

**JUSTIFICATION FOR CHANGE IN AN OMB CLEARANCE PACKAGE
FORM 664
(3150-0198)**

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 664.

NRC Form 664 is used to annually register certain devices that are possessed under the general license issued in 10 CFR 31.5. As a result of the final rule, devices containing radium-226 will be subject to registration. The universe of NRC licensees is estimated to increase by 3 licensees annually. The average burden per response to NRC written requests is 20 minutes. The overall estimated annual burden to NRC licensees is estimated to increase by 1 hour. The estimated equivalent additional burden for Agreement State licensees is a total of 4 hours as shown in the table at the end of this section, for a total of 5 hours.

In NRC Form 664 to review the annual registration of generally licensed devices that are possessed in accordance with 10 CFR 31.5 and the experience and adequacy of facilities for the possession, use, and transfer of radioactive material pursuant to registration and licensing requirements.

The currently approved burden for Form 664 is as follows:

Responses:	1,000 responses (250 for NRC Licensees plus 750 for Agreement State Licensees).
Respondents:	1,000 responses (250 for NRC Licensees plus 750 for Agreement State Licensees).
Burden Hours	333 hours (83 hours for NRC Licensees plus 250 hours for Agreement State Licensees)

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

Responses:	15 (3 NRC + 12 Agreement State)
Respondents:	15 (3 NRC + 12 Agreement State)
Total Burden Hours:	5 hours (1 NRC + 4 Agreement State)

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

Responses:	1,015 responses (253 for NRC Licensees plus 762 for Agreement State Licensees).
Respondents:	1,015 responses (253 for NRC Licensees plus 762 for Agreement State Licensees).
Burden Hours	338 hours (84 hours for NRC Licensees plus 254 hours for Agreement State Licensees)

NRC Form 664 Reporting Burden (3150-0198)

Annual Reporting Requirements for NRC Licensees

Section	No. Of Rspndts	Rsp. Per Respndt	Total Responses	Brdn per Response	Total Annual Burden Hours
NRC licensees	3	1	3	0.33	1
NRC Form 664 Reporting			3		1

NRC Form 664 NRC Licensee Totals:

Number of Responses: 3
Number of Respondents: 3
Total Burden Hours: 1 hour

NRC Form 664 Equivalency Agreement State Reporting Burden (3150-0198)

Annual Equivalency Reporting Requirements for Agreement State Licensees

Section	No. Of Rspndts	Rsp. Per Respndt	Total Responses	Brdn per Response	Total Annual Burden Hours
NRC licensees	12	1	12	0.33	4
NRC Form 664 Reporting			12		4

NRC Form 664 Agreement State Licensee Totals:

Number of Responses: 12
Number of Respondents: 12
Total Burden Hours: 4 hours

NRC Form 664 Totals

Number of Responses: 15 (3 NRC + 12 Agreement State)
Number of Respondents: 15 (3 NRC + 12 Agreement State)
Total Burden Hours: 5 hours (1 NRC + 4 Agreement State)