FINAL OMB SUPPORTING STATEMENT
FOR
10 CFR PART 31
GENERAL DOMESTIC LICENSES FOR BYPRODUCT MATERIAL
(3150-0016)

EXTENSION WITH BURDEN REVISION

Description of the Information Collection

Part 31 of Title10 of the Code of Federal Regulations establishes general licenses for certain types of activities. The terms and conditions of the general licenses require that records must be kept by the general licensees and/or the general licensees must submit transfer and events reports to the NRC.

Part 31 of Title 10 of the Code of Federal Regulations establishes general licenses for possession, use, and ownership of byproduct materials. Regulations governing the general licenses require that general licensees must maintain records and submit information to the Nuclear Regulatory Commission (NRC) or an Agreement State. Licensees must (1) maintain records as applicable, for three years (or until the device is transferred or disposed) showing results of tests on the devices, who tested or leak tested the device, and when it occurred; (2) report to the NRC if a transfer, loss, failure, or damage to, the radioactive material device, on-off mechanism, indicator on the device occurs, or if 0.005 microcurie or more of removable radioactive activity is detected; (3) provide regulatory and safety-related documents to the licensee receiving the device; (4) respond within 30 days to written requests from the NRC for information related to their licenses; (5) annually register certain generally licensed devices with the NRC or an Agreement State; (6) report to the NRC on changes in the licensees name or location of use of generally licensed devices containing byproduct material; and (7) ensure that labels are not removed from generally licensed devices.

This submission seeks to extend the clearance for information collections in Part 31 and revise burden estimates for this Part based on a review of recent data submissions for Part 31.

This submission includes burden hours transferred from "Requirements for Expanded Definition of Byproduct Material," Final Rule (OMB Clearance #3150-0203). This rule expanded the definition of byproduct material to include certain discrete sources of radium, certain accelerator-produced radioactive material, and certain discrete sources of naturally occurring radioactive material. This rule increased the number of affected entities subject to reporting under Part 31.

A. JUSTIFICATION

1. Need for and Practical Utility of the Collection of Information

Section 31.2 establishes the provisions for the general licenses of 10 CFR Part 31. The Part 31 general licenses are subject to the general provisions of Part 30 (Sections 30.1 through 30.10), the provisions of §§ 30.14(d), 30.34(a) to (e), 30.41,30.50 to 30.53, 30.61 to 30.63, and Parts 19, 20, and 21, unless indicated otherwise in the specific provision of the general license. OMB clearance numbers for the information collections contained in these regulations are as follows:

10 CFR Part	OMB Clearance No.
19	3150-0044
20	3150-0014
21	3150-0035
30	3150-0017

Section 31.5 establishes regulatory requirements for a general license for certain measuring, gauging, or controlling devices. The devices contain radioactive byproduct material and are designed and manufactured for the purpose of detecting, measuring, gauging or controlling thickness, density, level, interface location, radiation, leakage, or qualitative or quantitative chemical composition, or for producing light or an ionized atmosphere. The devices are initially distributed to the general licensees by persons licensed in accordance with Section 32.51. Generally licensed devices are subjected to regulatory requirements and in-depth reviews are performed as these devices are to be used by persons requiring no radiological training. Additionally, the devices are required to have tamper-proof features. Section 31.5(c)(4) requires that the general licensee shall assure that prescribed periodic leak tests of radioactive generally licensed devices and proper operation of on-off mechanism, and/or other specified tests have been performed and the licensee shall maintain records of such tests. The records must contain the result of the tests, the date the tests were performed, and the names of the individuals performing testing, installing, servicing, and removing radioactive material and its shielding or containment. The records must be maintained for 3 years or until the device is transferred or disposed of. On an as needed basis, the test records are reviewed by the NRC and Agreement States inspectors to test their accuracy completeness and to determine that the devices are in compliance with the regulatory requirements.

