

DRAFT OMB SUPPORTING STATEMENT  
FOR PROPOSED RULE  
10 CFR PART 31  
GENERAL DOMESTIC LICENSING FOR BYPRODUCT MATERIAL  
(3150-0016, 3150-0044, 3150-0014, 3150-0017, 3150-0198, 3150-0120)  
REVISION

DESCRIPTION OF THE INFORMATION COLLECTION

*The Existing General License (GL) Regulatory System in 10 CFR Part 31 and its Rationale*

The existing GL regulatory framework is contained in 10 CFR Part 31. A generally licensed device usually consists of radioactive material contained in a sealed source within a shielded housing. The device is designed with inherent radiation safety features so that it can be used by persons with no radiation training or experience. Thus, the GL regulatory system simplifies the licensing process because a case-by-case determination of the adequacy of the radiation training or experience of each user is not necessary. As part of the GL regulatory system, NRC evaluates the adequacy of generally licensed products by ensuring that manufacturers and distributors (who hold NRC specific licenses) of the products meet the various specific requirements in 10 CFR Part 32, Subpart B. Although there is no limit specified in the existing GL regulatory system regarding the quantity of radioactive material that can be allowed in a device and still continue to be generally licensed, at this time all of the generally licensed devices are in IAEA Categories<sup>1</sup> 3-5 (i.e., there are no Category 1 or 2 generally licensed devices currently in existence).

As part of the current GL regulatory system, Section 31.5 contains requirements that generally licensed devices containing radioactive material in quantities above “registration” levels listed in Section 31.5(c)(13)(i) must be registered with the NRC or the Agreement State. The radionuclides listed in Section 31.5(c)(13)(i) are Co-60, Cs-137, Sr-90, Ra-226, and Am-241 and any other transuranics. The GL registration program is primarily intended to ensure that general licensees are aware of and understand the requirements for the possession of devices containing byproduct materials and that devices containing byproduct material are maintained and transferred properly and not inadvertently discarded. The GL registration program was initiated by rulemaking in 2000 because NRC was concerned about occurrences where generally licensed devices had not been handled or disposed of properly and believed that if general licensees were aware of their responsibilities they would comply with requirements for proper handling and disposal of generally licensed devices which would help reduce the potential for incidents, including those related to sources not being disposed of properly and being accidentally melted in steel mills, which can cause unnecessary radiation exposure and property contamination.

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The IAEA source categorization scheme includes five categories. Sources in Category 1 are considered to be the most ‘dangerous’ because they can pose a very high risk to human health if not managed safely and securely. At the lower end of the categorization system, sources in Category 5 are the least dangerous; however, even these sources could give rise to doses in excess of the dose limits if not properly controlled. Each of the Categories contain radioactive material in sealed sources in quantities that can be characterized as follows:

Category 1: equal to or greater than the Category 1 threshold;

Category 2: less than the Category 1 threshold but equal to or greater than the Category 2 threshold (which is 1/100th of Category 1);

Category 3: less than the Category 2 threshold but equal to or greater than the Category 3 threshold (1/10th of Category 2);

Category 4: less than the Category 3 threshold but equal to or greater than the Category 4 threshold (1/100th of Category 3).

Category 5: less than the Category 4 threshold down to IAEA exempt quantities.

The scope of IAEA’s *Code of Conduct on the Safety and Security of Radioactive Sources* is limited to Categories 1-3, i.e., those having the highest potential to cause permanent injury or death when used in a malevolent manner

*The Proposed Rule*

The need for this proposed amendment to the GL regulatory system was not foreseen in 2000 when NRC issued the rule amendments instituting the GL registration system. As noted above, the principal rationale for the GL registration program was to make general licensees more aware of applicable requirements, hence reducing the potential that lack of knowledge or inadvertent misuse by general licensees could cause improper handling or disposal of devices, and the belief that if general licensees are aware of their responsibilities they will comply with requirements for proper handling and disposal of generally licensed devices. This rulemaking seeks to reflect the changed domestic and international threat environments, and related U.S. Government-supported international initiatives in the nuclear security area, by setting an upper limit for licensing of generally licensed devices at 1/10th of IAEA Category 3.

