

FINAL SUPPORTING STATEMENT
FOR
10 CFR PART 19
"NOTICES, INSTRUCTIONS, AND REPORTS TO WORKERS: INSPECTION
AND INVESTIGATIONS"
(OMB Clearance No. 3150-0044)

REVISION REQUEST

DESCRIPTION OF THE INFORMATION COLLECTION

Licenseses are required to instruct workers on matters related to radiological working conditions. This instruction ranges from a tour of the workplace pointing out hazards to a 1-week intensive course on radiation protection involving the preparation of training material. Workers need to be educated about health risks from occupational exposure to radioactive materials or radiation, precautions or procedures to minimize exposure, worker responsibility to report promptly to the Commission any licensee conditions which may lead to or cause a violation of Commission regulations, and the individual radiation exposure reports which are available to them. The licensee is required to control radiation doses to individuals in restricted areas so that, with the exception of planned special exposures under 10 CFR 20.1206, no one receives an annual dose which exceeds the limits established by 10 CFR 20.1201. The annual limit shall be the more limiting of the total effective dose equivalent being equal to 5 rems or the sum of the deep-dose equivalent and the committed dose equivalent to any individual organ or tissue other than the lens of the eye being equal to 50 rems. The annual limit to the lens of the eye is 15 rems, and 50 rems to the skin, or to any extremity.

The individual should be informed of the radiation dose he or she receives because: (a) that information is needed by both a new employer and the individual when the employee changes jobs in the nuclear industry; (b) the individual needs to know the radiation dose received as a result of an accident or incident (if this dose is in excess of the 10 CFR Part 20 limits) so that he or she can seek counseling about future work involving radiation, medical attention, or both, as desired; and (c) since long-term exposure to radiation may be an adverse health factor, the individual needs to know whether the accumulated dose is being controlled within NRC limits. Pursuant to 10 CFR 19.16, a worker may notify the Commission about radiological working conditions he believes are in violation of the Atomic Energy Act, the regulations, or license, and the worker may request an inspection. Upon receipt of such notice, the Commission must determine whether the complaint meets certain requirements specified in 10 CFR Part 19, and either request an inspection or determine that an inspection is not warranted and so notify the complainant in writing.

A. JUSTIFICATION

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

10 CFR 19.12 requires NRC licenseses 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 (1) kept informed of the storage, transfer, or use of radiation and/or radioactive material; (2) 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; (3) instructed in, and required to observe, to the extent within the workers control, the applicable provisions of Commission regulations and licenses for the protection of personnel from exposure to radiation and/or radioactive material; (4) 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; (5) 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 (6) 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.”

10 CFR 19.13 - “Notifications and Reports to Individuals,” requires NRC licensees to give written reports of exposure to radiation as described in the following subsections from that regulation. The records of exposure to radiation referenced by 10 CFR 19.13 are maintained in accordance with the requirements of 10 CFR Part 20.”

10 CFR 19.13(a) – “Radiation exposure data for an individual, and the results of any measurements, analyses, and calculations of radioactive material deposited or retained in the body of an individual, shall be reported to the individual as specified in this section. The information reported shall include data and results obtained pursuant to Commission regulations, orders or license conditions, as shown in records maintained by the licensee pursuant to Commission regulations. Each notification and report shall: be in writing; include appropriate identifying data such as the name of the licensee, the name of the individual, the individual's social security number; include the individual's exposure information; and contain the following statement:

This report is furnished to you under the provisions of the Nuclear Regulatory Commission regulation 10 CFR part 19. You should preserve this report for further reference.”

10 CFR 19.13(b) - “Each licensee shall make dose information available to workers as shown in records maintained by the licensee under the provisions of 10 CFR 20.2106. The licensee shall provide an annual report to each individual monitored under 10 CFR 20.1502 of the dose received in that monitoring year if: (1) The individual's occupational dose exceeds 1 mSv (100 mrem) TEDE or 1 mSv (100 mrem) to any individual organ or tissue; or (2) The individual requests his or her annual dose report.”

