# Supporting Statement for Chronic Beryllium Disease Prevention Program (64 FR 68854)

## **Part A: Justification**

## OMB No. 1910-5112

#### **Collection Instruments**

DOE F 440.1 - Signed Consent Forms for Medical Exams Annual Revision to CBDPP Plans Worker Notification of Monitoring Results Maintain Beryllium Registry Annual Recordkeeping Annual Performance Feedback

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### Introduction

Provide a brief introduction of the Information Collection Request. Include the purpose of this collection, note the publication of the 60-Day Federal Register Notice, and provide the list of forms within this collection.

This supporting statement provides information regarding the Department of Energy (DOE) paperwork reduction act submission request pertaining to the Chronic Beryllium Disease Prevention Program (CBDPP).

The Department published a 60-day Federal Register Notice and Request for Comments concerning this collection in the Federal Register on January 4, 2021, volume 86, number 1, page 78. The notice described the collection and invited interested parties to submit comments or recommendations regarding the collection. No comments were received.

Information in the collection is collected through a series of methods (listed below):

Signed Consent Forms for Medical Exams (DOE F 440.1) Annual Revision to CBDPP Plans Worker Notification of Monitoring Results Maintain Beryllium Registry Annual Recordkeeping Annual Performance Feedback

### A.1. Legal Justification

Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection. Attach a copy of the appropriate section of each statute and regulation mandating or authorizing the information collection.

The Department of Energy (DOE) issued 10 CFR Part 850, Chronic Beryllium Disease Prevention Program, which included provisions that impose collections of information (64 FR 68854). This information collection request (ICR) is a renewal, requesting approval of an existing ICR. The information continues to be necessary to provide DOE with the information needed to reduce the number of workers currently exposed to beryllium in the course of their work at sites managed by DOE or its contractors; minimize the levels of and potential for exposure to beryllium; and provide medical surveillance to ensure early detection of chronic beryllium disease.

#### A.2. Needs and Uses of Data

Indicate how, by whom, and for what purpose the information is to be used. Except for a new collection, indicate the actual use the agency has made of the information received from the current collection.

DOE and DOE contractors continue to use this information to manage their chronic beryllium disease prevention programs, provide information to employees, and permit oversight of the programs by its management. The 10 CFR Part 850 requires collections in the following areas:

*Chronic Beryllium Disease Prevention Program Plan* (§ 850.10) - Requires employers to prepare and submit an initial CBDPP Plan to DOE for approval, and to submit updates of the CBDPP Plan periodically to DOE for approval. Under the current ICR, only paperwork burdens for revising the annual plans will be incurred, since no new plans are expected to be submitted.

*Baseline Inventory* (§ 850.20) - This ICR does not include paperwork burdens for this requirement since these inventories have been completed, and no new inventories are expected.

*Exposure Monitoring/Worker Notification* (§ 850.24) - Requires employers to notify workers of the results of exposure monitoring. This ICR includes paperwork burdens for providing written notification to workers of the results of their exposure monitoring results.

Signed Consent Forms (§ 850.36) - Requires employers to obtain the signed consent form from workers prior to medical evaluations. This ICR includes paperwork burdens for obtaining a signed consent form (DOE F 440.1) from workers who voluntarily participate in the medical surveillance program prior to a medical evaluation.

*Registry of Beryllium-Associated Workers* (§ 850.39) - Requires employers to establish and maintain a registry of beryllium-associated workers. This ICR includes paperwork burdens for maintaining the registry since these registries have been established by currently affected reporting organizations and no new registries are expected under the rule.

*Recordkeeping* (§ 850.39) - Requires employers to establish and maintain records related to the beryllium inventory and hazard assessment, exposure monitoring, workplace controls and medical surveillance. This ICR only includes paperwork burdens for maintaining the records of these recordkeeping systems since they have been established by the affected reporting organizations and no new systems are expected under the rule.