This proposed action is designed to improve accountability and control of sources by limiting the quantity of radioactive material in a generally licensed device to below 1/10th of the IAEA Category 3 thresholds. Licensees with devices with radioactive material at or above this limit would be required to obtain a specific license for the radioactive material in the device. This rulemaking is directed toward improving the security of generally licensed devices with radioactive sources falling within IAEA Categories 3-5 by causing a portion of them to be specifically licensed and allowing the remaining portion to continue to be generally licensed.

As part of its overall evaluation of licensee security, the NRC evaluated its current GL regulatory system and noted that it included little in the way of security measures, resulting in unintended potential vulnerabilities for these devices. Because generally licensed devices are subject to relatively few administrative or operational regulatory constraints (mainly as a result of the safety features incorporated into their design), security vulnerabilities can be a concern. Under the current GL regulatory system, a general licensee would not be subject to the same regulatory controls (i.e., pre-licensing reviews, inspection, safety and security requirements) as specific licensees possessing similar quantities of radioactive material. Placing certain generally licensed devices under the SL process would subject them to elements of oversight that are not part of the GL process, including the license application and review process, and the inspection process. The rationale for placing the limit for generally licensed devices at 1/10th of Category 3 sources is to improve accountability and control of these sources and to reduce the potential that a sufficient number of these sources could be aggregated to create the equivalent of a Category 2 quantity of concern. The threshold of a Category 3 source is 1/10th of the threshold of a Category 2 source. This means that a group of 10-12 sources, each slightly below the threshold of a Category 3 source (i.e., high-end of Category 4 source) could be aggregated to Category 2 quantity. These high-end Category 4 sources are relatively widespread in use in industry, used in fixed gauges in various industrial settings. Thus, this rule is designed to help reduce the potential for aggregation of sufficient number of 1/10th of Category 3 sources to Category 2 levels for malicious purposes.

The NRC believes that the additional burden to licensees and regulatory bodies as a result of the proposed amendments would be reasonable to incur because of the benefits derived from placing these higher activity generally licensed devices under a greater range of regulatory controls, thus enhancing public health and safety and security.

This proposed rule would address concerns expressed by members of the U.S. Congress and the Government Accountability Office (GAO) regarding the aggregation of a large number of lower activity sources whose activity level, if taken together, could exceed Category 2 thresholds. In addition, the Organization of Agreement States filed a petition for rulemaking on June 27, 2005 (PRM-31-5), requesting that NRC strengthen its GL regulatory system.

### Proposed Amendment

This proposed rule would amend Section 31.5(a) to limit the quantity of radioactive material in generally licensed devices to below 1/10th of the IAEA's Category 3 threshold. Licensees who possess devices containing radioactive material meeting or exceeding these thresholds would have to become specifically licensed and, therefore, be subject to all applicable Title 10 regulations. Devices containing radioactive material below these thresholds would continue to be generally licensed.

### Impact on Information Collections

The proposed changes in rule language, in themselves, would not affect information collection requirements. However, they would impact on information collection burdens in existing sections in Parts 19, 20, and 30 (OMB Clearance Nos. 3150-0044, 3150-0014, and 3150-0017, respectively), because current general licensees that possess devices with radioactive sources greater than or equal to 1/10th of Category 3 sources would have to obtain a specific license and thus comply with other pertinent existing requirements in NRC's regulations. The applications for license are made on NRC Form 313, which is under OMB Clearance No. 3150-0120. It would also reduce the number of persons generally licensed under Section 31.5, resulting in reduced information collection under the various requirements in Section 31.5, most notably the registration requirement under Section 31.5(c)(13). [The burden for registration for NRC general licensees is accounted for under OMB Clearance No. 3150-0198 (NRC Form 664).] Brief descriptions of each the applicable sections in those regulations with information collection burden are presented in the Attachment.

