

License Title	Program codes	NRC	MML	Total NRC Licensees	Agreement States	Total Licensees
Medical Institution-Broad	2110	23	44	67	395	462
Medical Institution-Written Directive Required	2120	257	81	338	1994	2332
Medical Institution-Written Directive Not Required	2121	145	13	158	932	1090
Medical Private Practice-Written Directive Required	2200	58	0	58	342	400
Medical Private Practice-Written Directive Not Required	2201	286	0	286	1687	1973
Eye Applicators Strontium-90	2210	14	0	14	83	97
Mobile Medicine Service – Written Directive Not Required	2220	41	0	41	242	283
High Dose-Rate Remote Afterloader	2230	85	0	85	502	587
Mobile Medical Service – Written Directive Required	2231	2	0	2	12	14
Medical Therapy – Other Emerging Technology	2240	26	0	26	153	179
Teletherapy	2300	2	0	2	12	0
Gamma Stereotactic Radiosurgery	2310	8	0	8	47	55
Sub Totals		947	138	1085	6401	
TOTAL						7468

1 NRC Material License Program Codes, November 2012.

2 Data from NRC License Tracking System (LTS), November 2012.

3 Estimated, based on 1 to 5.9 ratio of NRC licensees to Agreement States licensees.

Table 3 – Reporting Burden for NRC Licensees (3150-0120)

Section	Program Codes	Number of Respondents	Responses Per Respondent	Total Number of Responses	Burden per Response (Hours)	Total Annual Burden (Hours)	Cost @ \$274/Hr
35.12(b)	All (ARSO)	33	1	33	0.25	8.25	\$2,261
35.12(b)	All (copy)	33	1	33	-0.25	-8.25	-\$2,261
35.12(c)(1)	All (Renewals)	108	1	108	-0.25	-27.00	-\$7,398
35.12(c)(1)	All (Amendments)	1085	1	1,085	-0.25	-271.25	-\$74,323
35.13(d)	All (Turnover)	33	1	33	0.50	16.50	\$4,521
35.13(d)	All (Amendments)	108	1	108	0.50	54.00	\$14,796
35.13(i)	2120, 2200, 2230, 2240	507	2	1,014	-0.50	-507.00	-\$138,918
35.50(a)	All (Turnover)	10	1	10	-0.50	-5.00	-\$1,370
35.50(c)(1)	Subset of 35.50(a)						\$0
35.50(c)(3)	2201	1	1	1	-0.50	-0.50	-\$137
35.51(a)	2110, 2120, 2200, 2210, 2230, 2231, 2240, 2310 (Turnover)	5	1	5	-0.50	-2.50	-\$685
35.55(a)	2110, 2120 (Turnover)	1	1	1	-0.50	-0.50	-\$137
35.57(a)(1)	21210, 2120, 2200, 2210, 2230, 2231, 2240, 2310	6	1	6	-0.50	-3.00	-\$822
35.57(a)(2)	All	11	1	11	-0.50	-5.50	-\$1,507
35.57(a)(3)	2210, 2120, 2200, 2210, 2230, 2231, 2240, 2310	6	1	6	-0.50	-3.00	-\$822
35.57(b)(1)	All	325	1	325	-0.50	-162.50	-\$44,525
35.57(b)(2)	All	27	1	27	-0.50	-13.50	-\$3,699
35.65(b)(2)	2110, 2120, 2121, 2200, 2201, 2200, 2231	2	1	2	0.50	1.00	\$274
35.190(a)	2110, 2120, 2121, 2200, 2201, 2220 (Turnover)	8	1	8	-0.50	-4.00	-\$1,096
35.290(a)	2110, 2120, 2121, 2200, 2201, 2220 (Turnover)	8	1	8	-0.50	-4.00	-\$1,096
35.390(a)	2110, 2120, 2200, 2231 (Turnover)	4	1	4	-0.50	-2.00	-\$548
35.392(a)	2110, 2120, 2200, 2231 (Turnover)	4	1	4	-0.50	-2.00	-\$548
35.394(a)	2110, 2120, 2200, 2231 (Turnover)	4	1	4	-0.50	-2.00	-\$548
35.433	No Additional Burden						\$0
35.490(a)	2110, 2120, 2200, 2210, 2240 (Turnover)	5	1	5	-0.50	-2.50	-\$685
35.690(a)	2110, 2230, 2300, 2310 (Turnover)	2	1	2	-0.50	-1.00	-\$274
Total		2336		176		-947.25	-\$259,547

Table 6 – Reporting Burden for Agreement States Licensees (3150-0120)

