

ANNUAL REPORTING BURDEN OF 10 CFR PART 34 FOR NRC LICENSEES

| Section | Description | Number of Respondents | Responses Per Respondent | Total Responses/yr | Burden Hrs/response | Total Burden hr/yr | Cost at \$278/hr |
|-----------------------------|---|-----------------------|--------------------------|--------------------|---------------------|--------------------|------------------|
| 34.13(b)-(k) | An application for a specific license for the use of licensed material in industrial radiography will be approved if the applicant meets the specified requirements | 8 | 1 | 8 | 40 | 320 | \$88,960 |
| 34.27(d) | Report within 5 days results of leak testing which indicates that a source is leaking | 0 | 1 | 0 | 4 | 0 | \$0 |
| 34.41(c) | A licensee may conduct lay-barge, offshore platform, or underwater radiography only if procedures have been approved by the Commission or by an Agreement State. | 13 | 1 | 13 | 20 | 260 | \$72,280 |
| 34.101(a)&(b) | Report within 30 days of the occurrence of failures related to the source assembly and any component critical to safe operation to properly perform its intended function | 5 | 1 | 5 | 10 | 50 | \$13,900 |
| 34.101(c) | Requires notification prior to conducting radiographic operations or storing radioactive material in excess of 180 days at any location not listed on the license | 5 | 1 | 5 | 0.5 | 2.5 | \$695 |
| Appendix A, Part I, Item 12 | Requires independent certifying organizations and/or Agreement States to exchange information about certified individuals with the Commission and the Agreement States | 1 | 6 | 6 | 0.5 | 3 | \$834 |
| TOTAL | | 32 | | 37 | | 635.50 | \$176,669 |

ANNUAL REPORTING BURDEN OF 10 CFR PART 34 FOR AGREEMENT STATE LICENSEES

| Section | Description | Number of Respondents* | Responses Per Respondent | Total Responses/yr | Burden Hrs/response | Total Burden hr/yr | Cost at \$278/hr |
|---------------|---|------------------------|--------------------------|--------------------|---------------------|--------------------|--------------------|
| 34.13(b)-(k) | An application for a specific license for the use of licensed material in industrial radiography will be approved if the applicant meets the specified requirements | 58 | 1 | 58 | 40 | 2,320.00 | \$644,960 |
| 34.27(d) | Report within 5 days results of leak testing which indicates that a source is leaking | 0 | 1 | 0 | 4 | 0 | \$0 |
| 34.41(c) | A licensee may conduct lay-barge, offshore platform, or underwater radiography only if procedures have been approved by the Commission or by an Agreement State. | 94 | 1 | 94 | 20 | 1,880.00 | \$522,640 |
| 34.101(a)&(b) | Report within 30 days of the occurrence of failures related to the source assembly and any component critical to safe operation to properly perform its intended function | 36 | 1 | 36 | 10 | 360 | \$100,080 |
| 34.101(c) | Requires notification prior to conducting radiographic operations or storing radioactive material in excess of 180 days at any location not listed on the license | 36 | 1 | 36 | 0.5 | 18 | \$504 |
| TOTAL | | 224 | | 224 | | 4,578.00 | \$1,268,184 |

