

FINAL OMB SUPPORTING STATEMENT FOR
10 CFR PART 39
LICENSES AND RADIATION SAFETY REQUIREMENTS FOR WELL LOGGING
(3150-0130)

EXTENSION WITH BURDEN REVISIONS

Description of the Information Collection

NRC regulations in 10 CFR Part 39 establish rules that specify radiation safety requirements for the use of licensed material in well logging operations. The regulations provide for comprehensive and consistent radiation safety requirements in NRC and Agreement State regulations, and safety requirements designed to reduce the likelihood of accidents involving the rupture of radioactive sources in well logging operations.

A. Justification

1. Need for and Practical Utility of the Information Collection

Section 39.11 provides that an applicant for a specific license to use licensed material in well logging operations must submit NRC Form 313, "Application for Material License." The NRC materials licensing staff will review the information submitted on NRC Form 313 to determine whether an applicant for a license has training, experience, equipment, facilities, and procedures for the use of licensed material that are adequate to protect the public health and safety.

The use of NRC Form 313 is approved by OMB under clearance number 3150-0120, which should be referred to for information collection burden and supporting data.

Section 39.13 provides that an applicant must submit the following information with the application:

- 39.13(b) - A description of training programs, assurances of competency and annual safety reviews;
- 39.13(c) - Written operating and emergency procedures covering its radiation safety program;
- 39.13(d) - Internal inspection program;
- 39.13(e) - Description of overall organizational structure as it applies to radiation safety, including specified delegations of responsibility and authority;
- 39.13(f) - (1) Description of procedures for leak testing sealed sources, or
(2) Manufacturer and model number of a leak test kit.

This information is reviewed by the NRC staff to determine whether the training, radiation safety, and internal inspection programs and procedures and the licensee's organizational structure will provide adequate protection of the public health and safety. The NRC review and the findings therefrom form the basis for NRC licensing decisions. Burden and cost has been approved under OMB clearance number 3150-0120.

Section 39.13(a) provides that a licensee shall file a license application or renewal for any special nuclear material in accordance with Sections 70.21, 70.22 and 70.33, which describe

the procedures for submitting licensing applications (approved by OMB clearance number 3150-0009). The license will be approved by the Commission if it meets all the requirements. The licensee must maintain copies of these license applications until the license is terminated.

Section 39.13(d) provides that a licensee must keep internal inspection records for 3 years. These records are reviewed by NRC inspectors to verify that the licensee is maintaining an effective inspection program and that problems are being identified and corrected.

Sections 39.15(a) and (b) require that a licensee wishing to conduct well logging operations with a sealed source must first have, and retain as a record, a written agreement with the well owner or operator that identifies who will carry out responsibilities with regard to recovery of sealed sources which become stuck or lost in a well, performance of radiation monitoring, decontamination of site, equipment and personnel if necessary, and that within 30 days after a well logging source has been classified as irretrievable, certain requirements will be implemented to immobilize and protect the separated well logging tool and source. The licensee must retain a copy of the written agreement for 3 years after the completion of the well logging operation. A permanent identification plaque must be mounted at the surface of the well in which a well logging source has been abandoned. In addition to a warning, the plaque must contain the date the source was abandoned, the name of the well owner or operator, the name and well identification number(s) or other designation, identification of the source by radionuclide and quantity of activity, and depth to the top of the plug.

The written agreement is needed to ensure that recovery or abandonment procedures will be implemented in the event of a stuck or irretrievable well logging source. The agreement binds the well owner or operator (nonlicensee) to immobilizing the source with a cement plug, protecting it from subsequent damage with a drill deflecting device, and posting the wellhead with an appropriate plaque. Without this agreement, the well logger would be unable to complete recovery or abandonment procedures if the well owner or operator refused. The identification plaque is necessary to provide a warning to anyone reentering the well of the presence of the abandoned source and to provide information on the source and its location within the well.

Section 39.15(c) provides that a licensee or applicant may apply to the Commission for approval of proposed procedures to abandon an irretrievable well logging source in a manner other than that currently authorized. Such an application would be reviewed by NRC to determine whether the proposed procedures would provide an adequate margin of protection of the public health and safety.

Section 39.17 provides that NRC may require further statements after the filing of the application and before expiration of the license to enable NRC to determine whether a license should be modified or revoked. Such additional information is sometimes needed to clarify information or to rectify deficiencies in existing programs for protection of the public health and safety, the common defense and security, or the environment.

