

DRAFT OMB SUPPORTING STATEMENT FOR
NRC FORM 4
CUMULATIVE OCCUPATIONAL EXPOSURE HISTORY
(3150-0005)
(Clearance Revision)

Description of the Information Collection

The purpose of Title 10 of the *Code of Federal Regulations* Part 20 (10 CFR Part 20) is to establish “Standards for Protection against Radiation.” 10 CFR Part 20 provides requirements to persons licensed by the U.S. Nuclear Regulatory Commission (NRC) to receive, possess, use, transfer, or dispose of byproduct, source, or special nuclear material or to operate a production or utilization facility under parts 30 through 36, 39, 40, 50, 52, 60, 61, 63, 70, or 72. In addition, 10 CFR Part 20 applies to persons required to obtain a certificate of compliance or an approved compliance plan under 10 CFR Part 76.

Pursuant to 10 CFR 20.1502 licensees are required to monitor exposures to radiation and radioactive material at levels to demonstrate compliance with the occupational dose limits in 10 CFR 20.1201. 10 CFR 20.2104 requires licensees to determine the occupational radiation dose received by an individual, who required monitoring under 10 CFR 20.1502, during the current year. To comply with these requirements, the licensee may accept a written signed statement from the individual or from the individual’s most recent employer as a record of the occupational dose that the individual received during the current year. The licensee may also accept as a record of cumulative radiation dose an up-to-date NRC Form 4, “Cumulative Occupational Dose History,” or its equivalent. The NRC Form 4 should be signed by the individual and countersigned by an appropriate official of the most recent employer for work involving radiation exposure, or the individual’s current employer (if the individual is not employed by the licensee).

A. JUSTIFICATION

1. Need for and Practical Utility of the Information Collection

10 CFR 20.2104 requires licensees to determine an individual’s prior occupational dose. As specified in Section 20.2104(c), licensees may obtain this information through several methods. Section 20.2104(d) requires licensees to record an individual’s prior occupational dose on an NRC Form 4, or its equivalent, and this record must show each period in which the individual received occupational exposure to radiation or radioactive material and must be signed by the individual who received the exposure. The data contained in NRC Form 4, or its equivalent, can be reviewed by NRC inspectors to determine compliance with the annual dose limits in 10 CFR 20.1201 to ensure the health and safety of licensee employees.

In addition, Section 20.2104(f) requires licensees to retain the NRC Form 4 records, or its equivalent, until the Commission terminates the license.

The NRC Form 4 information collection is based, in part, on Presidential Guidance to Federal Agencies for Occupational Exposure published in the *Federal Register* on January 27, 1987. NRC Form 4 is a cumulative summary of the information found on NRC Form 5, which is submitted by NRC licensees annually pursuant to 10 CFR 20.2206.

2. Agency Use of Information

The NRC uses the information to ensure that licensees are complying with the appropriate regulations, specified in 10 CFR 20.1502 and 10 CFR 20.2104, and their license conditions in order to protect the health and safety of occupational radiation workers and the public.

3. Reduction of Burden Through Information Technology

The NRC Form 4 is not required to be submitted to the NRC. However, NRC licensees provide this form to their occupational radiation workers who were monitored pursuant to 10 CFR 20.1502.

Regulatory Guide 8.7, Revision 2, (November 2005), "Instructions for Recording and Reporting Occupational Radiation Dose Data," provides licensees with guidance regarding the recommended format for both paper and electronic submission of occupational radiation dose data. The electronic reporting guidance provided in this document is intended to reduce the reporting burden on licensees. In addition, the NRC-supplied software, Radiation Exposure Management Information Transmittal (REMIT) is available to licensees at no cost. Licensees with Internet access may download this software free of charge from the NRC's Radiation Exposure Information and Reporting System (REIRS) Web site at <http://www.reirs.com>. This software vastly reduces the burden of collecting and maintaining occupational radiation dose information and allows licensees to generate the NRC Form 4.

In addition, NRC has an automated dose history request form on the REIRS Web site that allows individuals and organizations to request a cumulative dose history report, or NRC Form 4, for individuals monitored at NRC facilities. The automated request form is another paperwork reduction feature. A requestor electronically submits a request and a NRC Form 4 report is sent via an encrypted email.

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, special Web-based interface, or other means. It is estimated that approximately 98% of the potential responses are filed electronically.

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 an ongoing program to examine all information collections with the goal of eliminating all duplication and/or unnecessary information collections.

5. Effort to Reduce Small Business Burden

NRC's development and maintenance of the REMIT software is a direct effort to reduce the burden on small businesses. REMIT is also used by large businesses to help reduce their paperwork burden. NRC provides the REMIT software, at no cost, to all licensees (both small and large firms) to assist them in their recording, reporting, and maintenance of occupational radiation exposure data. In addition, the automated dose history request option, available on the REIRS Web site is particularly beneficial to small businesses that may not have the resources to obtain prior dose histories for their occupational radiation workers. It is not possible to reduce the burden on small businesses any further and still meet the objectives stated in A.1.

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

If the requirements of 10 CFR 20.2104 were not met by licensees, licensees would not be knowledgeable of an occupational worker's prior radiation exposure. A lack of knowing this information could lead to an occupational radiation worker receiving a radiation exposure in excess of the limits specified in 10 CFR 20.1201 for the current year. This lack of information could result in non-compliance by a licensee.

7. Circumstances Which Justify Variation from OMB Guidelines

Records associated with the NRC Form 4 must be retained for the life of the NRC license in accordance with Section 20.2104(f).

8. Consultations Outside the NRC

Opportunity for public comment on the information collection requirements for this clearance package has been published in the Federal Register.

