  
FOR  
NRC FORM 5  
OCCUPATIONAL EXPOSURE RECORD FOR A MONITORING PERIOD  
(3150-0006)

(CLEARANCE REVISION)

Description of the Information Collection

Part 20, Title 10 of the Code of Federal Regulations (10 CFR Part 20), provides requirements to licensees who receive, possess, use, transfer, or dispose of byproduct, source, or special nuclear material or operate a production or utilization facility under parts 30-36, 39, 40, 50, 60, 61, 70, 72 or 76. The purpose of 10 CFR Part 20 is to establish "Standards for Protection Against Radiation."

Pursuant to 20.2104(a)(1) licensees are required to determine occupational radiation exposure of employees received during the current year to ensure compliance with the annual dose limits. In 10 CFR 20.2106 all licensees must maintain records of doses received by all individuals for whom monitoring was required. Certain licensees as listed in 10 CFR 20.2106 must report radiation occupational exposures to the NRC on an annual basis on NRC Form 5 or on electronic media containing all the information required by NRC Form 5. Pursuant to 10 CFR 19.13(b) individuals, for whom monitoring is required, must be informed of data contained in NRC Form 5.

The NRC uses the information submitted by licensees to monitor the effectiveness of radiation protection programs and procedures at licensees' facilities. This information is maintained in the NRC's Radiation Exposure Information and Reporting System (REIRS). This database is the NRC component of a nationwide radiation worker registry which implements the Federal Radiation Protection Guidance for Occupational Exposure approved by the President on January 20, 1987 (52 FR 2822-2834, January 27, 1987). An analysis of this data is published annually in NUREG-0713 "Occupational Radiation Exposure at Commercial Nuclear Power Reactors and Other Facilities" and is used by NRC, other government agencies, and licensees to develop dose-trends at licensed facilities.

NRC encourages licensees to reduce the paperwork burden on themselves and on the NRC by transmitting this information electronically. Complete information is provided to licensees in Regulatory Guide 8.7, Revision 2 (November 2005), "Instructions for Recording and Reporting Occupational Radiation Dose Data," regarding the recommended format for such submittal. In addition, software has been developed, and is available from the NRC at no cost to the licensee. For those licensees with Internet access this software may be downloaded free of charge from the NRC's Web Page for Occupational Radiation Exposure at NRC Licensed Facilities at "<http://www.reirs.com>." This software vastly reduces the burden of collecting and maintaining information. Also, it allows licensees to analyze compiled data to improve radiation protection, to produce the completed NRC Form 5 equivalent, and download this information to a disk for submittal to the NRC.

## A. JUSTIFICATION

### 1. Need for and Practical Utility of the Information Collection

In order to protect the health and safety of workers, 10 CFR Part 20 requires all licensees to control their occupational radiation dose. The NRC regulations require licensees listed in 10 CFR 20.2206(a) to submit a NRC Form 5, or its equivalent, to the NRC annually for each individual monitored. The NRC compiles and analyzes these reports to assess the effectiveness of radiation protection programs among its licensees.

### 2. Agency Use of Information

The NRC uses the information to ensure that licensees are complying with the appropriate regulations in a manner adequate to protect worker and public safety. The information is also used by the NRC to evaluate licensees' operations to ensure that they are meeting the requirements of their licenses.

### 3. Reduction of Burden Through Information Technology

As of August 2006, 211 of the 218 licensees who reported electronic data for calendar year 2005 used either the Radiation Exposure Management Information Transmittal (REMIT) software or their own method to record and prepare this information. Of the 211 electronic reports submitted, 107 were from materials licensees and 104 were from reactor licensees. The 211 licensees who submitted electronic data consisted of 167,387 records versus the remaining 7 licensees who submitted 5,032 paper NRC Form 5's or their equivalents, for a total of 172,419 separate records. Of these records 160,701 were from reactor licensees and 11,718 were from materials licensees. NRC encourages the use of any applicable information technology to produce and store information. NRC has published detailed instructions on the electronic transmission of the data contained in the NRC Form 5 to reduce the burden of reporting on licensees.

There are no legal obstacles to reducing the burden associated with this information collection. The NRC encourages respondents to use information technology when it would be beneficial to them. NRC issued a regulation on October 10, 2003 (68 FR 58791), consistent with the Government Paperwork Elimination Act, which allows its licensees, vendors, applicants, and members of the public the option to make submissions electronically via CD-ROM, on the REIRS.com website, or other means. It is estimated that for CY 2005, 47% of responses were filed electronically via the REIRS web page.

### 4. Effort to Identify Duplication and Use Similar Information

No sources of similar information are available. There is no duplication of requirements. NRC has in place an ongoing program to examine all information collections with the goal of eliminating all duplication and/or unnecessary information collections.

