

## 10 CFR Part 54, Justification for Consolidation of Information Collection Burden

The June 2008 submission had incorrectly split the total burden for this clearance of 544,940 hours into three separate information collections (ICs) within the clearance (504,900 hours, 40,000 hours and 40 hours). When the renewal request was opened for processing, it contained three separate IC's split into beginning balances at 504,900 hours, 40,000 hours and 40 hours. In the June 2008 submission the analyst had inadvertently created an additional IC for the burden instead of incorporating the new burden into the already existing IC burden for this clearance. This error created problems for the renewal package, in which the burden reduction were not accurately reflected, so the IC's two and three were zeroed out, especially since there was an overall reduction in burden by 239,450 hours.

The three IC's are (1) license renewal applications (reporting requirements), (2) documentation of compliance (recordkeeping); and (3) commitment completion letter. The responses and burden associated with each IC are (1) 6 responses/504,900 hours; (2) 40 responses/40,000 hours and a cost of \$4,128; and (3) 4 responses/40 hours. Based on the burden currently in ROCIS it was difficult to reduce the overall burden for this clearance for this renewal cycle, which decrease from 544,940 hours to 305,490 hours.

Because the IC's were incorrectly submitted, the responses, burden and cost associated with the new submission had to be zeroed out to correct the overall burden submission for November 2011. The new submission shows a change due to agency discretion of 40,040 hours which was zeroed out for IC's two and three in addition to the responses and cost. It also shows an adjustment of 199,410 hours, which covers the burden reduction for this clearance renewal cycle. .