Section	Program Codes	Number of Respondents	Responses Per Respondent	Total Number of Responses	Burden per Response (Hours)	Total Annual Burden (Hours)	Cost @ \$274/Hr
35.12(b)	All (ARSO)	192	1	192	0.25	48.00	\$13,152
35.12(b)	All (copy)	192	1	192	-0.25	-48.00	-\$13,152
35.12(c)(1)	All (Renewals)	369	1	369	-0.25	-92.25	-\$25,277
35.12(c)(1)	All (Amendments)	6401	1	6,401	-0.25	-1,600.25	-\$438,469
35.13(d)	All (Turnover)	192	1	192	0.50	96.00	\$26,304
35.13(d)	All (Amendments)	639	1	639	0.50	319.50	\$87,543
35.13(i)	2120, 2200, 2230, 2240	2991	2	5,982	-0.50	-2,991.00	-\$819,534
35.50(a)	All (Turnover)	57	1	57	-0.50	-28.50	-\$7,809
35.50(c)(1)	Subset of 35.50(a)						\$0
35.50(c)(3)	2201	2	1	2	-0.50	-1.00	-\$274
35.51(a)	2110, 2120, 2200, 2210, 2230, 2231, 2240, 2310 (Turnover)	32	1	32	-0.50	-16.00	-\$4,384
35.55(a)	2110, 2120 (Turnover)	6	1	6	-0.50	-3.00	-\$822
35.57(a)(1)	2110, 2120, 2200, 2210, 2230, 2231, 2240, 2310	35	1	35	-0.50	-17.50	-\$4,795
35.57(a)(2)	All	64	1	64	-0.50	-32.00	-\$8,768
35.57(a)(3)	2110, 2120, 2200, 2210, 2230, 2231, 2240, 2310	35	1	35	-0.50	-17.50	-\$4,795
35.57(b)(1)	All	1917	1	1,917	-0.50	-958.50	-\$262,629
35.57(b)(2)	All	160	1	160	-0.50	-80.00	-\$21,920
35.65(b)(2)	2110, 2120, 2121, 2200, 2201, 2200, 2231	9	1	9	0.50	4.50	\$1,233
35.190(a)	2110, 2120, 2121, 2200, 2201, 2220 (Turnover)	50	1	50	-0.50	-25.00	-\$6,850
35.290(a)	2110, 2120, 2121, 2200, 2201, 2220 (Turnover)	50	1	50	-0.50	-25.00	-\$6,850
35.390(a)	2110, 2120, 2200, 2231 (Turnover)	25	1	25	-0.50	-12.50	-\$3,425
35.392(a)	2110, 2120, 2200, 2231 (Turnover)	25	1	25	-0.50	-12.50	-\$3,425
35.394(a)	2110, 2120, 2200, 2231 (Turnover)	25	1	25	-0.50	-12.50	-\$3,425
35.433	No Additional Burden						\$0
35.490(a)	2110, 2120, 2200, 2210, 2240 (Turnover)	27	1	27	-0.50	-13.50	-\$3,699
35.690(a)	2110, 2230, 2300, 2310 (Turnover)	8	1	8	-0.50	-4.00	-\$1,096
Total		13503		1,032		-5,522.50	-\$1,513,165

Table 7 – Recordkeeping Burden for NRC Licensees for Part 35 (3150-0010)

Section	Program Codes	No. of NRC Recordkeepers	Number of Records per Licensee	Total Number of Records	Burden Hours per Record	Total Annual Burden Hours	Cost @ \$274/Hour
35.24(b)	All	Burden covered in 35.2024(c)					
35.41(a)	35.41(b)(5) & 35.41(b)(6)	Burden covered in 35.2041					
35.41(b)(5)	2110, 2120, 2200, 2210, 2230, 2231, 2240, 2310	Covered in 35.41(a) (18)					
35.41(b)(6)	2110, 2120, 2200, 2240	Covered in 35.41(a) (15)					
35.65(b)(2)	2110, 2120, 2121, 2200, 2201, 2220, 2231	2	1	2	2.50	5.00	\$1,370
35.204(b)	2110, 2120	Covered under 35.2204 (61)					
35.610(d)	2110, 2120, 2230, 2300, 2310	Covered in 35.2310					
35.2024(c)	From 35.24(b) (Turnover)	33	1	33	1.00	33.00	\$9,042
35.2041	From 35.41(a) (Turnover)	33	1	33	9.00	297.00	\$81,378
35.2204	From 35.204(b)	48	1	48	13.00	624.00	\$170,976
35.2310	From 35.610(d)	25	1	25	1.00	25.00	\$6,850
Total		141		141		984.00	\$269,616

