

Subject: Comments to support NRC information collection for NRC Form 314 – Certificate of Disposition of Materials (3150-0028).

Comments provided by W. Clark Evers, RSO, HDP and Ken Pallagi, Licensing Manager, HDP

1. Is the proposed collection of information necessary for the NRC to properly perform its functions? Does the information have practical utility?

In reviewing Form 314, it appears practical for a small facility that only ever possessed sealed radioactive sources to complete the form and prove that all licensed materials have been appropriately disposed of or transferred prior to license termination. However for a large facility this may be much more problematic. A facility that has disposed of radioactive wastes of different types and classifications, over several years, possibly to several different facilities would need to supplement the form with a significant amount of documentation to support accurate completion. And in the case of NRC Licensee's, this information has most likely already been transmitted to the NRC through formal information requests, on-site inspections, and Final Status Survey Release Records, etc.

2. Is the burden estimate accurate?

For a small facility containing only sealed sources, the burden estimate appears accurate, assuming that the radiation survey requested in Part C has already been performed or is not required. For a large facility again, preparation of documentation to support completion of the form could be a significant undertaking, and it is not clear if the requested radiation survey in Part C is in reference to the facility surveys prescribed by 10 CFR 20 Subpart E, or in addition to it. Either way, completion of the facility radiation surveys is a significant undertaking, requiring significant documentation.

3. Is there a way to enhance the quality, utility, and clarity of the information to be collected?

No comment at this time.

4. How can the burden of the information collection be minimized, including the use of automated collection techniques or other forms of information technology?

It seems that Form 314 is a confirmation on the part of the licensee that all required actions have been completed, including disposal and/or transfer of radioactive material, prior to the request for license termination. This confirmation will be a summary of the information that should have already been transmitted to NRC Headquarters as part of the license termination process, and confirmed through the on-site inspection process, making the completion of this form seem like a formality. Assuming that all required decommissioning activities have been completed, a Final Status Survey Release Record has been completed, reviewed, and approved by NRC Headquarters, and license termination is eminent, then completion of Form 314 will not be all that burdensome, however it will only seemingly serve to certify again the information that has already been submitted.

If the intention of Form 314 is to confirm that any radioactive sources that remained on-site after decommissioning activities have been completed are appropriately transferred and/or disposed of prior to officially terminating the license, then it may be helpful to allow the licensee to specify a date at which decommissioning activities completed, and the radioactive material that remained on the license after that date. Then tracking the small amount of radioactive material that remained onsite after decommissioning activities were completed would not be altogether too difficult. The statement in Section B.2.a makes a very broad reference to "...all radioactive materials produced and/or possessed by the licensee under this license number cited above have been disposed of...", which could be interpreted to mean all radioactive materials that were ever possessed under the license. For a facility that has been in operation for several decades, this will be extremely cumbersome, and most likely unnecessary as the request for license termination will already include this information.

Alternatively, perhaps instead of proving that all radioactive material has been removed from the site by tracking the transfer and/or disposal of said material, allow the Licensee to prove the absence of any radioactive material through the facility surveys in part C, and/or through technical evaluation.