

## DRAFT OMB SUPPORTING STATEMENT FOR NRC FORM 4

### CUMULATIVE OCCUPATIONAL EXPOSURE HISTORY

(3150-0005)

(Clearance Revision)

#### Description of the Information Collection

Part 20, Title 10 of the Code of Federal Regulations (10 CFR Part 20), provides requirements to licensees who receive, possess, use, transfer, or dispose of byproduct, source, or special nuclear material or who operate a production or utilization facility under parts 30 through 36, 39, 40, 50, 60, 61, 70, 72 or 76 for compliance with "Standards for Protection Against Radiation." One of the requirements stipulates that the occupational radiation exposure must be recorded by all licensees. Certain categories of NRC licensees are subject to the reporting requirements of 10 CFR 20.2206 and must report radiation exposure for individuals monitored to the NRC on an annual basis.

Pursuant to 10 CFR 20.2104 "Determination of Prior Occupational Dose," for each individual who is likely to receive, in a year, an occupational dose requiring monitoring, the licensee shall 1) determine the occupational radiation dose received during the current year, and 2) attempt to obtain the records of cumulative occupational radiation dose. To comply with these requirements the licensee may accept a written signed statement from the individual or from the individual's most recent employer as a record of the occupational dose that the individual received during the current year. The licensee may accept as a record of cumulative radiation dose an up-to-date NRC Form 4, or equivalent. The NRC Form 4 should be signed by the individual and countersigned by an appropriate official of the most recent employer for work involving radiation exposure, or the individual's current employer (if the individual is not employed by the licensee). The instructions for NRC Form 4 were revised to add a definition of "No Record." This clarification does not impact the burden per response.

#### A. JUSTIFICATION

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

The information collection was based, in part, on Presidential Guidance to Federal Agencies for Occupational Exposure published in the *Federal Register* on January 27, 1987.

In order to protect the health and safety of workers, 10 CFR Part 20 requires licensees to control, within specified limits, the occupational radiation dose. NRC Form 4 is to be completed and maintained by NRC licensees until their license is terminated by the Commission. The data contained on the form can be reviewed by the NRC inspectors to determine compliance with the dose-limit requirements of the NRC regulations in order to ensure the health and safety of the licensee employees.

The NRC Form 4 is a cumulative summary of the information found on NRC Form 5 submitted annually by all the licensees for individuals for whom monitoring was provided.

2. Agency Use of Information

The NRC uses the information to ensure that licensees are complying with the appropriate regulations and their license conditions in order to protect the health and safety of the workers and the public.

3. Reduction of Burden Through Information Technology

The NRC Form 4 is not required to be submitted to the NRC. It is provided to the radiation workers listing their exposure history. The NRC supplied software, Radiation Exposure Management Information Transmittal (REMIT) is available at no cost to licensees. The NRC provides technical support to users of the REMIT software which allows licensees to generate the NRC Form 4. In addition, the NRC has an automated dose history request form on the Radiation Exposure and Information Reporting System (REIRS) web site ([www.reirs.com](http://www.reirs.com)) to allow individuals and organizations to request a dose history using NRC Form 4 for individuals monitored at NRC facilities. The automated request form reduces the amount of paper needed to submit a request, and the report is sent to the requestor as a password protected e-mail attachment, thereby reducing the paper needed to respond to the request.

4. Effort to Identify Duplication and Use Similar Information

The Information Requirements Control Automated System (IRCAS) was searched and no duplication was found. There is no similar information available to the NRC.

5. Effort to Reduce Small Business Burden

The information required by NRC Form 4 is needed for the employees of small businesses as well as for employees of larger business firms to ensure that licensees comply with 10 CFR Part 20.2104. The REMIT software was designed to reduce the burden to small businesses in generating and exchanging Form 4's. The automated dose history available on the REIRS web site is particularly beneficial to small businesses who may not have the resources to obtain prior dose histories. It is not possible to reduce the burden on small businesses any further and still meet the objectives stated in A.1.

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

The NRC Form 4 is filled in for an individual at the start of each new employment period. Less frequent collection would mean not checking doses received from previous employment. A worker could receive an occupational dose in excess of the limits of 10 CFR Part 20 if the dose from prior employment during the current year is not considered in assessing the dose a worker could receive during current employment.

7. Circumstances Which Justify Variation from OMB Guidelines

Records associated with the NRC Form 4 must be retained for the life of the NRC license in order to determine a worker's prior occupational radiation dose, as required pursuant to 10 CFR 20.2104.

