

SUPPORTING STATEMENT - PART A

Radiation Exposure Data Collection
OMB Control Number 0702-XXXX

1. Need for the Information Collection

The Director of the Army Staff (DASAF), Office of the Chief of Staff, Army is required to provide oversight of the Army Radiation Safety Program. This includes developing, managing and promulgating Federal and Department of the Army radiation safety policy, guidance, and personnel exposure standards.

The information collection requirement is to document and record an individual's external and internal short and long-term exposure to radioactive materials and radiation. The information collection is also utilized to monitor, evaluate and control the risks and associated health hazards, conduct investigations, management studies and training to ensure individual qualifications and education in handling radioactive materials are maintained in compliance with the Nuclear Regulatory Commission (NRC) 10 CFR 20, Army NRC license conditions, and Occupational Safety and Health Administration (OSHA) 29 CFR 1926.53.

The collection is also authorized by:

10 Code of Federal Regulations Part 20: Standards for Protection Against Radiation. Provides the requirements for oversight of NRC licensed radioactive material. 10 CFR 20.2107 provides guidance on records of dose to individual members of the public. The annual reporting requirement is 10 CFR 20.1501(c).

29 CFR 1910.1096: Occupational Health and Safety Administration, Ionizing Radiation: Covers guidance, oversight, and exposure limits for radiation generating equipment, specifically 29 CFR 1910.1096(b)(2)(iii) and (n)(1) requires exposures to be properly documented and saved. 29 CFR 1910.1096(i)(2) and (o) states the records of exposure should be made available upon request by the individual.

AR 385-10: The Army Safety and Occupational Health Program is the overarching guidance on the Army's safety and occupational health programs which includes the Army radiation safety program. The AR 385-10 covers the occupational ionizing radiation program requirements to include dosimetry covered in the DoD Instruction (DoDI) 6055.08 Occupational Ionizing Radiation Protection Program in Enclosure 2 Sections 2 and 5c. Army radioactive materials CONUS are covered under NRC licenses. Army Radiation Authorizations provides oversight of radioactive materials not covered under NRC requirements and OCONUS locations using radioactive materials or radiation generating equipment outside of NRC jurisdiction.

DA PAM 385-24: Army Radiation Safety Program: Establishes Army Radiation Safety Procedures. Guidance on the Army dosimetry program is provided in conjunction with DA Pam 385-25.

DA PAM 385-25: This pamphlet provides occupational dosimetry guidance and dose recording procedures for exposure to ionizing radiation.

2. Use of the Information

The information collected is used to monitor, evaluate, and control the risks of individual exposure to ionizing radiation from radioactive materials or radiation generating devices at an Army facility for occupational workers, active duty military, government civilian's, family members/dependents, retirees, contractors and visitors. The respondents who potentially may be exposed (unless it is a medical procedure) to a high level of ionizing radiation or radioactive materials while working at or visiting an Army facility may require dosimetry or bioassay sampling. The facility Radiation Safety Officer (RSO) who oversees the program will make a determination to collect the radiation information on either the DoD Form 1952, Dosimetry Application and Record of Previous Exposure or the DA Form 7689, Bioassay Information sheet.

External exposure:

The DD Form 1952 provides the Army Dosimetry Center (ADC) information on the person receiving dosimetry, training on the potential radiation exposure, and the proper wearing of the dosimetry. The information collected includes the respondent's full name, date of birth, social security number, duty phone, email address, mailing address and the level of radiation exposure information. The data collected on the DD Form 1952 will be completed and submitted electronically or completed manually then scanned and emailed to the ADC. Once the wearing period of the dosimeter is complete the dosimeter and data is sent to the ADC on the dosimeter issue listing along with the original DD1952. The automated dosimetry report is provided back to the RSO who issued the dosimeter and oversees the dosimetry program. Typical levels are at or near background radiation levels. No report is required back to the individual unless they request the report or if the level of exposure is 10% of the limit. The general limit for the public is 100 milli Roentgen Equivalent Man (mrem) which is the Nuclear Regulatory Commission (NRC) standard per 10 CFR 20. Reporting would be at 10 mrem.

Internal Exposure:

The DA Form 7689 Bioassay Information Summary Sheet is used if there is a potential for an internal uptake of radioactive materials. The information collected from the respondents includes the respondent's full name, date of birth, social security number, duty phone, email address, mailing address and the level of radiation exposure information. The data collected on the DA Form 7689 will be completed and submitted electronically or completed manually then scanned and emailed to the ADC. The RSO will determine if the potential existed and in consultation with the NRC license RSO will make the determination

if a bioassay sample is needed. Samples are sent to an Army laboratory to be analyzed. The DA Form 7689 provides the type of bioassay testing to perform and the laboratory results. The bioassay results are sent to the ADC to be included in the sampled person's annual dosimetry report and in the annual exposure report sent to the NRC.

3. Use of Information Technology

Information technology is utilized to the maximum extent possible to collect data on both the DD Form 1952 and DA 7689. 80% of the data is collected and submitted electronically and in absence of an electronic platform/medium 20% of the data is collected manually, scanned, and then emailed to the ADC.

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 is required each time the general public visits an Army location that uses radioactive materials and the RSO determines the need for dosimetry or a bioassay sampling. This is a very infrequent occurrence, but must be in accordance with the Nuclear Regulatory Commission (NRC) regulations in 10 CFR 20, DoD policy DoDI 6055.08, and Army Policy AR 385-10 The Army Safety Program. Failure to comply could result in a reportable exposure to the NRC or OSHA.