*Performance Feedback* (§ 850.40) - DOE reporting organizations continue to incur paperwork burdens in performing the performance feedback for continuous improvements to the program.

This ICR submission is a renewal, requesting approval of an existing ICR. Only recurring requirements will impose burden on the respondents since no new requirements have been added.

## A.3. Use of Technology

Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques or other forms of information technology, e.g., permitting electronic submission of responses.

Within existing budget and resource constraints, Department program managers and contractors continually work to apply the latest appropriate-level information collection burden and improve the timeliness and usefulness of the information being collected.

The 10 CFR Part 850 requires that the "Registry" of beryllium associated workers, inventory of beryllium locations and operations, hazard assessments, exposure measurements, exposure controls, and medical surveillance records are maintained electronically. Accurate records are essential for effectively implementing the CBDPP, assessing the plan's adequacy, and studying the relationship between workplace conditions and chronic beryllium disease. DOE further expects that both updating CBDPP plans and notifying workers of exposure monitoring results are being handled electronically through the Department's secure e-mail system. Roughly 65% of the information is collected electronically.

## A.4. Efforts to Identify Duplication

#### Describe efforts to identify duplication.

DOE is a self-regulating agency, therefore, its contractors are not under the Occupational Safety and Health Administration's (OSHA's) jurisdiction and must comply with DOE regulations. However, DOE adopted OSHA's permissible exposure limit for beryllium. DOE periodically contacts OSHA regarding their beryllium rule and is not aware of any beryllium reporting requirements required by OSHA or the CDC of its employees or contractors.

This information collection applies to the management of a program required by DOE, therefore, meaningful duplication in other agencies are unlikely.

## A.5. Provisions for Reducing Burden on Small Businesses

If the collection of information impacts small businesses or other small entities, describe any methods used to minimize burden.

All respondents under this collection are the DOE contractors that operate the DOE sites with workers potentially exposed to beryllium. The impact of collecting this information from small business was considered in the development of the contract requirements, and documents

were minimized to the extent permitted by applicable statutory requirements and other legal and management constraints.

Many of the respondents are large universities or large companies with revenue and employment figures orders of magnitude above the Small Business Administration's (SBA) small business definitions for the relevant NAICS code. (Many of the DOE contract annual funding levels are themselves above the SBA definition, even excluding the companies' other revenue streams.)

Of the reporting organizations covered under this collection, only one appears to have any potential of being small by SBA definitions.<sup>1</sup> Because this company is performing the work covered by this collection under contract to DOE, the burden and cost of performing the recordkeeping would have been taken into account during the contract bidding process.

The prime contractors responding to this information collection<sup>2</sup> may subcontract with small businesses. However, the prime contractor is responsible for most elements of the information collection, such as preparing and submitting the CBDPP plan and reporting registry data. To the extent that any small subcontractor is performing work that would require beryllium-related reporting, their subcontract would include funding to cover the associated burden and cost.

## A.6. Consequences of Less-Frequent Reporting

Describe the consequence to Federal program or policy activities if the collection is not conducted or is conducted less frequently, as well as any technical or legal obstacles to reducing burden.

This collection is required by 10 CFR 850, which requires DOE sites to inventory and assess beryllium exposure hazards and transmit all records generated as required by this rule to DOE. Changes to the reporting requirements would require a rulemaking process that modified these requirements.

The frequency of collection is dictated by sound health, safety, and management practice. When any of these conditions change to permit a reduction of the frequency of information collections, a reduction is encouraged.

If the collection were not conducted or was conducted less frequently, workers workers exposed to beryllium dust could develop beryllium sensitization or chronic beryllium disease, a

<sup>&</sup>lt;sup>1</sup> The average annual award value of Swift & Staley Inc, DOE's infrastructure contract at the Paducah Site, appears to be approximately \$41.9 million per year (\$240,807,817.39 divided by the 2,098 days in the 10/02/2015 to 06/30/2021 period of performance divided by 365 days per year yields an average of \$41,894,592 per year). \$41.9 million would be just above the \$41.5 million SBA definition for NAICS 561210 (Facilities Support Services). Swift & Staley does not appear to have any other active federal contracts, and no other information about their revenue could be located.

