

**JUSTIFICATION FOR CHANGE IN AN OMB CLEARANCE PACKAGE
FORM 5
(3150-0006)**

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 5.

NRC Form 5 is used by licensees to record the occupational exposure of each individual monitored for radiation exposure at the licensed facility. The universe of licensees that use this form will increase as a result of the final rule. The increase is estimated to be a total of 200 NRC licensees. The additional recordkeeping burden associated with this form is a total of 206 hours, as shown in the NRC Form 5 table at the end of this section. There is no additional reporting burden associated with NRC licensees' effort to complete NRC Form 5, also shown in the table at the end of this section. The total burden for NRC licensees for NRC Form 5 is 206 hours. The estimated equivalent additional burden for Agreement State licensees is a total of 825 hours for recordkeeping and 0 hours for reporting and as shown in the tables at the end of this section, for a total of 825 hours. Total hours for NRC and Agreement State licensees for NRC Form 5 are 1,031 hours.

The currently approved burden for Form 5 is as follows:

Responses:	172,419 (43,105 for NRC responses plus 129,314 for Agreement State Licensees).
Respondents:	4602 respondents (1,150 for NRC recordkeepers plus 3,452 for Agreement State Licensees).
Burden Hours	65,618 hours (16,405 hours for NRC recordkeepers plus 49,213 hours for Agreement State Licensees)

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

Responses:	1,000 (200 NRC responses + 800 Agreement State recordkeepers)
Respondents:	0 respondents (0 for NRC recordkeepers plus 0 for Agreement State).
Burden Hours:	1,031 hours (206 NRC recordkeepers + 825 Agreement State)

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

Responses:	173,419 (43,305 for NRC responses plus 130,114 for Agreement State recordkeepers).
Respondents:	4602 respondents (1,150 for NRC recordkeepers plus 3,452 for Agreement State Licensees).
Burden Hours	66,649 hours (16,611 hours for NRC recordkeepers plus 50,038 hours for Agreement State Licensees)

NRC Form 5 Recordkeeping Burden (3150-0006)

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	200	3.126	625	0.33	206
NRC Form 5 Recordkeeping			625		206

Reporting Information Collection Burden Associated with NRC Form 5

Section	No. Of Rspndts	Responses per Respondent	Number of Responses	Burden per Response	Annual Burden Hours
Materials	0	1	0	40	0
NRC Form 5 Reporting			0		0

NRC Form 5 NRC Licensee Totals:

Number of Responses: 200 (0 responses + 200 additional recordkeepers)
 Number of Respondents: 0
 Total Burden Hours: 206 hours (206 hours recordkeeping + 0 hours reporting)

NRC Form 5 Equivalency Agreement State Recordkeeping Burden (3150-0006)

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	800	3.126	2,501	0.33	825
NRC Form 5 Recordkeeping			2,501		825

Reporting Information Collection Burden Associated with NRC Form 5

Section	No. Of Rspndts	Responses per Respondent	Number of Responses	Burden per Response	Annual Burden Hours
Materials	0	1	0	40	0
NRC Form 5 Reporting			0		0

NRC Form 5 Agreement State Licensee Totals:

Number of Responses: 800 (0 responses + 800 additional recordkeepers)
Number of Respondents: 0
Total Burden Hours: 825 hours (825 hours recordkeeping + 0 hours reporting)

NRC Form 5 Totals

Number of Responses: 1,000 (200 NRC + 800 Agreement State)
Number of Respondents: 0 (0 NRC + 0 Agreement State)
Total Burden Hours: 1,031 hours (206 NRC + 825 Agreement State)