

REQUEST FOR OMB REVIEW

(Under the Paperwork Reduction Act and Executive Order 12291)

Important — Read instructions (SF-83A) before completing this form. Submit the required number of copies of SF-83, together with the material for which review is requested to:

Office of Information and Regulatory Affairs
Office of Management and Budget
Washington, D.C. 20503

1. Department/Agency and Bureau/Office originating request U.S. Nuclear Regulatory Commission	3. Name(s) and telephone number(s) of person(s) who can best answer questions regarding request:
2. 6-digit Agency/Bureau number (first part of 11-digit Treasury Account No.) 3 1 5 0	4. 3-digit functional code (last part of 11-digit Treasury Account No.) 2 7 6
5. Title of information Collection or Rulemaking Notices, Instructions, and Report to Workers; Inspections, 10 CFR 19	C. Is this a rulemaking submission under Section 3504(h) of P.L. 96-511? (Check one) 1 <input checked="" type="checkbox"/> No (Section 3507 submission) 2 <input type="checkbox"/> Yes, NPRM. Expected date of publication: _____ 3 <input type="checkbox"/> Yes, final rule. Expected date of publication: _____ Effective date: _____
6. A. Is any information collection (reporting or recordkeeping) involved? (Check one) 1 <input checked="" type="checkbox"/> Yes and proposal is attached for review 2 <input type="checkbox"/> Yes but proposal is not attached — skip to question D. 3 <input type="checkbox"/> No — skip to question D. B. Are the respondents primarily educational agencies or institutions or is the purpose related to Federal education programs? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	D. At what phase of rulemaking is this submission made? (Check one) 1 <input checked="" type="checkbox"/> Not applicable 2 <input type="checkbox"/> Major rule, at NPRM stage 3 <input type="checkbox"/> Major Final rule for which no NPRM was published 4 <input type="checkbox"/> Major Final rule, after publication of NPRM 5 <input type="checkbox"/> Nonmajor rule, at NPRM stage 6 <input type="checkbox"/> Nonmajor rule, at Final stage

COMPLETE SHADED PORTION IF INFORMATION COLLECTION PROPOSAL IS ATTACHED

7. Current (or former) OMB Number 3150-0044 Expiration Date 8-31-82	8. Requested Expiration Date 8-31-85	12. Agency report form number(s) Not applicable
9. Is proposed information collection listed in the information collection budget? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	13. Are respondents only Federal agencies? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	14. Type of request (Check one) 1 <input type="checkbox"/> preliminary plan 2 <input type="checkbox"/> new (not previously approved or expired more than 6 months ago) 3 <input type="checkbox"/> revision 4 <input checked="" type="checkbox"/> extension (adjustment to burden only) 5 <input type="checkbox"/> extension (no change) 6 <input type="checkbox"/> reinstatement (expired within 6 months)
10. Will this proposed information collection cause the agency to exceed its information collection budget allowance? (If yes, attach amendment request from agency head.) <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	11. Number of report forms submitted for approval None	

15. <table border="1" style="width:100%; border-collapse: collapse;"> <tr> <td style="width:50%;">a. Approximate size of universe (if sample)</td> <td>NA</td> </tr> <tr> <td>b. Size of sample</td> <td>NA</td> </tr> <tr> <td>c. Estimated number of respondents or record keepers per year</td> <td>4800</td> </tr> <tr> <td>d. Reports annually by each respondent (item 25)</td> <td>97.3</td> </tr> <tr> <td>e. Total annual responses (item 15c x 15d)</td> <td>467,000</td> </tr> <tr> <td>f. Estimated average number of hours per response</td> <td>0.1666</td> </tr> <tr> <td>g. Estimated total hours of annual burden in Fiscal Year (item 15e x 15f)</td> <td>77,800</td> </tr> </table>	a. Approximate size of universe (if sample)	NA	b. Size of sample	NA	c. Estimated number of respondents or record keepers per year	4800	d. Reports annually by each respondent (item 25)	97.3	e. Total annual responses (item 15c x 15d)	467,000	f. Estimated average number of hours per response	0.1666	g. Estimated total hours of annual burden in Fiscal Year (item 15e x 15f)	77,800	16. Classification of Change in Burden (explain in supporting statement) <table border="1" style="width:100%; border-collapse: collapse;"> <thead> <tr> <th></th> <th>No. of Responses</th> <th>No. of Reporting Hours</th> <th>Cost to the Public</th> </tr> </thead> <tbody> <tr> <td>a. In inventory</td> <td align="center">700</td> <td align="center">140</td> <td align="center">\$</td> </tr> <tr> <td>b. As proposed</td> <td align="center">467,000</td> <td align="center">77,800</td> <td align="center">\$</td> </tr> <tr> <td>c. Difference (b-a)</td> <td align="center">466,300</td> <td align="center">77,660</td> <td align="center">\$</td> </tr> <tr> <td colspan="4" style="text-align: center;">Explanation of difference (indicate as many as apply)</td> </tr> <tr> <td colspan="4" style="text-align: center;">Adjustments</td> </tr> <tr> <td>d. Correction-error</td> <td align="center">±</td> <td align="center">±</td> <td align="center">± \$</td> </tr> <tr> <td>e. Correction-reestimate</td> <td align="center">±466,300</td> <td align="center">±77,660</td> <td align="center">± \$</td> </tr> <tr> <td>f. Change in use</td> <td align="center">±</td> <td align="center">±</td> <td align="center">± \$</td> </tr> <tr> <td colspan="4" style="text-align: center;">Program changes</td> </tr> <tr> <td>g. Increase</td> <td align="center">+ NA</td> <td align="center">+</td> <td align="center">+ \$</td> </tr> <tr> <td>h. Decrease</td> <td align="center">- NA</td> <td align="center">-</td> <td align="center">- \$</td> </tr> </tbody> </table>		No. of Responses	No. of Reporting Hours	Cost to the Public	a. In inventory	700	140	\$	b. As proposed	467,000	77,800	\$	c. Difference (b-a)	466,300	77,660	\$	Explanation of difference (indicate as many as apply)				Adjustments				d. Correction-error	±	±	± \$	e. Correction-reestimate	±466,300	±77,660	± \$	f. Change in use	±	±	± \$	Program changes				g. Increase	+ NA	+	+ \$	h. Decrease	- NA	-	- \$
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17. Abstract—Needs and Uses (50 words or less)

