

May 27, 2011

DRAFT SUMMARY OF INFORMATION COLLECTION REQUEST

Title: NRC Form 241, "Report of Proposed Activities in Non-Agreement States, Areas of Exclusive Federal Jurisdiction, or Offshore Waters" (3150-0013)

Current Burden/Responses: 582 Hours (582 Reporting + 0 Recordkeeping)
2,188 Responses (2,188 Responses + 0 Recordkeepers)

Proposed Burden/Responses: 482 Hours (482 Reporting + 0 Recordkeeping)
1,756 Responses (1,756 Responses + 0 Recordkeepers)

Frequency of Response: On occasion

Number of Respondents: 172

Reasons for Changes in Burden/Responses:

The NRC reviewed the actual number of responses received during the last 3 years in order to estimate the number of forms that will be submitted during the clearance period. From 2008 to 2010, an average of 1,756 forms was filed annually. The previous estimate was 2,188 forms (based on a review of the actual number of forms received from 2005 to 2008), an overall reduction of 432 forms. The number of initial submissions increased from 140 to 172 (an increase of 32 forms and 166 hours); the number of changes increased from 412 to 475 (an increase of 63 forms and 63 hours); and the number of clarifications decreased from 1,636 to 1,109 (a reduction of 527 forms and 132 hours).

As a result of the reduction in the estimated number of forms filed annually, the overall burden estimate has decreased from 582 to 482 hours, a net reduction of 100 hours.

The increase in initial submissions may be attributed to an increase in the number of Agreement State licensees as a result of three States signing agreements with the NRC to become Agreement States between 2008 and 2010.

In addition, the hourly rate increased from \$238/hour to \$259/hour.

Level of concurrence:

Chief, Licensing Branch
Division of Materials Safety and State Agreement
Office of Federal and State Materials and Environmental Management Programs

Recordkeeping Requirements in Accordance with the Retention Periods for Records/Rule:

The NRC has determined that the quantity of records to be maintained is roughly proportional to the recordkeeping burden and, therefore, can be used to calculate approximate records storage costs. 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. Because the recordkeeping burden is estimated to be 0 hours, the storage cost for this clearance is \$00.00 (0 hours x 0.0004 x \$259/hour).

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.

The Agreement State licensees do not routinely submit information to the NRC. Therefore, there is no similar information available to NRC that can be used to keep track of the Agreement

State licensees' activities conducted in non-Agreement States, areas of exclusive Federal jurisdiction, or offshore waters under the general license provided for in 10 CFR 150.20.

Abstract: Any Agreement State licensee who engages in the use of radioactive material in non-Agreement States, areas of exclusive Federal jurisdiction, or offshore waters, under the general license in Section 150.20, is required to file, with the NRC regional administrator for the region in which the Agreement State that issues the license is located, a copy of NRC Form 241 ("Report of Proposed Activities in Non-Agreement States, Areas of Exclusive Federal Jurisdiction, or Offshore Waters"), a copy of its Agreement State specific license, and the appropriate fee as prescribed in Section 170.31 at least 3 days before engaging in such activity. This mandatory notification permits NRC to schedule inspections of the activities to determine whether the activities are being conducted in accordance with requirements for protection of the public health and safety.