

**SUPPORTING STATEMENT**  
**U.S. Department of Commerce**  
**National Institute of Standards (NIST)**  
**FORM NIST-366A: REQUEST FOR PERSONAL RADIATION MONITORING**  
**SERVICES**  
**OMB Control No. 0693-XXXX**

**A. JUSTIFICATION**

**1. Explain the circumstances that make the collection of information necessary.**

The National Institute of Standards and Technology (NIST) is required by 10 CFR 20.1502 and CFR 20.2106 to monitor individuals who may be exposed to ionizing radiation above specific levels. This form will be used to collect information associated with this monitoring and to determine the type of monitoring required. NIST conducts research on materials, physics, biology, chemistry and other scientific disciplines using radiation sources. Individuals may be exposed to this radiation when conducting their research or as part of support services provided at NIST.

10 CFR 20.1502 Citation:

§ 20.1502 Conditions requiring individual monitoring of external and internal occupational dose. Each licensee shall monitor exposures to radiation and radioactive material at levels sufficient to demonstrate compliance with the occupational dose limits of this part. As a minimum—

(a) Each licensee shall monitor occupational exposure to radiation from licensed and unlicensed radiation sources under the control of the licensee and shall supply and require the use of individual monitoring devices by—

(1) Adults likely to receive, in 1 year from sources external to the body, a dose in excess of 10 percent of the limits in § 20.1201(a),

(2) Minors likely to receive, in 1 year, from radiation sources external to the body, a deep dose equivalent in excess of 0.1 rem (1 mSv), a lens dose equivalent in excess of 0.15 rem (1.5 mSv), or a shallow dose equivalent to the skin or to the extremities in excess of 0.5 rem (5 mSv);

(3) Declared pregnant women likely to receive during the entire pregnancy, from radiation sources external to the body, a deep dose equivalent in excess of 0.1 rem (1 mSv);<sup>2</sup> and

(4) Individuals entering a high or very high radiation area.

(b) Each licensee shall monitor (see § 20.1204) the occupational intake of radioactive material by and assess the committed effective dose equivalent to—

(1) Adults likely to receive, in 1 year, an intake in excess of 10 percent of the applicable ALI(s)

in table 1, Columns 1 and 2, of appendix B to §§ 20.1001-20.2402;

(2) Minors likely to receive, in 1 year, a committed effective dose equivalent in excess of 0.1 rem (1 mSv); and

(3) Declared pregnant women likely to receive, during the entire pregnancy, a committed effective dose equivalent in excess of 0.1 rem (1 mSv).

[56 FR 23398, May 21, 1991, as amended at 60 FR 20185, Apr. 25, 1995; 63 FR 39482, July 23, 1998]

Citation of § 20.2106 Records of individual monitoring results:

(a) Recordkeeping requirement. Each licensee shall maintain records of doses received by all individuals for whom monitoring was required pursuant to § 20.1502, and records of doses received during planned special exposures, accidents, and emergency conditions. These records must include, when applicable—

(1) The deep-dose equivalent to the whole body, lens dose equivalent, shallow-dose equivalent to the skin, and shallow-dose equivalent to the extremities;

(2) The estimated intake of radionuclides (see § 20.1202);

(3) The committed effective dose equivalent assigned to the intake of radionuclides;

(4) The specific information used to assess the committed effective dose equivalent pursuant to § 20.1204(a) and (c), and when required by § 20.1502;

(5) The total effective dose equivalent when required by § 20.1202; and

(6) The total of the deep-dose equivalent and the committed dose to the organ receiving the highest total dose.

(b) Recordkeeping frequency. The licensee shall make entries of the records specified in paragraph (a) of this section at least annually.

(c) Recordkeeping format. The licensee shall maintain the records specified in paragraph (a) of this section on NRC Form 5, in accordance with the instructions for NRC Form 5, or in clear and legible records containing all the information required by NRC Form 5.

(d) Privacy protection. The records required under this section should be protected from public disclosure because of their personal privacy nature. These records are protected by most State

privacy laws and, when transferred to the NRC, are protected by the Privacy Act of 1974, Public Law 93-579, 5 U.S.C. 552a, and the Commission's regulations in 10 CFR part 9.

(e) The licensee shall maintain the records of dose to an embryo/fetus with the records of dose to the declared pregnant woman. The declaration of pregnancy shall also be kept on file, but may be maintained separately from the dose records.

(f) The licensee shall retain the required form or record until the Commission terminates each pertinent license requiring this record. This includes records required under the standards for protection against radiation in effect prior to January 1, 1994.

5 Assessments of dose equivalent and records made using units in effect before the licensee's adoption of this part need not be changed.

[56 FR 23404, May 21, 1991, as amended at 60 FR 20186, Apr. 25, 1995; 63 FR 39483, July 23, 1998]

**2. Explain how, by whom, how frequently, and for what purpose the information will be used. If the information collected will be disseminated to the public or used to support information that will be disseminated to the public, then explain how the collection complies with all applicable Information Quality Guidelines.**

The information will be collected when individuals begin work with radiation sources at NIST. This can include both NIST employees, guest researchers and contractors using NIST facilities. The information will be used by NIST personnel to assign the appropriate radiation dosimetry and to ensure that measured radiation dose is properly recorded. Information will be collected through an electronic fillable, fileable pdf form, or in some cases, a paper form. The NIST 366-A form is only used at NIST and must be collected by NIST as part of Nuclear Regulatory Commission (NRC) license requirements. The information collected is specific to the operations conducted at NIST.

