

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
<b>TOTAL</b>		<b>24</b>		<b>24</b>		<b>240</b>	<b>\$69,600</b>

**AGREEMENT STATE LICENSEES**

<b>Section</b>	<b>Description</b>	<b>Number of Respondents*</b>	<b>Responses per Respondent</b>	<b>Total Responses/ year</b>	<b>Burden hours/response</b>	<b>Total Burden hour/year</b>	<b>Cost at \$290/hour</b>
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
<b>TOTAL</b>		<b>175</b>		<b>175</b>		<b>3,574</b>	<b>\$1,036,460</b>

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,	66	16	1,056	license termination

	and that timely notifications are made as required by § 20.2203 of this chapter				
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	1	10	10	life of program

	certificate				
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
<b>TOTAL</b>		<b>66</b>		<b>26,462.44</b>	

#### 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,	CP includes procedures for	8	10	80	life of

Part II, item 4	denying an application, revoking, suspending, and reinstating a certificate				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
<b>TOTAL</b>		<b>482</b>		<b>191,515.08</b>	

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
<b>TOTAL</b>		66		264		<b>2,620.20</b>	<b>\$759,858</b>

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
<b>TOTAL</b>		482		<b>1,928.00</b>		<b>19,135.40</b>	<b>\$5,549,266</b>