10 CFR 19.13(c)(1)(i), (ii) and (2) – “At the request of a worker formerly engaged in licensed activities controlled by the licensee, each licensee shall furnish to the worker a report of the worker's exposure to radiation and/or to radioactive material: (i) as shown in records maintained by the licensee pursuant to § 20.2106 for each year the worker was required to be monitored under the

provisions of § 20.1502; and (ii) for each year the worker was required to be monitored under the monitoring requirements in effect prior to January 1, 1994.

(2) This report must be furnished within 30 days from the time the request is made or within 30 days after the exposure of the individual has been determined by the licensee, whichever is later. This report must cover the period of time that the worker's activities involved exposure to radiation from radioactive material licensed by the Commission and must include the dates and locations of licensed activities in which the worker participated during this period."

10 CFR 19.13(d) – "When a licensee is required by §§ 20.2202, 20.2203 or 20.2204 of this chapter to report to the Commission any exposure of an individual to radiation or radioactive material, the licensee shall also provide the individual a report on his or her exposure data included in the report to the Commission. This report must be transmitted no later than the transmittal to the Commission."

10 CFR 19.13(e) – "At the request of a worker who is terminating employment with the licensee that involved exposure to radiation or radioactive materials, during the current calendar quarter or the current year, each licensee shall provide at termination to each worker, or to the worker's designee, a written report regarding the radiation dose received by that worker from operations of the licensee during the current year or fraction thereof. If the most recent individual monitoring results are not available at that time, a written estimate of the dose must be provided together with a clear indication that this is an estimate."

10 CFR 19.16(a) – "Any worker or representative of workers who believes that a violation of the [Atomic Energy] Act, the regulations in this chapter, or license conditions exists or has occurred in license activities with regard to radiological working conditions in which the worker is engaged, may request an inspection by giving notice of the alleged violation to the Administrator of the appropriate Commission Regional Office, or to Commission inspectors. Any such notice shall be in writing, shall set forth the specific grounds for the notice, and shall be signed by the worker or representative of workers. A copy shall be provided the licensee by the Regional Office Administrator, or the inspector no later than at the time of inspection except that, upon the request of the worker giving such notice, his name and the name of individuals referred to therein shall not appear in such copy or on any record published, released or made available by the Commission, except for good cause shown."

2. Agency Use of the Information

With the exception of 10 CFR 19.12 and 19.16, Part 19 information collections are not provided to the Commission; notices, instructions, and reports required by Part 19 are provided by NRC licensees to individuals participating in licensed activities. Some information collections may require an annual report to the NRC. As stated above, notices received pursuant to 10 CFR 19.16 must be reviewed by the Commission to determine whether the complaint meets certain requirements specified in 10 CFR Part 19. The Commission will then either request an inspection or determine that an inspection is not warranted and so notify the complainant in writing.

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 new automated information technology when it would be beneficial to them. NRC issued a regulation 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. Requests which are not for personal records that require verification of identity of the requester are being accepted by electronic mail and facsimile transmission in addition to mail and in-person written requests. It is estimated that approximately 25% of the responses are filed electronically.

Notifications and requests made pursuant to 10 CFR Part 19 must be made in writing. On the average, the NRC receives only one report per year pursuant to 10 CFR Part 19, and this is in response to 10 CFR 19.16. Radiation record information is stored pursuant to 10 CFR Part 20; a majority of licensees currently store these records electronically.

4. Effort to Identify Duplication and Use Similar Information

The collection of the information required is not a duplication of other information. There is no similar information available to the NRC. Licensees are required to maintain this information by the provisions of 10 CFR Part 20 and to report exposure information to workers pursuant to 10 CFR Part 19. 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

There is no feasible way of reducing the burden on small businesses while still accomplishing the objective of informing individuals of their exposure to radiation. However, the burden is small and should have no significant impact on operating costs.

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

Workers would not be aware of their total radiation dose.

7. Circumstances which Justify Variation from OMB Guidelines

This action does not vary from OMB guidelines.

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 July 9, 2010 (75 FR 39585). No comments were received.

9. Payment or Gift to Respondents

Not applicable.

10. Confidentiality of the 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

Not applicable.

