

~~1~~FINAL OMB SUPPORTING STATEMENT FOR
REPORTING AND RECORDKEEPING REQUIREMENTS FOR
EXPORT AND IMPORT OF NUCLEAR EQUIPMENT AND MATERIAL
10 CFR PART 110

(3150-0036)

REVISION

DESCRIPTION OF THE INFORMATION COLLECTION

The Nuclear Regulatory Commission (NRC), under the Atomic Energy Act of 1954, as amended (AEA), and Title II of the Energy Reorganization Act of 1974, as amended, has authority for exercising export and import controls over nuclear equipment and material as specified in 10 CFR §§ 110.8, 110.9, and 110.9a. Any person who wishes to export or import nuclear equipment and material under the provisions in 10 CFR Part 110 must provide certain information collection elements to enable the NRC and the Executive Branch to make required export and import licensing determinations. In support of the reporting requirements pursuant to 10 CFR 110.50(c), optional NRC forms 830, 830A, 831 and 831A have been developed to assist licensees in submitting prior shipment notifications.

A. JUSTIFICATION

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

All persons who wish to export or import nuclear equipment and material as specified in 10 CFR §§ 110.8, 110.9, and 110.9a must provide certain information collection elements to enable the NRC and the Executive Branch to make required export and import licensing determinations to ensure compliance with NRC regulations and to satisfy statutory requirements of the AEA. Information collections in 10 CFR 110 are as follows:

Section 110.7a(a) states information provided to the Commission by an applicant for a license or by a licensee or information required by statute or by the Commission's regulations, orders, or license conditions to be maintained by the applicant or the licensee shall be complete and accurate in all material respects.

Section 110.7a(b) requires that each applicant or licensee notify the Administrator of the appropriate NRC Regional Office within two working days of identifying any information that has a significant implication for public health and safety or common defense and security on a regulated activity.

Section 110.20(a) states that a person may use an NRC general license as authority to export or import nuclear equipment or material, if the nuclear equipment or material to be exported or imported is covered by the NRC general

licenses described in §§ 110.21 through 110.27. If an export or import is not covered by the NRC general licenses described in §§ 110.21 through 110.27, a person must file an application with the Commission for a specific license in accordance with §§ 110.31 through 110.32. This requirement is covered under the clearance for NRC Form 7, ""Application for NRC Export/Import License, Amendment, Renewal or Consent Request", OMB 3150-0027.

Section 110.23(a)(5)(iii) states that all exports of americium are subject to the reporting requirements listed in 110.54(b).

Section 110.23(a)(6) states that all exports of neptunium are subject to the reporting requirements listed in 110.54(b).

Section 110.26(d) states that the general license does not authorize the export of essentially complete reactors through piecemeal exports of facility components. When individual exports of components would amount in the aggregate to export of an essentially complete nuclear reactor, a facility export license is required.

Section 110.26(e) states that all exports of nuclear reactor components under paragraph (a) of this section are subject to the reporting requirements in 110.54(c).

Section 110.27(d) states that persons using the general license for imports of formula quantities of strategic special nuclear material (as defined in 73.2 of this chapter) under this general license shall provide the notifications required in § 73.27 and § 73.72 of this chapter.

Section 110.31(a) states that a person shall file an application for a specific license to export or import with the Deputy Director of the NRC's Office of International Programs, using an appropriate method listed in § 110.4.

Section 110.31(b) states that applications for an export, import, amendment or renewal licenses or a request for an exemption from a licensing requirement under this part shall be filed on NRC Form 7. This requirement is covered under the clearance for NRC Form 7, ""Application for NRC Export/Import License, Amendment, Renewal or Consent Request", OMB 3150-0027.

Section 110.31(c) states that an application for a specific license to export and import or a request for an exemption from a licensing requirement must be accompanied by the appropriate fee in accordance with the fee schedules in § 170.21 and § 170.31. A license application will not be processed unless the specified fee is received. This requirement is covered under the clearance for NRC Form 7, ""Application for NRC Export/Import License, Amendment, Renewal or Consent Request", OMB 3150-0027.

