

SUPPORTING STATEMENT - PART A

Radiation Sources on Army Land-0702-0109

Summary of Changes from Previously Approved Collection

- New form has been added: DA Form 3337

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 completed through the DA Form 3337. 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. This is collected 100% online.

4. Non-duplication

The information obtained through this collection is unique and is not already available for use or adaptation from another cleared source.

5. Burden on Small Businesses

This information collection does not impose a significant economic impact on a substantial number of small businesses or 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

This collection of information does not require collection to be conducted in a manner inconsistent with the guidelines delineated in 5 CFR 1320.5(d)(2).

8. Consultation and Public Comments

Part A: PUBLIC NOTICE

A 60-Day Federal Register Notice (FRN) for the collection published on Monday, July 22, 2019. The 60-Day FRN citation is 84 FRN 35105.

No comments were received during the 60-Day Comment Period.

A 30-Day Federal Register Notice for the collection published on Monday, September 30, 2019. The 30-Day FRN citation is 84 FRN 51526.

Part B: CONSULTATION

No additional consultation apart from soliciting public comments through the Federal Register was conducted for this submission.

9. Gifts or Payment

No payments or gifts are being offered to respondents as an incentive to participate in the collection.

10. Confidentiality

A Privacy Act Statement is not required for this collection because we are not requesting individuals to furnish personal information for a system of records.

A System of Record Notice (SORN) is not required for this collection because records are not retrievable by PII.

A Privacy Impact Assessment (PIA) is not required for this collection because PII is not being collected electronically.

The Letters are reviewed by the Records Management Office, which noted letters should be retained in accordance with Military Department Record Management instructions.

11. Sensitive Questions

No questions considered sensitive are being asked in this collection.

12. Respondent Burden and its Labor Costs

Part A: ESTIMATION OF RESPONDENT BURDEN

- 1) Collection Instrument(s)
DA Form 3337
 - a) Number of Respondents: 235
 - b) Number of Responses Per Respondent: 1
 - c) Number of Total Annual Responses: 235
 - d) Response Time: 2 hours
 - e) Respondent Burden Hours: 470 hours

- 2) Total Submission Burden (Summation or average based on collection)
 - a) Total Number of Respondents: 235
 - b) Total Number of Annual Responses: 235
 - c) Total Respondent Burden Hours: 470 hours

Part B: LABOR COST OF RESPONDENT BURDEN

- 1) Collection Instrument(s)
DA Form 3337
 - a) Number of Total Annual Responses: 235
 - b) Response Time: 2 Hours
 - c) Respondent Hourly Wage: \$36
 - d) Labor Burden per Response: \$72
 - e) Total Labor Burden: \$16,920

- 2) Overall Labor Burden
 - a) Total Number of Annual Responses: 233
 - b) Total Labor Burden: \$16,920

The Respondent hourly wage was determined by using the [Department of Labor Wage Website] (<http://www.dol.gov/dol/topic/wages/index.htm>)

13. Respondent Costs Other Than Burden Hour Costs

There are no annualized costs to respondents other than the labor burden costs addressed in Section 12 of this document to complete this collection.

14. Cost to the Federal Government

Part A: LABOR COST TO THE FEDERAL GOVERNMENT.

- 1) Collection Instrument(s)
DA Form 3337

- a) Number of Total Annual Responses: 235
 - b) Processing Time per Response: 2 hours
 - c) Hourly Wage of Worker(s) Processing Responses : \$36
 - d) Cost to Process Each Response: \$72
 - e) Total Cost to Process Responses: \$16,920
- 2) Overall Labor Burden to the Federal Government
- a) Total Number of Annual Responses: 235
 - b) Total Labor Burden: \$16,920

Part B: OPERATIONAL AND MAINTENANCE COSTS

- 1) Cost Categories
- a) Equipment: \$0
 - b) Printing: \$0
 - c) Postage: \$0
 - d) Software Purchases: \$0
 - e) Licensing Costs: \$0
 - f) Other: \$0
- 2) Total Operational and Maintenance Cost: \$0

Part C: TOTAL COST TO THE FEDERAL GOVERNMENT

- 1) Total Labor Cost to the Federal Government: \$16,920
- 2) Total Operational and Maintenance Costs: \$0
- 3) Total Cost to the Federal Government: \$16,920

15. Reasons for Change in Burden
There has been no change in burden since the last approval.

16. Publication of Results
The results of this information collection will not be published.

17. Non-Display of OMB Expiration Date
We are not seeking approval to omit the display of the expiration date of the OMB approval on the collection instrument.

18. Exceptions to "Certification for Paperwork Reduction Submissions"
We are not requesting any exemptions to the provisions stated in 5 CFR 1320.9.