Section 31.5(c)(4) requires that the general licensee shall assure that prescribed periodic leak tests, proper operation of on-off mechanism, and/or other specified tests have been performed and that the licensee shall maintain records of such tests. The records must contain the result of the tests, the date the tests were performed, and the names of the individuals performing testing, installing, servicing, and removing radioactive material and its shielding or containment. Records must be maintained for 3 years or until the device is transferred or disposed of. On an as needed basis, the test records are reviewed by the NRC to determine that devices are in compliance with the regulatory requirements.

Section 31.5(c)(5) requires that the general licensee report, within 30 days, to the Director, Office of Federal and State Materials and Environmental Management Programs, the occurrence of a failure or damage to the containment boundary or shielding of the radioactive material or the on-off mechanism or indicator on the generally licensed device, or upon the detection of 0.005 microcurie or more of removable radioactive material. The report must contain a brief description of the event and the remedial action taken. In addition, the licensee is required to submit a plan for ensuring that the premises and environs are acceptable for unrestricted use in the event that detection of 0.005 microcurie or more of removable radioactive material, or failure of or damage to a source, is likely to result in contamination of the premises or the environs.

This reporting requirement is necessary to ensure that the NRC is notified in a timely manner of any abnormal occurrences or potential problems with generally licensed devices authorized by the NRC. It is important that the NRC receive such reports to determine if

damage or failure of a device could or did constitute a radiation safety problem and to determine that the remedial action taken was appropriate. These reports also provide device performance data which could assist in identifying and characterizing a generic problem. The requirement for plans for ensuring that the premises and environs are acceptable for unrestricted use is to require that general licensees, who are not subject to decommissioning requirements, have adequate plans and procedures for cleaning up any contamination.

Section 31.5(c)(8) requires that general licensees transfer or dispose of generally licensed devices containing byproduct material only (1) by export under NRC's import/export regulations in 10 CFR Part 110, (2) by transfer to a person authorized to receive the device by a specific license issued under 10 CFR Parts 30 and 32 of, this chapter, or equivalent regulations of an Agreement State (manufacturer/distributor), (3) by transfer to a specific licensee under Part 30, or equivalent regulations of an Agreement State authorized for waste collection, (4) by transfer to another general licensee as authorized in Section 31.5(c)(9). Upon transfer, the general licensee shall, within 30 days after such transfer, furnish to the Director, Office of Federal and State Materials and Environmental Management Programs, a report containing identification of the device by manufacturers (or initial transferor's) name, model number, and serial number, the name, address, and license number of the person receiving the device (license number is not required if the device is exported), and the date of transfer.

These reports are necessary so that the NRC and Agreement States can make a determination that the transfer of a generally licensed device was to an entity authorized to receive a device. Such reports also assist in determining when devices are removed from service at a particular location and in tracking individual generally licensed devices.

Section 31.5(c)(9) requires the general licensee wishing to transfer a generally licensed device pursuant to 10 CFR Part 31.5 to another general licensee to do so only under certain circumstances and the general licensee is required to give the transferee, as a minimum, a copy of Sections 30.51, 31.2, 20.2201, and 20.2202 and any safety documents identified in the label of the device. In addition, the general licensee shall report within 30 days to the Director, Office of Federal and State Materials and Environmental Management Programs, the manufacturer's (or initial transferor's) name, the model number and serial number of the device, the name of the transferee and the mailing address for the location of use. Additionally, the name of a contact, and the title and phone number of the responsible individual identified by the transferee as having the knowledge and authority for taking required actions to comply with regulatory requirements must be included in the report.

The transferor must provide copies of applicable NRC regulations and safety documents to a transferee to ensure the new licensee has all necessary safety information for using the device and enable the new licensee to ensure the day-to-day compliance with regulations and requirements. The required reporting to NRC is the only mechanism available for making the regulatory authorities aware that a particular general licensee is no longer responsible for a device at a particular location and that a different person is responsible for the device or devices and has the qualifications to act in that regard.

Section 31.5(c)(11) requires general licensees to respond to written requests from NRC to provide information relating to the general license within 30 calendar days of the date of the request, or other time specified in the request. If the general licensee cannot provide the

requested information within the allotted time, it shall, within that same time period, request a longer period to supply the information by submitting a letter to the Director, Office of Federal and State Materials and Environmental Management Programs and provide written justification as to why it cannot comply.

