

1FINAL SUPPORTING STATEMENT
FOR
NRC FORM 244
REGISTRATION CERTIFICATE - USE OF DEPLETED URANIUM
UNDER GENERAL LICENSE
(3150-0031)

EXTENSION

Description of the Information Collection

The U.S. Nuclear Regulatory Commission (NRC) regulations in Part 40 of Title 10 of the *Code of Federal Regulations* (10 CFR), establish requirements for the receipt, possession, use and transfer of radioactive source and byproduct materials. Section 40.25 of 10 CFR established a general license authorizing the use of depleted uranium contained in industrial products or devices for the purpose of providing a concentrated mass in a small volume of the product or device. The NRC Form 244 is used to report the receipt and transfer of depleted uranium, as required by 10 CFR 40.25. The registration information required by the NRC Form 244 enables the NRC to make a determination on whether the possession, use, or transfer of depleted uranium source and byproduct material is in conformance with the NRC's regulations for the protection of public health and safety. General licensees can also use NRC Form 244 to update any of the information contained in the form, once the form is authorized by the NRC.

A. Justification

1. Need for the Collection of Information

10 CFR 40.25(c) requires persons who receive, acquire, possess, or use depleted uranium to file NRC Form 244, "Registration Certificate - Use of Depleted Uranium Under General License," with the NRC within 30 days after first receipt of the depleted uranium under the general license in 10 CFR 40.25(a) and to report to NRC any changes to the information on NRC Form 244 within 30 days of the change (NRC staff note that in practice registrants send the NRC an NRC Form 244 with the updated information required by 10 CFR 40.25(c)(2)). The purposes of the registration requirement are (1) to provide means of identifying the general licensee, (2) to permit the NRC to inform the general licensee of the terms and conditions of the general license upon first receipt of depleted uranium, and (3) to facilitate subsequent communication with the general licensee.

10 CFR 40.25(d)(3) requires persons transferring depleted uranium to a transferee pursuant to the general license in 10 CFR 40.25(a) to furnish to the transferee a copy of 10 CFR 40.25 and a copy of NRC Form 244, and if under the regulations of an Agreement State, an explanation of that fact. These documents inform the end user of the product of the need to register and other requirements of the general license. The NRC has printed 10 CFR 40.25 on the back of the NRC Form 244, so that compliance with both requirements can be achieved by providing and using one piece of paper to the transferee, thus minimizing the burden for obtaining a license.

10 CFR 40.35(d) requires that licensees for such manufacture or initial transferor of depleted uranium furnish a copy of the general license contained in 10 CFR 40.25 and a copy of the NRC Form 244, or the equivalent general license and certificate from an Agreement State, accompanied by an explanatory note, to each person to whom source material in a product or device is transferred for use pursuant to this general license. These documents inform the user of the need to register and other requirements of the general license.

2. Agency Use and Practical Utility of the Information

The information that licensees report on the NRC Form 244 is used to identify depleted uranium contained in industrial products or devices for mass-volume applications and to identify the location of the material. In addition, the form serves as a certification that the information presented in it is accurate and complete that the registrant has developed and will maintain procedures to establish physical control over the depleted uranium that the registrant will prevent transfer of the depleted uranium to persons not authorized to receive the depleted uranium and will notify the regulatory authority in writing of any changes in information furnished by a registrant within 30 days.

The information on the form is reviewed by the NRC to determine that a licensee has confirmed possession and use of the depleted uranium to the locations, purposes, receipt, and quantities authorized by the general license. Furthermore, information collected through NRC Form 244 is added to the NRC's General License Tracking System.

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 is beneficial. The NRC has issued [Guidance for Electronic Submissions to the NRC](#) which provides direction for the electronic transmission and submittal of documents to the NRC. Electronic transmission and submittal of documents can be accomplished via the following avenues: the Electronic Information Exchange process, which is available from the NRC's "Electronic Submittals" Web page, by Optical Storage Media (e.g. CD-ROM, DVD), or by e-mail. Respondents are able to submit the requested information using fillable-fillable forms and/or computer-readable formatted forms. It is estimated that 100 percent of the potential responses are filed electronically.