Section 110.31(g) states that the applicant shall withdraw an application when it is no longer needed. The Commission's official files retain all documents related to a withdrawn application. This requirement is covered under the clearance for NRC Form 7, ""Application for NRC Export/Import License, Amendment, Renewal or Consent Request", OMB 3150-0027.

Section 110.32, 'Information required in an application for a specific license/NRC Form 7,' specifies the data elements and supplemental documentation required from an applicant used to determine whether or not to grant a license.

Section 110.50(a)(8) states that a licensee shall not proceed to export or import and shall notify the Commission promptly if he knows or has reason to believe that the packaging requirements of part 71 of this chapter have not been met.

Section 110.50(b)(3) states that unless a license specifically authorizes the export of certain foreign-obligated nuclear material or equipment, a licensee may not ship such material or equipment until the licensee has requested and the Commission has issued an amendment to the license authorizing such shipment; or the licensee has given at least 40 days advance notice of the intended shipment in writing to the Deputy Director, Office of International Programs (OIP); and the Deputy Director, OIP has obtained confirmation, through either the Department of Energy or State, that the foreign government in question has given its consent to the intended shipment pursuant to its agreement for cooperation with the United States; and communicated this in writing to the licensee.

Section 110.50(c), 'Advanced notification,' states that a licensee authorized to export or import the radioactive material listed in Appendix P to this part is responsible for notifying NRC and, in cases of exports, the government of the importing country in advance of each shipment. A list of points of contact in importing countries is available at NRC's Office of International Programs Web site, accessible on the NRC Public Web site at <http://www.nrc.gov>.

NRC Form 830 "Report of Import" (and continuation sheet 830A) is a voluntary form that licensees may use to comply with the requirements of 110.50(c) and report the import of radioactive material. NRC Form 831 "Report of Export" (and continuation sheet 831A) is a voluntary form that licensees may use to report the export of radioactive material. These forms assist less experience licensees to comply with the reporting requirement.

Section 110.51, 'Amendment and renewal of licenses,' states that applications for amendment of a specific license be filed on NRC Form 7 in accordance with §§ 110.31 and 110.32 and shall specify the respects in which the licensee desires the license to be amended and the grounds for such amendment. This requirement is covered under the clearance for NRC Form 7, ""Application for

NRC Export/Import License, Amendment, Renewal or Consent Request", OMB 3150-0027.

Section 110.52(b), 'Revocation, suspension, and modification,' states that the Commission may require further information from a licensee to determine whether a license should be revoked, suspended, or modified.

Section 110.53(b)(1), 'United States address, records, and inspections,' states that each license applicant or licensee (general or specific) shall maintain records concerning his exports or imports. The licensee shall retain these records for five years after each export or import except that byproduct material records must be retained for three years after the date of each export or import shipment.

Section 110.53(b)(2) states that records which must be maintained pursuant to this part may be the original or a reproduced copy or microform if such reproduced copy or microform is duly authenticated by authorized personnel and the microform is capable of producing a clear and legible copy after storage for the period specified by Commission regulations. The record may also be stored in electronic media with the capability for producing legible, accurate, and complete records during the required retention period. Records such as letters, drawings, specifications, must include all pertinent information such as stamps, initials, and signatures. The licensee shall maintain adequate safeguards against tampering with and loss of records.

Section 110.54(a), Reporting requirements, states that reports of exports of nuclear facilities and equipment, nuclear grade graphite for nuclear end use, and deuterium shipped during the previous quarter must be submitted by licensees making exports under the general license or specific license of this part by January 15, April 15, July 15, and October 15 of each year on Forms AP-M, "Exports of specified equipment and non-nuclear material" or AP-13, "Exports of specified equipment and non-nuclear material", and associated forms, submitted to OMB by U.S. Department of Commerce, Bureau of Industry and Security and cleared under #0694-0135. The reports must contain information on all nuclear facilities, equipment, and non-nuclear materials (nuclear grade graphite for nuclear end use and deuterium) listed in Annex II of the Additional Protocol.

Section 110.54(b) requires that persons making exports under the general license established by § 110.23(a) or under a specific license shall submit by February 1 of each year one copy of a report of all americium and neptunium shipments during the previous calendar year. This report shall be submitted to the Deputy Director, Office of International Programs at the address provided in § 110.4. The report must include a description of the material, including quantity in TBq and gram, approximate shipment dates and a list of recipient countries, end users, and intended use keyed to the items shipped.