Record Retention Period
Inventory and leak testing 3 years
5 years after ARSO is removed from license
Duration of the license 3 years
3 years

Table 9 – Recordkeeping Burden for Agreement State Licensees for Part 35 (3150-0010)

Section	Program Codes	No. of Agreement State Recordkeepers	Number of Records per Licensee	Total Number of Records	Burden Hours per Record	Total Annual Burden Hours	Cost @ \$274/Hour
35.24(b)	All	Burden covered in 35.2024(c)					
35.41(a)	35.41(b)(5) & 35.41(b)(6)	Burden covered in 35.2041					
35.41(b)(5)	2110, 2120, 2200, 2210, 2230, 2231, 2240, 2310	Covered in 35.41(a) (106)					
35.41(b)(6)	2110, 2120, 2200, 2240	Covered in 35.41(a) (88)					
35.65(b)(2)	2110, 2120, 2121, 2200, 2201, 2220, 2231	8	1	8	2.50	20.00	\$5,480
35.204(b)	2110, 2120, 2121, 2200, 2201, 2220	Covered under 35.2204 (2390)					
35.610(d)	2110, 2120, 2230, 2300, 2310	Covered in 35.2310					
35.2024(c)	From 35.24(b) (Turnover)	192	1	192	1.00	192.00	\$52,608
35.2041	From 35.41(a) (Turnover)	194	1	194	9.00	1,746.00	\$478,404
35.2204	From 35.204(b)	283	1	283	13.00	3,679.00	\$1,008,046
35.2310	From 35.610(d)	147	1	147	1.00	147.00	\$40,278
Total		824		824		5,784.00	\$1,584,816

Record Retention Period
Inventory and leak testing 3 years
5 years after ARSO is removed from license
Duration of the license
3 years
3 years

Table 11 - Third-party Disclosure Burden for NRC Licensees

Section	Program Codes	Number of Respondents	Responses Per Respondent	Total Number of Responses
35.3045(e)	2110, 2120, 2200, 2210, 2230, 2231, 2240, 2300, 2310	1	3	3
35.3204(a)	2110, 2120, 2121, 2200, 2201, 2220, 2500	2	1	2
Total		3	4	5

Table 12 - Third-party Disclosure Burden for Agreement State Licenses

Section	Program Codes	Number of Respondents	Responses Per Respondent	Total Number of Responses
35.3045(e)	2110, 2120, 2200, 2210, 2230, 2231, 2240, 2300, 2310	5	3	15
35.3204(a)	2110, 2120, 2121, 2200, 2201, 2220, 2500	12	1	12
Total		17	4	27

(3150-0010)

Burden per Response (Hours)	Total Annual Burden (Hours)	Cost @ \$274/Hr
-2.00	-6.00	-\$1,644
0.25	0.50	\$137
	-5.50	-\$1,507

Uses (3150-0010)

Burden per Response (Hours)	Total Annual Burden (Hours)	Cost @ \$274/Hr
-2.00	-30.00	-\$8,220
0.25	3.00	\$822
	-27.00	-\$7,398

Table 14 - One-Time Implementation Reporting Burden for Agreement State Licensees for Form 313 (3150-0120)

Section	Program Codes	Number of Respondents	Responses Per Respondent	Total Number of Responses	Burden per Response (Hours)	Total Annual Burden (Hours)	Cost @ \$274/Hr
35.13(d)	All	6401	1	6,401	0.50	3200.50	\$876,937
35.65(b)(2)	2110, 2120, 2121, 2200, 2201, 2220, 2231	55	1	55	2.00	110.00	\$30,140
Total		6456		6456		3310.50	\$907,077
Annualized Total				2152.00		1103.50	\$302,359

Table 15 - One Time Implementation Recordkeeping Burden for Agreement State Licensees for Part 35 (3150-0010)

Section	Program Codes	No. of NRC Recordkeepers	Number of Records per Licensee	Total Number of Records	Burden Hours per Record	Total Annual Burden Hours	Cost @ \$274/HR	Record Retention Period
35.24(b)	All	Burden covered in 35.2024(c)						
35.41(a)	35.41(b)(5) & 35.41(b)(6)	Burden covered in 35.2041						
35.41(b)(5)	2110, 2120, 2200, 2210, 2230, 2231, 2240, 2300, 2310	Covered in 35.41(a) (3540)						
35.41(b)(6)	2110, 2120, 2200, 2240	Covered in 35.41(a) (2885)						
35.41(c)		Covered in 35.2041						
35.65(b)(2)	2110, 2120, 2121, 2200, 2201, 2220, 2231	56	1	56	2.00	112.00	\$30,688	Inventory and leak testing 3 years
35.2024(c)	From 35.24(b)	6401	1	6,401	1.00	6,401.00	\$1,753,874	5 years after ARSO is removed from license
35.2041	From 35.41(a)	6425	1	6,425	9.00	57,825.00	\$15,844,050	Duration of the license
Total				12,882.00		64,338.00	\$17,628,612	
Annualized Total						21446.00	\$5,876,204	