<sup>&</sup>lt;sup>2</sup> Most respondents are prime contractors. Y-12 Navarro Research and Engineering (Y-12 NRE) and Y-12 Atkins Nuclear Secured (Y-12 ANS) are subcontractors on the Consolidated Nuclear Y-12 National Security Complex (Y-12) operation contract that report separately to the registry. Neither Navarro Research and Engineering nor Atkins Nuclear Secured are small by SBA's definitions.

chronic lung disease, without the early detection that can help prevent the associated illness and death.

## A.7. Compliance with 5 CFR 1320.5

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

(a) requiring respondents to report information to the agency more often than quarterly;

(b) requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;

(c) requiring respondents to submit more than an original and two copies of any document;

(d) requiring respondents to retain records, other than health, medical government contract, grant-in-aid, or tax records, for more than three years;

(e) in connection with a statistical survey, that is not designed to product valid and reliable results that can be generalized to the universe of study;

(f) requiring the use of statistical data classification that has not been reviewed and approved by OMB;

(g) that includes a pledge of confidentially that is not supported by authority established in stature of regulation, that is not supported by disclosure and data security policies that are consistent with the pledge, or which unnecessarily impedes sharing of data with other agencies for compatible confidential use; or

(h) requiring respondents to submit proprietary trade secrets, or other confidential information unless the agency can demonstrate that it has instituted procedures to protect the information's confidentiality to the extent permitted by law.

Departmental orders and other internal DOE requirements are collected in a manner consistent with 5 CFR 1320 guidelines.

### A.8. Summary of Consultations Outside of the Agency

If applicable, provide a copy and identify the date and page number of publication in the Federal Register of the agency's notice, required by 5CFR 320.8(d), soliciting comments on the information collection prior to submission to OMB. Summarize public comments received in response to that notice and describe actions taken in response to the comments. Specifically address comments received on cost and hour burden. Describe efforts to consult with persons outside DOE 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 report.

The Department published a 60-day Federal Register Notice and Request for Comments concerning this collection in the Federal Register on January 4, 2021, volume 86, number 1, page 78. The notice described the collection and invited interested parties to submit comments or recommendations regarding the collection. No comments were received.

The Department subsequently published a 30-day Federal Register Notice and Request for Comments concerning this collection in the Federal Register on April 7, 2021, volume 86, number 65, page 18046. Comments for this notice are due May 7, 2021.

Beyond the publication of the Federal Register notices, DOE did not consult with persons outside of DOE.

### A.9. Payments or Gifts to Respondents

Explain any decision to provide any payment or gift to respondents, other than remuneration of contractors or grantees.

There was no remuneration given for submission of any of the information other than the fact that the expense of responding was treated as an allowable cost.

### A.10. Provisions for Protection of Information

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

Where confidential information was involved in the information collection the provisions for dealing with this confidential information were set forth in the contract documents, and the related Departmental regulations were normal to the handling of management and program information by the Department.

### A.11. Justification for Sensitive Questions

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. This justification should include the reasons why DOE considers the questions necessary, the specific uses to be made of the information, the explanation to be given to persons from whom the information is requested, and any steps to be taken to obtain their consent.

Per departmental regulations, any request for information on an individual's exposure to radiation is handled in accordance with the Privacy Act (5 U.S.C.552a). Other than data on individual exposures, there continues to be no information collected that is of a sensitive or personal nature.

## A.12A. Estimate of Respondent Burden Hours

Provide estimates of the hour burden of the collection of information. The statement should indicate the number of respondents, frequency of response, annual hour burden, and <u>an</u> <u>explanation of how the burden was estimated</u>. Unless directed to do so, DOE should not conduct special surveys to obtain information on which to base hour burden estimates. Consultation with a sample fewer than 10 potential respondents is desirable.