Section 110.54(c) requires that persons making exports under the general license established by § 110.26(a) shall submit by February 1 of each year one copy of a report of all components shipped during the previous calendar year. This report shall be submitted to the Deputy Director, Office of International Programs at the address provided in § 110.4. This report must include a description of the components keyed to the categories listed in appendix A to this part, approximate shipment dates, and a list of recipient countries and end users keyed to the items shipped.

2. Agency Use of Information

The information submitted pursuant to 10 CFR Part 110 is necessary to ensure that radioactive sources are being exported/imported to licensed entities, and only to the entities listed on the license. Without this information, the United States would not be in compliance with the International Atomic Energy Agency's 'The Code of Conduct On The Safety And Security Of Radioactive Sources. The NRC ensures the information is complete, accurate and timely. If not, staff often contact the licensee and asks that they correct the information. A failure of any of these criteria can lead to Enforcement action. Each record is reviewed for accuracy and sorted by licensee. For those licensees with high volumes of shipments, they are also sorted by country. In addition, all import records subject to this requirement are printed, screened and logged into an electronic spreadsheet.

The requirement of § 110.7a (a), that information provided to the Commission by an applicant for a license or by a licensee or information required by statute or by the Commission's regulations, orders, or license conditions to be maintained by the applicant or the licensee shall be complete and accurate in all material respects is essential to ensure that licensees not withhold or misrepresent material facts which could impact a license determination.

The notification requirement in § 110.7a (b) enhances the capability of the Commission to respond rapidly and effectively if such a threat were to materialize on a regulated activity.

The information obtained from persons who wish to export or import nuclear equipment and material as specified in 10 CFR §§ 110.8, 110.9, and 110.9a is necessary to make required export and import licensing determinations, as well as to ensure compliance with NRC regulations which satisfy statutory requirements of the AEA.

Section 110.20(a) explains how the regulations work to determine if a person may use an NRC general license as authority to export or import nuclear equipment or material, if the nuclear equipment or material to be exported or imported is covered by the NRC general licenses described in §§ 110.21 through 110.27. If an export or import is not covered by the NRC general licenses

described in §§ 110.21 through 110.27, a person must file an application with the Commission for a specific license in accordance with §§ 110.31 through 110.32.

The requirement in Section 110.23(a)(5)(iii) to provide annual reports of americium exported under general license required by § 110.54(b) provide the NRC with data which the U.S. Government must report to the International Atomic Energy Agency (IAEA).

The requirement in Section 110.23(a)(6) to provide annual reports of neptunium exported under general license required by § 110.54(b) provide the NRC with data which the U.S. Government must report to the IAEA.

Section 110.26(d) is necessary in order to prevent the export of a complete reactor system through piecemeal exports of separate components under the NRC general license. In such an instance, a facility export license is required.

The requirement in Section 110.26(e) to provide annual reports of components exported under general license required by § 110.54(c) provide NRC with additional assurance against the improper accumulation of sensitive components in the country of import.

The notice of import of a formula quantity of strategic special nuclear material required by § 110.27(d) is used to ensure that the material is adequately protected at all times within the geographical limits of the U.S.

License applications required by §§ 110.31 and 110.32 are used by the Commission and the Executive Branch to make required export and import licensing determinations. If applicable statutory, regulatory, and policy considerations are satisfied, the NRC will issue a license authorizing the export or import.

Notices of defective packaging required by § 110.50(a)(8) facilitate NRC's ability to enforce the packaging requirements of 10 CFR Part 71 and to take possible enforcement action against licensees for packaging violations.

The requirement in § 110.50(b)(3) to notify the NRC in writing at least 40 days prior to shipment of foreign nuclear equipment or material unless a license specifically authorizes the export of foreign nuclear equipment or material enables the U.S. Government to obtain confirmation that the foreign government has given its consent to the intended export.

Prior notification of shipments of radioactive materials listed in Appendix P required by § 110.50(c) is used to track this material within the U.S. and to detect any diversions of the material.