ANNUAL RECORDKEEPING REQUIREMENTS OF 10 CFR PART 34 FOR NRC LICENSEES

| Section | Description | Number of Record-keepers | Burden Hrs Per Recordkeeper | Total Hr/Yr | Record Retention Period |
|-------------------------|--|--------------------------|-----------------------------|-------------|-------------------------|
| 34.25(b)&(c) | Radiation survey instrument calibration & records thereof | | Included in 34.65 | | |
| 34.27(c)(1)&(2) | Sealed source leak testing & records thereof | | Included in 34.67 | | |
| 34.27(e) | "S" tube leak testing & records thereof | | Included in 34.67 | | |
| 34.29(a)&(b) | Sealed source inventories & records thereof | | Included in 34.69 | | |
| 34.31(a)&(b)(1)&(2)&(c) | Licensee's program for inspection and maintenance of § 34.43(a) | | Included in 34.73 | | |
| 34.42(a) | Completion of the training and testing requirements of § 34.43(a) | 74 | 4 | 296 | license termination |
| 34.42(c)(1) | RSO establishes, oversees, and regularly reviews all operating, emergency, and ALARA procedures as required | 74 | 8 | 592 | license termination |
| 34.42(c)(2) | RSO oversees and approves all phases of the training program for radiographic personnel | 74 | 16 | 1184 | license termination |
| 34.42(c)(3) | RSO ensures that required radiation surveys and leak tests are performed and documented in accordance with the | 74 | 8 | 592 | license termination |
| 34.42(c)(4) | RSO ensures that personnel monitoring devices are calibrated and used properly, that records are kept of the monitoring results, and that timely notifications are made as required by § 20.2203 of this chapter | 74 | 16 | 1184 | license termination |
| 34.42(c)(5) | RSO ensures that operations are conducted safely and assumes control for instituting corrective actions | 74 | 8 | 592 | license termination |
| 34.33(b) | Tests of controls and alarms at permanent radiographic installations and records thereof | | Included in 34.75 | | |
| 34.43(f) | Records of training, examinations, refresher safety training, and semiannual inspections of job performance | | Included in 34.79 | | |
| 34.45(a)&(b) | Program for routine operations and emergencies for employees to follow in performing safety functions & copies of procedures | | Included in 34.81 | | |
| 34.47(b) | Read and record exposure on direct reading dosimeters; maintain records | | Included in 34.83(a) | | |
| 34.47(c) | Periodic check of pocket dosimeters or electronic dosimeters for correct response to radiation; maintain records | | Included in 34.83(a) | | |
| 34.47(d) | Determination of exposure if an individual's pocket dosimeter goes off-scale | | Included in 34.83(d) | | |
| 34.47(e) | Requirements if a personnel dosimeter is lost or damaged | | Included in 34.83(d) | | |
| 34.47(f) | Requirement to maintain reports received from personnel dosimeter processors | | Included in 34.83(c) | | |
| 34.47(g)(4) | Calibrate alarm ratemeters; maintain records | | Included in 34.83(b) | | |
| 34.49(c)&(d) | Surveys of radiographic exposure device & records thereof | | Included in 34.85 | | |
| 34.61 | Licensee to have a copy of the license, license conditions, documents incorporated by reference, and all amendments | 74 | 0.16 | 11.84 | license termination |
| 34.63 | Maintain records showing receipts and transfers of sealed sources and devices using DU shielding | 74 | 1.6 | 118.4 | 3 Years |

