

May 1, 2008

## **DRAFT SUMMARY OF INFORMATION COLLECTION REQUEST**

Title: 10 CFR Part 31, General Domestic Licenses for Byproduct Material

Current Burden/Responses:

15,343 hours (2,519 hours for NRC licensees [844 hours reporting and 1,675 hours recordkeeping] and 12,824 hours for Agreement State licensees [6,124 hours reporting and 6,700 hours recordkeeping]. Note that this total includes burden transferred from "Requirements for Expanded Definition of Byproduct Material," Final Rule (OMB Clearance #3150-0203).

Proposed Burden/Responses:

10,868 hours (1,460 hours for NRC licensees [975 hours recordkeeping and 485 hours reporting] and 9,408 hours for Agreement State licensees [4,850 hours recordkeeping and 4,558 hours reporting]).

Frequency of Response: On occasion.

Number of Respondents: 3,900 NRC general licensees and 19,400 Agreement State licensees

Reasons for Changes in Burden/Responses:

The previous burden estimate was 15,343 (2,519 hours for NRC licensees [844 hours reporting and 1,675 hours recordkeeping] and 12,824 hours for Agreement State licensees [6,124 hours reporting and 6,700 hours recordkeeping]. Note that this total includes burden transferred from "Requirements for Expanded Definition of Byproduct Material," Final Rule (OMB Clearance #3150-0203).

The current burden estimate is 10,868 (1,460 hours for NRC licensees [485 hours reporting and 975 hours recordkeeping] and 9,408 hours for Agreement State licensees [4,558 hours reporting and 4,850 hours recordkeeping]).

The overall decrease in burden is 4,475 hours. The reasons for this change are as follows:

NRC Licensees:

The NRC reviewed data from its General License Tracking System and determined that fewer NRC licensees were reporting under Part 31 than previously estimated. This reduction is attributable to more accurate data in the licensee tracking system. Duplications and discrepancies that existed in the system at the time of the last submittal have since been, and continue to be, cleared from the system. As a result of this review, the number of estimated reporting hours decreased from 844 to 485 hours, a decrease of 359 hours.

The recordkeeping burden for NRC licensees has decreased from 6,600 respondents (6,700 x .25 hours = 1,675 hours) to 3,900 respondents (3,900 x .25 hours = 975 hours).

This reduction of 700 hours is due to review of data from the GLTS. Based on recent data, the NRC has updated the estimates to reflect the number of respondents holding general licenses. The number of NRC's licensees holding general licenses has decreased because Pennsylvania and Minnesota became Agreement States. Also, some specific licensees converted the generally licensed devices to specifically licensed devices.

Agreement States:

NRC reviewed the estimated number of Agreement State licensee respondents, and revised the burden to reflect the current status of the general license program. This accounts for Pennsylvania and Minnesota becoming Agreement States. In addition, the estimates were revised to reflect Agreement States which opted out of the general license to specifically license devices pursuant to 10 CFR Part 30. (Some licensees converted generally licensed devices to specifically licensed devices.)

As a result of these changes, the number of hours estimated for Agreement State reporting under Part 31 has decreased from 6,124 hours of reporting to 4,558 hours, a change of 1,566 hours.

As a result of these changes, the recordkeeping burden for Agreement States also decreased, from 26,800 respondents (26,800 x .25 hours = 6,700 hours) to 19,400 respondents (19,400 x .25 hours = 4,850 hours), a reduction of 1,850 hours.

In addition, cost estimates have changed since the last clearance, as a result of an increase in the fee per hour from \$156 to \$258/hour.

Level of Concurrence:            Branch Chief, Source Safety and Security Branch  
                                         Division of Materials Safety and State Agreements  
                                         Office of Federal and State Materials and Environmental  
                                         Management Programs

Effort to Identify Duplication and to use Similar Information:

No sources of similar information are available. There is no duplication of requirements. NRC has in place a program that examines all information with the goal of eliminating duplications and/or unnecessary information collections.

Abstract:

10 CFR Part 31 establishes general licenses for the possession and use of byproduct material in certain devices and a general license for use of byproduct material. General licensees are required to keep records and submit reports identified in Part 31 in order for NRC to determine with reasonable assurance that devices are operated safely and without radiological hazard to users or the public.