

DCD (SP03)

① PAL  
② FCC  
③ SLD  
~~④ RD~~  
⑤ HXS

Robert J. Huston, *Chairman*  
R. B. "Ralph" Marquez, *Commissioner*  
John M. Baker, *Commissioner*  
Jeffrey A. Saitas, *Executive Director*



# TEXAS NATURAL RESOURCE CONSERVATION COMMISSION

*Protecting Texas by Reducing and Preventing Pollution*

January 25, 2000

00 FEB 15 PM 2:55

OSP

Ms. Rosetta Virgilio  
U. S. Nuclear Regulatory Commission  
Office of State Programs  
Washington, D.C. 20005

Re: Response to The Office of Management and Budget's (OMB) Fiscal Year Information Budget Call Survey of Select Number of Agreement States (SP-00-004)

Dear Ms. Virgilio:

The Texas Natural Resource Conservation Commission's (TNRCC) Underground Injection Control and Radioactive Waste Section, Waste Permits Division, has reviewed the above-referenced request. Our understanding is the purpose of the request is to assist you in obtaining OMB clearance for recurring information collections. TNRCC offers the following information to assist you in compiling budget estimates.

1. Estimating Information Collection Burden Under OMB Clearance 3150-0183:

This information includes estimates of the paperwork burden for both implementing the Integrated Materials Performance Evaluation Program (IMPEP) and for total Maintenance of the State Program.

IMPEP Questionnaire: TNRCC spends about 70 hours, rather than your estimated 45 hours.

IMPEP Review: TNRCC spends about 500 hours on this, rather than your estimated 180. The time includes the on-site review, time to respond to questions (there were two rounds of questions from the last IMPEP), and time to participate in the Management Review Board meeting. Our paperwork burden is more nearly 40%, rather than your estimated 20%.

Maintenance of Program: TNRCC spends about 18,700 hours annually, excluding time spent on IMPEP. This is near the 18,300 hours you estimated as an average for each of the 31 agreement states; however, our paperwork burden is more nearly 50%, rather than your estimated 40%. The paperwork burden includes "documentation of issuance of licenses, preparation of inspection reports and correspondence, preparation of regulations, documentation of training, preparation and documentation of procedures, and general responses to the public;" but does not include inspecting, training, review of technical and regulatory information, and attending meetings.

92  
TNRCC FILE CENTER

SP-A-4  
SP-AG-21

The table below shows the estimated total annual paperwork burden for TNRCC:

ITEM	TOTAL BURDEN	PAPERWORK BURDEN	
	Hours	Hours	Percent
IMPEP QUESTIONNAIRE	70	70	100
IMPEP REVIEW	500	200	40
Maintenance of Program	18,700	9350	50
Total	19,270	9620	50

2. Estimating Information Collection Burden Under OMB Clearance 3150-0029:

This information includes estimates of the time burden for responding to "one-time only or as-needed information collection to address specific generic issues and events or procedures and guidance that are unique to the Agreement States." These data may be used to prepare responses to Congressional inquiries and requests from other sources.

The TNRCC estimates that these requests require an average of 20 hours for response, rather than your estimated 6 hours. Last year the NRC received 95 responses from all Agreement States to 20 requests. Assuming the time expended per request is 20 hours, the total Annual Burden for all Agreement States would be  $95 \times 20 = 1900$  hours.

Thank you for the opportunity to respond to your request for information. Should you have any questions or comments, please contact Mr. George FitzGerald of my staff at (512) 239-6070, or send correspondence to Mail Code 131 (MC131).

Sincerely,



Alice Hamilton Rogers, Manager  
Underground Injection Control & Radioactive Waste Section  
Waste Permits Division

AHR/GF/rbh  
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Ms. Virgilio  
Page 3  
January 24, 2000

cc: George FitzGerald

Ms. Virgilio  
Page 4  
January 24,2000

bcc: Dale Kohler

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SP-A-4  
SP-AG-27

Case Ref. Copy

Ms. Virgilio  
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January 25,2000

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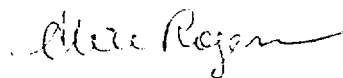
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