This requirement is contained in this section to clarify that the NRC may request information from the general licensee during the useful working life of a device, if needed in carrying out its duties.

Section 31.5(c)(13) requires annual registration of certain generally licensed devices which were manufactured or initially transferred and labeled in accordance with specifications contained in a specific license issued to 10 CFR 32.51. Devices for general licensees whose devices meet the annual registration criteria are contained in Section 31.5(c)(13). These general licensees are required annually to verify, correct, and/or add to information provided in the request for registration and submit this information to NRC within 30 days of the request. This information includes: (a) name and mailing address of the general licensee; (b) information about each device: the manufacturer (or initial transferor), model number, serial number, the radioisotope and activity (as indicated on the label); (c) the name, title, and phone number of the responsible person designated as a representative of the general licensee under Section 31.5(c)(12); (d) the address or location at which the device(s) are used and/or stored. For portable devices, the address of the primary place of storage; (e) certification by the responsible representative of the general licensee that the information concerning the device(s) has been verified through a physical inventory and checking of label information; and (f) certification by the responsible representative of the general licensee that they are aware of the requirements of the general license. If one or more intermediate persons will temporarily possess the device at the intended place of use before its possession by the user, the report must include the same information for both the intended user and each intermediate person, and clearly designate the intermediate person(s).

NRC Form 664, “General Licensee Registration,” which is used to collect this information, has previously been cleared under OMB Clearance No. 3150-0198, which should be referred to for additional supporting information, burden, and cost data.

Section 31.5(c)(14) requires general licensees to notify NRC within 30 days of changes of address for the location of use of devices. For portable devices, the change of address reporting applies only to the device’s primary place of storage.

This requirement allows the NRC to track general licensees for contact or inspection purposes. The quarterly reports required of distributors under Section 32.52(a) and (b) provide NRC and the Agreement State regulatory agencies with the identity of general licensees in their jurisdictions and the location of use of the generally licensed devices.

If general licensees move their operations without notifying NRC or the appropriate Agreement State agency, they may be difficult to locate.

Section 31.8(c)(2) requires that persons generally licensed in accordance with Section 31.8 shall not receive, possess, use or transfer a generally licensed americium-241 and radium-226 calibration or reference source unless it bears a label which contains sufficient information relative to safe use and storage of the source, identification that receipt, possession, use, and transfer of the source are subject to a general license, and contain

the model number and serial number. This requirement is necessary because it is the only means the Commission has to inform anyone who may come in contact with the calibration or reference source, what they are and their model and serial number in the event they are lost, damaged and need to be identified.

Section 31.11(b) requires a physician receiving, possessing, using or transferring byproduct material in accordance with the general license in Section 31.8 to file NRC Form 483, "Registration Certificate-In Vitro Testing With Byproduct Material Under General License." The physician will receive a validated copy back from NRC with a registration number assigned. This requirement is necessary because suppliers of byproduct material are required to determine that the person receiving the material is authorized to receive it. The validated registration certificate serves as evidence for the supplier that a physician is a general licensee authorized to receive the byproduct material. The certificate contains terms and conditions of the general license that assure that the general licensee is aware of terms and conditions prior to receipt of the byproduct material. NRC Form 483 has previously been cleared under OMB No. 3150-0038, which should be referred to for additional supporting information, burden, and cost data.

Section 31.11(e) requires a physician receiving, possessing, using or transferring byproduct material in accordance with the general license in Section 31.8 to report any changes to the information furnished on NRC Form 483 within 30 days. The NRC staff uses the information submitted on the registration form to identify each physician using byproduct material under the general license. The registration information facilitates communication with the general licensee. NRC Form 483 has previously been cleared under OMB No. 3150-0038, which should be referred to for additional supporting information, burden, and cost data.

Section 31.12 allows for a general license for certain items and self-luminous products containing radium-226. Section 31.12(a) states that a general license is issued to any person to acquire, receive, possess, use, or transfer, in accordance with the provisions of paragraphs (b), (c), and (d) of this section, radium-226 contained in the products manufactured prior to November 30, 2007.