The additional information that the Commission may require from licensees as

specified in § 110.52(b) is used by the NRC to make necessary statutory, regulatory, and policy determinations in connection with prospective actions to revoke, suspend or modify an export or import license.

Applications for amendments required by §§ 110.51 are used by the Commission and the Executive Branch to make required export and import licensing determinations. If applicable statutory, regulatory, and policy considerations are satisfied, the NRC will issue an amended license authorizing the export or import.

Shipment records required by § 110.53(b) are used for NRC inspection to ensure compliance with regulations and are necessary in connection with prospective enforcement actions against possible violators of 10 CFR Part 110.

The requirement in Section 110.54(b) to submit annual reports of americium and neptunium exported under general license provide the NRC with data which the U.S. Government must report to the IAEA.

The requirement in Section 110.54(c) to submit annual reports of components exported under general license provide NRC with additional assurance against the improper accumulation of sensitive components in the country of import.

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 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. The mandatory prior notifications under § 110.50(c) can be submitted electronically, and optional reporting forms for import and export notifications will be made available from the NRC web site. All of these notifications are now being transmitted to the NRC either by telefax or email. It is estimated that approximately 99% of the potential responses are filed electronically.

4. Effort to Identify Duplication and Use Similar Information

No sources of similar information are available. 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.

The Department of Energy's (DOE) [reporting requirements under 10 CFR 810](#) and the NRC's [reporting requirements under 10 CFR 110](#) are for entirely separate purposes and there is no overlap in the information that must be reported to DOE or NRC. The Department of Energy (DOE) regulations at 10

CFR Part 810, "Assistance to Foreign Atomic Energy Activities" pertain to the export of unclassified nuclear technology and assistance (provision of information or technical services) to foreign destinations. The NRC's 10 CFR Part 110 regulates the export of actual nuclear materials, radioactive sources and/or nuclear facilities/equipment (physical commodities) to foreign destinations. NRC reporting records come from private companies that use radioactive materials. DOE's records are derived from government-funded and licensed entities.

5. Effort to Reduce Small Business Burden

The requirements specified in 10 CFR Part 110 are the same for large and small businesses, because the proliferation and policy concerns are the same; thus, all businesses must provide the same data. The NRC staff estimates that less than 10% of all businesses subject to the information collections in this Part are small businesses.

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

Failure to provide complete and accurate information on all applications as specified in § 110.7a could result in an unreliable applicant obtaining an import or export authorization.

Failure to fully comply with § 110.7a(b) could result in a licensee not providing information that has significant implications for public health and safety or common defense and security.

Failure to fully comply with §§ 110.8, 110.9, and 110.9(a) could result in unauthorized and unregulated import or export of material and equipment subject to NRC licensing jurisdiction.

The information requested in §§ 110.31-32 is the minimum amount necessary for NRC to fulfill the statutory and regulatory requirements governing exports and imports of nuclear material and equipment. The information is submitted only when deemed necessary and is keyed to the decision criteria that guides the NRC in approving or denying applications. Schedules are not imposed. If the collection is less frequent, a person who wishes to export or import under 10 CFR Part 110 would be unable to do so because the NRC could not make the necessary determinations to approve applications.

If the collection in §110.50(a)(8) is less frequent, the licensee could possibly ship improperly packaged nuclear materials which may endanger the health and safety of the public.

If the collection in § 110.50(b)(3) is less frequent, the U.S. Government might violate the provisions of U.S. bilateral agreements with other Governments. The report is not frequently required because the origin of the material is normally

identified before the export license is issued, and, accordingly, is authorized for export on the face of the license.

The records maintained in § 110.53 are largely common business records and do not contain any special requirements, therefore, the regulatory impact is minimal. If the information is provided less frequently, the NRC would be unable to verify compliance with requirements in a timely manner.

The reporting requirements in 110.54 provide trade statistics for strategic exports and support international obligations to report certain exports under general license authorizations. The information requested in § 110.54(b) must be collected on a yearly basis to comply with a U.S. Government reporting commitment to the IAEA. The reporting requirement in § 110.54(c) is reasonable and less burdensome on exporters than submitting specific license applications.