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|--|--|----|-------|-------|---------------------|
| 34.65 | Maintain records of calibrations of radiation survey instruments | 74 | 1.6 | 118.4 | 3 Years |
| 34.67 | Maintain records of leak test results | 74 | 1.2 | 88.8 | 3 Years |
| 34.69(a)&(b) | Maintain records of quarterly inventories of sealed sources and devices containing DU shielding & include specific information concerning such inventories | 74 | 2 | 148 | 3 Years |
| 34.71(a)&(b) | Maintain utilization logs for each sealed radioactive source & records thereof | 74 | 36 | 2664 | 3 Years |
| 34.73(a)&(b) | Maintain records of equipment problems and maintenance | 74 | 27 | 1998 | 3 Years |
| 34.75 | Maintain records of alarm system and entrance control device tests at permanent radiographic installations | 12 | 48.2 | 578.4 | 3 Years |
| 34.79(a)&(b) | Maintain records of training of radiographers and radiographers' assistants in accordance with § 34.43(f) | 74 | 5 | 370 | 3 Years |
| 34.81 | Retain records of current operating and emergency procedures specified in § 34.45 | 74 | 0.08 | 5.92 | license termination |
| 34.83(a) | Maintain exposure records for direct reading dosimeters | 74 | 122.5 | 9065 | 3 Years |
| 34.83(b) | Maintain records for alarm rate meter calibrations | 74 | 2.5 | 185 | 3 Years |
| 34.83(c)&(d) | Maintain records for reports from personnel dosimeter processor & for estimates of exposures resulting from off- scale or lost or damaged dosimeters | 74 | 3 | 222 | 3 Years |
| 34.85 | Maintain record of last survey of each radiographic exposure device on each day used prior to placing device in storage | 74 | 120 | 8880 | 3 Years |
| 34.87 | Maintain each record in a legible form | 74 | 0 | 0 | life of program |
| 34.89(a)&(b) | Maintain copies of records sufficient to demonstrate compliance at field stations and temporary job sites | 74 | 5 | 370 | license termination |
| Note: 34.87 requires the licensee to maintain all records in a legible form (including electronic storage media). This requirement does not impose additional burden beyond the burden included in other recordkeeping requirements. | | | | | |
| Appendix A, Part I, item 6 | ICO written by laws and policies | 1 | 10 | 10 | life of program |
| Appendix A, Part I, item 9 | ICO written procedures describing its certification program | 1 | 70 | 70 | life of program |
| Appendix A, Part I, item 10 | ICO procedures to ensure due process with respect to administration of certification program | 1 | 10 | 10 | life of program |
| Appendix A, Part I, item 11 | ICO procedures for proctoring examinations | 1 | 10 | 10 | life of program |
| Appendix A, Part I, item 13 | ICO description of procedures for choosing examination sites and for providing an appropriate examination environment | 1 | 10 | 10 | life of program |
| Appendix A, Part II, item 2 | CP required to provide documentation demonstrating that radiography applicants have received training and are capable of independently working as a radiographer | 1 | 38 | 38 | life of program |
| Appendix A, Part II, item 3 | CP includes procedures to ensure that all examination questions are protected from disclosure | 1 | 10 | 10 | life of program |
| Appendix A, Part II, item 4 | CP includes procedures for denying an application, revoking, suspending, and reinstating a certificate | 1 | 10 | 10 | life of program |
| Appendix A, Part II, item 6 | CP includes procedures for renewing certifications; renewals without examination require evidence of recent full-time employment and annual refresher training | 1 | 10 | 10 | life of program |

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|------------------------------|---|-----------|-----|------------------|-----------------|
| Appendix A, Part II, item 7 | CP provides timely response to inquiries from members of the public about an individual's certification status | 1 | 50 | 50 | life of program |
| Appendix A, Part III, item 3 | Written examinations have test items drawn from a question bank containing psychometrically valid questions based on the material in § 34.43(g) | 1 | 120 | 120 | life of program |
| TOTAL | | 74 | | 29,611.76 | |

ANNUAL RECORDKEEPING BURDEN OF 10 CFR PART 34 FOR AGREEMENT STATE LICENSEES

| Section | Description | Number of Recordkeepers | Burden Hrs Per Recordkeeper | Total Hr/Yr | Record Retention Period |
|-------------------------|--|-------------------------|-----------------------------|-------------|-------------------------|
| 34.25(b)&(c) | Radiation survey instrument calibration & records thereof | | Included in 34.65 | | |
| 34.27(c)(1)&(2) | Sealed source leak testing & records thereof | | Included in 34.67 | | |
| 34.27(e) | "S" tube leak testing & records thereof | | Included in 34.67 | | |
| 34.29(a)&(b) | Sealed source inventories & records thereof | | Included in 34.69 | | |
| 34.31(a)&(b)(1)&(2)&(c) | Licensee's program for inspection and maintenance Tests of controls and alarms at permanent radiographic installations and records thereof | | Included in 34.73 | | |
| 34.33(b) | Completion of the training and testing requirements of § 34.43(a) | | Included in 34.75 | | |
| 34.42(a) | RSO establishes, oversees, and regularly reviews all operating, emergency, and ALARA procedures as required by 10 CFR part 20 of this chapter | 533 | 4 | 2132 | license termination |
| 34.42(c)(1) | RSO oversees and approves all phases of the training program for radiographic personnel | 533 | 8 | 4264 | license termination |
| 34.42(c)(2) | RSO ensures that required radiation surveys and leak tests are performed and documented in accordance with | 533 | 16 | 8528 | license termination |
| 34.42(c)(3) | RSO ensures that personnel monitoring devices are calibrated and used properly, that records are kept of the monitoring results, and that timely notifications are made as required by § 20.2203 of this chapter | 533 | 8 | 4264 | license termination |
| 34.42(c)(4) | RSO ensures that operations are conducted safely and assumes control for instituting corrective actions | 533 | 16 | 8528 | license termination |
| 34.42(c)(5) | Records of training, examinations, refresher safety training, and semiannual inspections of job performance | 533 | 8 | 4264 | license termination |
| 34.43(f) | | | Included in 34.79 | | |
| 34.45(a)&(b) | Program for routine operations and emergencies for employees to follow in performing safety functions & copies of | | Included in 34.81 | | |
| 34.47(b) | Read and record exposure on direct reading dosimeters; maintain records | | Included in 34.83(a) | | |
| 34.47(c) | Periodic check of pocket dosimeters or electronic dosimeters for correct response to radiation; maintain records | | Included in 34.83(a) | | |
| 34.47(d) | Determination of exposure if an individual's pocket dosimeter goes off-scale | | Included in 34.83(d) | | |

