

DRAFT OMB SUPPORTING STATEMENT FOR 10 CFR PART 36

"LICENSES AND RADIATION SAFETY REQUIREMENTS

FOR IRRADIATORS"

(3150-0158)

REVISION TO CLEARANCE EXTENSION

Description of the Information Collection

The Nuclear Regulatory Commission's regulations in 10 CFR Part 36 contain requirements for the issuance of a license authorizing the use of sealed sources containing radioactive materials in irradiators used to irradiate objects or materials for a variety of purposes in research, industry, and other fields. This part also contains the radiation safety requirements for operating irradiators. These regulations were issued pursuant to the Atomic Energy Act of 1954, as amended, and the Energy Reorganization Act of 1974, as amended.

The regulations in 10 CFR Part 36 (as described in Subpart A) apply to panoramic, dry-source-storage irradiators; underwater irradiators; and panoramic, wet-source-storage irradiators. They do not cover self-contained dry-source-storage irradiators, medical uses of sealed sources (such as teletherapy), or nondestructive testing (such as industrial radiography). The irradiators covered by this part have dose rates that exceed 5 grays (500 rads) per hour at 1 meter from the radioactive sealed sources in air or in water, as applicable for the irradiator type.

Subpart B of this part covers specific licensing requirements for obtaining a license or a license exemption. Subpart C lists the design and performance criteria for irradiators, including special requirements for sealed sources installed after, licenses issued after, and irradiator construction begun after July 1, 1993. Requirements for operating irradiators are covered in Subpart D. These include requirements for operator training, written operating and emergency procedures, personnel monitoring, radiation surveys, inspection, and maintenance. The records and reports required to ensure that the irradiator is being safely operated so that it poses no danger to the health and safety of the general public and the irradiator employees are listed in Subpart E.

A. Justification

1. Need for and Practical Utility of the Information Collection

The records that 10 CFR Part 36 requires the licensees to maintain will be used by NRC or Agreement State inspectors to evaluate compliance with NRC regulations to ensure that public health and safety are protected. The reports required by 10 CFR Part 36 will be used to alert NRC to any special problems that may be a threat to health and safety so that adequate protective actions can be taken.

The need for and practical utility of the specific information collection requirements of 10 CFR Part 36 are identified below.

(e)

(d)

(c)

(b)

(a)

the Section 102 of the Energy Policy Act of 2005, in panoramic radiators unless

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Section 26.89(a) of the following (b) addition to appendix NRC of the NRC regulations: (i) (h) (g) (f)

~~effective as to the following (b) addition to appendix NRC of the NRC regulations: (i) (h) (g) (f)~~

licensee. The licensee shall file with the Commission a copy of the information required by this section.

Estimated Burden on Sensitive Occasions, or for Operations Outside the NRC

14. = \$200 (Base Salary) + \$100 (Travel) + \$50 (Per Diem) + \$50 (Reporting) + \$50 (Recordkeeping) + \$50 (Control)

Estimated Annualized Cost

Estimated Annualized Cost

670 Reporting 35,300 Recordkeeping

Statistical Methods about Burden or Category

10,000,000 Series

COLLECTIONS OF INFORMATION FROM INDIVIDUALS AND HOUSEHOLDS Reasons for Changes in Burden or Category

Number of

13

Inspe

TABLE 1: Recordkeeping Burden for NRC Licensees (Part 36)

| Section | Number of NRC Licensees | Annual Hrs Per Licensee | Total Burden Hours | Comments |
|----------------|--------------------------------|--------------------------------|---------------------------|---|
| 36.21(a)(1) | 22 | 0.5 | 11 | |
| 36.53(a),(b) | 22 | 60 | 1320 | Averaged over 10 yrs. Procedures are assumed to have a 10 year useful life. |
| 36.81(a) | 22 | 2 | 44 | |
| 36.81(b) | 22 | 20 | 440 | |
| 36.81(c) | 22 | 2 | 44 | |
| 36.81(d) | 22 | 40 | 880 | |
| 36.81(e) | 22 | | | Burden is covered under Part 20 and OMB clearance number 3150-0014. |
| 36.81(f) | 22 | 20 | 440 | |
| 36.81(g) | 22 | 4 | 88 | |
| 36.81(h) | 22 | 10 | 220 | |
| 36.81(i) | 22 | 200 | 4400 | |
| 36.81(j) | 22 | 20 | 440 | |
| 36.81(k) | 22 | | | Burden is covered under Sections 30.51 and 30.41 OMB clearance 3150-0017. |
| 36.81(l) | 22 | 80 | 1760 | Averaged over 10 years. |
| 36.81(m) | 22 | | | Burden covered under Section 30.35(g) OMB clearance number 3150-0017. |
| TOTAL | 22 | | 10,087 | |