7. Circumstances Which Justify Variation From OMB Guidelines

The reason for retaining records for five years for each export or import except for byproduct material, where records shall be retained for three years, is that these exports or imports are relatively more important with respect to nuclear nonproliferation.

Requiring the applicant or licensee to notify the Commission within two days of identifying information having a significant implication for public health and safety or common defense and security on a regulated activity enables the Commission to respond rapidly and effectively to a threat to the public health and safety or the common defense and security. This collection requirement is contained in other parts of NRC's regulations. No notifications are expected.

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 September 5, 2012 (77 FR 54615). 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 Burden and Burden Hour Cost

There are approximately 108 record keepers for exporters/importers of nuclear material and equipment. All licensees comply equally with the collections in §§ 110.23(a)(5)(iii), 110.23(b)(6), 110.26(e), 110.27(d), 110.31(f), 110.50(a)(8), 110.50(b)(3), 110.50(c), 110.51, 110.52(b) and 110.54.

The estimated annual burden for this collection is 780 hours (672 hours reporting and 108 hours recordkeeping). The total cost for the collection is \$213,720 (780 hours x \$274/hr). See tables 1 – 3 for a detailed breakdown of licensee burden for each requirement under Part 110.

13. Estimate of Other Additional Costs

For licensees subject to 10 CFR Part 110, it is most likely that any purchases of equipment and services were made before October 1, 1995, in order to achieve regulatory compliance with requirements not associated with this information collection, for reasons other than to provide information or keep records for the government, or as part of customary and usual business or private practices.

NRC estimates that the storage and equipment costs for licensees subject to this information collection are approximately \$22.50 per license, based on a rate of \$45 per square foot of filing space. The recordkeeping burden is roughly proportional to the quantity of records to be maintained. Based on the number of active licenses issued annually, the total annual records storage cost is estimated to be equal to the per license rate of (\$22.50) x (108 record keepers) x (an average of 3.42 licenses issued per year per record keeper) x (5 years of required record retention) or \$41,553.

14. Estimated Annualized Cost to the Federal Government

The collection of information under 10 CFR Part 110 requires approximately 131 NRC professional staff hours per year to investigate, review and take action on the reported information associated with the collections referred to above. The annual labor cost to the Federal Government at an average of \$274 per staff hour for reactor and materials licensees is \$35,894 (131 hours x \$274). The costs for OMB 3150-0036 are recovered fully through fee assessments to NRC licensees pursuant to 10 CFR Parts 170 and 171. Table 4 summarizes costs to the NRC for processing information under this collection:

15. Reasons for Changes in Public Burden or Cost

The estimated burden increased by 256 hours from 524 hours up to 780 hours. The responses increased by 1,652 responses, from 946 responses to 2,598 responses. There have been no changes to the requirements under 10 CFR

Part 110; however, the NRC staff has adjusted the estimated number of responses for some requirements. The number of respondents was also increased from 103 to 108 as a result of data from the last clearance cycle.

The primary reason for the increase in responses and hours is due to a change in the estimates for notifications submitted pursuant to 110.50(c). The number of estimated responses to comply with 110.50(c) increased from 400 to 1,800 for respondents not using a form and from 400 to 600 for respondents using a form. The estimated number of responses is based on data from the past clearance cycle on the actual number of responses submitted to the NRC. The NRC staff believes that this represents a fair estimate for the number of responses that will be received annually during the current clearance cycle.

In the previous clearance cycle, some licensees' responses to a single license application were included in both the Part 110 clearance and the clearance for NRC Form 7, "Application for NRC Export/Import License, Amendment, Renewal or Consent Request", OMB 3150-0027." In the current cycle, these application responses are only counted under the NRC Form 7 clearance and have been removed from the Part 110 clearance.

In addition, burden estimates for 110.50(c) were updated based on staff experience. Burden estimates for licensees not using a form to submit import/export data was reduced from 24 minutes to 15 minutes. The burden estimate for respondents using a form was reduced from 24 minutes to 12 minutes, due to the addition of continuation sheets (more information below).