12. Estimated Industry Burden and Burden Hour Cost

In 2007, there were 22,457 licenses issued in the U.S. for the use of radioactive material. The majority of these licenses (17,807) belonged to licensees who resided in one of 35 Agreement States that are not subject to the requirements described in 10 CFR Part 19. Approximately 4,650 licensees were subject to the requirements contained in 10 CFR Part 19 and these included 104 licenses issued to civilian nuclear power plants. In 2009, there are 37 Agreement States with 19,591 licensees that are not subject to the requirements in 10 CFR Part 19. Conversely, in 2009 there are approximately 3,067 licensees in the U.S. subject to the requirements contained in 10 CFR Part 19. Hence, the numbers of licensees subject to the requirements in 10 CFR Part 19 fluctuate from year to year.

Industry burden is estimated based on data received for 2008 (the most recent compilation of occupational exposure data submitted to the NRC). In 2008, there were 3,844 licensees in the U.S. subject to the requirements contained in 10 CFR Part 19. Of these 3,844 licensees, 194 licensees were required to report to NRC under 10 CFR 20.2206. The following discussions contain burden estimates for those 194 licensees that were required to report to the NRC. In addition, estimates are provided for the remaining 3,650 licensees that were not required to report to NRC in accordance with 10 CFR 20.2206. In 2008, there were another 18,669 licensees, most located in Agreement States, that are not subject to the requirements in 10 CFR Part 19.

Section 19.12 Instruction to Workers

In 2008, there were 3,844 NRC licensees in the U.S. All are required to provide instructions to those who are likely to receive in excess of 100 mrem (1 mSv) occupational dose in a year. The time required to provide instruction to their workers in the areas described in 10 CFR 19.12 can vary depending on the size and type of licensee, and this instruction can range from a tour of the workplace pointing out hazards to a 1-week intensive course on radiation protection. Preparation of the training material and dissemination of periodic updates to 10 CFR 19.12-type instructions are considered to be the paperwork burden involved in meeting the requirements of 10 CFR 19.12. Since preparation of training material is a one-time burden incurred when a licensee first obtains its license,

most of the burden associated with the current list of 3,844 licensees has already been incurred and therefore is not applicable for this 3-year clearance period. However, between 2006 and 2009 approximately 136 licensees per year of the current list of 3,844 licensees are new licensees that have never possessed a materials license. Approximately ten percent (14 licensees) of these new licensees previously possessed a license and relocated to another state. This group will not incur the one-time reporting burden. The remaining 122 licensees have never possessed a license and therefore will incur a one-time reporting burden in preparation of training material during this 3-year clearance period. The maximum burden is considered to be 80 hours to prepare a 1-week course using existing instructional materials such as Regulatory Guides 8.13, "Instruction Concerning Prenatal Radiation Exposure," and 8.29, "Instruction Concerning Risks from Occupational Radiation Exposure." Roughly as many as 7 percent of the 122 new licensees (9 licensees) will expend this maximum effort (80 hours x 9 new licensees = 720 hours). Roughly 15 percent of the 122 new licensees (18 licensees) will expend 40 hours to develop 2-day courses (40 hours x 18 licensees = 720 hours). The remaining balance of 78 percent, approximately 95 licensees, will spend 8 hours to develop basic safety training (8 hours x 95 new licensees = 760 hours). Thus, the total annual, one-time burden to comply with the 10 CFR 19.12 requirement to provide initial instruction to workers is estimated at 2,200 hours (720 + 720 + 760). To the extent that licensees utilize the instructional material provided in Regulatory Guides 8.13 and 8.29, this burden is reduced. Therefore, the reporting burden for this section is 2,200 hours.

The dissemination of periodic updates to the information initially provided to workers applies to all 3,844 licensees, which is captured as recordkeeping. Assuming that licensees modify/update the instructions to their workers on the average of once per year and the preparation and dissemination of this material requires approximately 1 hour per licensee, then the total annual burden to prepare and disseminate periodic updates to 10 CFR 19.12-type material is 3,844 hours. Therefore, the total annual burden to comply with the requirements of 10 CFR 19.12 is 6,044 hours (2,200 hours reporting and 3,844 hours recordkeeping). The total cost for complying with section 19.12 is \$1,553,308 (6,044 hours x \$257/hour).

Section 19.13(b) Annual Reports to Current Employees

During 2008, 194 licensees meet the conditions of 10 CFR 20.1502 requiring individual radiation monitoring and are required by 10 CFR 20.2206 to submit annual reports of the results of this monitoring to the NRC. The reporting burden for the annual reports submitted to the NRC for this section is covered under 10 CFR Part 20 (OMB Clearance 3150-0014).