Table 2: Annual Reporting Burden for 10 CFR Part 36 NRC Licensees

| Section | Number of NRC Licensees | Number of Responses Per Respondent | Total Responses | Hours Per Response | Total Annual Burden Hours | Comments |
|----------------|--------------------------------|---|------------------------|---------------------------|----------------------------------|---|
| 36.11 | 22 | | | | | Burden is covered under NRC Form 313 (OMB Clearance No. 3150-0120). |
| 36.13 | 22 | | | | | Burden is covered under NRC Form 313 (OMB Clearance No. 3150-0120). |
| 36.17(a),(b) | 22 | | | | | Burden is covered under NRC Form 313 (OMB Clearance No. 3150-0120). |
| 36.19(a) | 22 | | | | | Burden is covered under NRC Form 313 (OMB Clearance No. 3150-0120). |
| 36.19(b) | 22 | .05 | 1 | 10 | 10 | |
| 36.69 (a),(b) | 22 | | | | | Burden is covered in NRC Form 313 (OMB Clearance No. 3150-0120). |
| 36.83(a),(b) | 22 | 0.08 | 1.8 | 100 | 180 | Includes only those events that would not be reported under 30.50(b). |
| TOTAL | 22 | | 2.8 | | 190 | |

TABLE 3: Annual Recordkeeping Burden for Agreement State Licensees (Part 36)

| Section | Number of A/S Licensees | Annual Hrs Per Licensee | Total Burden Hours | Comments |
|----------------|--------------------------------|--------------------------------|---------------------------|---|
| 36.21(a)(1) | 55 | 0.5 | 28 | |
| 36.53(a),(b) | 55 | 60 | 3300 | Averaged over 10 yrs. Procedures are assumed to have a 10 year useful life. |
| 36.81(a) | 55 | 2 | 110 | |
| 36.81(b) | 55 | 20 | 1100 | |
| 36.81(c) | 55 | 2 | 110 | |
| 36.81(d) | 55 | 40 | 2200 | |
| 36.81(e) | 55 | | | Burden is covered under Part 20 and OMB clearance number 3150-0014. |
| 36.81(f) | 55 | 20 | 1100 | |
| 36.81(g) | 55 | 4 | 220 | |
| 36.81(h) | 55 | 10 | 550 | |
| 36.81(i) | 55 | 200 | 11000 | |
| 36.81(j) | 55 | 20 | 1100 | |
| 36.81(k) | 55 | | | Burden is covered under Sections 30.51 and 30.41 OMB clearance 3150-0017. |
| 36.81(l) | 55 | 80 | 4400 | Averaged over 10 years. |
| 36.81(m) | 55 | | | Burden covered under Section 30.35(g) OMB clearance number 3150-0017. |
| TOTAL | 55 | | 25,218 | |

Table 4: Annual Reporting Burden for 10 CFR Part 36 Agreement State Licensees

| Section | Number of A/S Licensees | Number of Responses Per Respondent | Total Responses | Hours Per Response | Total Annual Burden Hours | Comments |
|----------------|--------------------------------|---|------------------------|---------------------------|----------------------------------|---|
| 36.11 | 55 | | | | | Burden is covered under Agreement State form equivalent to NRC Form 313 (OMB Clearance No. 3150-0120). |
| 36.13 | 55 | | | | | Burden is covered under Agreement State form equivalent to NRC Form 313 (OMB Clearance No. 3150-0120). |
| 36.17(a),(b) | 55 | | | | | Burden is covered under Agreement State form equivalent to NRC Form 313 (OMB Clearance No. 3150-0120). |
| 36.19(a) | 55 | | | | | Burden is covered under Agreement State form equivalent to NRC Form 313 (OMB Clearance No. 3150-0120). |
| 36.19(b) | 55 | .05 | 3 | 10 | 30 | |
| 36.69 (a),(b) | 55 | | | | | Burden is covered under Agreement State form equivalent to NRC Form 313 (OMB Clearance No. 3150-0120). |
| 36.83(a),(b) | 55 | 0.08 | 4.5 | 100 | 450 | Includes only those events that would be reported under Agreement State regulations equivalent to 30.50(b). |
| TOTAL | 55 | | 7.5 | | 480 | |