Minor changes were made to the NRC Forms 830 and 830a as part of this submission. These changes did not increase the burden for completion of the form. There were no changes to the requirements contained in the 10 CFR Part 110 regulations. Changes are as follows:

- Revised the wording in fields A, B, and C on the NRC Form 830 to match the requirements in the regulations. The previous form incorrectly requested the license number or general license reference, the address and contact information of the U.S. importing facility, and the recipient, in that order. The revised form now requests mailing and contact information on the licensee, the recipient name and address, and the contact information and address of the exporting facility, in that order.
- Added a field for reference number, to replace the previous field for license number. Since August 27, 2010, imports are authorized under a general license in the regulations (at 110.27), so there is no longer a need to provide a box for a license number on the NRC Form 830. However, licensees requested the NRC provide a space for them to type a reference number on the form to help keep their records organized. In addition, the NRC staff also uses any reference number provided by the licensee in matching the notice with subsequent notices from the same licensee stating that the shipment reached its destination.

In addition, the NRC is submitting for the first time two additional forms, NRC Form 830A and NRC Form 831A to serve as "continuation sheets" for the NRC Forms 830 and 831. These sheets allow a licensee to report multiple sources being exported or imported, rather than completing a separate NRC Form 830 or 831 for each source. The burden estimate of 12 minutes to report for licensees using the optional forms includes the time to complete both the report and the continuation sheet. The NRC staff believes that the use of a continuation form will reduce licensee reporting time, because multiple sources may be reported in a single submission. Thus, the reporting time for licensees using the optional forms has been reduced from 24 minutes to 12 minutes.

For those firms that developed their own reporting form there is little or no benefit from use of the NRC forms. NRC staff contacted the single largest licensee that submits the notifications. They represent 70-80 percent of our total volume of notices. They are highly automated with regard to the notice requirement. Even so, the NRC contact at that company stated that it takes them 15 minutes to prepare and send the report, without using the NRC form (note that their estimate matches the estimate for licensees not using the form, which is 15 minutes). In addition, the NRC has included 12 minutes of additional follow-up time for 30 of the responses each year

Licensees using the form are typically infrequent reporters of export transactions. For them, the form is a tremendous help in providing the data, and saves time. In the past (prior to form development approximately 3 years ago), the licensee sent in notices with no shipping date, no country of ultimate destination, and other errors. As a result, they had to send in corrected notices. In contrast, the 830 and 831 only list the fields required, making it easy to visualize if the notification is complete. The 830 and 831 have sufficient space for most all transactions that would involve multiple sources. The continuation forms were made available for rare instances in which dozens of sources must be reported.

The NRC Forms 830 and 831 were only developed and approved 3 years ago during the renewal process. In combination with the new continuation form, and based on experience during the past three years with licensees, NRC staff believes that 12 minutes is the actual average reporting time for licensees using these forms.

Finally, the cost increase also reflects an increase in the annual labor cost for reactor and materials licensees from \$238 to \$274 per hour.

16. Publication for Statistical Use

NRC does not perform statistical analysis of the submissions. The records are reviewed for accuracy and compliance with the regulation. The records are not published or made public.

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

There are no exceptions.

B. COLLECTIONS OF INFORMATION EMPLOYING STATISTICAL METHODS

Statistical methods are not used in this collection of information.