This supporting statement addresses the information collection burdens that would be changed under the existing sections in Parts 19, 20, 30, and 31 as a result of the additional current general licensees who would be required to obtain a specific license to comply with the applicable paperwork requirements. Note, in accordance with Section 31.2, general licensees are subject to some of the information collections in Part 30, but exempt from others.

## A. JUSTIFICATION

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

This proposed action is needed to improve accountability and control of devices with 1/10th of Category 3 sources. It would help reduce the potential that a sufficient number of these sources could be aggregated to create the equivalent of a Category 2 source which could, in the absence of proper security measures, potentially be used in a radiological dispersal device or a radiological exposure device. Placing a limit on the amount of material that can be in a generally licensed device would help in limiting the potential for aggregation of these sources to higher activity quantities of concern.

Under the current GL regulatory system, there are situations where NRC does not have an opportunity to review the purpose of use, adequacy of applicant facilities and equipment, training and experience, and ability to meet any other applicable requirements. Thus, NRC has determined that it is appropriate to amend 10 CFR Part 31 to require specific licensing for some materials currently regulated under the GL regulatory system. Limiting the source activity allowed under a GL would result in expanding the specific licensing regulations to cover more licensees. Because SL regulatory activities provide for more comprehensive licensing, inspection and security reviews than GL activities, placing a limit on the source activity that can be allowed under a GL (and thus, converting a portion of the existing population of generally licensed devices with

higher activity sources into SLs) can improve the accountability and control of these sources and enhance both the safety and security of radioactive sources.

### **Brief Description of Affected Existing Sections in Parts 19, 20, 30, and 31**

The proposed rule would not amend sections in Parts 19, 20 and 31. However, the rule change would impact information collection burdens in existing sections in Parts 19, 20, 30, and 31. These impacts are due to the additional licensees possessing devices with sources above 1/10th of Category 3 that need to comply with the requirements of these Parts and their particular sections.

A brief description of the affected existing sections is presented below:

Section 19.12 requires NRC licensees to give reports to workers as follows: "All individuals who in the course of employment are likely to receive in a year an occupational dose in excess of 100 mrem (1mSv) shall be kept informed of the storage, transfer, or use of radiation and/or radioactive material; instructed in the health protection problems associated with exposure to radiation and/or radioactive material, in precautions or procedures to minimize exposure, and in the purposes and functions of protective devices employed; instructed in, and required to observe, to the extent within the worker's control, the applicable provisions of Commission regulations and licenses for the protection of personnel from exposure to radiation and/or radioactive material; instructed of their responsibility to report promptly to the licensee any condition which may lead to or cause a violation of Commission regulations and licenses or unnecessary exposure to radiation and/or radioactive material; instructed in the appropriate response to warnings made in the event of any unusual occurrence or malfunction that may involve exposure to radiation and/or radioactive material; and advised as to the radiation exposure reports which workers may request pursuant to § 19.13. The extent of these instructions shall be commensurate with potential radiological health protection problems present in the work place."

Sections 19.13(b), (c) and (e) require written occupational exposure reports be provided to workers annually, on request, or at employment termination.

Section 20.1302(c) allows licensees to apply to the Commission for permission to use alternate effluent release concentration limits based on actual physical and chemical characteristics of the effluent released. This is needed to ensure that if alternate values are used by licensees, that they are adequate to protect the health and safety of the public.

Paragraph 20.1906(d) requires licensees to notify the carrier and the NRC regional office upon receipt of a radioactive material package which is damaged, contaminated, or where radiation levels exceed limits. This is needed so that NRC can, through inspection, ensure that shipment procedures and practices are adequate to protect the health and safety of workers and the public.