The information in reports required by §19.13, 10 CFR 19, is used by both individual radiation workers and NRC licensees to assure that radiation doses to individuals are maintained within established limits.

18. Related report form(s) (give OMB number(s), IRCN(s), internal agency report form number(s) or symbol(s)) 10 CFR Part 20	20. Catalog of Federal Domestic Assistance Program Number N/A
19. Type of affected public (Check as many as apply) 1 <input type="checkbox"/> individuals or households 2 <input type="checkbox"/> state or local governments 3 <input type="checkbox"/> farms 4 <input checked="" type="checkbox"/> businesses or other institutions (except farms)	21. Small business or organization <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No 22. Type of activity of affected public—indicate 3-digit Standard Industrial Classification (SIC) code(s) (up to 10) — if over 10, check <input type="checkbox"/> Multiple or <input type="checkbox"/> All 8 1 9

23. Brief description of affected public (e.g., "retail grocery stores," "State education agencies," "households in 50 largest SMSAs")

NRC licensees of all types

24. Purpose (Check as many as apply. If more than one, indicate predominant by an asterisk) 1 <input type="checkbox"/> application for benefits 2 <input type="checkbox"/> program evaluation 3 <input type="checkbox"/> general purpose statistics 4 <input checked="" type="checkbox"/> regulatory or compliance 5 <input type="checkbox"/> program planning or management 6 <input type="checkbox"/> research	26. Collection method (Check as many as apply) 1 <input checked="" type="checkbox"/> mail self-administered 2 <input checked="" type="checkbox"/> other self-administered 3 <input type="checkbox"/> telephone interview 4 <input type="checkbox"/> personal interview 5 <input type="checkbox"/> recordkeeping requirement: Required retention period: _____ years 6 <input type="checkbox"/> other—describe:
25. Frequency of Use 1 <input type="checkbox"/> Nonrecurring Recurring (check as many as apply) 2 <input checked="" type="checkbox"/> on occasion 6 <input type="checkbox"/> semiannually 3 <input type="checkbox"/> weekly 7 <input checked="" type="checkbox"/> annually 4 <input type="checkbox"/> monthly 8 <input type="checkbox"/> biennially 5 <input type="checkbox"/> quarterly 9 <input type="checkbox"/> other—describe:	27. Collection agent (Check one) 1 <input type="checkbox"/> requesting Department/Agency 2 <input type="checkbox"/> other Federal Department/Agency 3 <input type="checkbox"/> private contractor 4 <input type="checkbox"/> recordkeeping requirement 5 <input checked="" type="checkbox"/> other—describe: NRC licensee
28. Authority for agency for information collection or rulemaking—indicate statute, regulation, judicial decree, etc. Atomic Energy Act, as amended. Energy Reorganization Act, as amended	30. Do you promise confidentiality? (If yes, explain basis for pledge in supporting statement.) <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
29. Respondent's obligation to reply (Check as many as apply) 1 <input type="checkbox"/> voluntary 2 <input type="checkbox"/> required to obtain or retain benefit 3 <input checked="" type="checkbox"/> mandatory—cite statute, not CFR (attach copy of statutory authority)	31. Will the proposed information collection create a new or become part of an existing Privacy Act system of records? (If yes, attach Federal Register notice or proposed draft of notice.) <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No 32. Cost to Federal Government of information collection or rulemaking \$ None