The recordkeeping burden is based on reports provided by licensees for 2008. The total number of people monitored by the 194 licensees is about 129,890 individuals. The recordkeeping burden for each record requires approximately 5 minutes to prepare. The compliance burden of 10 CFR 19.13(b) on the population of 194 licensees affected is estimated to be 10,824 hours/year (129,890 reports/year x 5/60 hours/report = 10,824 hours/year).

The other 3,650 licensees required to maintain records of workers advised of dose histories that is not reportable (3,650 licensees x 16 workers/licensee = 58,400 individuals), which averages approximately 5 minutes per worker, has an estimated burden of 4,867 hours/year (58,400 reports/year x 5/60 hours/report = 4,867 hours/year). The total estimated annual burden for 19.13(b) is 15,691 hours at a cost of \$4,032,587 (15,691 hours x \$257/hour).

Section 19.13(c) Reports to Former Employees

Approximately 194 licensees are affected by the requirement to provide an NRC Form 5 report to former employees of the total dose received while in the employment of the licensee. Virtually all of these NRC Form 5 reports are prepared by licensees. 10 CFR 20.2104 requires all licensees to determine the occupational dose received during the current year and attempt to obtain the records of cumulative occupational radiation doses. If the new hire cannot provide this information to the licensee, the hiring licensee may attempt to acquire this data by contacting the new employee's previous employer. In most cases, these NRC Form 5 reports are being requested for transient workers (workers who work at more than one NRC-licensed facility during the monitoring year). The recent availability of a nationwide personnel data access system which contains employee dose history information has reduced the number of employee dose history requests that licensees receive to approximately 15% of the total number of reported transient workers in any given year. In 2008, over 98% of all transient workers are employed by commercial nuclear power plant licensees (which take approximately 10 minutes to respond to requests from prior employees) and the balance of 2% are employed by other licensees (which take approximately 90 minutes to respond to such requests). Therefore, the total annual burden to the commercial nuclear power plant licensee in supplying these NRC Form 5 reports is 1,266 hours (50,632 reported transient workers x 0.15 = 7,595 reports x 10/60 hour/report = 1,266 hours). The annual burden to the other licensees is 212 hours (940 reported other transient workers x 0.15 = 141 reports x 1.5 hours/report = 212 hours).

The total burden for 10 CFR Part 19.13(c) for 194 licensees is estimated to be 1,478 hours/year (1,266 hours for commercial nuclear power plant licensee plus 212 hours for other licensees) with an estimated total cost of \$379,846 (1,478 hours/year x \$257/hr).

Section 19.13(d) Reports to Individuals of Exposure Data Contained in Reports to NRC

Section 19.13(d) requires licensees to provide an individual with the same exposure data that licensees are required to send to NRC pursuant to 10 CFR 20.2202, 20.2203, and 20.2204 of 10 CFR Part 20. Sections 20.2202 and 20.2203 require licensees to report to the NRC any incident involving a radiation dose that exceeds NRC limits. Section 20.2204 requires licensees to submit a written report to NRC within 30 days following any planned special exposure.

Since these reports are generated under the requirements of 10 CFR Part 20, there is little additional burden necessary to meet the requirements of 10 CFR Part 19. To satisfy the requirements of 10 CFR Part 19, a copy of the individual's report data from the Part 20 report is provided to the affected individual, requiring less than 5 minutes per report.

Sections 20.2202 and 20.2203 affect approximately 194 licensees. In recent years (since 1999), the number of individuals receiving exposures in excess of regulatory limits has ranged from 0 to 3 persons per year. Assuming that: (1) there is an average of 1 report per year of personnel receiving exposures in excess of regulatory limits, and (2) that it takes approximately 5 minutes to obtain and send a copy of the individual's report data from the Part 20 report, the total compliance burden of 10 CFR 19.13(d) (for 10 CFR 20.2202 and 20.2203 reports) is estimated to be less than 0.1 hour per year (1 reports/year x 5/60 hours/report = 0.08 hours/year).

The reporting burden of 19.13(d) for 10 CFR 20.2204 reports is approximately 0.1 hours/year based on an estimated total of 1 report per year (1 reports/year x 5/60 hours/report = 0.08 hours/year).