The additional information submitted is reviewed by various NRC organizational units to assess the adequacy of the applicant's physical plant, procedures and plans for protection of the public health and safety, common defense and security, and the environment. The NRC review and the findings therefrom form the basis for NRC decisions concerning the issuance, modification, or revocation of licenses.

Burden and cost associated with further statements are included in the burden and cost data for submittal of applications on NRC Form 313, and are covered by OMB clearance number 3150-0120, which should be referred to for further burden and cost information.

Section 39.31(a) requires that a licensee label (1) the source, the source holder, or the logging tool containing radioactive materials; and (2) the storage or transport container. The labels are needed to warn people that these devices or containers contain radioactive materials and that persons should notify civil authorities or the company if they find a labeled device or container.

Section 39.33(d) provides that a licensee must maintain calibration records for a period of 3 years after the date of calibration of a survey instrument. Calibration of radiation survey instruments is necessary to ensure that these instruments function properly.

The information documents that the calibrations were performed. The records also permit NRC inspectors to verify that the licensee is keeping a calibrated and operable radiation survey instrument at each field station and temporary job site to make required radiation surveys. Inspections are conducted at least every 3 years.

Section 39.35(a) requires the licensee to keep a record of the results of leak testing of sealed sources for 3 years after the leak test is performed and record the leak test results in units of microcuries.

The information documents that the leak tests were performed. The records also permit NRC inspectors to verify that the licensee is performing the leak tests. Inspections are conducted at least every 3 years.

Section 39.35(d)(2) provides for reporting of leak test failures by the licensee to the NRC within 5 days of receiving the test results. The reporting requirement is needed to inform the NRC that the licensee has taken actions to remove the leaking source from service and to check for radioactive contamination.

The information contained in the report allows NRC regional offices to determine, within approximately 1 week, whether an inspector should be sent to check potential problems that may affect public health and safety.

Section 39.37 provides for a licensee to keep records of each semiannual physical inventory to account for all licensed material received and possessed under the license. The record of inventory must be retained for 3 years. The information is needed to indicate that the licensee has conducted semiannual inventories to account for licensed material received and possessed under the license.

The information documents that sources possessed under the license were accounted for at the time of inventory. The information also permits NRC inspectors to verify that the licensee has conducted an inventory at least every 6 months. Inspections are conducted at least every 3 years.

Section 39.39 requires that a licensee keep utilization records for sources of licensed material. The records must be retained for 3 years. This information permits the licensee to trace the history of the use of sources, radioactive markers, or unsealed licensed material if there are any questions concerning licensed material.

The information also permits NRC inspectors to verify that the licensee is utilizing licensed material appropriate to particular well logging operations. Inspections are conducted at least every 3 years.

Section 39.43(a) requires that a licensee maintain a record of defects found and repairs made as a result of visual checks of source holders, logging tools, and source handling tools. The record must be retained for 3 years. The records are reviewed by NRC inspectors to ensure that the licensee is maintaining an effective program for identification and correction of defects.

Section 39.43(b) provides that a licensee must maintain records of semiannual inspections and maintenance for 3 years. The inspection and maintenance are needed to ensure that the sealed sources and source holders are in good working condition.

The information permits NRC inspectors to verify that the licensee conducted the required semiannual inspection and maintenance. Inspections are conducted at least every 3 years.

Section 39.43(c) prohibits the licensee from removing a sealed source from a source holder or logging tool and performing maintenance on a sealed source or holders in which sealed sources are contained without written procedures developed pursuant to Section 39.63 that have been approved either by the Commission pursuant to Section 39.13(c) or by an Agreement State. The procedures are submitted with NRC Form 313 and are approved under OMB clearance number 3150-0120.

Section 39.43(d) requires that licensees may not perform any operation, such as drilling, cutting, or chiseling, on a stuck sealed source unless approved by the Commission or an Agreement State. This approval is requested and granted for the license application submitted on NRC Form 313 and approved under OMB clearance number 3150-0120.

Section 39.45(b) requires that the licensee must receive Commission approval, pursuant to Sections 39.13 on NRC Form 313, approved by OMB clearance number 3150-0120, before injecting licensed material into fresh water aquifers.