4. Effort to Identify Duplication and Use Similar Information

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

5. Effort to Reduce Small Business Burden

Some of the licensees who use source and byproduct material are small businesses. However, since the health and safety consequences of improper handling or use of radioactive source and byproduct material are the same for large and small entities, it is not possible to reduce the burden on small businesses by less frequent or less complete reporting, recordkeeping, or accounting and control procedures.

6. Consequences to Federal Program or Policy Activities If the Collection Is Conducted Less Frequently

If the information is not collected, NRC will have no way to assess whether licensees are operating within the radiation safety requirements applicable to the possession, use, or transfer of depleted uranium. Applications for new general licenses are submitted only once, and amendments are submitted and approved as appropriate. Applications for renewal of specific licenses are submitted every 15 years. Information submitted in previous applications may be referenced without being resubmitted. The frequency of information collection is kept to a minimum necessary to assure that licensees will continue to conduct programs in a manner that will assure adequate protection of environment, public health, and safety. Conducting this information collection less frequently would result in the NRC not having the most updated information related to the licensee's possession, use, or transfer of depleted uranium.

7. Circumstances Which Justify Variation from the Office of Management and Budget (OMB) Guidelines

There are no variations from OMB guidelines.

8. Consultations Outside the NRC

Opportunity for public comment on the information collection requirements for this clearance package was published in the *Federal Register* on August 15, 2025 (90 FR 39430). NRC staff contacted four licensees to directly solicit comment. One out-of-scope comment was received on the docket.

9. Payment or Gifts to Respondents

Not applicable.

10. Confidentiality of Information

Confidential and proprietary information is protected in accordance with the NRC regulations at 10 CFR 9.17 (a) and 10 CFR 2.390 (b). However, no information normally considered confidential, or proprietary is requested.

11. Justification for Sensitive Questions

This information collection process does not include sensitive questions.

12. Estimated Burden and Burden Hour Cost

a. NRC Licensees:

The average number of annual respondents is one (three respondents annually over 3 years). Based on these estimates, the annual industry burden will be 1 hour. Registrants are required by 10 CFR 40.25(c)(2) to submit a report to the Office of Nuclear Material Safety and Safeguards when the information on NRC Form 244 changes. In practice, the NRC staff have observed that registrants send the NRC an NRC Form 244 with the updated information required by 10 CFR 40.25(c)(2). Therefore, the updated forms

from current registrants are counted in the estimated burden along with the forms from first-time registrants.

Reporting Burden (NRC Licensees)				
Number of Respondents	Responses per Respondent	Number of Responses	Burden Hours per Response	Total Annual Burden Hours
1.0	1.0	1.0	1.0	1.0

The annual recordkeeping burden for affected NRC licensees is \$53 (1 recordkeeper × 10 minutes × \$317/hour). Any records storage costs associated with this information collection is included in the recordkeeping burden. 10 CFR 40.25 does not indicate a retention period for NRC Form 244. Therefore, the licensee should keep the form for the life of the license, as indicated in 10 CFR 40.61(b). For licensees who file NRC Form 244, the life of the license would mean until the licensee transfers all material and will no longer receive or possess industrial products or devices containing depleted uranium.

Recordkeeping Burden (NRC Licensees)		
Number of Recordkeepers	Burden Per Recordkeeper	Total Annual Burden Hours
1.0	0.2	0.2

Licensees who manufacture or initially distribute depleted uranium are required to furnish a copy of the general license contained in 10 CFR 40.25 and a copy of the NRC Form 244, or the equivalent general license and certificate from an Agreement State to each person to whom source material in a product or device is transferred for use pursuant to this general license.

Third-Party Disclosures (NRC Licensees)				
Number. of Respondents	Responses per Respondent	Number of Responses	Burden Hours per Response	Total Annual Burden Hours
1.0	1.0	1.0	0.5	0.5

b. Agreement State Licensees:

The NRC estimates that there are approximately 7.5 times the number of Agreement State licensees as there are NRC licensees. This estimate is based on the estimate of 2,000 NRC byproduct material licenses and 15,000 Agreement State licenses, according to the information contained in NRC's 2024-2025 Information Digest (NUREG-1350, Volume 35). The current ratio is 7.5 (7.5 Agreement State licensees: 1 NRC licensee).