Paragraph 20.1906(e) requires licensees to develop and maintain procedures regarding radioactive material shipment. This is needed to ensure that the packages containing radioactive material will be opened in a manner consistent with the protection of the health and safety of the public and workers.

Paragraph 20.2006 requires that licensees establish a manifest tracking system to control transfers of low-level radioactive waste intended for disposal at a land disposal facility so that

NRC can inspect to ensure that adequate control of this material exists as specified in Appendix G to §§ 20.1001-20.2402. Paragraph 20.2006(b) requires that licensees use NRC's Uniform Low-level Radioactive Waste Manifest and transfer this information to the intended consignee, as specified in Section I of Appendix G to §§ 20.1001-20.2402. Paragraph 20.2006(c) requires a certification by the waste generator, processor, or collector as specified in Section II of Appendix G to §§ 20.1001-20.2402.

The information in Paragraphs 20.2006 (a)-(c) is needed to control shipments and disposal of Low Level Waste (LLW) to insure public health and safety and to protect the environment.

Section 20.2102(a) requires licensees to maintain records of radiation protection programs. This is needed so that NRC can, through inspection, ensure that licensee radiation protection procedures and practices are adequate to protect the health and safety of workers and the public.

Section 20.2103(a) requires licensees to maintain records showing the results of surveys and calibration of instruments and equipment. This is needed so that NRC can, through inspection, ensure that licensees are appropriately implementing radiation protection practices, that radiation protection equipment is appropriately working and well maintained, and that it is periodically tested for proper functioning to ensure adequate protection of health and safety of workers and the public.

Section 20.2106 requires licensees to maintain records of radiation doses received by individuals for whom monitoring is required, specifies the information to be included, the records' format and the period of time that these records should be maintained. It also requires protection of these records due to their personal privacy nature. This is needed to verify that radiation doses to individuals are kept within the limits specified in the regulations and that licensee radiation protection practices are adequate.

Section 20.2107 requires licensees to maintain records to demonstrate compliance with dose limits for individual members of the public and the timeframe for which these should be maintained. This is needed to verify that radiation doses to members of the public are kept within the limits specified in the regulations and to ensure adequate protection of public health and safety.

Section 20.2108(a) requires licensees to maintain records of the disposal of radioactive materials. This is needed so that the NRC could verify that the disposal of radioactive material is done according to regulatory requirements.

Paragraph 20.2203(a) establishes that, in addition to the notification required by Section 20.2202, each licensee shall submit a written report within 30 days after learning of specific incidents involving doses or concentrations of radioactive materials in excess of limits. This is needed to ensure that there are appropriate follow-up actions to avoid a recurrence.

Section 20.2204 requires a report to the NRC within 30 days after a planned special exposure. This is needed to ensure that the use of planned special exposures is in accordance with requirements.

Section 30.32(g) requires that an application for a specific license to use byproduct material in the form of a sealed source or in a device that contains a sealed source must either identify the source or device by manufacturer and model number, as registered with the NRC under Section 32.210 or with an Agreement State, or contain the radiation safety related information that is

identified in Section 32.210(c). This determination is used to establish that the applicant's proposed equipment and facilities are adequate to protect health and minimize danger to life or property. The NRC review and the findings there form the basis for NRC licensing decisions. NRC Form 313, which is used to collect this information, is cleared under OMB Clearance No. 3150-0120.

Condition 26 Licensed material contained in Fixed Gauges and Self-shielded Irradiators shall be used by, or under the supervision of, individuals who have received the training described in an application. The licensee shall maintain records of individuals designated as users for 3 years following the last use of licensed material by the individual.

Condition 164 The licensee shall conduct a physical inventory every 6 months, or at other intervals approved by the U. S. Nuclear Regulatory Commission, to account for all sources and/or devices received and possessed under the license. Records of inventories shall be maintained for 5 years from the date of each inventory and shall include the radionuclides, quantities, manufacturers' name and model numbers, and the date of the inventory.

Condition 165(i) requires that the licensee maintain records of leak test results in units of microcuries for 5 years.