Section 31.12(b) stipulates that persons who acquire, receive, possess, use, or transfer byproduct material under the general license issued in paragraph (a) of this section are exempt from the provisions of 10 CFR parts 19, 20, and 21, and § 30.50 and 30.51, to the extent that the receipt, possession, use, or transfer of byproduct material is within the terms of the general license; provided, however, that this exemption shall not be deemed to apply to any such person specifically licensed under this chapter.

Section 31.12(c) states that any person, who acquires, receives, possesses, uses, or transfers byproduct material in accordance with the general license in paragraph (a) of this section, shall notify the NRC should there be any indication of possible damage to the product so that it appears it could result in a loss of the radioactive material. A report containing a brief description of the event, and the remedial action taken, must be furnished to the Director, Office of Federal and State Materials and Environmental Management Programs, U.S. Nuclear Regulatory Commission, Washington, DC 20555–0001 within 30 days.

2. Agency Use of Information

The records required by Section 31.5(c)(4) are used by NRC inspectors to establish compliance with the requirements of the general license regulations. It is important that NRC receive reports required by Section 31.5(c)(5) so that NRC may determine if damage or failure of a device could or did constitute a radiation safety hazard and to determine if remedial action taken was appropriate. Other reports and records required by the regulation are important so that NRC can determine that the transfer of a device for disposal is to a person specifically licensed to receive the device, to assist in determining when a device is removed from a particular location, and for determining when a general licensee is no longer responsible for the device.

The requirements in Section 31.8(c)(2) are necessary so that, in the event of a lost source, the NRC may provide on request information about the source/device to anyone who is exposed to the device source or sources.

3. Reduction of Burden Through Information Technology

There are no legal obstacles to reducing the burden associated with this information collection. The NRC encourages respondents to use information technology when it would be beneficial to them. NRC issued a regulation on October 10, 2003 (68 FR 58791), consistent with the Government Paperwork Elimination Act, which allows its licensees, vendors, applicants, and members of the public the option to make submissions electronically via CD-ROM, e-mail, fax, special Web-based interface, or other means. However, these information collections do not readily lend themselves to the use of information technology because of the varied types of information and the infrequency of submission; there currently are no electronic submissions for this clearance. Registration information can be provided by the licensee by transmitting the requested information by an e-mail or a fax.

4. Effort to Identify Duplication and 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.

5. Effort to Reduce Small Business Burden

While a number of the licensees are considered small businesses, the health and safety consequences of improper use of radioactive material are the same for large and small entities. Therefore, it is not possible to reduce the burden on small businesses by less frequent submission or less complete summary applications.

6. Consequences to Federal Program or Policy Activities if the Collection is Not Conducted or is Conducted Less Frequently

Required reports are collected and evaluated on a continuing basis as events occur. The schedule for collecting the information is the minimum frequency which will permit NRC to assure that the public health and safety and environment is adequately protected.

7. Circumstances Which Justify Variation from OMB Guidelines

Contrary to the Office of Management and Budget Guidelines (OMB) in 5 CFR 1320.6(b), Sections 31.5(c)(5), 31.5(c)(8), 31.5(c)(9), 31.5(c)(11), 31.5(c)(13), 31.5(c)(14), and 31.11(e) 31.12 (5) (c) (1) and Sections 20.2201 and 20.2202 require that licensees shall report immediately for the loss of certain devices and submit a report or notification to NRC in less than 30 days from the date of the actions required by the respective sections. The requirement to provide a report or notification within 30 days is necessary to ensure that NRC is made aware of any significant safety information associated with events or transfers so as to take prompt action to protect the public health and safety.

8. Consultations Outside NRC

Opportunity for public comment on the information collection requirements for this clearance package was published in the Federal Register on May 8, 2008, (73 FR 26150). No comments were received.

9. Payment or Gifts to Respondents

Not applicable.