The number of Agreement State responses is estimated from the number of NRC responses times the 7.5:1 ratio of Agreement State licenses to NRC licenses. Therefore, the number of annual Agreement State responses is estimated to be 7.5 responses (1 NRC response × 7.5).

Reporting Burden (Agreement State Licensees)				
Number of Respondents	Responses per Respondent	Number of Responses	Burden Hours per Response	Total Annual Burden Hours
7.5	1.0	7.5	1.0	7.5

The recordkeeping burden is estimated to be 0.2 hours per recordkeeper for 7.5 recordkeepers, for a total of 1.5 annual recordkeeping burden hours.

Recordkeeping Burden (Agreement State Licensees)		
Number of Recordkeepers	Burden Per Recordkeeper	Total Annual Burden Hours
7.5	0.2	1.5

The NRC estimates that three Agreement State licensees may have to comply with third-party disclosures, at 0.5 hour per response, for a total of 1.5 hours of third-party disclosure burden.

Third-Party Disclosures (Agreement State Licensees)				
No. of Respondents	Responses per Respondent	Number of Responses	Burden Hours per Response	Total Annual Burden Hours
3.0	1.0	3.0	0.5	1.5

c. Total:

The total annual burden is estimated to be 12.2 hours (1.7 NRC licensee hours + 10.5 Agreement State hours) to report the receipt and transfer of depleted uranium under general license as required by 10 CFR 40.25. The burden estimates are based on actual submittals to NRC in the past years. The total cost for NRC Licensees and Agreement State Licensees would be \$3,867 (12.2 hours × \$317 per hour). This rate is based on NRC's fully recoverable fee rate.

The total burden and burden cost for NRC and Agreement State Licensees is based on reporting, recordkeeping, and third-party disclosures. Licensees who manufacture or initially distribute depleted uranium are required to furnish a copy of the general license contained in 10 CFR 40.25 and a copy of the NRC Form 244, or the equivalent general license and certificate from an Agreement State to each person to whom source material in a product or device is transferred for use pursuant to this general license. Therefore, these licensees would incur in recordkeeping and third-party disclosure costs.

Burden Total for NRC and Agreement State Licensees		
	Responses	Burden
Reporting	8.5	8.5
Recordkeeping	8.5	1.7
Third-Party Disclosure	4.0	2.0
TOTAL	21	12.2

The total estimated burden cost is \$3,867 (12.2 hours × \$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 basis of this rate, see the Revision of Fee Schedules; Fee Recovery for fiscal year 2024 (89 FR 51789; June 20, 2024).

13. Estimate of Other Additional Costs

There are no additional costs associated with this information collection.

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 subject matter expertise and include the burden needed to review, analyze, and process the collected information and any relevant operational expenses.

The annual cost for the NRC to review NRC Form 244 is estimated to be \$158 (0.5 hour per report × 1 reports per year × \$317 per hour). The majority of the cost for review of NRC Form 244 is associated with review of information and certification regarding depleted uranium. This cost also encompasses operational expenses related to filing and recordkeeping of the form, as well as processing of the form and postage to return the processed form to the licensee.

15. Reasons for Change in Burden

The overall burden increased 0.5 hours, from 11.7 to 12.2 hours, as shown below.

	Previous Request		Current Request		Change	
	Burden	Responses	Burden	Responses	Burden	Responses
Reporting	8.3	8.3	8.5	8.5	0.2	0.2
Recordkeeping	1.4	8.3	1.7	8.5	0.3	0.2
Third-party disclosure	2.0	4.0	2.0	4.0	0	0
Total	11.7	20.6	12.2	21	0.5	0.4

The number of registration certificates submitted annually by NRC licensees has remained constant. The number of registration certificates submitted by Agreement State licensees has been estimated to have increased from 7.3 to 7.5. Therefore, the estimated increase in form submissions is caused solely by

an increased ratio of Agreement State to NRC licensees.

The increase in overall burden can also be attributed to the estimated increase in Agreement State responses.

The change in cost also reflects an increase in the annual labor cost for material licensees from \$288 to \$317 per hour.

16. Publication for Statistical Use

Not applicable.

17. Reason for Not Displaying the Expiration Date

The expiration date is displayed on NRC Form 244.

18. Exceptions to the Certification Statement

Not applicable.

B. Collection of Information Employing Statistical Methods

Not applicable.