TABLE 1

ANNUAL REPORTING BURDEN OF 10 CFR PART 34

**NRC LICENSEES**

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| **Section** | **Description** | **Number of Respondents** | **Responses per Respondent** | **Total Responses/year** | **Burden hours/response** | **Total Burden hour/year** | **Cost at $290/hour** |
| 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 | 0 | 1 | 0 | 40 | 0 | $0 |
| 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. | 0 | 1 | 0 | 20 | 0 | $0 |
| 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 | 24 | 1 | 24 | 10 | 240 | $69,600 |
| 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 | 0 | 1 | 0 | 0.5 | 0.0 | $0 |
| 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 | 0 | 6 | 0 | 0.5 | 0 | $0 |
| **TOTAL** |  | **24** |  | **24** |  | **240** | **$69,600** |

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| **AGREEMENT STATE LICENSEES** | | | | | | | |
| **Section** | **Description** | **Number of Respondents\*** | **Responses per Respondent** | **Total Responses/year** | **Burden hours/response** | **Total Burden hour/year** | **Cost at $290/hour** |
| 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 | 45 | 1 | 45 | 40 | 1,800 | $522,000 |
| 34.27(d) | Report within 5 days results of leak testing which indicates that a source is leaking | 0 | 1 | 0 | 4 | 0.00 | $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 | 74 | 1 | 74 | 20 | 1,480 | $429,200 |
| 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 | 28 | 1 | 28 | 10 | 280 | $81,200 |
| 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 | 28 | 1 | 28 | 0.5 | 14 | $4,060 |
| **TOTAL** |  | **175** |  | **175** |  | **3,574** | **$1,036,460** |

TABLE 2

ANNUAL RECORDKEEPING REQUIREMENTS OF 10 CFR PART 34

NRC LICENSEES

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| **Section** | **Description** | **Number of Recordkeepers** | **Burden  hours/ Recordkeeper** | **Total  hour/year** | **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 | Included in 34.73 | | | |
| 34.42(a) | Completion of the training and testing requirements of § 34.43(a) | 66 | 4 | 264 | license termination |
| 34.42(c)(1) | RSO establishes, oversees, and regularly reviews all operating, emergency, and ALARA procedures as required | 66 | 8 | 528 | license termination |
| 34.42(c)(2) | RSO oversees and approves all phases of the training program for radiographic personnel | 66 | 16 | 1,056 | license termination |
| 34.42(c)(3) | RSO ensures that required radiation surveys and leak tests are performed and documented in accordance with the regulations, including any corrective measures when levels of radiation exceed established limits | 66 | 8 | 528 | 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 | 66 | 16 | 1,056 | license termination |
| 34.42(c)(5) | RSO ensures that operations are conducted safely and assumes control for instituting corrective actions | 66 | 8 | 528 | 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 | 66 | 0.16 | 10.56 | license termination |
| 34.63 | Maintain records showing receipts and transfers of sealed sources and devices using DU shielding | 66 | 1.6 | 105.60 | 3 Years |
| 34.65 | Maintain records of calibrations of radiation survey instruments | 66 | 1.6 | 105.60 | 3 Years |
| 34.67 | Maintain records of leak test results | 66 | 1.2 | 79.20 | 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 | 66 | 2 | 132 | 3 Years |
| 34.71(a)&(b) | Maintain utilization logs for each sealed radioactive source & records thereof | 66 | 36 | 2,376 | 3 Years |
| 34.73(a)&(b) | Maintain records of equipment problems and maintenance | 66 | 27 | 1,782 | 3 Years |
| 34.75 | Maintain records of alarm system and entrance control device tests at permanent radiographic installations | 11 | 48.2 | 530.20 | 3 Years |
| 34.79(a)&(b) | Maintain records of training of radiographers and radiographers' assistants in accordance with §34.43(f) | 66 | 5 | 330 | 3 Years |
| 34.81 | Retain records of current operating and emergency procedures specified in § 34.45 | 66 | 0.08 | 5.28 | license termination |
| 34.83(a) | Maintain exposure records for direct reading dosimeters | 66 | 122.5 | 8,085 | 3 Years |
| 34.83(b) | Maintain records for alarm ratemeter calibrations | 66 | 2.5 | 165 | 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 | 66 | 3 | 198 | 3 Years |
| 34.85 | Maintain record of last survey of each radiographic exposure device on each day used prior to placing device in storage | 66 | 120 | 7,920 | 3 Years |
| 34.87 | Maintain each record in a legible form | 66 | 0 | 0 | life of program |
| 34.89(a)&(b) | Maintain copies of records sufficient to demonstrate compliance at field stations and temporary job sites | 66 | 5 | 330 | license termination |
| Note: Section 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 |
| 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** |  | **66** |  | **26,462.44** |  |