The burden for any additional report required by 10 CFR 19.13(d) is minuscule when compared with the burden for 10 CFR 19.13(b) and (c), as shown above.

Section 19.13(e) Report to Terminating Employee

Section 19.13(e) requires that the licensee, at the request of a worker who is terminating employment with the licensee which involved exposure to radiation or radioactive materials, provide a written report to each such worker, at termination, regarding the radiation dose received by the worker.

Most of the requests for dose history reports from workers terminating employment come from transient workers (workers who work at more than one NRC-licensed facility during the monitoring year). Most transient workers work at commercial power reactors. It takes approximately 5 minutes for a commercial reactor licensee to prepare a dose history report for a terminating employee. Therefore, the annual burden for 10 CFR 19.13 (e) due to transient workers is 4,219 hours (50,632 reported transient workers/year for commercial reactors x 5/60 hours/report = 4,219 hours/year) and 78 hours for other transient workers (940 reported other transient workers x 5/60 hours/report = 78 hours/year).

Approximately 15% of the number of monitored workers other than transient workers (78,318 workers x 0.15 = 11,748 workers) terminate their employment in any given year and request their dose history reports. Since 87% of all monitored individuals work at commercial power reactors, it is assumed that 10,220 workers (11,748 workers x 0.87 = 10,220) of these 11,748 terminating employees work at commercial power reactors. The 10,220 terminating employees at commercial nuclear power reactors requesting reports have an annual burden of 851 hours (10,220 power plant employees/year x 5/60 hours/report = 851 hours/year).

Of the remaining monitored workers, 1,539 work for non-power plant licensees, which are smaller in size and frequently lack computerized record keeping capabilities, and for these reasons it takes these licensees an estimated 20 minutes to process dose history reports for terminating employees, resulting in an annual burden of 513 hours (1,539 non-power plant employees/year x 20/60 hours/report = 513 hours/year).

Therefore, the total annual burden to the licensee in supplying dose history reports to workers who are terminating employment is 5,661 hours (4,219 + 78 + 851 + 513 = 5,661 hours/year).

In addition, the 3,650 licensees that are not required to report to the NRC in accordance with 20.2206, but process dose history reports for their 8,760 terminating employees (3,650 licensees x 16 workers/licensee = 58,400 workers x 0.15 = 8,760 terminating workers/year), have an estimated annual burden of 2,920 hours (8,760 reports/year x 20/60 hours/report).

Therefore, the total annual compliance burden for 19.13(e) is 8,581 hours (5,661 hours/year + 2,920 hours/year). The total cost = \$2,205,317 (8,581 hours x \$257/hour).

Section 19.16(a) Requests by Workers for Inspections

Out of 3,844 licensees in the U.S., it is estimated that the Commission receives only one notification/request each year pursuant to 19.16(a). These written requests are expected to take approximately 30 minutes to prepare. Thus, the total annual reporting burden associated with 10 CFR 19.16(a) is estimated to be 30 minutes. The total annual cost for this section is \$129 (0.5 hours x \$257/hr.).

Total Estimate of Annual Industry Burden

The total estimated industry burden is shown on the attached burden tables.

13. Estimate of Other Additional Costs

NRC has determined that the records storage cost is roughly proportional to the recordkeeping burden cost. Based on a typical clearance, the records storage cost has been determined to be equal to 0.04 percent of the recordkeeping burden cost. Therefore, the records storage cost for this clearance is \$3,042 (29,594 hr x 0.0004 x \$257/hr).

14. Estimated Annualized Cost to the Federal Government

There is no cost to the Federal government except for those involving requests by workers for inspections. Approximately one worker requests an inspection each year pursuant to 10 CFR 19.16. Each request takes an average of 3 hours to resolve. Thus, the estimated annual cost to the Federal government is \$771 (1 report/year x 3 hours/report x \$257/hour). This cost is fully recovered through fee assessments to NRC licensees pursuant to 10 CFR Parts 170 and/or 171.

15. Reasons for Changes in Burden or Cost

The overall burden increased by 6,571 hours from 25,224 burden hours to 31,795 burden hours. Although the number of new licensees decreased from 255 to 136 and the number of recordkeepers decreased from 240 to 194, the number of workers for whom records were maintained increased from 121,000 in 2004 to 130,000 workers in 2008.