Section 30.36(d) requires licensees to notify the NRC, in writing, of the occurrence of any of the situations described in subsections 1 to 4 of this subpart. This is needed to notify the NRC that decommissioning activities are being started and to allow the NRC to verify that these activities are performed as approved in a decommissioning plan or the regulations in 10 CFR.

Section 30.36(j) requires, as a final step in decommissioning, that a licensee certify the disposition of all licensed material, including accumulated wastes, by submitting a completed NRC Form 314, "Certificate of Disposition of Materials." In addition, this section requires that the licensee conduct a radiation survey of the site where the licensed activities were carried out and note on NRC Form 314 whether or not the survey was conducted and, if so, attach the results, if not separately forwarded to NRC. The radiation survey, similar to those generated during operations, is required to confirm the absence of radioactive materials or to establish the level of residual radioactive contamination. The information on disposal of nuclear materials and the survey are considered the minimum information necessary to establish a record to support a finding that a license can be safely terminated. NRC Form 314 is cleared under OMB Clearance No. 3150-0028.

Section 30.37(a) requires that an application for renewal of a specific license be filed in accordance with Section 30.32. The NRC reviews the information submitted to determine whether an applicant for a license renewal has training, experience, equipment, facilities, and procedures for the use of byproduct material that are adequate to protect the public health and safety.

The burden and cost data for these applications for renewal of specific licenses have been included in the supporting statement for NRC Form 313, which is cleared under OMB Clearance No. 3150-0120.

Section 30.38 requires that an application for amendment of a license be filed in accordance with Section 30.32. The NRC reviews the information submitted to determine whether the licensee has training, experience, equipment, facilities, and procedures for the use of byproduct material that are adequate to protect the public health and safety.

The burden and cost data for these applications for license amendments have been included in the supporting statement for NRC Form 313, which is cleared under OMB Clearance No. 3150-0120.

Section 31.5(c)(13) requires annual registration of certain generally licensed devices. These general licensees are required annually to verify, correct, and/or add to information provided in the request for registration and submit this information to NRC within 30 days of the request. All affected general licensees are currently registering their devices. The proposed rule would reduce burden for this requirement because some of the current general licensees would become specific licensees.

NRC Form 664, "General Licensee Registration," which is used to collect this information, has previously been cleared under OMB Clearance No. 3150-0198, which should be referred to for additional supporting information, burden, and cost data. The proposed rule would reduce burden for this requirement because some of the current general licensees would become specific licensees.

## 2. Agency Use of the Information

The NRC would use the information provided in a specific license to identify licensees that possess devices with 1/10th of Category 3 sources so that these licensees would now be subject to elements of oversight that are not part of the GL process, including the license application and review process and the inspection process to improve accountability and control of these sources and protect public health and safety. The license application process would allow for more rigorous screening of applicants through pre-licensing visits to the proposed location of licensed activities (currently under consideration); a more efficient licensing process to reduce the potential for falsifying licenses, and facilitate the rapid communication between regulators regarding the legitimacy of a given entity; and other potential enhancements to the specific licensing process. The additional opportunity for inspections by converting certain GLs to SLs, would enhance the effectiveness of any applicable safety and security measures which would be accurately determined in a more timely manner and would also provide a regulatory mechanism to establish and enforce security requirements more effectively than it is possible under a GL.

## 3. Reduction of Burden Through Information Technology

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, e-mail, special Web-based interface, or other means.

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

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

While some licensees who possess 1/10th of Category 3 sources are small businesses, estimated by NRC staff to be about 50 percent of the total licensees affected by the proposed rule, the concerns associated with the secure use of devices with sources at this level are the same for large and small entities. It is not possible to reduce the burden on small businesses by less frequent or less complete reporting while maintaining the required level of protection of public health and safety.

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

Required reports are collected and evaluated on a continuing basis as events occur. The schedule for collecting the information is the minimum frequency which will permit NRC to assure that the public health and safety are adequately protected.