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 Wednesday, February 5, 2020. The 60-Day FRN citation is 85 FRN 6533-6534.

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

A 30-Day Federal Register Notice for the collection published on Monday, June 14, 2021. The 30-Day FRN citation is 86 FR 31485.

Part B: CONSULTATION

Significant input and information was received through consultations with the U.S. Army Primary Standards Laboratory, of the U.S. Army Test Diagnostic Equipment Activity, U.S. Army Aviation Missile Command of the Army Material Command at Redstone Arsenal, Alabama.

9. Gifts or Payment

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

10. Confidentiality

Information collected is protected under the Privacy Act of 1974 as amended. Respondents are assured confidentiality with a Privacy Act Statement printed visibly on both the DD Form 1952 and DA Form 7689.

The current published SORN A0040-11 DASG is being modified to reflect SORN DASG A0385-10. A draft copy of SORN A0385-10 has been provided with this package for OMB review.

A draft copy of the PIA, Central Dosimetry Radiation Repository, has been provided with this package for OMB's review.

Professional consultant control files destroy 1 year after termination. Clinical and pathological lab reports destroy when no longer needed for conducting business. Personnel dosimetry files destroy after 75 years. Personnel bioassays maintained by safety officers destroy after individual leaves the organizations or is no longer occupationally exposed; all other personnel bioassays are destroyed after 75 years. Ionizing radiation authorized personnel user listings destroy 5 years after transfer or separation of individual. Radiation incident cases are destroyed after 75 years.

11. Sensitive Questions

Collection of the social security number is required for tracking in the ADC Central Dosimetry Records Repository (CDRR) and in responding back to the Nuclear Regulatory Commission to meet the requirements in 10 CFR 20.1501(c).

The Social Security Number Justification Memorandums for both the DD 1952 and DA Form 7689 are provided in this package to grant authority for the SSN Collection.

12. Respondent Burden and its Labor Costs

Part A: ESTIMATION OF RESPONDENT BURDEN

1) Collection Instrument(s)

Radiation Exposure Data Collection; DD Form 1952 (Dosimetry Application and Record of Previous Radiation Exposure);

- a) Number of Respondents: 25
- b) Number of Responses Per Respondent: 1
- c) Number of Total Annual Responses: 25
- d) Response Time: 15 minutes (0.25 hours)
- e) Respondent Burden Hours: 6.25 hours

Radiation Exposure Data Collection; DA Form 7689 (Bioassay Information Summary Sheet);

- a) Number of Respondents: 25
- b) Number of Responses Per Respondent: 1
- c) Number of Total Annual Responses: 25
- d) Response Time: 15 minutes (0.25 hours)
- e) Respondent Burden Hours: 6.25 hours

2) Total Submission Burden

- a) Total Number of Respondents: 50
- b) Total Number of Annual Responses: 50
- c) Total Respondent Burden Hours: 12.5 hours

Part B: LABOR COST OF RESPONDENT BURDEN

1) Collection Instrument(s)

Radiation Exposure Data Collection; DD Form 1952 (Dosimetry Application and Record of Previous Radiation Exposure),

- a) Number of Total Annual Responses: 25
- b) Response Time: 15 minutes (0.25 hour)
- c) Respondent Hourly Wage: \$29.96 per hour
- d) Labor Burden per Response: \$7.49
- e) Total Labor Burden: \$187.25

DA Form 7689(Bioassay Information Summary Sheet);

- a) Number of Total Annual Responses: 25
- b) Response Time: 15 minutes (0.25 hour)
- c) Respondent Hourly Wage: \$29.96 per hour
- d) Labor Burden per Response: \$7.49
- e) Total Labor Burden: \$187.25

2) Overall Labor Burden

- a) Total Number of Annual Responses: 50

b) Total Labor Burden: \$375

The Respondent hourly wage was determined by using the Department of Labor Wage Website. We utilized industry total private January 2021 hourly rate of \$29.96 <https://www.bls.gov/news.release/empsit.t19.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)

Radiation Exposure Data Collection; DD Form 1952 (Dosimetry Application and Record of Previous Radiation Exposure),

- a) Number of Total Annual Responses: 25
- b) Processing Time per Response: 0.5 hours (30 minutes)
- c) Hourly Wage of Worker(s) Processing Responses: \$36.29
- d) Cost to Process Each Response: \$18.15
- e) Total Cost to Process Responses: \$453.75

Radiation Exposure Data Collection; DA Form 7689(Bioassay Information Summary Sheet);

- a) Number of Total Annual Responses: 25
- b) Processing Time per Response: 0.5 hours (30 minutes)
- c) Hourly Wage of Worker(s) Processing Responses: \$36.29
- d) Cost to Process Each Response: \$18.15
- Total Cost to Process Responses: \$453.75

2) Overall Labor Burden to the Federal Government

- a) Total Number of Annual Responses: 50
- b) Total Labor Burden: \$908

The hourly wage for a GS-12 Step 5 base rate of a Federal government employee was \$36.29 and determined by using the 2021 GS table from the Office of Personnel Management Website https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2021/GS_h.pdf.

Part B: OPERATIONAL AND MAINTENANCE COSTS –There are no additional operational or maintenance costs to the Federal Government.

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: \$908
- 2) Total Operational and Maintenance Costs: \$0
- 3) Total Cost to the Federal Government: \$908

15. Reasons for Change in Burden

This is an existing collection currently in use without an OMB Control Number.

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.