Section 39.49 requires the licensee using a uranium sinker bar in well logging applications to properly display a caution marker indicating it is a radioactive material and that persons should notify civil authorities or the company if found. The labels are needed to warn people that the bars are radioactive.

Section 39.51 requires the licensee to submit NRC Form 313 to perform sealed source well logging operations without a surface casing. The procedure must be approved by the Commission pursuant to Section 39.13(c) or by an Agreement State.

Section 39.53 provides that a licensee may use an energy compensation source (ECS), contained within a logging tool or other tool components, only if the ECS contains quantities of licensed material not exceeding 3.7 MBq [100 microcuries]. When used in well logging applications with a surface casing for protecting fresh water aquifers, use of the ECS is only subject to the requirements of Sections 39.35, 39.37 and 39.39. When used in well logging applications without a surface casing for protecting fresh water aquifers, use of the ECS is only subject to the requirements of Sections 39.15, 39.35, 39.37, 39.39, 39.51, and 39.77.

Section 39.55 requires that licensees using tritium neutron generator target sources exceeding 1,110 GBq [30 curies] or in a well without a surface casing to protect fresh water aquifers

are subject to the requirements of Part 39 while using sources not exceeding 1,110 GBq [30 curies] and used in a well with a surface casing to protect fresh water aquifers are not subject to Sections 39.15, 39.41, and 39.77.

Section 39.61(a)(2) requires that the licensee provide copies of and instruction in the applicable NRC regulations in 10 CFR Parts 19, 20, and 39, the NRC license under which the well logging will be performed, and the operating and emergency procedures, to each well logging supervisor.

Section 39.61(b)(2) requires that the licensee provide copies of and instruction in the licensee's operating and emergency procedures to each well logging assistant.

These documents are needed to ensure that well logging supervisors and assistants have been given instruction in, and have available for reference, the NRC requirements and the operating and emergency procedures needed for safe operation.

Section 39.61(d) requires that a licensee maintain records of training and of the annual safety review for each logging supervisor and logging assistant. The training records must include copies of written tests and dates of oral tests given. The records are needed to confirm that the logging supervisors and logging assistants received the required training. The training records must be retained until 3 years after termination of employment. Records of annual safety reviews must be retained for 3 years.

Section 39.63 requires that licensees maintain and follow written operating and emergency procedures that cover handling and use of licensed material, use of remote handling tools, surveys, control of personnel exposures, locking and securing of sources, personnel monitoring, transportation, receipt, recordkeeping, inspection and maintenance, reporting, and actions in case of a stuck or ruptured source.

The information is used by the licensee and its employees to guide the handling and use of radioactive material in normal and emergency situations. Submission of the procedures is covered by Section 39.13(c). The procedures must be retained as a record until the Commission terminates the license.

Section 39.65(a)-(c) requires that a licensee keep records of personnel dosimeter and bioassay results until the Commission authorizes disposition. The personnel dosimeter and bioassay results are needed to measure exposure received by workers during well logging operations.

The information documents the radiation doses received by the licensee's employees. This information also permits NRC inspectors to verify that the licensee kept dosimetry and bioassay records. Inspections are conducted at least every 3 years.

Section 39.67(f) requires that a licensee must maintain radiation survey records for 3 years. Radiation survey records are needed to alert workers to radiation levels and the presence of contamination at work locations.

The information documents that the licensee conducted radiation surveys. The information also permits NRC inspectors to verify that the licensee complies with the survey requirements. Inspections are conducted at least every 3 years.

Section 39.69(a) requires that a licensee initiate emergency procedures as required by Section 39.63 procedures, approved by OMB clearance number 3150-0120. These procedures may include reporting as required under Section 39.77.

Section 39.73 requires that a licensee maintain certain documents and records at each field station. This information is needed at the site so that the licensee's operating personnel can have easy access to the documents they need to perform the job safely. Also, when an NRC inspector inspects a field station, the information provides the inspector with indications that the licensee complies with NRC requirements. Inspections are conducted at least every 3 years.

Section 39.75 requires that a licensee conducting operations at temporary job sites maintain certain documents and records at each temporary job site. This information is needed so that the licensee's operating personnel can have easy access to the documents they need to perform the job safely. The information also permits NRC inspectors to inspect these records at the temporary job site. Inspections are conducted at least every 3 years.