7. Circumstances Which Justify Variation from OMB Guidelines

None.

8. Consultations Outside the NRC

Concerns by members of the U.S. Congress and the Government Accountability Office (GAO) have been expressed regarding the aggregation of a large number of lower activity sources whose activity level, if taken together, could exceed Category 2 thresholds. These are discussed in two GAO audit reports on the security aspects of NRC's licensing process, GAO-06-940T (July 7, 2006) and GAO-07-1038T (July 12, 2007). In addition, the Organization of Agreement States filed a petition for rulemaking on June 27, 2005 (PRM-31-5), requesting that NRC strengthen its GL regulatory system.

The opportunity for public comment on the information collection requirements has been published in the *Federal Register*.

9. Payment or Gifts to Respondents

Not applicable.



10. Confidentiality of Information

None, except for proprietary information.

11. Justification for Sensitive Questions

No sensitive information is requested under this amendment.

12. Estimated Burden and Burden Hour Cost

As indicated in the Regulatory Analysis for this proposed rulemaking, there are approximately 280 NRC licensees and 1120 Agreement State licensees covered by this rulemaking.

Tables 1 and 2 summarize estimated reporting and recordkeeping burden, the number of responses, and the number of recordkeepers for NRC and Agreement State licensees. Tables 3 - 10 provide the details of the estimates. A summary is presented here:

Total burden/cost:

31,114 hours (9,354 reporting; 21,760 recordkeeping)

\$7,405,132 (31,114 hours x \$238/hour)

Total respondents:

1,400 (280 NRC licensees; 1120 Agreement State licensees)

Total responses:

2,975 (1,575 responses; 1,400 recordkeepers)

13. Estimate of Other Additional Costs

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 \$2,072 (21,760 hours X \$238/hour X 0.0004).

The NRC considers Internet access to be a standard business practice. Therefore, the cost associated with the purchase of Internet access services is not considered an incremental cost to licensees.

14. Estimated Annualized Cost to the Federal Government

Costs to the NRC relate to the cost of reviewing and approving licensee applications, amendments, renewals, and other reports and inspecting licensee operations. The cost for these actions for the NRC and Agreement States is estimated to be \$1,694,560 (7,120 hours for NRC and Agreement States X \$238/hr).

15. Reasons for Change in Burden

The proposed rule would impose an additional information collection burden of 31,114 hours (\$7,405,132) to the existing burden of the requirements in 10 CFR Parts 19, 20, and 30, with some reduction of burdens under Part 31. This increased burden would result from the limitation of generally licensed devices to those with sources less than 1/10th of IAEA Category 3. Approximately 1,400 current general licensees (280 NRC licensees and 1,120 Agreement State licensees) would be affected by this rule by having to become specific licensees and follow the requirements of these existing Parts in NRC and equivalent Agreement State regulations. The information is needed to improve the accountability and control of the certain existing generally licensed devices with radioactive sources above the limit in this proposed amendment. In addition, the cost for professional effort has been increased from \$157 to \$238 per hour.

16. Publication for Statistical Use

The information requested would not be published for statistical use.

17. Reason for Not Displaying the Expiration Date

The requirement would be contained in a regulation. Amending the Code of Federal Regulations to display information that, in an annual publication, could become obsolete would be unduly burdensome and too difficult to keep current.

18. Exceptions to the Certification Statement

Not applicable.

B. COLLECTION OF INFORMATION EMPLOYING STATISTICAL METHODS

Not applicable.