#### Respondents

DOE estimates that the total annual number of respondents is 6,650. This includes the 26 DOE reporting organizations affected<sup>3</sup>, and 6,624 workers also affected. All the reporting organizations are responsible for four of the requirements (see Table A1) and 24 of the reporting organizations are responsible for another requirement (see Table A1)<sup>4</sup>. The 6,624 workers responsible for signing the consent forms are thus also counted as respondents.

#### Responses

Table A1 details the number of responses per respondent and the total annual responses for each Information Collection. Three of the Information Collections under this ICR requires only one response per site: annual revision to CBDPP plans, recordkeeping, and performance feedback. The other three Information Collections (worker notification, signed consent forms, and maintaining the beryllium registry) requires more than one response per respondent. Details of these multiple responses per respondent are provided in the notes to Table A1.

There are three requirements for which each of the 26 reporting organizations submits one response per organization. These are revising CBDPP plans, annual recordkeeping, and annual performance feedback (see the "All" row for these requirements in the "Annual Number of Responses" column of Table A1). Multiplying the 26 reporting organizations by the three requirements results in 78 responses annually (26 responses for each requirement × 3 requirements).

<sup>&</sup>lt;sup>3</sup> DOE reporting to the Beryllium Registry is considered on a "reporting organization" basis, which may include either a DOE site as a whole or the individual contractors at a single DOE site (depending on how they prefer to report to DOE). DOE reporting organizations by this information collection are the 26 reporting organizations reporting BeLPT data to the 2017 Beryllium-Associated Worker Registry: Ames Laboratory (AMES), Argonne National Laboratory (ANL), Brookhaven National Laboratory (BNL), DOE Oak Ridge Office (DOE-ORO), East Tennessee Technology Park (ETTP), Fermi National Accelerator Laboratory (Fermi), Hanford Site (HAN), Idaho National Laboratory (INL), Knolls Atomic Power Laboratory (KAPL), Lawrence Berkeley National Laboratory (LBNL), Lawrence Livermore National Laboratory (LLNL), LLNL Clean Harbors Environmental Services (LLNL CHES), Los Alamos National Laboratory (LANL), National Security Campus (NSC), National Strategic Protective Services, LLC for ETTP and ORNL (NSPS), Nevada National Security Site (NNSS), Oak Ridge National Laboratory (ORNL), Pacific Northwest National Laboratory (PNNL), Paducah Site (PADUCAH), Pantex Plant (PTX), Sandia National Laboratories (SNL), Savannah River Site (SRS), Stanford Linear Accelerator Center (SLAC), Y-12 Atkins Nuclear Secured (Y-12 ANS), Y-12 National Security Complex (Y-12), and Y-12 Navarro Research and Engineering (Y-12 NRE).

<sup>&</sup>lt;sup>4</sup> Twenty-four reporting organizations reported exposure monitoring results to the Beryllium registry (DOE, 2017).

For notifying employees of exposure monitoring results, DOE assumes that each monitoring occasion (*i.e.*, each time a sample is taken) will constitute a response. Based on information in the Beryllium registry, 3,271 new (incremental) samples were collected in 2017. Thus, notifying workers will involve close to 3,271 annual responses.

Consent forms are signed for each medical exam. As estimated above, DOE expects there to be 5,982 exams annually, therefore 6,632 annual responses are obtained from signed consent forms (*i.e.*, equal to the number of exams for affected workers). Note that eight workers had follow-up medical exams so were required to sign the consent form a second time resulting in eight more responses than respondents.