Section 39.77(a) requires that a licensee report immediately by telephone if a sealed source has been ruptured with a follow-up written report within 30 days. Paragraph (b) reminds licensees to follow Parts 20 and 30 reporting requirements for certain incidents. Requirements under Parts 20 and 30 have been cleared under OMB clearance numbers 3150-0014 and 3150-0017, respectively. Paragraph (c) provides that licensees must notify NRC by telephone if a sealed source becomes irretrievable and file a written report on the abandonment of the sealed source. The licensee must also notify the well owner or operator of the abandonment procedures. If abandonment procedures cannot be completed within 30 days, the licensee must request an extension of time. Paragraph (c)(2) requires the licensee to advise the well owner of the abandonment procedures under Section 39.15(a) or (c). Paragraph (d), approved under OMB clearance numbers 3150-0014 and 3150-0017, respectively, requires that the licensee must make a written report to NRC within 30 days after the source has been classified as irretrievable, and must send a copy of the written report to each State or Federal agency that issued permits or otherwise approved the drilling operation. This information collection is needed so that NRC regional offices will be informed of any incidents involving licensed materials, lost sources, or irretrievable well logging sources.

The information in paragraphs (c) & (d) permits NRC regional offices to make a determination whether an inspector should be dispatched to a site and to assure that corrective actions have been taken. When the licensee, in consultation with the well owner or operator, determines that a sealed source lost in a well becomes irretrievable, the licensee is required, except as provided by paragraph (c)(1)(ii), to notify NRC regional offices by telephone to request approval to implement abandonment procedures. The NRC regional office, based on the information supplied by the licensee, approves the abandonment if all reasonable efforts at recovery have been expended.

Section 39.91 provides that the Commission may grant exemptions from the requirements of Part 39 under specified conditions, upon the application of any interested person or on its own initiative. Applications under this section are examined by the NRC materials licensing staff to determine whether the requested exemption is authorized by law and whether it will not endanger life or property or the common defense and security, and to determine if it is otherwise in the public interest. Burden and cost has been approved under OMB clearance number 3150-0120.

2. Agency Use of the Information

The records that Part 39 requires licensees to maintain are reviewed by the NRC staff during inspections, license renewals, and license amendment reviews to evaluate compliance with NRC radiation safety requirements for possession and use of licensed radioactive material in well logging.

For example, internal inspection records are reviewed by NRC inspectors to verify that the licensee is maintaining an effective inspection program and that problems are being identified and corrected. The written agreement with a well owner or operator is needed to ensure that recovery or abandonment procedures will be implemented in the event of a stuck or irretrievable well logging source. The identification plaque is necessary to provide a warning to anyone reentering the well of the presence of the abandoned source and to provide information on the source and its location within the well. Labels required on the source, the source holder, or the logging tool containing radioactive materials, and -the storage or transport container, are needed to warn people that these devices or containers contain radioactive materials and that persons should notify civil authorities or the company if they find a labeled device or container.

Calibration records are needed to permit NRC inspectors to verify that the licensee is keeping a calibrated and operable radiation survey instrument at each field station and temporary job site to make required radiation surveys. Similarly, records of the results of leak testing of sealed sources are reviewed by NRC inspectors to verify that licensees have the source tested for leakage at least every 6 months, to ensure the sealed sources maintain their integrity.

The required reports regarding ruptured or irretrievable sources permit the NRC staff to make a determination whether an inspector should be dispatched to a site and to assure that corrective actions have been taken. When the licensee, in consultation with the well owner or operator, determines that a sealed source lost in a well becomes irretrievable, the licensee is required to notify NRC regional offices by telephone to request approval to implement abandonment procedures. The NRC regional office, based on the information supplied by the licensee, approves the abandonment if all reasonable efforts at recovery have been expended.

3. Reduction of Burden Through Information Technology

There are no legal obstacles to reducing the burden associated with this information collection. Applicants and licensees are encouraged to use automated information technology when it would be beneficial to them. The types of information and the infrequency of submission, the applications and reports may not lend themselves readily to the use of automated information technology for submission. However, the "Electronic Maintenance and Submissions of Information" rule, effective January 1, 2004, allows for the submission and maintenance of data in various electronic formats.

4. Effort to Identify Duplication and Use Similar Information

The Information Requirements Control Automated System (IRCAS) was searched to determine duplication. None was found. There is no similar information available to the NRC.

