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December 23, 2013

Ms. Tremaine U. Donnell  
NRC Clearance Officer  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555-0001

**Subject:** Responses to Questions on Agency Information Collection Activities; Proposed Collection  
Comment Request (Federal Register 78 FR 66076, dated November 4, 2013; Docket ID NRC-2013-0226)

**Project Number: 689**

Dear Mr. Donnell:

On behalf of the nuclear energy industry, the Nuclear Energy Institute (NEI)<sup>1</sup> appreciates the opportunity to provide comments on the attached responses NRC questions published in the subject Federal Register notice.

Please feel free to contact me at 202.739.8043; exa@nei.org should you have any questions or concerns.

Sincerely,

A handwritten signature in black ink that reads "Ellen P. Anderson". The signature is written in a cursive style.

Ellen P. Anderson

Enclosure

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<sup>1</sup> The Nuclear Energy Institute (NEI) is the organization responsible for establishing unified industry policy on matters affecting the nuclear energy industry, including the regulatory aspects of generic operational and technical issues. NEI's members include all entities licensed to operate commercial nuclear power plants in the United States, nuclear plant designers, major architect/engineering firms, fuel cycle facilities, nuclear materials licensees, and other organizations and entities involved in the nuclear energy industry.

**Comments on Responses to Questions on Agency Information Collection Activities; Proposed Collection**

No.	NRC Questions	Industry Responses
1.	Is the proposed collection of information necessary for the NRC to properly perform its functions? Does the information have practical utility?	<p>The NRC Form 4 is the "Cumulative Occupational Dose History" and supports licensees' efforts to ensure compliance with annual radiation dose limits via verification of applicable prior occupational radiation dose at other licensed facilities.</p> <p>When used as a means to document current year exposure it is useful to ensure compliance with 10 CFR 20.1501. However, the form and its contents date back to when there was a requirement to document lifetime dose. The concept of "cumulative" for a time period greater than a year is no longer required by NRC regulations.</p>
2.	Is the burden estimate accurate?	<p>The burden estimate of 4,146 "recordkeepers" for a total burden of 24,521 hours per year is questionable. 10 CFR 20.2104 requires that the licensee "shall determine the occupational radiation dose received during the current year" for an individual required to be monitored under 10 CFR 20.1502. With that fact in mind, it is likely that there are far more than 4,146 Form-4's generated per year. It takes approximately 1 hour (form preparation through final retention disposition) to generate a Form-4 per worker. If the assumption is made that a current year Form-4 is prepared for each outage radiation worker at each licensee the total burden is much higher than 24,000 hours per year. All that said, the Form-4 remains a useful tool for documentation of current year radiation exposure; however, we think the total licensee burden is low. It is, however, a significant burden to obtain cumulative exposure.</p>
3.	Is there a way to enhance the quality, utility, and clarity of the information to be collected?	No Comments
4.	How can the burden of the information collection be minimized, including the use of automated collection techniques or other forms of information technology?	<p>The NEI computer-based Personnel Access Data System (PADS) has dramatically simplified this process. Nuclear power plants average approximately 1 hour for complete Form-4 preparation. Further efforts to enhance that process will yield better results. These efforts could include more streamlined addition of non-PADS facility dose data.</p> <p>Perhaps making Form-4's available online would be useful.</p>