

February 10, 2005

SUMMARY OF INFORMATION COLLECTION REQUEST, Draft OCP

Title: 10 CFR Part 36 "Licenses and Radiation Safety Requirements for Irradiators"

Current Burden/Responses: 36,883 hours/87 responses (10 plus 77 recordkeepers)

Proposed Burden/Responses: 44,356 hours/108 responses (13 plus 95 recordkeepers)

Number of Respondents: 95 (19 NRC licensees and 76 Agreement State licensees.)

Burden Attributable to Third-Party Collections: None

Frequency of Response: On occasion

Reasons for Changes in Burden/Responses: The overall burden has increased by 7,473 hours from 36,883 to 44,356 hours because of an increase in the number of agreement state licensees from 64 to 76. Although the number of agreement state licensees increased, the number of NRC licensees decreased from 22 to 19. As a result of more recent information about the ratio of Agreement State licensees to NRC licensees, the total number of licensees subject to Part 36 has increased and the burden has increased proportionally.

On December 15, 2003 OMB approved a 908 hour burden increase related to NRC orders under § 36.19 (b). These orders required licensees to submit security and safeguards information, and to update procedures to ensure safe and secure activity. Upon further review of the NRC's reporting and recordkeeping requirements, it was determined that the burden for Orders given to irradiator licensees should be accounted for under Part 30 (OMB # 3510-0017), because the safeguards requirements have been extended to a variety of materials licensees licensed under Part 30. The next clearance extension for Part 30 is due December 2005. An information Correction Worksheet, OMB Form 83-C, has been prepared to transfer the 908 hour burden from Section 36.19(b) to Section 30.61 upon approval of 10 CFR Part 36 (OMB # 3150-0158).

Cost estimates have changed since the last clearance, as a result of an increase in the fee per hour from \$144 to \$156/hour.

Level of Concurrence: Chief
Materials Safety and Inspection Branch
Division of Industrial and Medical Nuclear Safety
Office of Nuclear Material Safety and Safeguards

Recordkeeping Requirements in Accordance with the Retention Periods for Records Rule:
Not Applicable.

Search of the Information Requirements Control Automated System (IRCAS):
IRCAS was searched and no duplication was found.

Abstract: 10 CFR Part 36 contains 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. The subparts cover specific requirements for obtaining a license or license exemption, design and performance criteria for irradiators; and radiation safety requirements for operating irradiators, including requirements for operator training, written operating and emergency procedures, personnel monitoring, radiation surveys, inspection, and maintenance. Part 36 also contains the recordkeeping and reporting requirements that are necessary 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.

cc: Chris Colburn
B. St. Mary