For maintaining the beryllium registry, DOE noted that only 24 reporting organizations currently report monitoring and medical examination results to the registry. DOE has assumed that each time the registry is updated constitutes a response. The registry would be updated for each medical exam. The registry reported 6,624 employees' medical screening results for 2017.<sup>5</sup> Of these employees, eight (0.12 percent) had at least two medical exams, as they were diagnosed as "sensitized" the first time (in 2017). No employees were diagnosed with CBD the first time. Thus, close to 6,632 exams will occur annually (6,624 + 8), and thus, 6,632 updates to beryllium registries will occur.

The total number of annual responses is estimated to be 16,613 (26 + 3,271 + 6,632 + 6,632 + 26 + 26).

#### **Electronic Responses**

As noted in question 3, both the beryllium registry and recordkeeping to be accomplished through electronic means. DOE further expects that both submitting CBDPP plans and notifying workers of exposure monitoring results are handled electronically. This encompasses 9,955 annual responses (26 each for revising the CBDPP plans annually and recordkeeping; 6,632 for maintaining the beryllium registry, and 3,271 for notifying workers; see the previous section for details on these estimates), or ~60 percent of the total number of responses.

#### **Burden Hours**

Table A1 below summarizes the estimates of the annual burden hours for each of the requirements. The notes to Table A1 provide details of the estimates for each of the requirements. Where appropriate, DOE refers to the Economic Analysis for 10 CFR 850.

As noted above, this ICR submission is a renewal, requesting approval of an existing ICR. Thus, only annual recurring costs have been included in these estimates. DOE estimates that the

<sup>&</sup>lt;sup>5</sup> See the table entitled "Year of First Positive or Abnormal BeLPT Result for Employees that Are Sensitized or CBD" on page 17 in the 2017 Summary of The Beryllium-Associated Worker Registry.

CBDPP rule imposes 29,290 annual recurring hours (combined professional, worker, and clerical).

Form Number/Title (and/or other Collection Instrument name)	Type of Respondents	Number of Respondents	Annual Number of Responses	Burden Hours Per Response	Annual Burden Hours	Annual Reporting Frequency
Annual Revision to CBDPP Plans	All	26	26		3,194	
	Professional	26	26	96.8 [f]	2,517	1
	Clerical	26	26	26.05 [f]	677	
Worker	All	24[c]	3,271 [e]		654	
Notification of	Professional	24[c]	3,271 [e]	0	0	136 [I]
Monitoring Results	Clerical	24[c]	3,271 [e]	0.2 [g]	654	100 [1]
Signed Consent Forms for Medical Exams	All	6,624	6,632		1,658	
	Worker	6,624	6,632	0.25 [h]	1,658	1 or 2 [m]
	Clerical	6,624	6,632	0	0	
Maintain Beryllium Registry	All	26	6,632		1,658	
	Professional	26	6,632	0	0	255.076 [n]
	Clerical	26	6,632	0.25 [i]	1,658	
Annual Recordkeeping [a]	All	26	26		17,810	
	Professional	26	26	0	0	1
	Clerical	26	26	685 [j]	17,810	
Annual Performance Feedback [b]	All	26	26		4,316	
	Professional	26	26	166 [k]	4,316	1
	Clerical	26	26	0	0	
TOTAL	All	6,650 [d]	16,613		29,290	
	Professional	6,650 [d]	16,613		6,833	
	Worker	6,650 [d]	16,613		1,658	
	Clerical	6,650 [d]	16,613		20,799	

Recordkeeping can encompass a varied set of related and similar activities that can be reporting [a] organization-specific. DOE has combined these varied activities into one general activity of recordkeeping

- and estimated total burden hours for each reporting organization to perform all these activities. The Economic Analysis for the final rule (Chapter 3, Section 3.2.17.2) provides details on these estimates.
- [b] Each reporting organization is required to perform an assessment of the CBDPP program annually.
- [c] Only 24 of the affected reporting organizations currently report exposure monitoring results to the Beryllium registry.
- [d] This is not the sum of the column but reflects the number of unique respondents counted in the column. As stated above, each of the 26 reporting organizations counts as a single respondent as do the 6,624 workers.
- [e] The Beryllium registry reports 3,271, exposure monitoring results in 2017.
- [f] The unit burden estimates vary by reporting organization and was calculated separately for each reporting organization from data made available during the rulemaking. The 2009 ICR estimated that 19 affected

reporting organizations incurred total burden hours of 1,839 professional hours and 495 clerical hours annually to revise the CBDPP plans, or an average of 96.8 professional hours and 26.05 clerical hours per reporting organization. These estimates have been retained and applied to the update number of affected DOE reporting organizations.

