

FINAL SUPPORTING STATEMENT FOR  
NRC FORM 7, "APPLICATION FOR NRC EXPORT/IMPORT LICENSE, AMENDMENT,  
RENEWAL OR CONSENT REQUEST(S)"

(3150-0027)

EXTENSION

Description of the Information Collection

The United States (U.S.) Nuclear Regulatory Commission (NRC), under the Atomic Energy Act of 1954, as amended, (AEA) and Title II of the Energy Reorganization Act of 1974, as amended, has authority for exercising export and import controls over nuclear equipment and material. All persons who wish to export or import nuclear equipment and material as specified in Title 10 Code of Federal Regulations (10 CFR) Part 110, sections 110.8, 110.9, and 110.9a must provide certain information to enable the NRC and the Executive Branch to make required export and import licensing determinations to ensure compliance with NRC regulations and to satisfy statutory requirements of the AEA.

NRC Form 7, "Application for NRC Export/Import License, Amendment, Renewal, Or Consent Request(s)," is used to collect the information needed for compliance with the requirements in the AEA.

A. JUSTIFICATION

1. Need for and Practical Utility of the Collection of Information

Pursuant to the AEA, the NRC uses NRC Form 7 as a multipurpose license application form designed to allow persons to provide the minimum amount of information necessary for NRC to fulfill the statutory and regulatory requirements governing exports and imports of nuclear material and equipment under the NRC's authority. The form is clear, concise, easy to understand, and simple to prepare.

Completion of the NRC Form 7 is required to obtain an authorization to export or import certain nuclear equipment and material under NRC jurisdiction. The form supports an agency reporting requirement from the public to provide information to the NRC for its review and consideration in granting authorization to export or import nuclear equipment and material.

2. Agency Use and Practical Utility of Information

Data collected on the NRC Form 7 provides the agency with the information needed to describe the materials proposed for export or import, identifies the countries receiving the materials, names any other parties to the transaction, and provides multiple means to contact the applicant if the NRC staff has additional questions. With this information, the NRC can review the license application and make the required licensing determinations to ensure compliance with regulations. If all the applicable statutory, regulatory, and policy considerations are satisfied, the NRC will issue a license.

3. Reduction of Burden Through Information Technology

There are no legal obstacles to reducing the burden associated with this information collection. The NRC encourages respondents to use information technology when it would be beneficial to them. The NRC has issued *Guidance for Electronic Submissions to the NRC*<sup>1</sup> which provides direction for the electronic transmission and submittal of documents to the NRC. NRC Form 7 has electronic signature capability and licensees can submit by email. The NRC staff estimates the 99 percent of submissions are submitted electronically. Some licensees (approximately 1 percent) choose to submit a paper copy rather than an electronic submission.

4. Effort to Identify Duplication and Use Similar Information

No sources of similar information are available. There is no duplication of requirements.

5. Effort to Reduce Small Business Burden

The requirements specified in 10 CFR sections 110.20–110.27, 110.31, and 110.32 are the same for large and small businesses, because the nuclear proliferation, security and policy concerns are the same; therefore, all businesses must provide the same data. The NRC also allows businesses to apply for broad, long-term licenses to export materials which are particularly beneficial to small businesses in reducing burdens associated with paperwork expenses and uncertainties in delivery. It is estimated the 1 percent of respondents completing the NRC Form 7 are small businesses.

6. Consequences to Federal Program or Policy Activities if the Collection is Not Conducted or is Conducted Less Frequently

If an export or import is not authorized by one of the general licenses in 10 CFR sections 110.20–110.27, a specific license is required, which requires completion and submittal of the NRC Form 7 license application. The information requested to complete the Form 7 in 10 CFR sections 110.31–32 is submitted only when deemed necessary by respondents and is keyed to the decision criteria that guides the NRC in approving or denying applications for the different types of equipment or materials that must be licensed. It specifically incorporates the requirements of the AEA. Therefore, if the collection is not conducted or is conducted on a less frequent basis, a person who wishes to export under NRC's export authority would be unable to do so because the NRC could not make the necessary determination on whether a license should be issued.

The information cannot be collected on a less frequent basis because it would delay or prevent exports or imports from being approved by the NRC.

7. Circumstances which Justify Variation from OMB Guidelines

None.

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<sup>1</sup> [Reference Materials For Electronic Submissions | NRC.gov](#)

8. Consultations Outside the Nuclear Regulatory Commission

Opportunity for public comment on the information collection requirements for this clearance package was published in the *Federal Register*. In addition, the NRC staff contacted the following potential respondents by email to provide them with an opportunity to comment: Southwest Research Institute, ORANO, ThermoFisher, J.L. Shepherd, Nordion, Energy Solutions, and Technetics. Two responses were received as a result of these solicitations:

- J.L. Shepherd and Associates commented that the proposed collection of information for the NRC form 7 is necessary for compliance with the International Atomic Energy Agency's (IAEA) Code of Conduct, is easily understood and prepared. The burden estimate is reasonable and accurate, and there is no way to enhance the information collected on the Form 7. The instructions are clear, easy to fill out, and the electronic submission is efficient, and J.L. Shepherd has not found a source like the form 7.
- International Isotopes Inc. commented that the proposed collection of information for the NRC form 7 is necessary to implement the requirements of the IAEA's Code of Conduct. The estimated burden of information on average is accurate, however when the importer is in a developing country, it can take several hours to obtain the necessary information. There is no way to enhance the form 7, it is user friendly, and the instructions are clear. And the burden of information can be minimized by ensuring that the link to the IAEA's Point of Contact list on the International Programs web page is maintained and updated, which has been updated on the NRC public website as appropriate.

9. Payment or Gift to Respondents

Not applicable.

10. Confidentiality of Information

Confidential and proprietary information is protected in accordance with NRC regulations at 10 CFR 9.17(a) and 10 CFR 2.390(b).

11. Justification for Sensitive Questions

There are no sensitive questions.

12. Estimated Burden and Burden Hour Cost

The NRC estimates 64 applications will be filed annually on NRC Form 7, and completion of the form is estimated to take 2.4 hours, for a total of 153.6 hours annually. Using an average cost of \$317 per hour for reactor licenses and material licensees, the annual cost expended by the public to prepare NRC Form 7 is estimated to be \$48,691 (153.6 hours x \$317 per hour).

The \$317 hourly rate used in the burden estimates is based on the NRC's fee for hourly rates as noted in 10 CFR 170.20 "Average cost per professional staff-hour." For more information on the hourly rate, see the "Revision of Fee Schedules, Fee Recovery for Fiscal Year 2024" final rule (89 FR 51789; June 20, 2024).

13. Estimate of Other Additional Costs

There are no additional costs.

14. Estimated Annualized Cost to the Federal Government

The staff has developed estimates of annualized costs to the Federal Government related to the conduct of this collection of information. These estimates are based on staff experience and include the burden needed to review, analyze, and process the collected information and any relevant operational expenses.

The NRC estimates that each NRC Form 7 requires an average of 31 hours of staff time to process. With 64 submissions expected annually the estimated annual cost to the Federal Government is \$628,928 (64 submittals per year x 31 hours per submittal x \$317 per hour).

15. Reasons for Changes in Burden or Cost

There is no change in burden. The fee rate has increased from \$279 per hour to \$317 per hour.

16. Publication for Statistical Use

Not applicable.

17. Reason for Not Displaying the Expiration Date

The expiration date is displayed.

18. Exceptions to the Certification Statement

There are no exceptions.

B. COLLECTIONS OF INFORMATION EMPLOYING STATISTICAL METHODS

Statistical methods are not used in the collection of information.