

Supporting Statement for OMB Review of OMB Form 83-I, subject:  
Radiation Sources on Army Land

Justification

1. Need for the Information Collection

The Army requires Non-Army agencies (including civilian contactors) to obtain an Army Radiation Permit (ARP) from the installation commander to use, store or possess ionizing radiation sources on an Army Installation IAW Title 32 Code of Federal Regulation Section 655.10. For the purpose of this paragraph, “ionizing radiation source” means any source that, if held or owned by an Army organization, would require a specific Nuclear Regulatory Commission (NRC) license or Army Radiation Authorization (ARA). Purpose of the ARP is to protect the public, civilian employees and military personnel on an installation from potential exposure to radioactive sources.

2. Use of the Information

The ARP allows the installation to maintain cognizance over the presence of radioactive sources on the installation. Cognizance is necessary to ensure emergency responders are properly notified and prepared to deal with the radioactive materials when necessary, ensure other proper protective controls are maintained, and to ensure proper removal of the radioactive materials from the installation when no longer required.

3. Use of Information Technology

The ARP request is by letter and requires specific data. Most of the information required is on the license issued to the requestor by the NRC or other regulatory agency. Supplementary information required are dates showing the duration of the ARP. Thus, the most expeditious manner to submit the request is by email or facsimile.

4. Non-Duplication

The office preparing this justification statement is the proponent for the Army Radiation Safety Program. The office establishes Army Radiation Safety policies and procedures. To the best of our knowledge, there is no duplicative permitting process within or available to the Army.

5. Burden on Small Business

The collection of information does not have a significant impact on small businesses or other entities.

6. Less Frequent Collection

Information collection for the ARP is required each time a Non-Army agency needs to use, store, or possess radioactive material on an Army installation IAW Title 32 Code of Federal Regulation Section 655.10. Failure to comply will result in an installation commander not having knowledge of the presence of radioactive materials on the installation, and not providing adequate controls to ensure the safety of the public, civilian employees and military personnel on the installation.

#### 7. Paperwork Reduction Act Guidelines

There are no special circumstances. The collection of information will be conducted in a manner consistent with the guidelines in 5 CFR 1320.5(d)(2).

#### 8. Consultation and Public Comments

A notice for the submission of this information collection proposal was published in the Federal Register on November 21, 2013 (78 FR 69838). No comments were received. The 30 day notice was published January 30, 2014 (79 FR 4887). Comment period is currently open.

#### 9. Gifts or Payment

No payments or gift to permit requestors is required or allowed.

#### 10. Confidentiality

No assurance of confidentiality is required. Most information required to obtain ARP is already required for licensing by the NRC.

#### 11. Sensitive Questions

There are no questions of a sensitive nature, such as sexual behavior and attitudes, religious beliefs, and other matters commonly considered private.

#### 12. Respondent Burden, and its Labor Costs

The number of annual requesters is estimated to be 235 with an annual hour burden of 470. Annual frequency of submission of information will depend on the frequency of using, storing or possessing radioactive materials on Army installations. Annual hour burden is based on past experience of about 2 hours to prepare and submit each request. Estimated total annualized cost for the hour burdens of submitting the information is \$16,920.00. This estimated is based on 235 requests requiring 2 hours of burden each at an average hourly wage rate of \$36.00. The annualized cost per requestor will depend on the frequency of requesting ARPs annually.

#### 13. Respondent Costs Other Than Burden Hour Costs

There are no capital or start-up costs associated with this information collected.

#### 14. Cost to the Federal Government

Estimated annualized cost to the Federal Government is \$16,920.00. This estimate is based on past experience to review the information provided, provide appropriate response, and maintain files. Basis for the estimate is 235 requests requiring 2 hours of work by Federal Government employees at an average hourly rate of \$36.00.

#### 15. Reasons for Change in Burden

No Change. This is an extension of a currently approved collection.

#### 16. Publication of Results

Results will not be published for statistical purposes.

17. Non-Display of OMB Expiration Date

Approval not to display the expiration date is not being sought.

18. Exceptions to “Certification for Paperwork Reduction Submissions”

No exceptions to the certification are being sought.