5. Effort to Reduce Small Business Burden

The majority of licensees who use byproduct material are small businesses. Since the health and safety consequences of improper handling or use of radioactive 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 Programs or Policy Activities if the Collection is not Conducted or is Conducted Less Frequently

If the information were not conducted, or were conducted less frequently, NRC would not have the information needed to assure that licensees are conducting and will continue to conduct programs in a manner that will assure adequate protection of the public health and safety. Required reports are collected and evaluated on a continuing basis as events occur. Applications for new licenses and amendments are submitted only once. Applications for renewal of licenses are submitted every 10 years. Information submitted in previous applications may be referenced without being resubmitted.

7. Circumstances Which Justify Variation from OMB Guidelines

Contrary to the OMB Guidelines in 5 CFR 1320.5(d), 10 CFR 39.31(a) requires that a licensee label (1) the source, the source holder, or the logging tool containing radioactive materials; and (2) the storage or transport container. The labels are required for the life of the device and are needed to warn people that these devices or containers contain radioactive materials and that persons should notify civil authorities or the company if they find a labeled device or container.

Section 39.35(d)(2) requires that licensees submit a report to NRC within 5 days of a failed leak test. However, reporting would be required only if the test reveals the presence of 0.005 microcurie or more of removable radioactive material. The report must be filed within 5 days to permit NRC to ensure that the licensee has taken action to remove the leaking source from service and to check for radioactive contamination. It also permits NRC to determine whether inspection or other response may be required to deal with potential problems affecting the public health and safety.

Section 39.65(c) requires licensees to retain records of personnel dosimeters and bioassay results until the Commission authorizes disposition. The information documents the radiation doses received by the licensee's employees. This information may be needed to reconstruct a worker's dose history in the event the worker loses his/her records.

Section 39.73 requires licensees to maintain certain documents and records at specified locations. The retention periods for the various documents vary and may be required for as long as the license is in effect. This information is needed at the various sites so that the licensee's operating personnel can have easy access to the documents they need to perform the job safely.

Section 39.75 requires licensees conducting operations at temporary job sites to maintain certain documents and records at each temporary job site. The retention periods for the various documents vary and may be required for as long as the license is in effect. This information is needed so that the licensee's operating personnel can have easy access to the documents they need to perform the job safely.

Section 39.77(a) requires immediate telephone notification, with a written report within 30 days, because the loss of licensed material and rupture of a sealed source could cause extensive radioactive contamination. Immediate notification would permit NRC to judge the severity of the situation and consider whether NRC should take immediate action. The confirmatory letter

within 30 days is needed to permit NRC to judge whether the licensee has taken corrective actions and whether NRC should consider follow-up actions.

Section 39.77(c) requires licensees to notify NRC by telephone if a source becomes irretrievable and obtain NRC approval for abandoning a sealed source in a well. The requirement for prompt notification is needed to permit NRC to judge whether all reasonable effort at recovery has been expended.

Section 39.77(d) requires that the licensee must make a written report to NRC within 30 days after the source has been classified as irretrievable. The written report within 30 days is needed to assure that the abandonment procedures are carried out promptly and satisfactorily. Furthermore, the report constitutes a record to alert State regulatory agencies that a sealed source is in the well if permission is requested to reenter the well.

8. Consultations Outside the NRC

The opportunity for public comment was published in the Federal Register on June 3, 2004. No comments were received.

9. Payment or Gift to Respondents

Not applicable.

10. Confidentiality of Information

None, except for proprietary information.

11. Sensitive Questions

None.

12. Estimated Burden and Burden Hour Cost

	NRC Licensees (hrs/yr)	Agreement State Licensees(hrs/yr)	Total Burden (hrs)
Reporting	111	405	516
Recordkeeping	7,483	26,934	34,417
TOTALS	7,594	27,339	34,933

The total burden for Part 39 is 34,933 hours. The total cost is \$2,301,876 (\$470,520 + \$1,831,356). The burden estimates are based on staff's best estimate of the time required to perform information collection activities.

	NRC	Agreement States	Total
Total Number of Licensees	35	126	161
Total Number of Responses	356	1,283	1,639

Total number of responses = 1800 (1639 responses + 391 recordkeepers).

