

June 7, 2011

## DRAFT SUMMARY OF INFORMATION COLLECTION REQUEST

1. Title: 10 CFR 9, Public Records (3150-0043)
2. Current Burden/Responses: 167 hours/ 212 responses (212 responses + 0 recordkeepers)
3. Proposed Burden/Responses: 1,042.5 hours/responses (3,870 reporting responses + 0 recordkeepers)
4. Burden Attributable to Third Party Collections: n/a
5. Frequency of Response: On occasion
6. Number of Respondents: 3,870
7. Reasons for Changes in Burden/Responses:  
The burden has increased by 875.5 hours, from 167 hours to 1,042.5 hours.

The bulk of this increase is due to a change in the sections identified as information collections within 10 CFR Part 9. In the previous renewal of the information collections in 10 CFR Part 9, the burden for the following information collections was removed:

- 9.23(a)(1), Public access to records in the Public Document Room
- 9.23(b), Requests for agency records under the FOIA
- 9.53(a) & (b), Privacy Act requests, how and where presented
- 9.54(a)(1), Identification for Privacy Act requests
- 9.54(b), Notarized statement (submitted in lieu of documents supporting the requestor's identity) for Privacy Act requests
- 9.54(c), Documents verifying parentage or guardianship for Privacy Act requests
- 9.55(a)(1), Specification of records sought in Privacy Act request

At that time, the NRC evaluated the requirements against the draft implementing guidance issued in by OMB in 1999 and determined that these sections do not contain information collections. However, during the present renewal, the NRC has re-evaluated these requirements and has determined that the burden for these requests should, in fact, be included in the estimates for 10 CFR Part 9. As a result, the NRC is adding the burden for these sections back into the totals for this Part. This has resulted in an increase of 936.5 hours in burden associated with these sections.

The change in burden for all other Part 9 requirements combined is a decrease of 61 hours. The largest increases are for Privacy Act Requests and Identification for Privacy Act Requests, each of which has increased by 18 hours. The largest decrease is attributed to a decrease in submitter objections to disclosure under 9.28(b). The estimated number of objections has decreased from 10 objections to 4 objections, a decrease of 6 objections. At an estimated 10 hours per objection, this represents a decrease of 60 hours.

In addition, the rate has increased from \$238 to \$259.