**TABLE 1.
ANNUAL REPORTING BURDEN**

| Section | Number of Respondents | Responses per Respondent | Responses | Burden Per Response | Burden Hours | Cost at \$274/hr |
|------------------------------------|--|--------------------------|-----------|---------------------|--------------|------------------|
| 110.7a(a)&(b) | 0 | 0 | 0 | 0.25 | 0 | \$ 0 |
| 110.20(a) | covered under NRC Form 7, "Application for NRC Export/Import License, Amendment, Renewal or Consent Request", OMB 3150-0027 | | | | | |
| 110.23(a)(5) (iii) | included in 110.54(b) | | | | | |
| 110.23(a)(6) | included in 110.54(b) | | | | | |
| 110.26(d) | covered under NRC Form 7, "Application for NRC Export/Import License, Amendment, Renewal or Consent Request", OMB 3150-0027 | | | | | |
| 110.26(e) | included in 110.54(c) | | | | | |
| 110.27(d) | included in 73.27 & 73.72, OMB 3150-0002 | | | | | |
| 110.31 | covered under NRC Form 7, "Application for NRC Export/Import License, Amendment, Renewal or Consent Request", OMB 3150-0027 | | | | | |
| 110.32 | covered under NRC Form 7, "Application for NRC Export/Import License, Amendment, Renewal or Consent Request", OMB 3150-0027 | | | | | |
| 110.50(a)(8) | 1 | 1 | 1 | 0.5 | 0.5 | \$ 137 |
| 110.50(b)(3) | 14 | 1 | 14 | 0.5 | 7 | \$ 1,918 |
| 110.50(c) - no form | 36 | 50 | 1800 | 0.25 | 450 | \$ 123,300 |
| 110.50(c) - with form ¹ | 6 | 100 | 600 | 0.2 | 120 | \$ 32,880 |
| 110.50(c) - add'l follow-up | 6 | 5 | 30 | 0.2 | 6 | \$ 1,644 |
| 110.51 | covered under NRC Form 7, "Application for NRC Export/Import License, Amendment, Renewal or Consent Request", OMB 3150-0027 | | | | | |
| 110.52(b) | 1 | 1 | 1 | 0.5 | 0.5 | \$ 137 |
| 110.54(a) | Covered under Forms AP-M, "Exports of specified equipment and non-nuclear material" and AP-13, "Exports of specified equipment and non-nuclear material", US Dept of Commerce, OMB 0694-0135 | | | | | |
| 110.54(b) | 24 | 1 | 24 | 2 | 48 | \$ 13,152 |

¹ 110.50(c) requires licensees exporting radioactive material listed in Appendix P to notify both the NRC and the government of the importing country in advance of each shipment. The licensee fulfills this responsibility by emailing the NRC and copying the importing country on the message. Because this is a single notification sent to two entities, no additional third party burden has been included in this collection. All burden for these notifications is captured as reporting burden under 110.50(c).

| | | | | | | |
|-----------|-----|---|------|---|-----|---------------|
| 110.54(c) | 20 | 1 | 20 | 2 | 40 | \$ 10,960 |
| TOTAL | 108 | | 2490 | | 672 | \$ 184,128 |

**TABLE 2
ANNUAL RECORDKEEPING BURDEN**

| Section | Number of Recordkeepers | Hours per Recordkeeper | Burden Hours | Cost at \$274/hr |
|------------------|--------------------------------|-------------------------------|---------------------|-------------------------|
| 110.53(b)(1)&(2) | 108 | 1 | 108 | \$ 29,592 |

**TABLE 3
ANNUAL LICENSEE BURDEN TOTALS**

| | Responses | Hours | Cost at \$274/hr |
|---------------|------------------|--------------|-------------------------|
| Reporting | 2,490 | 672 | \$ 184,128 |
| Recordkeeping | 108 | 108 | \$ 29,592 |
| TOTAL | 2,598 | 780 | \$ 213,720 |

**TABLE 4
COSTS TO THE FEDERAL GOVERNMENT**

| Section | Number of Respondents | Responses per Respondent | Responses | Time Per Response | Hours | Cost at \$274/hr |
|-----------------------------|------------------------------|---------------------------------|------------------|--------------------------|--------------|-------------------------|
| 110.7a(a)&(b) | 0 | 0 | 0 | 0.25 | 0 | \$ - |
| 110.50(a)(8) | 1 | 1 | 1 | 0.5 | 0.5 | \$ 137 |
| 110.50(b)(3) | 14 | 1 | 14 | 0.5 | 7 | \$ 1,918 |
| 110.50(c) - no form | 36 | 50 | 1800 | 0.0125 | 22.5 | \$ 6,165 |
| 110.50(c) - with form | 6 | 100 | 600 | 0.01 | 6 | \$ 1,644 |
| 110.50(c) - add'l follow-up | 6 | 5 | 30 | 0.2 | 6 | \$ 1,644 |
| 110.52(b) | 1 | 1 | 1 | 1 | 1 | \$ 274 |
| 110.54(b) | 24 | 1 | 24 | 2 | 48 | \$13,152 |
| 110.54(c) | 20 | 1 | 20 | 2 | 40 | \$10,960 |
| TOTAL | 108 | | 2490 | | 131 | \$35,894 |