

June 30, 2005

## SUMMARY OF INFORMATION COLLECTION REQUEST

Title: 10 CFR 32, "Specific Domestic Licenses to Manufacture or Transfer Certain Items Containing Byproduct Material," Clearance Extension (Final OCP)

Current Burden/Responses: 151,644 hours/4,187 responses (3,502 + 685 recordkeepers)

Proposed Burden/Responses 135,741 hours/4,147 responses (3,172 + 975 recordkeepers)

Frequency of Response: On occasion, quarterly, every 5 years, and 10-year renewals

Reasons for Changes in Burden/Responses:

Section 32.21a added an additional 7,800 burden hours for recordkeeping for NRC licensees. This section was inadvertently omitted in the last submittal.

In Section 32.51(a)(3)-(5)&32.51a(d) the number of NRC recordkeepers has decreased from 24 to 20. Therefore, the burden hours have decreased from 1,164 to 970 hours, resulting in a burden decrease of 194 hours. For Agreement State licensees, the number of recordkeepers has decreased from 96 to 80. Therefore, the Agreement State burden has decreased from 4,656 to 3,880 hours, resulting in a burden reduction of 776 hours.

In Section 32.51a(a)&(b) the number of NRC recordkeepers has decreased from 194 to 95. Therefore, the burden hours have decreased from 252 to 124 hours, resulting in a burden reduction of 128 hours.

In Section 32.52(a)&(b) the NRC burden has been re-estimated based on a 4:1 ratio of NRC to Agreement State licensees and an estimation of 4 responses per respondent. The previous submittal only provided a total number of responses and burden per response (which has not changed). Based on the re-estimate in the NRC reporting table, the burden for submitting NRC Form 653 to NRC has decreased by 8 hours from 58 to 50 hours and the burden for sending the distribution reports to the Agreement States has decreased by 74 hours, from 192 to 118 hours. Based on the re-estimate in the Agreement State reporting table, the burden for submitting NRC Form 653 to NRC has decreased by 28 hours, from 230 to 202 hours and the burden for distribution reports has decreased by 294 hours, from 768 to 474 hours.

In Section 32.72(a)(4) the number of NRC recordkeepers have been decreased from 92 to 47 to more accurately reflect current data in the License Tracking System. Therefore, the burden hours were reduced from 35,880 to 18,330 for a burden reduction of 17,550 hours. The number of Agreement State recordkeepers has decreased from 230 to 188, reflecting the current information in the GLTS. Therefore, the burden hours have decreased from 89,700 to 73,320 hours, resulting in a burden decrease of 16,380 hours.

In Section 32.210 the number of NRC respondents has been reduced from 200 to 120 to reflect the current number of actions worked on. However, because the number of responses per respondent has been doubled, the burden hours have increased from 4,200 to 5,040 hours, resulting in an overall increase of 840 hours. For Agreement State

licensees, the number of respondents has increased from 100 to 480 reflecting the current multiplier (4:1) of Agreement State licensees to NRC licensees, resulting in a burden increase of 18,060 hours.

Level of Concurrence:

Branch Chief  
Rulemaking and Guidance 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:

Retentions are in accordance with standard retention periods.

Abstract:

10 CFR Part 32 establishes requirements for specific licenses for the introduction of byproduct material into products or materials and transfer of the products or materials to general licensees or persons exempt from licensing. It also prescribes requirements governing holders of the specific licenses. Some of the requirements are for information which must be submitted in an application for a specific license, records which must be kept, reports which must be submitted, and information which must be forwarded to general licensees and persons exempt from licensing. In addition, 10 CFR Part 32 prescribes requirements for the issuance of certificates of registration (concerning radiation safety information about a product) to manufacturers or initial transferors of sealed sources and devices. Submission or retention of the information is mandatory for persons subject to the 10 CFR Part 32 requirements. The information is used by NRC to make licensing and other regulatory determinations concerning the use of radioactive byproduct material in products and devices.

cc: B. St. Mary