

Date: July 7, 2005

SUMMARY OF INFORMATION COLLECTION REQUEST

Title: 10 CFR Part 74, Material Control and Accounting of Special Nuclear Material (Draft OCP)

Current Burden/Responses: 8,050 hour/36 responses

Proposed Burden/Responses: 9,064 hours/134 responses (24 responses + 110 recordkeepers)

Frequency of Response: On occasion, semi-annually, one time

Number of Respondents: 22

Reasons for Changes in Burden/Responses:

The burden has increased for this information collection by 1,014 hours, from 8,050 to 9,064 hours. On May 30, 2003, the Office of Management and Budget (OMB) approved the information collections contained in the final rule, "Material Control and Accounting Amendments," published December 23, 2002 (67 FR 78130). In the rule, the Commission amended the MC&A requirements to reduce unnecessary regulatory burden and to provide additional flexibility to licensees required to submit Material Balance Reports and Inventory Composition Reports. This information collection incorporates sections revised and added by the final rule.

The total overall increase in burden hours is 1,014 hours, which is calculated by:

(1) The reduction of 100 reporting burden hours from Section 74.43(c), because there are no currently operating Category II Facilities.

(2) The addition of 2,800 recordkeeping burden hours for § 74.19 (from 1,600 in the final rule to an estimated 4,400 burden hours.) While the overall number of recordkeepers has decreased from 200 in the final rule to 110 with this extension package, the amount of time devoted to recordkeeping has increased from 8 to 40 hours per recordkeeper annually, based on the staff's recalculation of the estimate that respondents will require 40 hours per response under this section. This estimate was based on actual reports received and a reevaluation of the licensee recordkeeping requirements for this section. The 110 recordkeepers are licensees who must maintain records for small quantities of nuclear materials.

(3) The reduction of 120 hours for § 74.43(d), because there are no currently operating Category II Facilities.

(4) The reduction of 16 hours for § 74.45, as no responses are estimated for this period.

(5) The reduction of 2,350 recordkeeping burden hours for § 74.51(a). The original burden was estimated to be 1,375 hours per respondent to maintain records, but it has since been recalculated to be 200 hours per respondent, due to a miscalculation for 2 facilities. The present burden estimate is based on

actual reports submitted to NRC which established that it took approximately 200 hours to perform recordkeeping duties for this section. The total burden for this section is now 400 hours, which is 2,350 hours less than the original recordkeeping burden of 2,750 hours.

(6) The addition of 400 recordkeeping burden hours each for §§ 74.59(f) and 74.59(g) (a total of 800 hours), which require HEU facility licensees to perform a physical inventory and reconciliation every six months and establish auditable records and maintain them for at least 3 years. This burden was inadvertently left off out of the previous clearance package. However, based on actual reports received, the staff has estimated that respondents will require 200 hours per respondent to perform a physical inventory and reconciliation under § 74.59(f), and 200 hours per respondent to establish auditable records to demonstrate that the requirements of Sections 74.53, .55, .57, and .59 have been met.

Therefore, the burden for this clearance renewal is estimated to be 9,064 hours, which is: 8,050 - 100 + 2,800 - 120 - 16 - 2,350 + 800 hours.

There has also been an increase in the cost because the hourly rate has increased from \$157 to \$201/hr.

Level of Concurrence: Deputy Director
Division of Nuclear Security
Office of Nuclear Security and Incident Response

Recordkeeping Requirements in Accordance with the Retention Periods for Records Rule:
Records retentions are in accordance with standard retentions.

Search for Duplication of Information:

There is no duplication of requirements. NRC has in place an ongoing program to examine all information collections with the goal of eliminating all duplication and/or unnecessary information collections.

Abstract: 10 CFR Part 74 establishes requirements for material control and accounting of SNM, and specific performance-based regulations for licensees authorized to possess, use, and produce strategic special nuclear material, and special nuclear material of moderate strategic significance and low strategic significance. The information is used by NRC to make licensing and regulatory determinations concerning material control and accounting of special nuclear material and to satisfy obligations of the United States to the International Atomic Energy Agency (IAEA). Submission or retention of the information is mandatory for persons subject to the requirements.

cc: B. St. Mary

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