**Table 1**

**Summary of Annual Burdens <sup>(1) (2)</sup>  
(NRC and Agreement State Licensees)**

Applicable Parts Or NRC Form	Reporting Burden (hours)	Recordkeeping Burden (hours)	Total Burden	
			Hours	Cost (\$238/hr)
Part 20	3,155 NRC 631; Agr.St. 2524 (See Table 3)	20,160 NRC 4,032; Agr. St. 16,128 (See Table 4)	23,315	5,548,970
Part 30	6430 NRC 1286; Agr.St 5144 (See Table 5)	200 NRC 40; Agr.St 160 (See Table 6)	6,630	1,577,940
Part 19	232 NRC 46; Agr.St. 186 (see Table 7)	1400 NRC 280; Agr. St. 1,120 (See Table 8)	1,632	388,416
Part 31	(370) Agr.St. (See Table 10)		(370)	(88,060)
Form 664	(93) NRC (See Table 9)		(93)	(22,134)
Total	9,354	21,760	31,114	7,405,132

<sup>(1)</sup> Other information collections in Section 31.5 would be affected, but changes would be insignificant.

<sup>(2)</sup> ( ) denotes reduction in burden.

**Table 2**

**Number of Respondents and Responses**

	Number of Respondents	Number of Responses	Number of Recordkeepers
Reporting	NRC: 280 Agr.Sts: 1,120	NRC: 315 Agr.Sts: 1,260	
Recordkeeping			NRC: 280 Agr.Sts: 1,120

Total	1,400	1,575	NRC and Agr.Sts: 1,400
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**Table 3 – Annual Reporting Requirements for Part 20 - NRC Licensees<sup>(1)</sup>**

SECTION	NO. OF RESPONDENTS	RESPONSES PER RESPONDENT	TOTAL RESPONSES	ANNUAL BURDEN PER RESPONSE	TOTAL ANNUAL BURDEN HRS	COST (at \$238/HR)
20.1302(c)	0.1	1	0.1	10	1	238
20.1906(d)	5.6	5	28	0.5	14	3,332
20.2006	140	1	140	4	560	133,280
20.2203(a)	4.2	1	4.2	6	25	5,950
20.2204	6.2	1	6.2	5	31	7,378
Total	156		178		631	150,178

(1) Estimated Hours and Costs for Agreement State licensees would be approximately 4 times that for NRC licensees

**Table 4 - Recordkeeping for Part 20 - NRC Licensees<sup>(1)</sup>**

SECTION	NO. OF RECORD-KEEPERS	BURDEN HRS PER RECORD-KEEPER	TOTAL ANNUAL BURDEN HRS	COST (at \$238/hr)
20.1906(e)	140	1	140	33,320
20.2102(a)	280	4	1,120	266,560
20.2103(a)	280	8	2,240	533,120
20.2106	280	1	280	66,640
20.2107	280	0.5	140	33,320
20.2108(a)	14	8	112	26,656
Total	280		4,032	959,616

(1) Estimated Hours and Costs for Agreement State licensees would be approximately 4 times that for NRC licensees

Total Part 20 burden:

NRC licensee burden hours: 631 + 4032 = 4663 (Cost @ 238/hr = \$1,109,794)

Agreement State licensee burden hours: 2,524 + 16,128 = 18,652

Total responses: 178(NRC) + 712 (AS) = 890

Total recordkeepers: 280 (NRC) + 1,120 (AS) = 1,400

**Table 5 – Annual Reporting Requirements for Part 30 - NRC Licensees<sup>(1)</sup>**

SECTION	NO. OF RESPONDENTS	RESPONSES PER RESPONDENT	TOTAL RESPONSES	ANNUAL BURDEN PER RESPONSE	TOTAL ANNUAL BURDEN HRS	COST (@\$238/hr)
30.32(g) (Burden under 3150-0120)	93	1	93	4.4	409.2	97,390
30.36(d)	18.5	1	18.5	1	18.5	4,403
30.36(j)	19.3	1	19.3	0.5	9.7	2,309
30.37	193	1	193	4.4	849	202,062
30.38 (included with 30.37)	-	-	-	-	-	-
<b>Total</b>	<b>280</b>		<b>324</b>		<b>1,286</b>	<b>306,068</b>

(1) Estimated Hours and Costs for Agreement State licensees would be approximately 4 times that for NRC licensees