AGREEMENT STATE LICENSEES

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| **Section** | **Description** | **Number of Recordkeepers** | **Burden  hours/ Recordkeeper** | **Total  hour/year** | **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 | Included in 34.73 | | | |
| 34.33(b) | Tests of controls and alarms at permanent radiographic installations and records thereof | Included in 34.75 | | | |
| 34.42(a) | Completion of the training and testing requirements of  § 34.43(a) | 482 | 4 | 1,928 | license termination |
| 34.42(c)(1) | RSO establishes, oversees, and regularly reviews all operating, emergency, and ALARA procedures as required by 10 CFR part 20 of this chapter | 482 | 8 | 3,856 | license termination |
| 34.42(c)(2) | RSO oversees and approves all phases of the training program for radiographic personnel | 482 | 16 | 7,712 | license termination |
| 34.42(c)(3) | RSO ensures that required radiation surveys and leak tests are performed and documented in accordance with the regulations, including any corrective measures when levels of radiation exceed established limits. | 482 | 8 | 3,856 | 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. | 482 | 16 | ,7712 | license termination |
| 34.42(c)(5) | RSO ensures that operations are conducted safely and assumes control for instituting corrective actions | 482 | 8 | 3,856 | license termination |
| 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 | 482 | 0.16 | 77.12 | license termination |
| 34.63 | Maintain records showing receipts and transfers of sealed sources and devices using DU shielding | 482 | 1.6 | 771.20 | 3 Years |
| 34.65 | Maintain records of calibrations of radiation survey instruments | 482 | 1.6 | 771.20 | 3 Years |
| 34.67 | Maintain records of leak test results | 482 | 1.2 | 578.40 | 3 Years |
| 34.69(a)&(b) | Maintain records of quarterly inventories of sealed sources and devices containing DU shielding & include specific | 482 | 2 | 964.00 | 3 Years |
| 34.71(a)&(b) | Maintain utilization logs for each sealed radioactive source | 482 | 36 | 17,352 | 3 Years |
| 34.73(a)&(b) | Maintain records of equipment problems and maintenance | 482 | 27 | 13,014 | 3 Years |
| 34.75 | Maintain records of alarm system and entrance control device tests at permanent radiographic installations | 77 | 48.2 | 3,711.40 | 3 Years |
| 34.79(a)&(b) | Maintain records of training of radiographers and radiographers' assistants in accordance with § 34.43(f) | 482 | 5 | 2,410 | 3 Years |
| 34.81 | Retain records of current operating and emergency procedures specified in § 34.45 | 482 | 0.08 | 38.56 | license termination |
| 34.83(a) | Maintain exposure records for direct reading dosimeters | 482 | 122.5 | 59,045 | 3 Years |
| 34.83(b) | Maintain records for alarm ratemeter calibrations | 482 | 2.5 | 1,205 | 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 | 482 | 3.2 | 1,542.40 | 3 Years |
| 34.85 | Maintain record of last survey of each radiographic exposure device on each day used prior to placing device | 482 | 120 | 57,840 | 3 Years |
| 34.87 | Maintain each record in a legible form | 482 | 0 | 0 | life of program |
| 34.89(a)&(b) | Maintain copies of records sufficient to demonstrate compliance at field stations and temporary job sites | 482 | 5.4 | 2,602.80 | license termination |
| Note: Section 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 II, item 2 | CP required to provide documentation demonstrating that radiography applicants have received training and are capable of independently working as a radiographer | 8 | 14 | 112 | life of program |
| Appendix A, Part II, item 3 | CP includes procedures to ensure that all examination questions are protected from disclosure | 8 | 10 | 80 | life of program |
| Appendix A, Part II, item 4 | CP includes procedures for denying an application, revoking, suspending, and reinstating a certificate | 8 | 10 | 80 | 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 | 8 | 10 | 80 | life of program |
| Appendix A, Part II, item 7 | CP provides timely response to inquiries from members of the public about an individual's certification status | 8 | 25 | 200 | 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** |  | **482** |  | **191,515.08** |  |

TABLE 3

ANNUAL THIRD-PARTY DISCLOSURE REQUIREMENTS OF 10 CFR PART 34

NRC LICENSEES

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| **Section** | **Description** | **Number of Respondents** | **Responses per Respondent** | **Total Responses/year** | **Burden hours/response** | **Total Burden  hour/year** | **Cost at $290/hour** |
| 34.20(b)(1) | Labels on radiographic exposure devices | 66 | 1 | 66 | 0.4 | 26.4 | $7,656 |
| 34.35(a) | Requires durable, legible, and clearly visible label on source changer or container that indicates whom to notify | 66 | 1 | 66 | 0.8 | 52.80 | $15,312 |
| 34.35(b) | Requires appropriate packaging, labeling, and shipping papers for transport of licensed material | 66 | 1 | 66 | 36 | 2,376 | $689,040 |
| 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 | 66 | 1 | 66 | 2.5 | 165 | $47,850 |
| **TOTAL** |  | 66 |  | 264 |  | **2,620.20** | **$759,858** |

AGREEMENT STATE LICENSEES

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| **Section** | **Description** | **Number of Respondents** | **Responses per Respondent** | **Total Responses/year** | **Burden hours/response** | **Total Burden hour/year** | **Cost at $290/hour** |
| 34.20(b)(1) | Labels on radiographic exposure devices | 482 | 1 | 482 | 0.4 | 192.80 | $55,912 |
| 34.35(a) | Requires durable, legible, and clearly visible label on source changer or the storage container that is securely attached | 482 | 1 | 482 | 0.8 | 385.60 | $111,824 |
| 34.35(b) | Requires appropriate packaging, labeling, and shipping papers for transport of licensed material | 482 | 1 | 482 | 36 | 17,3524 | $5,032,080 |
| 34.43(b)(1)&(c)(1) | Requires the licensee to provide radiographers and assistants with copies of pertinent sections of NRC and DOT | 482 | 1 | 482 | 2.5 | 1,2054 | $349,450 |
| **TOTAL** |  | 482 |  | **1,928.00** |  | **19,135.40** | **$5,549,266** |