The majority of the increase in burden is attributable to under reporting of burden associated with 19.13(b). In 2007, the NRC amended its regulations in 10 CFR 19.13(b) which reduced licensee reporting burden for reporting annual exposures for all workers to only report for those workers receiving occupational exposures that exceeded 1 mSv (100 mrem) to any individual organ or tissue. The associated burden reduction was 10,882 hours. However, this burden is not reportable under 19.13(b), rather it is reported under 10 CFR Part 20, OMB Clearance Number 3150-0014. Consequently, the burden reduction was incorrectly credited to OMB Clearance Number 3150-0044. The recordkeeping burden is not reduced for NRC licensees. In 2008, 181,462 workers were monitored for radiation exposure and the recordkeeping burden for these workers is reflected in this assessment.

The estimated burden for 10 CFR Part 20 in 2007 was 35,674 hours with a total cost of \$9,203,892. This burden was increased with the addition of 165 respondents and 330 responses with 432 additional burden hours for the NARM rulemaking in 2007. Hence, the actual 2007 burden was 36,106 hours with a total cost of \$9,315,348. The net change in burden from 2007 to 2010 is a net reduction of 4,311 hours and a decreased cost of \$1,144,033.

The reporting burden covers the burden for Section 19.12 (a portion of this section is a one time burden for new licensees); Section 19.13(b), which is covered under 10 CFR Part 20 (OMB Clearance 3150-0014); and Section 19.16(a). The recordkeeping burden now incorporates the third party reporting requirements for Sections 19.12, 19.13(b), 19.13(c), 19.13(d), and 19.13(e). However, there was a decrease in professional cost from \$258/hr to \$257/hr.

16. Publication for Statistical Use

NRC does not publish this information for statistical use.

17. Reason for Not Displaying the Expiration Date

The requirement is 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. COLLECTIONS OF INFORMATION EMPLOYING STATISTICAL METHODS

Not applicable.

TABLE 1 -- ANNUAL REPORTING BURDEN

Section	No. of Respondents	Responses Per Respondent	Total Responses	Burden Per Response	Total Annual Burden	Cost @ \$257/Hr
19.12 (One time)	122	1	122	18 hours	2,200	\$565,400
19.13(b)					Covered under 10 CFR Part 20 (3150-0014)	
19.16(a)	1	1	1	.5 hours	0.5	\$129
Total	123		123		2,201	\$565,529

TABLE 2 -- ANNUAL RECORDKEEPING BURDEN

Section	Number of Recordkeepers	Hours Per Recordkeeper	Total Annual Burden Hours	Cost @ \$257/Hr
19.12	3,844	1.00	3,844	\$987,908
19.13(b) (Monitored Reportable Workers)	194	55.7938	10,824	\$2,781,768
19.13(b) (Monitored Non-Reportable Workers)	3,650	1.3334	4,867	\$1,250,819
19.13(c) (Commercial Transient Workers)	104	12.17	1,266	\$325,362
19.13(c) (Other licensee Transient Workers)	90	2.36	212	\$54,484
19.13(d) (Monitored Reportable Workers)	1	0.1	0.1	\$26
19.13(e) (Commercial Transient Workers)	104	40.57	4,219	\$1,084,283
19.13(e) (Other licensee Transient Workers)	90	0.87	78	\$20,046
19.13(e) (Commercial Terminating Workers)	104	8.18	851	\$218,707
19.13(e) (Other licensee Terminating Workers)	90	5.7	513	\$131,841
19.13(e) (Non-reportable Terminating Workers)	3,650	0.80	2,920	\$750,440
Total			29,594	\$7,605,658

Total requested burden hours for Part 19:

Responses: 3,967 responses (123 responses + 3,844 recordkeepers)
 Respondents: 3,844 respondents
 Burden Hours: 31,795 hours
 Costs: \$8,171,187

Total estimated reporting burden is 2,201 hours and a total cost of \$565,529.

Total estimated recordkeeping burden is 29,594 hours and a total cost of \$7,605,658.

The overall estimated burden is 31,795 hours and a total cost of \$8,171,187.