13. Estimate of Other Costs

NRC has determined that the storage and equipment costs per foot are approximately \$45. The quantity of records to be maintained is roughly proportional to the recordkeeping burden. Based on the number of pages maintained for a typical clearance, the records storage cost has been determined to be equal to .0004 times the recordkeeping burden cost. Therefore, the storage cost for this clearance is estimated to be \$2,148 (34,417 recordkeeping hours X \$156 X 0.0004).

14. Estimated Annualized Cost to the Federal Government

It is estimated that the NRC annual cost of professional staff effort for activities other than application review is \$17,160 (110 hrs times \$156/hr). These costs are fully recovered through fee assessments to NRC licensees pursuant to 10 CFR Parts 170 and 171.

15. Reason for Change in Burden or Cost

The number of NRC licensees has decreased from 36 to 35, resulting in a burden reduction of 221 hours. The number of Agreement State licensees has increased from 90 to 126, resulting in a burden increase of 7,802 hours. Although the NRC burden has decreased slightly because there is one fewer licensee, overall the burden has increased by 7,581 hours because of the overall increase in licensees from 126 to 161. In addition, there was an increase in professional cost from \$143/hr to \$156/hr.

16. Publication for Statistical Use

None.

17. Reason for Not Displaying the Expiration Date

The requirement is contained in a regulation. Amending the Code of Federal Regulations to display information that, in an annual publication, could become obsolete would be unduly burdensome and too difficult to keep current.

18. Exceptions to the Certification Statement

None.

B. Collection of Information Employing Statistical Methods

Statistical methods are not used in this collection of information.

TABLE 1
ANNUAL INFORMATION COLLECTION BURDENS ASSOCIATED WITH
REPORTING REQUIREMENTS OF 10 CFR PART 39 FOR NRC LICENSEES

Section	Number of Respondents	Responses Per Respondent	Total Responses/yr	Burden Hrs/response	Total Burden hrs/yr
39.11 - See OMB clearance No. 3150-0120	0	0	0	0	0
39.13(a) - See OMB clearance No. 3150-0009	0	0	0	0	0
39.13(b),(c),(e),(f) -See OMB clearance No. 3150-0120	0	0	0	0	0
39.15(c)	1	1	1	5	5
39.17 - See OMB clearance No. 3150-0120	0	0	0	0	0
39.35(d)(2)	1	1	1	4	4
39.43(c)&(d) - See OMB clearance No. 3150-0120	0	0	0	0	0
39.45(b) - See OMB clearance No. 3150-0120	0	0	0	0	0
39.51 - See OMB clearance No. 3150-0120	0	0	0	0	0
39.53 - See OMB clearance No. 3150-0120	0	0	0	0	0
39.61(a)(2)&(b)(2)	35	10	350	.25	88
39.63 - See OMB clearance No. 3150-0120	0	0	0	0	0
39.69 - See OMB clearance No. 3150-0120	0	0	0	0	0
39.77(a)	1	1	1	12	12
39.77(b) - See OMB clearance Nos. 3150-0014 & 0017	0	0	0	0	0
39.77(c)	3	1	3	.5	2
39.77(d) - See OMB clearance Nos. 3150-0014 & 0017	0	0	0	0	0
39.91- See OMB clearance No. 3150-0120	0	0	0	0	0
Total			356		111

TABLE 2
ANNUAL INFORMATION COLLECTION BURDENS ASSOCIATED WITH **RECORDKEEPING**
REQUIREMENTS OF 10 CFR PART 39 FOR NRC LICENSEES

Section	Number of Recordkeepers	Burden Hrs Per Record-keeper	Total Hr/Yr	Record Retention Period
39.13(d)	35	1.25	44	3 years
39.15(a)&(b)	35	2	70	3 years
39.31(a)	35	.5	18	life of device
39.33(d)	35	1.6	56	3 years
39.35(a)&(c)	35	0.8	28	3 years
39.37	35	0.8	28	3 years
39.39 (a) and (b)	35	22.5	788	3 years
39.43(a)&(b)	35	7.7	270	3 years
39.49 - Included in 39.31(a)	0	0	0	
39.61(d)	35	7.5	263	3 years
39.65(a)-(c)	35	8.6	301	Until Commission authorizes disposition
39.67(f)	35	120	4,200	3 years
39.73	35	3	105	varies
39.75	35	37.5	1,312	varies
39.77(c)(2) - Included in 39.15(a)&(c)	0	0	0	
Total			7,483	

Section 39.13(d) is professional effort at \$156/hr while the remaining cost is clerical at \$60/hr.