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).

11. Justification for Sensitive Questions

NRC Form 4 specifies the use of the individual's name, social security number or other ID, date of birth, and sex. This information is necessary to ensure the proper identification of the individual.

12. Estimate of Annual Burden

The requirement to obtain and maintain the information specified in NRC Form 4, or its equivalent, for each individual for whom monitoring is required pursuant to 10 CFR 20.1501, extends to approximately 3,848 NRC licensees (104 reactor licensees + 3,744 materials licensees).

Since NRC Form 4 is completed each time a worker changes employment during the year, the greatest burden is on licensees who employ transient workers. In 2008, licensees required to submit annual occupational radiation exposure reports, in accordance with Section 20.2206(a), employed 28,780 transient workers (28,582 transient workers at the 104 reactor sites + 198 transient workers at the 90 materials sites). Approximately, 0.50 hours is required to complete, review, and authorize each NRC Form 4. The annual burden is 14,291 hours for reactor sites (28,582 transient workers at reactor sites x 0.5 hour/transient worker) and 99 hours for materials sites (198 transient workers x 0.50 hour/transient worker), for a total annual burden of 14,390 hours.

The annual cost to reactor sites for this requirement is \$3,672,787 (14,291 hours x \$257/hour). The total annual cost to materials sites is \$25,443 (99 hours x \$257/hour). The total annual cost to licensees is \$3,698,230 (\$3,672,787 for reactor sites + \$25,443 for materials sites) (See Table 1).

13. Estimate of Other Additional Cost

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 0.0004 times the recordkeeping burden cost. Therefore the storage cost for this clearance is estimated to be \$1,479 (14,390 hours x \$257/hour x 0.0004).

14. Estimated Annualized Cost to the NRC

NRC cost is incurred by inspectors reviewing the information on NRC Form 4, or its equivalent, and supporting records maintained by licensees. Annually, 104 hours (1 hour/site x 104 reactor sites) of inspection time is spent reviewing such records, at an average of 1 hour for each of the 104 reactor sites. The annual cost for reactor inspections to review of NRC Form 4, or its equivalent, is \$26,728 (104 hours x \$257/hour).

While the number of reactor sites has been constant, at 104 sites, for the past several years, there are fluctuations in the number of materials licensees. This fluctuation is mainly due to an increase in the number of Agreement States. Agreement States are those States that have entered into formal agreements with NRC, pursuant to Section 274 of the Atomic Energy Act (AEA), to regulate certain quantities of AEA material at facilities located within their borders. At the end of 2008, there were 35 Agreement States. These 35 Agreement States have regulatory authority over approximately 18,500 materials licensees.

However, NRC is responsible for conducting inspections of NRC Form 4, or its equivalent, and supporting records maintained by 3,744 materials licensees. It is estimated that approximately 374 hours (0.1 hour/site x 3,744 materials sites) of inspection time is spent reviewing such records at an average of 0.1 hour for each of the 3,744 materials sites. The annual cost for materials inspections to review these forms is \$96,118 (374 hours x \$257/hour).

Annually, the total time spent reviewing NRC Form 4, or its equivalent, records is 478 hours (104 hours for reactor sites + 374 hours for materials sites). The total inspection cost, annually, is approximately \$122,846 (\$26,728 for reactor inspections + \$96,118 for materials inspections) (See Table 2). These costs are fully recoverable through fee assessments to NRC licensees pursuant to 10 CFR Parts 170 and 171.

15. Reasons for Change in Burden

The estimated burden has increased by 4,378 hours from the previous burden of 10,012 hours to 14,390 hours. This burden change is due to the increase in the number of transient workers at licensee facilities. The increase in the number of transient workers increases the number of NRC Form 4, or its equivalent, records to be inspected by NRC. In the previous clearance, licenses maintained NRC Form 4, or its equivalent, records for 20,024 transient workers. As of June 2008, licensees maintained NRC Form 4, or its equivalent, records for 28,780 transient workers. This increase in transient workers, resulted in an additional 8,756 NRC Form 4, or its equivalent, records to be maintained by licensees and inspected by NRC.

16. Publication for Statistical Use

NRC Form 4 is not published for statistical use.

17. Reason for Not Displaying the Expiration Date.

The requirement will be contained in a regulation. Amending the Code of Federal Regulations to display information that, in an annual publication, could become out of date would confuse the public.

18. Exceptions to the Certification Statement.

Not applicable.

A. COLLECTIONS OF INFORMATION EMPLOYING STATISTICAL METHODS

Statistical methods are not employed in the collection of information.

TABLE 1

RECORDKEEPING BURDEN
ASSOCIATED WITH NRC FORM 4

NUMBER OF RECORDKEEPERS		NUMBER OF RECORDS/ RECORDKEEPERS	NUMBER OF RECORDS	BURDEN HOURS/ RECORDS	ANNUAL BURDEN HOURS	ANNUAL COST@ \$257/HR
Reactors	104	274.83	28,582	0.50	14,291	\$3,672,787
Materials	90	2.2	198	0.50	99	\$25,443
Totals	194		28,780		14,390	\$3,698,230

TABLE 2

ESTIMATED ANNUALIZED COST TO THE NRC
FOR REVIEW OF REPORTS AND INSPECTIONS
ASSOCIATED WITH NRC FORM 4

NUMBER OF RESPONDENTS		STAFF HOURS PER LICENSEE	STAFF BURDEN HOURS	ANNUAL COST@ \$257/HR
Reactors	104	1.0	104	\$26,728
Materials	3,744	0.1	374	\$96,118
Totals	3,848		478	\$122,846