

NRC FORM 748
[NATIONAL SOURCE TRACKING TRANSACTION REPORT]
(3150-0202)

NONSUBSTANTIVE CHANGE REQUEST

Description of the Information Collection

As a result of the terrorist attacks in the U.S. on September 11, 2001, the U.S. Nuclear Regulatory Commission (NRC) reviewed nuclear material security requirements, with particular focus on radioactive material of concern. Based on the findings of its review, the NRC amended its regulations in 2006 to implement a program called the National Source Tracking System (NSTS). Under this program, licensees are required to report information on the manufacture, transfer, receipt, and disposal of nationally tracked sources. This information is used to maintain the National Source Tracking System and will provide the NRC with a "cradle-to-grave" account for these sources and, thus, improve accountability and controls over them. The transaction information is collected using NRC Form 748, [National Source Tracking Transaction Report]. The data elements contained on this form represent the minimum information necessary to track the nationally tracked sources from cradle to grave to ensure that all such sources continue to be accounted for.

Reasons for Requesting Changes to the NRC Form 748

The collection of NSTS data using NRC Form 748 began in 2009. After licensees began submitting data, it became clear to the NRC that licensees were confused about reporting certain transactions. Licensees have had difficulties reporting multiple transactions correctly on a single form. Others have not known how to report import and export transactions since these transactions are not mentioned nor explained in the currently used form. Also, licensees have frequently reported device make and model information rather than reporting source make and model information. Consequently, licensees have had to contact the NSTS Help Desk and resubmit reports after their first reports were not accepted.

NRC has revised the form in order to better meet the needs of licensees. The information that the NRC requires licensees to report remains the same and the requirements have not changed.

The previous version of the NRC Form 748 was two pages in length, including one page of instructions. In revising the form, NRC has developed a "short form" and a "long form" for licensees to submit data:

- Since most licensees are reporting single transactions, the short form will be the primary form used. There is a short version of Form 748 for every type of transaction (8 transaction types), and the licensee may select the short Form 748 that specifically focuses on the transaction they would like to report. For example, if the licensee is reporting a transfer, only section 6 from the long form ("Transfers") will be included on the short form for reporting transfers (sections 5, 7, 8, 9, 10, 11, and 12 from the long form would not be included). The short forms contain the same

information found in the long form, but the shortened version includes only the response options that are applicable to the type of transaction that the licensee is reporting.

- The long form contains all possible transaction types that licensees are required to report. Although the long form is 16 pages in length, it is highly unlikely that a licensee would ever be in a situation in which they would need to use all 16 pages or all 8 transaction types to report multiple transaction types. Most licensees would not report more than 2 transaction types at a given time. The length of the long form is primarily due to the fact that transaction types have been broken down into separate sections to more clearly request information needed for each specific transaction. In addition, space is provided to allow licensees to submit up to four source reports for each type of transaction.

In addition, the licensee's ability to submit the form electronically has been enhanced. Previously, the form was fillable and printable. Licensees could mail or fax the form to the NRC, or scan it and send it electronically. The form can now be saved on the licensee's computer and emailed by clicking on the new "submit by email" button.

Summary of specific changes to the NRC Form 748

There is not a change in burden, however a number of enhancements have been made to the NRC Form 748:

- A short form and a long form have been developed. Licensees who need to report a single transaction type can use the short form which only includes the response options for that type of transaction. Licensees who need to report multiple transaction types may use the long form.
- The ability to submit the form electronically has been enhanced. Previously, the form was fillable and printable. Licensees could mail or fax the form to the NRC, or scan it and send it electronically. The new form can now be saved on the licensee's computer and emailed by clicking on the new "submit by email" button.
- Two additional transaction types have been added (import and export). Licensees were previously required to report these types of transactions (imports were reported as receipts and exports were reported as transfers). However, because imports and exports were not listed as unique transaction types and the form did not include instructions for reporting them, licensees were confused about how to report these transactions. This change will make the form more intuitive to complete.
- Labels have been modified to more clearly reflect the requested information. For example, "model number" is now "source model" to clarify that licensees are reporting on a source rather than a device.
- Certain responses apply only to certain types of transactions. For example, waste manifest number (item 5G on the previous form) only applies to transfer, receipt, and disposal transactions and therefore is not included in the response blocks for other types of transactions. This change makes it clear what information is required for each type of transaction.
- The previous version of the form included licensee name and address in a single reporting block, the proposed form has separate blocks for name, street address, city, state, and zip code to make it more clear that all the required information has been entered.

- Additional space has been provided to report up to four sources for each type of transaction.

Although the length of the form has increased from 2 pages to 16 pages, the NRC is not requiring any additional information to be submitted on the form. The increase in length of the long form is primarily due to the fact that transaction types have been broken down into separate sections to more clearly request information needed for each transaction (there are 8 types of transactions). In addition, space is provided to allow licensees to submit up to four source reports for each type of transaction. This is compared to the four lines available on the current form to report all transactions. Licensees reporting a single type of transaction may use the short form (3-4 pages in length) that provides only the response blocks applicable to that type of transaction. The short forms contain the same information found in the long form, but allows the licensee to select the 748 form which focuses specifically on the transaction that they would like to report. Since most licensees report single transactions, the short forms will be the primary method used for 748 Form reporting.

Burden

The burden varies by the transaction(s) reported. For example, it will take slightly longer to report multiple transactions on the long form (estimated 0.25 hours/respondent) rather than a single transaction that would be reported in a short form (estimated 0.156 hours/respondent).

Because the information required on the form has not changed, the current burden remains 412 hours and 2,613 responses. This averages an estimated 0.158 hours (9.5 minutes) per response.

TABLE 1
ESTIMATED REPORTING BURDEN
AGREEMENT STATE AND NRC LICENSEES

SECTION	NO. OF RESPONDENTS	RESPONSES PER RESPONDENT	TOTAL RESPONSES	ANNUAL BURDEN PER RESPONDENT (Hours)	TOTAL ANNUAL BURDEN (Hours)
Long Form-Multiple Transactions	50	1	50	0.25	12.5
Source Transfer Data (6)	763	1	763	0.156	119.03
Source Receipt Data (7)	650	1	650	0.156	101.4
New Manufactured Source Data (9)	615	1	615	0.156	95.94
Source Import Data (10)	300	1	300	0.156	46.8
Source Export Data (11)	235	1	235	0.156	36.66
Total	2,613		2,613	0.158	412.33