

November 18, 2011

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

Title: 10 CFR Part 20, "Standards for Protection Against Radiation" (3150-0014)

Current Burden/Responses: 110,244 hours/5,502 responses (1,762 reporting responses + 3,760 recordkeepers)

Proposed Burden/Responses: 91,503 hours/1,676 reporting responses plus 1,539 third party disclosure responses plus 3,000 recordkeepers)

Burden Attributable to Third Party Collections: 342 hours

Frequency of Response: Annually and on occasion

Number of Respondents: 3,000

Reasons for Changes in Burden/Responses:

The burden estimate changed from 110,244 to 91,503 hours, a decrease of 18,741 hours.. This decrease of 18,741 hours is attributed to a decrease in the number of licensees subject to Part 20 requirements. The previous burden estimates were based on 3,740 licensees, the current request is based on 3,000 licensees required to report and keep records.

The estimated number of responses changed from 5,502 responses (1,762 reporting responses plus 3,740 recordkeepers) to 6,185 responses (1,676 reporting responses plus 1,539 third party disclosure responses plus 3,000 recordkeepers), an increase of 683 responses. The primary reason for the increase in the number of responses is that the third party disclosure requirements have been broken out into a separate table; whereas in the previous submission they were included on the recordkeeping table. As a result, 1,539 third-party disclosure responses were added to the total.

In addition, there is an increase in the hourly rate from \$238 to \$273.

Level of Concurrence: Branch Chief  
Rulemaking Branch A  
Division of Intergovernmental Liaison and Rulemaking  
FSME

Recordkeeping Requirements in Accordance with the Retention Periods for Records Rule

Records pertaining to the radiation doses and radionuclide intakes by individual workers and to effluents released to air and water and the resultant radiation exposure of members of the public must be retained for the life of the license and transferred to the NRC upon termination of the license. This retention is required so that the past exposure history of any worker can be reconstructed to allow the worker to move from licensed facility to licensed facility and to permit the identification of trends, so that declining licensee performance can be detected and corrected.

Abstract:

10 CFR Part 20 establishes standards for protection against ionizing radiation resulting from activities conducted under licenses issued by the NRC. These standards require the establishment of radiation

protection programs, maintenance of radiation protection programs, maintenance of radiation records recording of radiation received by workers, reporting of incidents which could cause exposure to radiation, submittal of an annual report to NRC of the results of individual monitoring, and submittal of license termination information. These mandatory requirements are needed to protect occupationally exposed individuals from undue risks of excessive exposure to ionizing radiation and to protect the health and safety of the public.

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