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|-----------------------------|--|----------------------|-------|---------|---------------------|--|
| 34.47(e) | Requirements if a personnel dosimeter is lost or damaged | Included in 34.83(d) | | | | |
| 34.47(f) | Requirement to maintain reports received from personnel dosimeter processors | Included in 34.83(c) | | | | |
| 34.47(g)(4) | Calibrate alarm ratemeters; maintain records | Included in 34.83(b) | | | | |
| 34.49(c)&(d) | Surveys of radiographic exposure device & records thereof | Included in 34.85 | | | | |
| 34.61 | Licensee to have a copy of the license, license conditions, documents incorporated by reference, and all amendments | 533 | 0.16 | 85.28 | license termination | |
| 34.63 | Maintain records showing receipts and transfers of sealed sources and devices using DU shielding | 533 | 1.6 | 852.8 | 3 Years | |
| 34.65 | Maintain records of calibrations of radiation survey instruments | 533 | 1.6 | 852.8 | 3 Years | |
| 34.67 | Maintain records of quarterly inventories of sealed sources and devices containing DU shielding & include specific | 533 | 1.2 | 639.6 | 3 Years | |
| 34.69(a)&(b) | Maintain utilization logs for each sealed radioactive source | 533 | 2 | 1066 | 3 Years | |
| 34.71(a)&(b) | Maintain records of equipment problems and maintenance | 533 | 36 | 19188 | 3 Years | |
| 34.73(a)&(b) | Maintain records of alarm system and entrance control device tests at permanent radiographic installations | 533 | 27 | 14391 | 3 Years | |
| 34.75 | Maintain records of training of radiographers and radiographers' assistants in accordance with § 34.43(f) | 86 | 48.2 | 4164.5 | 3 Years | |
| 34.79(a)&(b) | Retain records of current operating and emergency procedures specified in § 34.45 | 533 | 5 | 2665 | 3 Years | |
| 34.81 | Maintain exposure records for direct reading dosimeters | 533 | 0.08 | 42.64 | license termination | |
| 34.83(a) | Maintain records for alarm ratemeter calibrations | 533 | 122.5 | 65292.5 | 3 Years | |
| 34.83(b) | Maintain records for reports from personnel dosimeter processor & for estimates of exposures resulting from off- | 533 | 2.5 | 1332.5 | 3 Years | |
| 34.83(c)&(d) | Maintain record of last survey of each radiographic exposure device on each day used prior to placing device | 533 | 3.2 | 1705.6 | 3 Years | |
| 34.85 | Maintain each record in a legible form | 533 | 120 | 63960 | 3 Years | |
| 34.87 | Maintain copies of records sufficient to demonstrate compliance at field stations and temporary job sites | 533 | 0 | 0 | life of program | |
| 34.89(a)&(b) | CP required to provide documentation demonstrating that radiography applicants have received training and are capable of independently working as a radiographer | 533 | 5.4 | 2878 | license termination | |
| Appendix A, Part II, item 2 | CP includes procedures to ensure that all examination questions are protected from disclosure | 9 | 14 | 126 | life of program | |
| Appendix A, Part II, item 3 | CP includes procedures for denying an application, revoking, suspending, and reinstating a certificate | 9 | 10 | 90 | life of program | |
| Appendix A, Part II, item 4 | CP includes procedures for renewing certifications; renewals without examination require evidence of recent full-time employment and annual refresher training | 9 | 10 | 90 | life of program | |

Note: 34.87 requires the licensee to maintain all records in a legible form (including electronic storage media). This requirement does not impose additional burden beyond the burden included in other recordkeeping requirements.