10. Confidentiality of Information

Confidential and proprietary information is protected in accordance with NRC regulations at 10 CFR 9.17(a) and 10 CFR 2.390(b) or equivalent Agreement States regulations. However, general licensees are advised and discouraged from submitting proprietary, confidential or trade secrets type of information.

General License Tracking System (GLTS) is not a system of record and it has been determined that GLTS is not subject to the Privacy Act.

11. Justification for Sensitive Questions

No sensitive information is requested under these regulations.

12. Estimated Burden and Burden Hour Cost

NRC Licensees:
See Tables 1 and 2 for reporting and recordkeeping burden for a total of 3,900 NRC general licensees that will respond to Part 31 information collection requirements. The total annual burden for NRC licensees is estimated to be 1,460 hours (485 reporting + 975 recordkeeping). The total cost for NRC licensees is estimated to be $347,480 (1,460 hours x $238/hour).

Agreement State Licensees:
See Tables 3 and 4 for reporting and recordkeeping burden for an estimated 19,400 Agreement State general licensees that will respond to Part 31 information collection requirements. NRC estimated the number of Agreement State licensees based on the current status and knowledge of Agreement State programs. The total annual burden is estimated to be 9,408 hours (4,558 reporting + 4,850 recordkeeping) per year. The total cost for the Agreement State licensees would be $2,239,104 (9,408 hours x $238/hour).

Total:
The total burden for both NRC and Agreement State licensees is estimated to be 10,868 hours (1,460 hours for NRC licensees + 9,408 hours for Agreement State licensees). The total cost is $2,586,584 (10,868 hours x $238/hour).

13. Estimate of Other Additional Costs

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 $555 (5,825 hours recordkeeping [975 NRC + 4,850 Agreement State hours] x .0004 x $238/hr).

14. Estimated Annualized Cost to the Federal Government

The estimated cost of NRC professional review and other efforts attributable to the other requirements is 1,200 hours at $238/hr = $285,600. This cost is fully recovered through fee assessments to NRC licensees pursuant to 10 CFR Parts 170 and/or 171.

The NRC staff time and associated burden for the requirements of Section 31.2 are included in the OMB clearance for the appropriate Sections of Parts 19, 20, 21, and 30. Application review activities are attributable to and reported under NRC Form 483, OMB Clearance No. 3150-0038.

15. Reasons for Change in Burden or Cost

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 No. 3150-0203). The transferred burden totaled 225 hours and 620 responses (45 hours and 124 responses for NRC licensees, 180 hours and 496 responses for Agreement State licensees).

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.

Following is a breakdown of the changes in reporting for NRC licensees:

Section 31.5(c)(5) respondents increased from 2 to 3
(1 respondent x 2.8/hrs per response)……. = +2.8 hrs

Section 31.5(c)(8) respondents decreased from 595 to 326
(-269 respondents x 0.6/hrs per response…… = -161.4 hrs

Section 31.5(c)(9) respondents increased from 9 to 43
(34 respondents x 1.0/hrs per response)…… …….= +34.0 hrs

Section 31.5(c)(11) respondents decreased from 1,340 to 651
(-689 respondents x 0.34/hrs per response)……..……= -234.3 hrs

Section 31.5(c)(14) respondents decreased from 52 to 47
(-5 respondent x 0.1/hrs per response)……..……..= -0.5 hrs

Total decrease in Part 31 reporting for NRC licensees……..…… = -359 hrs

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.

Section 31.5(c)(5) respondents increased from 8 to 9
(1 respondent X 2.8/hrs per response)……. = +2.8 hrs

Section 31.5(c)(9) respondents increased from 36 to 214
(+178 respondents X 1.0/hrs per response)…… = +178.0 hrs

Section 31.5(c)(11) respondents decreased from 5,360 to 3,245
(-2,115 respondents X 0.34/hrs per response)…… = -719.1 hrs

Section 31.5(c)(13) respondents decreased from 8,320 to 5,200
(-3,120 respondents X 0.33/hrs per response)…… = -1,029.6 hrs

Section 31.5(c)(14) respondents decreased from 208 to 230
(+22 respondents X 0.1/hrs per response)…….. = +2.2 hrs

Total decrease in reporting for Agreement States..……..…… = -1,566 hrs

Also 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 $238/hour.