### 5. Effort to Reduce Small Business Burden

The information required by NRC Form 5 is needed for the employees of small

businesses as well as for employees of larger business firms. NRC's development and support of the REMIT software is a direct effort to reduce the burden on small business by offering free software that helps licensees maintain and report radiation exposure records to the NRC. It is not possible to further reduce the burden on small businesses and still meet the objectives stated in A.1.

6. Consequences to Federal Program Activities if the Collection is not Conducted or is Conducted Less Frequently

Less frequent collection would mean that workers could receive occupational doses in excess of the limits in 10 CFR 20 if the doses were not reported annually. In some cases, REIRS is the only method to identify radiation exposures in excess of the regulatory limit for workers who receive exposure at more than one licensee.

7. Circumstances Which Justify Variation from OMB Guidelines

Records associated with the NRC Form 5 must be retained for the life of the NRC license in order to permit an individual to receive a planned special exposure.

8. Consultations Outside the NRC

Opportunity for public comment on the information collection requirements for this clearance package was published in the Federal Register on May 7, 2007, (72 FR 25787). The NRC received one comment letter from Council on Radionuclides and Radiopharmaceuticals, Inc. (CORAR) dated July 5, 2007.

a. Is the proposed collection of information necessary for the NRC to properly perform its functions? Does it have practical utility?

Comment: CORAR understands that the data collected is not suitable for epidemiology studies. It was not clear what the value of Form 4 is to the NRC since Form 5 should have all the necessary information to ensure compliance. Also, it is not clear what the value of Form 4 is from a previous employer. New employers only need to know the dose received in the current year and this would be on Form 5.

NRC Response: NRC reviewed the comments as to whether it is substantive and within the scope of the FRN, and determined that it is not within the scope, nor the purpose of the FRN. The epidemiology study was considered to be outside of the scope and is not the purpose of the information collection for either Forms 4 and 5. The occupational dose for employees is an annual as well as collective dose. Both forms are needed for total information content. The licensees are responsible for providing these records, not the employees.

b. Is the burden estimate is accurate?

Comment: CORAR believes the burden estimate appears reasonable and the actual time that licensees spend in preparing reports will vary considerably according to whether they use manual or electronic methods.



NRC Response: NRC is in agreement with the commenter regarding the reasonableness of the burden. Burden estimates are averaged and some licensees may take more or less time to complete forms.

c. Is there is a way to enhance the quality, utility, and clarity of the information to be collected?

Comment: CORAR indicated consideration should be made to develop an NRC central dose registry for occupational exposure to facilitate compliance with 10 CFR 20.2104. This system could be modeled after the Canadian Nuclear Safety Commission Program that maintains an effective national dose registry monitoring occupational exposure. However, there would need to be a means of limiting access of records to the individual to avoid concerns over confidentiality.

NRC Response: NRC reviewed the comment as to whether it is substantive and within the scope of the FRN and determined that it is not within the scope, nor the purpose of this FRN. The concerns about developing a central dose registry is not purpose of the information collections for either Forms 4 and 5.

d. How can the burden of the information collection be minimized, including the use of automated collection techniques or other forms of information technology?

Comment: CORAR believes the burden of the information collection could be minimized if the dosimeter processor, licensee, and NRC all used the same electronic reporting system. It would be helpful if reporting by use of the REMIT program would allow entry of data for multiple individuals at one time for a single licensed operation.

NRC Response: NRC reviewed the comment as to whether it is substantive and within the scope of the FRN and determined that the same electronic reporting system REMIT is used for entering multiple individuals.

9. Payment or Gifts to Respondents

Not applicable.

10. Confidentiality of Information

Confidential and proprietary information is protected in accordance with NRC regulations at 10 CFR 9.17(a) and 10 CFR 2.390(b).

11. Justification for Sensitive Questions

NRC Form 5 specifies the use of the individual's name, social security number or other identification, date of birth, and sex. This information is necessary to ensure the proper identification of the individual.

12. Estimate of Annual Burden

Recordkeeping: The requirement to obtain and maintain the information specified on NRC Form 5 for each individual for whom monitoring is required extends to all of the 104 reactor sites and all 3,890 materials licensees. It is estimated that approximately 126,195 persons are currently monitored annually

generating approximately 172,419 separate records (individuals that receive radiation exposure at more than one licensee generate more than one record). Assuming 0.33 hours of clerical time to complete each individual's NRC Form 5, the annual recordkeeping burden is 56,898 hours (172,419 records x 0.33 hours/record). The annual cost associated with this burden is \$2,560,410 (56,898 hours x \$45/hour), (see Table 1).