Additionally, NIST is required by 10 CFR 20.2106 to maintain records of radiation exposure monitoring. This form will be used to ensure the exposure information collected is properly associated with the individual using unique identifiers. In addition, NIST must provide reports to the monitored individuals when requested and to the NRC annually.

**3. Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological techniques or other forms of information technology.**

The information may be collected on fillable, fileable pdf form or on a handwritten form. The information is then transcribed into a secure database.

**4. Describe efforts to identify duplication.**

This form is only used at NIST and must be collected by NIST as part of Nuclear Regulatory Commission (NRC) license requirements. The information collected is specific to the operations conducted at NIST.

**5. If the collection of information involves small businesses or other small entities, describe the methods used to minimize burden.**

This collection does not involve small businesses or other small entities.

**6. Describe the consequences to the Federal program or policy activities if the collection is not conducted or is conducted less frequently.**

In order to maintain the NIST license (Per NRC requirements), dosimetry information must be recorded. If not, individuals will not be able to work with radiation sources. Critical research could not be conducted at NIST if this information is not collected.

**7. Explain any special circumstances that require the collection to be conducted in a manner inconsistent with OMB guidelines.**

The collection will be conducted in a manner consistent with OMB guidelines.

**8. Provide information of the PRA Federal Register Notice that solicited public comments on the information collection prior to this submission. Summarize the public comments received in response to that notice and describe the actions taken by the agency in response to those comments. Describe the efforts to consult with persons outside the agency to obtain their views on the availability of data, frequency of collection, the clarity of instructions and recordkeeping, disclosure, or reporting format (if any), and on the data elements to be recorded, disclosed, or reported.**

A 60-day Federal Register Notice soliciting public comments was published on March 6, 2020 (Vol. 85, Number 45, page 13139). No comments were received.

A 30-Day Federal Register Notice soliciting public comments was published on May 27, 2020 (Vol. 85, Number 102, page 31746).

**9. Explain any decisions to provide payments or gifts to respondents, other than remuneration of contractors or grantees.**

No payments or gifts are provided to respondents.

**10. Describe any assurance of confidentiality provided to respondents and the basis for assurance in statute, regulation, or agency policy.**

The form will include the following Privacy Act Statement:

AUTHORITY: The collection of this information is authorized under 10 CFR 20.1502.

PURPOSE: The National Institute for Standards and Technology's (NIST) mission is to promote U.S. innovation and industrial competitiveness by advancing measurement science, standards, and technology in ways that enhance economic security and improve our quality of life. NIST is required by 10 CFR 20.1502 to monitor individuals who may be exposed to ionizing radiation above specific levels. This form will be used to collect information associated with this monitoring and to determine the type of monitoring required.

ROUTINE USES: NIST will use this information to conduct necessary government business for monitoring radiation exposure at NIST facilities. Disclosure of this information is permitted under the Privacy Act of 1974 (5 U.S.C. Section 522a) to be shared among NIST staff for work-related purposes. Disclosure of this information is also subject to all the published routine uses as identified in the Privacy Act System of Records Notices: NIST 5: Nuclear Reactor Operator Licensees File; NIST 1: NIST Associates (this has a special section for Facility User Records for NCNR).

DISCLOSURE: Furnishing this information is voluntary, however this information is required in order to obtain authorization to work with or around radiation sources at NIST. The failure to provide accurate information may delay or prevent you from receiving this access. Submitting voluntary information constitutes your consent to the use of the information for the stated purpose. When you submit the form, you are indicating your voluntary consent for NIST to use of the information you submit for the purpose stated. This information may also be retained indefinitely as deemed necessary for the purpose of distributing updates and information. For additional information, see the NIST Privacy Statement/Security Notice.

The information will stored in accordance with NIST privacy act policies and procedures.

**11. Provide additional justification for any questions of a sensitive nature, such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private.**

The form does not include any such information.

**12. Provide an estimate in hours of the burden of the collection of information.**

It is estimated that the total burden for collection of the information is 150 hours per year. The form takes approximately 15 minutes to complete and is completed approximately 600 times per year. These estimates are based off of response times for typical dosimetry reading.

**13. Provide an estimate of the total annual cost burden to the respondents or record-keepers resulting from the collection (excluding the value of the burden hours in Question 12 above).**

There is no cost to the respondent.

**14. Provide estimates of annualized cost to the Federal government.**

The annualized cost to the federal government to collect the information is approximately \$500 per year. A technician takes approximately 10 minutes to process each form and processes approximately 600 forms per year. Technician times is estimated to cost \$50 per hour.

**15. Explain the reasons for any program changes or adjustments.**

This is a new information collection.

**16. For collections whose results will be published, outline the plans for tabulation and publication.**

The results will not be published

**17. If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons why display would be inappropriate.**

NIST will display the OMB control number and expiration date on the form.

**18. Explain each exception to the certification statement.**

There are no exceptions to this information collection.