The overall reductions captured in this renewal package is due to agency adjustments which resulted in a decrease of 15,780 responses from 51,825 responses to 36,045 responses; a decrease in burden of 4,475 hours from 15,343 hours to 10,868 hours; and a decrease in cost of $445 from $1,000 to $555.

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

Please note that although some statements inadvertently were not selected on the certification on the initial submission, there are no exceptions to the certification statement. This includes the following statements:

- The requirement's implementation will be consistent and compatible with current reporting and recordkeeping practices.
- The requirement indicates retention periods for recordkeeping requirements.
- The requirement information respondents of the information called for under 5 CFR 1320.8(b)(3) about why the information is being collected, use of the information, burden estimate, nature of response (voluntary, required for a benefit or mandatory), nature and extent of confidentiality, and need to display currently valid OMB number.
- The requirement makes appropriate use of information technology.

B. COLLECTIONS OF INFORMATION EMPLOYING STATISTICAL METHODS

Statistical methods are not used in this collection of information.

Table 1 - Reporting Requirements for Part 31 NRC Licensees

Section	Number of Respondents	Number of Responses Per Respondent	Total Annual Responses	Burden Hrs Per Response	Total Annual Burden (Hrs)	Cost @ $238/Hr
31.2 See OMB clearances 3150-0044, 3150-0014, 3150-0035, 3150-0017						
31.5(c)(5)	3	1	3	2.8	8.4	$1,999
31.5(c)(8)	326	1	326	0.6	195.6	$46,553
31.5(c)(9)	43	1	43	1	43	$10,234
31.5(c)(11)	651	1	651	0.34	221.3	$52,679
31.5(c)(13) See OMB clearance 3150-0198						
31.5(c)(14)	47	1	47	0.1	4.7	$1,119
31.11(b) & (e) See OMB clearance 3150-0038						
31.12(c)(1)	3	1	3	4	12	$2,856
31.12(c)(4)	0	1	0	4	0	$0
31.12(c)(5)	0	1	0	4	0	$0
TOTAL			1,073		485	$115,430

Table 2 - Recordkeeping Requirements for Part 31 NRC Licensees

Section	Number of Recordkeepers	Hours Per Recordkeeper	Total Annual Burden Hours	Cost @ $238/Hr	Record Retention Period
31.5(c)(4)	3,900	0.25	975	$232,050	3 years
31.8(c)(2)	0	0	0	$0	length of license
TOTAL	3,900		975	$232,050	

Table 3 - Reporting Requirements for Part 31 Agreement State Licensees

Section	Number of Respondents	Number of Responses Per Respondent	Total Annual Responses	Burden Hrs Per Response	Total Annual Burden (Hrs)	Cost @ $238/Hr
31.2 See OMB clearances 3150-0044, 3150-0014, 3150-0035, 3150-0017						
31.5(c)(5)	9	1	9	2.8	25.2	$5.998
31.5(c)(8)	2,380	1	2,380	0.6	1,428	$339,864
31.5(c)(9)	214	1	214	1	214	$50,932
31.5(c)(11)	3,245	1	3,245	0.34	1,103.3	$262,585
31.5(c)(13)	5,200	1	5,200	0.33	1,716	$408,408
31.5(c)(14)	230	1	230	0.1	23	$5,474
31.11(b) & (e) See OMB clearance 3150-0038						
31.12(c)(1)	12	1	12	4	48	$11,424
31.12(c)(4)	0	1	0	4	0	$0
31.12(c)(5)	0	1	0	4	0	$0
TOTAL			11,290		4,558	$1,084,804

Table 4 - Recordkeeping Requirements for Part 31 Agreement State Licensees

Section	Number of Recordkeepers	Hours Per Recordkeeper	Total Annual Burden Hours	Cost @ $238/Hr	Record Retention Period
31.5(c)(4)	19,400	0.25	4,850	$1,154,300	3 years
31.8(c)(2)	0	0	0	$0	length of license
TOTAL	19,400		4,850	$1,154,300	