**Table 6 - Recordkeeping for Part 30 - NRC Licensees<sup>(1)</sup>**

SECTION	NO. OF RECORD-KEEPERS	BURDEN HRS PER RECORD-KEEPER	TOTAL ANNUAL BURDEN HRS	COST (@\$238/hr)
Condition 26	27	0.5	13.5	3,213
Condition 164	166	0.08	13.25	3,154
Condition 165(i)	166	0.08	13.25	3,154
<b>Total</b>	<b>280</b>		<b>40</b>	<b>9,520</b>

(1) Estimated Hours and Costs for Agreement State licensees would be approximately 4 times that for NRC licensees

Total Part 30 burden:

NRC licensee burden hours: 1,286 + 40 = 1,326 (Cost @ 238/hr= \$315,588)

Agreement State licensee burden hours: 5,144 + 160 = 5,304

Total responses: 324 (NRC) + 1,296 (AS) = 1,620

Total recordkeepers: 280 (NRC) + 1,120 (AS) = 1,400

**Table 7 – Annual Reporting Requirements for Part 19 - NRC Licensees<sup>(1)</sup>**

SECTION	NO. OF RESPONDENTS	RESPONSES PER RESPONDENT	TOTAL RESPONSES	ANNUAL BURDEN PER RESPONSE	TOTAL ANNUAL BURDEN HRS	COST(at \$238/HR)
19.12	93	1	93	0.5	46.5	11,067
Total	93		93		46.5	11,067

(1) Estimated Hours and Costs for Agreement State licensees would be approximately 4 times that for NRC licensees

**Table 8 - Recordkeeping for Part 19 - NRC Licensees<sup>(1)</sup>**

SECTION	NO. OF RECORD-KEEPERS	BURDEN HRS PER RECORD-KEEPER	TOTAL ANNUAL BURDEN HRS	COST (at \$238/HR)
19.13	280	1	280	66,640
Total	280		280	66,640

(1) Estimated Hours and Costs for Agreement State licensees would be approximately 4 times that for NRC licensees

Total Part 19 burden:

NRC licensee burden hours:  $46.5 + 280 = 326.5$  (Cost @ 238/hr= \$77,707)

Agreement State licensee burden hours:  $186 + 1,120 = 1,306$

Total responses:  $93$  (NRC) +  $372$  (AS) =  $465$

Total recordkeepers:  $280$  (NRC) +  $1,120$  (AS) =  $1,400$

**Table 9 – Annual Reporting Requirements for Part 31/NRC Form 664 - NRC Licensees<sup>(1)(2)</sup>**

SECTION	NO. OF RESPONDENTS	RESPONSES PER RESPONDENT	TOTAL RESPONSES	ANNUAL BURDEN PER RESPONSE	TOTAL ANNUAL BURDEN HRS	COST (@\$238/hr)
31.5(c)(13) (Burden under 3150-0198) Form 664	(280)	1	(280)	0.33	(93)	(22,134)
Total	(280)		(280)		(93)	(22,134)

<sup>(1)</sup> Other information collections in Section 31.5 would be affected, but changes would be insignificant.

<sup>(2)</sup> ( ) denotes reduction in burden.

**Table 10 – Annual Reporting Requirements for Part 31 – Agreement State Licensees<sup>(1)(2)</sup>**

SECTION	NO. OF RESPONDENTS	RESPONSES PER RESPONDENT	TOTAL RESPONSES	ANNUAL BURDEN PER RESPONSE	TOTAL ANNUAL BURDEN HRS	COST (@\$238/hr)
31.5(c)(13)	(1,120)	1	(1,120)	0.33	(370)	(88,060)
Total	(1,120)		(1,120)		(370)	(88,060)

<sup>(1)</sup> Other information collections in Section 31.5 would be affected, but changes would be insignificant.

<sup>(2)</sup> ( ) denotes reduction in burden.