NRC Licensees Burden and Cost

It is estimated that, for NRC licensees and applicants, there will be 356 responses and 111 burden hours annually and there will be 35 recordkeepers with a recordkeeping burden of 7,483 hours annually. The total NRC licensee burden will be 7,594 hours at a cost of \$470,520 (111 hrs reporting + 44 hrs recordkeeping X \$156 [professional rate] = \$24,180 plus 7,439 hrs recordkeeping X \$60 [clerical rate] = \$446,340).

TABLE 3
ANNUAL INFORMATION COLLECTION BURDENS ASSOCIATED WITH
REPORTING REQUIREMENTS OF 10 CFR PART 39 FOR AGREEMENT STATE LICENSEES

Section	Number of Respondents	Responses Per Respondent	Total Responses/yr	Burden Hrs/response	Total Burden hrs/yr
39.11 - See OMB clearance No. 3150-0120	0	0	0	0	0
39.13(a) - See OMB clearance No. 3150-0009	0	0	0	0	0
39.13(b),(c),(e),(f) - See OMB clearance No. 3150-0120	0	0	0	0	0
39.15(c)	4	1	4	5	20
39.17 - See OMB clearance No. 3150-0120	0	0	0	0	0
39.35(d)(2)	4	1	4	4	16
39.43(c)&(d) - See OMB clearance No. 3150-0120	0	0	0	0	0
39.45(b) - See OMB clearance No. 3150-0120	0	0	0	0	0
39.51 - See OMB clearance No. 3150-0120	0	0	0	0	0
39.53 - See OMB clearance Nos. 3150-0014, 0017 & 0120	0	0	0	0	0
39.61(a)(2)&(b)(2)	126	10	1,260	.25	315
39.63 - See OMB clearance No. 3150-0120	0	0	0	0	0
39.69 - See OMB clearance No. 3150-0120	0	0	0	0	0
39.77(a)	4	1	4	12	48
39.77(b) - See OMB clearance Nos. 3150-0014 & 0017	0	0	0	0	0
39.77(c)	11	1	11	.5	6
39.77(d) - See OMB clearance Nos. 3150-0014 & 0017	0	0	0	0	0
39.91 - See OMB clearance No. 3150-0120	0	0	0	0	0
Total			1,283		405

TABLE 4
ANNUAL INFORMATION COLLECTION BURDENS ASSOCIATED WITH **RECORDKEEPING**
REQUIREMENTS OF 10 CFR PART 39 FOR AGREEMENT STATE LICENSEES

Section	Number of Recordkeepers	Burden Hrs Per Record-keeper	Total Hr/Yr	Record Retention Period
39.13(d)	126	1.25	158	3 years
39.15(a)&(b)	126	2	252	3 years
39.31(a)	126	.5	63	
39.33(d)	126	1.6	202	3 years
39.35(a)&(c)	126	0.8	101	3 years
39.37	126	0.8	101	3 years
39.39 (a) and (b)	126	22.5	2835	3 years
39.43(a)&(b)	126	7.7	970	3 years
39.49 - Included in 39.31(a)	0	0	0	
39.61(d)	126	7.5	945	3 years
39.65(a)-(c)	126	8.6	1,084	Until Commission authorizes disposition
39.67(a)-(f)	126	120	15,120	3 years
39.73	126	3	378	
39.75	126	37.5	4,725	
39.77(c)(2) - Included in 39.15(a)&(c)	0	0	0	
Total			26,934	

Section 39.13(d) is professional effort at \$156/hr while the remaining cost is clerical at \$60/hr.

Agreement State Licensees Burden and Cost

It is estimated that, for Agreement State licensees and applicants, there will be 1,283 responses and 405 burden hours annually, and there will be 126 recordkeepers and a recordkeeping burden of 26,934 hours annually. The total Agreement State burden will be 27,339 hours at a cost \$1,831,356 (1,283 hrs reporting + 158 hrs recordkeeping X \$156 [professional rate] = \$224,796 plus 26,776 hrs recordkeeping X \$60 [clerical rate] = \$1606,560).