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|------------------------------|---|------------|-----|------------------|-----------------|
| Appendix A, Part II, item 7 | CP provides timely response to inquiries from members of the public about an individual's certification status | 9 | 25 | 225 | life of program |
| Appendix A, Part III, item 3 | Written examinations have test items drawn from a question bank containing psychometrically valid questions based on the material in § 34.43(g) | 1 | 120 | 120 | life of program |
| TOTAL | | 533 | | 211837.22 | |

ANNUAL THIRD PARTY DISCLOSURE REQUIREMENTS OF 10 CFR PART 34 FOR NRC LICENSEES

| Section | Description | Number of Respondents | Responses Per Respondent | Total Responses/yr | Burden Hrs/response | Total Burden hr/yr | Cost at \$278/hr |
|--------------------|---|-----------------------|--------------------------|--------------------|---------------------|--------------------|------------------|
| 34.20(b)(1) | Labels on radiographic exposure devices | 74 | 1 | 74 | 0.4 | 29.6 | \$8,229 |
| 34.35(a) | Requires durable, legible, and clearly visible label on source changer or container that indicates whom to notify | 74 | 1 | 74 | 0.8 | 59.2 | \$16,458 |
| 34.35(b) | Requires appropriate packaging, labeling, and shipping papers for transport of licensed material | 74 | 1 | 74 | 36 | 2,664.00 | \$740,592 |
| 34.43(b)(1)&(c)(1) | Requires the licensee to provide radiographers and assistants with copies of pertinent sections of NRC and DOT regulations, the NRC license, and operating and emergency procedures | 74 | 1 | 74 | 2.5 | 185 | \$51,430 |
| TOTAL | | 74 | | 296 | | 2,937.80 | \$816,708 |

ANNUAL THIRD PARTY DISCLOSURE BURDEN OF 10 CFR PART 34 FOR AGREEMENT STATE LICENSEES

| Section | Description | Number of Respondents | Responses Per Respondent | Total Responses/yr | Burden Hrs/response | Total Burden hr/yr | Cost at \$278/hr |
|--------------------|--|-----------------------|--------------------------|--------------------|---------------------|--------------------|--------------------|
| 34.20(b)(1) | Labels on radiographic exposure devices | 533 | 1 | 533 | 0.4 | 213.2 | \$59,270 |
| 34.35(a) | Requires durable, legible, and clearly visible label on source changer or container that | 533 | 1 | 533 | 0.8 | 426.4 | \$118,539 |
| 34.35(b) | Requires appropriate packaging, labeling, and shipping papers for transport of licensed | 533 | 1 | 533 | 36 | 19,188.00 | \$5,334,264 |
| 34.43(b)(1)&(c)(1) | Requires the licensee to provide radiographers and assistants with copies of pertinent sections of NRC and DOT | 533 | 1 | 533 | 2.5 | 1,332.50 | \$370,435 |
| TOTAL | | 533 | | 2,132.00 | | 21,160.10 | \$5,882,508 |

TOTAL BURDEN FOR 10 CFR 34

| | NRC Licensees | Agreement State Licensees | TOTAL | Cost @\$278/hr |
|------------------------|----------------------|----------------------------------|-------------------|------------------------|
| Reporting | 635.50 | 4,578.00 | 5,213.50 | \$1,449,353.00 |
| Recordkeeping | 29,611.76 | 211,837.22 | 241,448.98 | \$67,122,816.44 |
| Third-Party Disclosure | 2,937.80 | 21,160.10 | 24,097.90 | \$6,699,216.20 |
| TOTAL | 33,185.06 | 237,575.32 | 270,760.38 | \$75,271,385.64 |