Table 17 – Total Recurring Annual Burden in Hours for NRC Licenses

	Reporting Burden	Recordkeeping Burden	3 rd Party Disclosure Burden
10 CFR Part 30	0.50	676.00	0.00
10 CFR Part 35	250.50	984.00	-5.50
Form 313	-947.25	0.00	0.00
Total:	-696.25	1,660.00	-5.50

Table 18 – Total Recurring Annual Burden in Hours for Agreement State Licensees

	Reporting Burden	Recordkeeping Burden	3 rd Party Disclosure Burden
10 CFR Part 30	3.00	3,991.00	0.00
10 CFR Part 35	1,484.25	5,784.00	-27.00
Form 313	-5,522.50	0.00	0.00
Total:	-4,035.25	9,775.00	-27.00

Table 19 – Total Recurring Annual Burden in Hours for All Licensees

	Reporting Burden	Recordkeeping Burden	3 rd Party Disclosure Burden
10 CFR Part 30	3.50	4,667.00	0.00
10 CFR Part 35	1,734.75	6,768.00	-32.50
Form 313	-6,469.75	0.00	0.00
Total:	-4,731.50	11,435.00	-32.50

Table 20 – Total One-Time Burden in Hours for NRC Licensees (Annualized)

	Reporting Burden	Recordkeeping Burden	Total
10 CFR Part 30	0.00	0.00	0.00
10 CFR Part 35	0.00	3,635.33	3,635.33
Form 313	182.50	0.00	182.50
Total:	182.50	3,635.33	3,817.83

Table 21 – Total One-Time Burden in Hours for Agreement State Licensees (Annualized)

	Reporting Burden	Recordkeeping Burden	Total
10 CFR Part 30	0.00	0.00	0.00
10 CFR Part 35	0.00	21,446.00	21,446.00
Form 313	1,103.50	0.00	1,103.50
Total:	1,103.50	21,446.00	22,549.50

Table 22 – Total One-Time Burden in Hours for All Licensees (Annualized)

	Reporting Burden	Recordkeeping Burden	Total
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10 CFR Part 30	0.00	0.00	0.00
10 CFR Part 35	0.00	25,081.33	25,081.33
Form 313	1,286.00	0.00	1,286.00
Total:	1,286.00	25,081.33	26,367.33

ees
Total
676.50
1,229.00
-947.25
958.25

_licensees
Total
3,994.00
7,241.25
-5,522.50
5,712.75

es
Total
4,670.50
8,470.25
-6,469.75
6,671.00

Table 23: TOTAL BURDEN		
	Reporting Burden	Recordkeeping Burden
10 CFR Part 30	3.50	4,667.00
10 CFR Part 35	1,734.75	31,849.33
Form 313	-5,183.75	0.00
Total:	-3,445.50	36,516.33

FOR PROPOSED RULE		
3 rd Party Disclosure Burden	Total	Cost at \$274/hr
0.00	4,670.50	\$1,279,717
-32.50	33,551.58	\$9,193,134
0.00	-5,183.75	-\$1,420,348
-32.50	33,038.33	\$9,052,503

Table 24 – Total Annual Responses for				
	NRC Licensees			Agre
	Responses	Recordkeepers	Total	Responses
10 CFR Part 30 (OMB 3150-0017)	1	52	53	6
10 CFR Part 35 (OMB 3150-0010)	1,063	141	1,204	6,273
Form 313 (OMB 3150-0120)	541	0	541	3,184
Total:			1,798	

Table 25 – Total Respondents			
	Number of Respondents NRC	Number of Respondents Agreement States	Total
10 CFR Part 30 (OMB 3150-0017)	52	307	359
10 CFR Part 35 (OMB 3150-0010)	1,085	6,401	7,486
Form 313 (OMB 3150-0120)	1,085	6,401	7,486
Unduplicated total:			7,845

The respondents for Part 35 and Form 313 are the same licensees.

All Licensees		
Government State Licensees		TOTAL
Recordkeepers	Total	
307	313	366
824	7097	8,301
0	3184	3,725
	10,594	12,392