- [g] Economic Analysis, Chapter 3, Section 3.2.4.4.
- [h] The Economic Analysis (Chapter 3, Section 3.2.14.6) assumes 0.25 hours per consent form for workers to
- review and sign the form.
- [i] Economic Analysis, Chapter 3, Section 3.2.14.2.
- [J] This number represents the average burden from the Economic Analysis for the final rule calculated as the total number of burden hours divided by the number of respondents (reporting organizations).
- [k] This number represents the average burden calculated as the number of burden hours divided by the number of respondents (reporting organizations). See Economic Analysis, Chapter 3, Section 3.2.18.
- [1] Calculated as the total number of annual responses (3,271) divided by the number of respondents (24), rounded to the nearest whole integer [3,271/24 = 136].
  - Each affected worker is required to sign a consent form each time a medical examination is performed. The Beryllium registry reported the 6,624 employee medical screening results and noted that 8 workers were
- [m] diagnosed as "sensitized" in 2017. DOE assumed that these 8 workers had a referral medical exam and signed an additional medical consent form. Therefore, DOE estimates that 6,632 (6,624 + 8) medical consent forms will be signed annually.
- [n] The Beryllium registry must be updated once for each medical examination, which is the same as note [m] above.

#### A.12B. Estimate of Annual Cost to Respondent for Burden Hours

Provide estimates of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories. The cost of contracting out or paying outside parties for information collection activities should not be included here. Instead, this cost should be included under 'Annual Cost to Federal Government'.

Table A2 summarizes the estimated annual recurring costs for this ICR. The notes to Table A2 provide details on the how these costs were derived, including the estimated hourly labor costs. As noted above, all initial requirements have been completed and thus only annual recurring costs are incurred under this ICR. DOE estimates that the CBDPP will impose \$1.87 million in annual recurring paperwork burden costs.

Form Number/Title (and/or other Collection Instrument name)	Type of Respondents	Total Annual Burden Hours [a]	Hourly Wage Rate	Total Respondent Costs
Annual Revision to CBDPP Plans	All	3,194		\$325,190.89
	Professional [b]	2,517	\$118.17	\$297,433.89
	Clerical [c]	677	\$41.00	\$27,757.00
Worker Notification of Monitoring Results	All	654		\$26,814.00
	Professional [b]	0	\$118.17	\$0.00
	Clerical [c]	654	\$41.00	\$26,814.00
Signed Consent Forms for Medical Exams	All	1,658		\$207,250.00
	Worker [d]	1,658	\$125.00	\$207,250.00
	Clerical [c]	0	\$41.00	\$0.00
Maintain Beryllium Registry	All	1,658		\$67,978.00
	Professional [b]	0	\$118.17	\$0.00
	Clerical [c]	1,658	\$41.00	\$67,978.00
Annual Recordkeeping [a]	All	17,810		\$730,210.00
	Professional [b]	0	\$118.17	\$0.00
	Clerical [c]	17,810	\$41.00	\$730,210.00
Annual Performance Feedback [b]	All	4,316		\$510,021.72
	Professional [b]	4,316	\$118.17	\$510,021.72
	Clerical [c]	0	\$41.00	\$0.00
TOTAL	All	29,290		\$1,867,464.61
	Professional [b]	6,833		\$807,455.61
	Worker [d]	1,658		\$207,250.00
	Clerical [c]	20,799		\$852,759.00

#### Table A2. Estimated Respondent Cost Burden

[a] Burden hours taken from Table A1.