8. Consultations Outside the NRC

The opportunity for public comment has been published in the *Federal Register*.

9. Payment or Gifts to Respondents.

Not applicable.

10. Confidentiality of Information

This information is subject to the Privacy Act of 1974 and is only available through the NRC's Privacy Act System of Records, NRC-27, REIRS.

11. Justification for Sensitive Questions

NRC Form 4 specifies the use of the individual's name, social security number or other ID, date of birth, and sex. This information is necessary to ensure the proper identification of the individual.

12. Estimate of Annual Burden

The requirement to obtain and maintain the information specified on NRC Form 4 for each individual for whom monitoring is required extends to the NRC licensees (104 reactors in commercial operation and about 4,498 NRC materials licensees). Since NRC Form 4 is filled out each time a worker changes employment during the year, the greatest burden is on licensees who utilize transient workers. In 2002, licensees required to submit annual occupational radiation exposure reports in accordance with 10 CFR 20.2206(a), utilized 24,352 transient workers. Of these workers 24,164 worked at the 104 reactor sites. The other 188 transient workers (24,352-24,164) worked at 135 materials licensees<sup>1</sup>. Approximately, 0.50 hours is required to complete, review and authorize each NRC Form 4. Therefore, there is an annual burden of 12,082 hours for reactor sites, (24,164 transient workers x 0.5 hour/transient worker), and 94 hours for materials licensees (188 transient workers x 0.5 hour/transient worker) for a total annual burden of 12,176 hours. The annual cost to reactor sites for this requirement is \$1,896,874 (12,082 hours x \$157/hour) and \$14,758 (94 hours x \$157/hour) for materials licensees. The total annual cost to licensees is \$1,911,632 (see Table 1).

13. Estimate of Other Additional Cost.

Not applicable.

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<sup>1</sup> The 135 materials licensees have most of their transient workers because of their NRC categorization and the type and quantity of material used.

14. Estimated Annualized Cost to the NRC

NRC cost is incurred by inspectors reviewing the information on NRC Form 4, or its equivalent, and supporting records maintained by licensees. Annually, 104 hours of inspection time is spent reviewing such records, at an average of 1 hour for each 104 sites. In addition, 450 hours of inspection time is spent reviewing these records at an average of 0.1 hours for each of the 4,498 materials licensees. Annually, the total time spent reviewing these records is approximately 554 hours. The annual cost for reactor inspections to review these forms is \$16,328 (104 hours x \$157) and the annual cost for materials inspections to review these forms is \$70,650 (450 hours x \$157). Annually the total inspection cost is approximately \$86,987 (see Table 2). These costs are fully recovered through fee assessments to NRC licensees pursuant to 10 CFR Parts 170 and 171.

15. Reasons for Change in Burden

The estimated burden has increased by 645 hours from 11,531 hours to 12,176 hours due to the increase of 1,275 transient workers from 23,077 to 24,352. There was a reduction in the number of materials licenses recordkeepers from 182 to 135, due primarily to a combination of 2 new Agreement States and the merger, acquisition and business failures of existing materials licenses.

16. Publication for Statistical Use

None.

17. Reason for Not Displaying the Expiration Date.

The requirement will be contained in a regulation. Amending the Code of Federal Regulations to display information that, in an annual publication, could become out of date would confuse the public.

18. Exceptions to the Certification Statement.

Not applicable.

## B. COLLECTIONS OF INFORMATION EMPLOYING STATISTICAL METHODS

Statistical methods are not employed in the collection of information.

TABLE 1  
RECORDKEEPING BURDEN  
ASSOCIATED WITH NRC FORM 4

NUMBER OF RECORDKEEPERS		NUMBER OF RECORDS/ RECORDKEEPERS	NUMBER OF RECORDS	BURDEN HOURS/ RECORDS	ANNUAL BURDEN HOURS	ANNUAL COST@ \$157/HR
Reactors	104	232.34	24,164	0.50	12,082	\$1,896,874
Materials	135	1.39	188	0.50	94	\$14,758
Totals	239		24,352		12,176	\$1,911,632

TABLE 2  
ESTIMATED ANNUALIZED COST TO THE NRC  
FOR REVIEW OF REPORTS AND INSPECTIONS  
ASSOCIATED WITH NRC FORM 4

NUMBER OF RESPONDENTS		STAFF HOURS PER LICENSEE	STAFF BURDEN HOURS	ANNUAL COST@ \$157/HR
Reactors	104	1.0	104	\$16,328
Materials	4,498	0.1	450	\$70,650
Totals	4,602		554	\$86,978