Reporting: The requirement in 10 CFR 20.2206(c) states that those licensees listed in 10 CFR 20.2206(a) are to report each individual's occupational radiation exposure annually. Approximately 40 hours is needed per licensee to review and authorize their annual submittal of the NRC Form 5. This time includes preparing a cover letter and downloading the information to a disk, or preparing the paper NRC Form 5s for shipment. In 2005, 104 reactor sites and 114 materials licensees reported this information to the NRC. The annual burden to the reactor licensees is 4,160 hours (104 reactor sites x 40 hours) and the annual burden to materials licensees is 4,560 hours (114 materials licensees x 40 hours). The total burden for licensees required to report is 8,720 hours (4,160 hours + 4,560 hours). The cost associated with each of these burdens is \$902,720 (4,160 hours x \$217/hour) for reactor sites and \$989,520 (4,560 hours x \$217/hour) for materials licensees. The total cost is \$1,892,240 annually (see Table 2).

Total: The overall burden for recordkeeping and reporting are 65,618 hours (56,898 hours + 8,720 hours) at a cost of and \$4,452,650 annually (\$2,560,410 + \$1,892,240).

13. Estimate of Other Additional Cost.

The quantity of records to be maintained is roughly proportional to the recordkeeping burden. Based on the number of pages maintained for a typical clearance, the records storage cost has been determined to be equal to 0.0004 times the recordkeeping burden cost. Therefore the storage cost for this clearance is estimated to be \$4,939 (56,898 hours x \$217/hour x 0.0004).

14. Estimated Annualized Cost to the NRC

The NRC cost is incurred by inspectors reviewing the information on NRC Form 5, or its equivalent, and supporting records maintained by licensees. Annually, 260 hours of inspection time is spent reviewing such records, at an average of 2.5 hours for each of the 104 reactor sites. In addition, 1,945 hours of inspection time is spent reviewing such records at average of 0.5 hours for each of the 3,890 materials licensees. Annually, the total time spent reviewing these records is approximately 2,205 hours. The annual cost for reactor inspections to review these forms is \$56,420 (260 x \$217/hour) and the annual cost for materials inspections to review these forms is \$422,065 (1,945 hours x \$217/hour). Annually the total inspection cost is approximately \$478,485 (see Table 3). These costs are fully recovered through fee assessments to NRC licensees pursuant to 10 CFR Parts 170 and 171.

15. Reasons for Change in Burden

The estimated burden has decreased by 1,842 hours from 67,460 (57,900 recordkeeping and 9,560 reporting) to 65,618 (56,898 recordkeeping and 8,720 reporting) due to a decrease in the total number of individuals monitored by

materials licensees who do not have to report to the NRC, but are still required to keep appropriate records.

16. Publication for Statistical Use

This Form is not published for statistical use.

17. Reason for Not Displaying the Expiration Date

The requirement will be contained in a regulation. Amending the Code of Federal Regulations to display information that, in an annual publication, could become out of date would confuse the public.

18. Exceptions to the Certification Statement

Not applicable.

B. COLLECTIONS OF INFORMATION EMPLOYING STATISTICAL METHODS

Statistical methods are not employed in the collection of information.

TABLE 1  
RECORDKEEPING INFORMATION COLLECTION BURDEN  
ASSOCIATED WITH NRC FORM 5

NUMBER OF RECORDKEEPERS		NUMBER OF RECORDS/ RECORDKEEPER	NUMBER OF RECORDS	BURDEN HOURS/ RECORDS	ANNUAL BURDEN HOURS	ANNUAL COST@ \$45/HR
Reactors	104	1,545.20	160,701	0.33	53,031	\$2,386,395
Materials	3,890	3.012	11,718	0.33	3,867	\$174,015
Totals	3,994		172,419		56,898	\$2,560,410

TABLE 2  
REPORTING INFORMATION COLLECTION BURDEN  
ASSOCIATED WITH NRC FORM 5

NUMBER OF RESPONDENTS		RESPONSES PER RESPONDENT	NUMBER OF RESPONSES	BURDEN PER RESPONSE	ANNUAL BURDEN HOURS	ANNUAL COST@ \$217/HR
Reactors	104	1	104	40	4,160	\$902,720
Materials	114	1	114	40	4,560	\$989,520
Totals	218		218		8,720	\$1,892,240

TABLE 3  
ESTIMATED ANNUALIZED COST TO THE NRC  
FOR REVIEW OF REPORTS AND CONDUCT OF INSPECTIONS  
ASSOCIATED WITH NRC FORM 5

NUMBER OF RESPONDENTS		STAFF HOURS PER LICENSEE	STAFF BURDEN HOURS	ANNUAL COST@ \$217/HR
Reactors	104	2.5	260	\$56,420
Materials	3,890	0.5	1,945	\$422,065
Totals	3,994		2,205	\$478,485