DOE has assumed that industrial hygienists would perform these tasks. The labor hour cost for industrial hygienists' hours was derived from information provided by the reporting organizations in the final

[b] rulemaking. The average cost per reporting organization from the Economic Analysis was updated to current (2020) dollars using the Employment Cost Index from BLS. The hourly labor cost used here was \$118.17 per hour.

The hourly wage of clerical time was taken from BLS's Occupational Employment Statistics data for Office and Administrative Support Occupations (SOC 43-0000) in 2019 and equals \$18.07. The hourly wage was

[c] marked up by a factor of 2.25 (see Economic Analysis, Chapter 3, Section 3.1.3) to reflect benefits and overhead. The resulting loaded hourly wage is \$41.00 per hour.

The labor hour cost for worker hours was derived from information provided by the reporting organizations in the final rulemaking. The average cost per reporting organization from the Economic Analysis was

updated to current (2020) dollars using BLS' Employment Cost Index. The hourly labor cost used here was \$125.00 per hour.

## A.13. Other Estimated Annual Cost to Respondents

Provide an estimate for the total annual cost burden to respondents or recordkeepers resulting from the collection of information.

There are no costs to respondents or recordkeepers other than those given in Section A12B.

#### A.14. Annual Cost to the Federal Government

Provide estimates of annualized cost to the Federal government.

The Department is not involved in the collection or maintenance of this data, therefore no cost is reported. The collection or maintenance of data at DOE reporting organizations is performed under contracts with DOE or the prime contractor at the site. DOE contractors are reimbursed through their contracts for the costs of complying with requirements in 10 CFR 850 which is represented in the total annual cost burden for respondents.

### A.15. Reasons for Changes in Burden

Explain the reasons for any program changes or adjustments reported in Items 13 (or 14) of OMB Form 83-I.

The change in the number of responses and respondents under this ICR (a total of 29,290 burden hours for 16,613 responses annually for 26 reporting organizations, as noted in Item 12) are due to an adjustment in agency estimates. Namely, DOE has updated the number of respondents and respondents using data from the 2017 Beryllium-Associated Worker Registry, and updated wages to 2019.

There are no changes in the ICR due to due to agency discretion since no new requirements have been added.

	Requested	Program Change Due to Agency Discretion	Change Due to Adjustment in Agency Estimate	Previously Approved
Total Number of Responses	16,613	0	-285	16,898
Total Time Burden (Hr)	29,290	0	-969	30,259
Total Cost Burden	\$1,867,465	\$0	\$36,294	\$1,831,171

### Table A3. ICR Summary of Burden

#### A.16. Collection, Tabulation, and Publication Plans

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

This information collection will not be published for statistical use. This ICR submission is a renewal, requesting approval of an existing ICR.

### A.17. OMB Number and Expiration Date

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

The Department is not seeking approval to not display the expiration date for OMB approval of this information collection. This ICR submission is a renewal, requesting approval of an existing ICR.

#### A.18. Certification Statement

#### Explain each exception to the certification statement identified in Item 19 of OMB Form 83-I.

The Department is not requesting any exceptions to the certification statement provided in Item 19 of OMB Form 83-I. This ICR submission is a renewal, requesting approval of an existing ICR.

#### Sources

Bureau of Labor Statistics. 2020a. Employment Cost Index (Series ID CIS201000000000). Available at <u>https://data.bls.gov/timeseries/CIS2010000000000</u>

Bureau of Labor Statistics. 2020b. Occupational Employment Statistics (OES) - May 2019 - National. Available at <a href="https://www.bls.gov/oes/tables.htm">https://www.bls.gov/oes/tables.htm</a>

Department of Energy (DOE). 1999. Chronic Beryllium Disease Prevention Program Final Rule: Economic Analysis.

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