COMPLETE ITEMS 33 THRU 35 ONLY IF RULEMAKING SUBMISSION

33. Compliance costs to the public \$ _____	34. Is there a regulatory impact analysis attached? <input type="checkbox"/> Yes <input type="checkbox"/> No	35. Is there a statutory or judicial deadline affecting issuance? <input type="checkbox"/> Yes. Enter date _____ <input type="checkbox"/> No
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CERTIFICATION BY AUTHORIZED OFFICIALS SUBMITTING REQUEST—We certify that the information collection or rulemaking submitted for review is necessary for the proper performance of the agency's functions, that the proposal represents the minimum public burden and Federal cost consistent with need, and is consistent with applicable OMB and agency policy directives. Signature and title of:

APPROVING POLICY OFFICIAL FOR AGENCY Patricia G. Norry	DATE 9-21-82	SUBMITTING OFFICIAL R. Stephen Scott	DATE 9/21/82
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SUPPORTING STATEMENT FOR EXTENSION
OF EXISTING REPORTING REQUIREMENTS
SECTION 19.13 OF 10 CFR PART 19,
"NOTICES, INSTRUCTIONS, AND REPORTS TO
WORKERS: INSPECTIONS"

A.1. Justification

This supporting statement for extension of requirements in §19.13, 10 CFR 19, contains a change in the burden on licensees as a result of reestimate of the number of reports required by the rule.

Limits for radiation doses to individuals are defined in NRC regulations in terms of rems per calendar quarter. NRC licensees are required to maintain total radiation doses to workers within the established limits. The requirements in §19.13 are links in a chain of regulatory measures to control the total occupational dose to individual workers and are important with respect to professional radiation workers, particularly transient workers.

Section 19.13, 10 CFR 19, requires a licensee to provide to workers written reports regarding the radiation dose received by the workers as a result of employment at the licensee's facility. The requirements of the section can be viewed in some ways as analogous to a person being kept informed of a medical or physiological condition in order to control his or her state of health or well being.

Section 19.13(a) is merely the general requirement to provide the reports specified in the section, and describes the general content of the reports.

Section 19.13(b) requires a licensee, at the request of a worker, to advise the worker annually of the worker's exposure to radiation or radioactive material as shown in records maintained by the licensee under §20.401(a) and (e) of 10 CFR 20. (The recordkeeping requirements of §20.401(a) and (c) are separately justified elsewhere.) These reports, if requested by the worker, provide the worker an annually updated account of his or her occupational radiation exposure.

Section 19.13(c) requires a licensee, at the request of a formerly employed worker, to provide that worker a report of the worker's exposure to radiation or radioactive materials while employed at the licensee's facility. The section specifies the content of the report. These reports, if requested by formerly employed workers will provide the worker with a historical record of his or her occupational radiation exposure.

Section 19.13(d) requires a licensee to provide a worker with a report regarding the individual's radiation exposure included in any report the licensee provides the NRC under §§20.405 or 20.408 of 10 CFR 20. (§§20.405 and 20.408 are justified separately.)

Section 20.405 requires licensees to report to the NRC the exposures of individuals to radiation exceeding established regulatory limits. The report to the individual required by §19.13(d) thus provides information

Assuming that: (1) each employee requests a report of his/her radiation exposure each time he/she terminates employment, and (2) each report takes 10 minutes to prepare, the total compliance burden of §19.13(c) on the population of 500 licensees is estimated to be 15,000 man-hours per year. (90,000 reports/year X 10 min./report = 15,000 hours/year.)

Section 19.13(d).

§20.405 involves the reporting of radiation overexposures (exposures exceeding the established limits). The requirements affect a total population of approximately 4800 licensees, the number providing radiation monitoring of their workers. The number of individuals overexposed has ranged during the years of record from about 15 to 50.

Assuming: (1) an average of 25 overexposures reports per year, and that (2) each report takes 10 minutes to prepare, the total compliance burden of §19.13(d) (for §20.405 reports) on the population of 4800 licensees is estimated to be 4 man-hours per year. (25 reports/year X 10 minutes/report = 4 man-hours.)

§20.408 involves the reporting, by certain types of licensees, of radiation exposures for employees terminating work at the licensees facilities. It is estimated that approximately 500 licensees are affected by this requirement. As discussed under paragraph 1 in the justification, this report is the same as required by §19.13(c), the difference being that the §19.13(d) report is furnished automatically while the §19.13(c) report is furnished at the request of the terminating employee.

As the reports are similar, the same assumptions used for §19.13(c) are used for §19.13(d), and the total compliance burden of §19.13(d) on the population of 500 licensees affected is estimated to be 15,000 man-hours per year.

However, the reports to workers under this §19.13(d) may satisfy the workers needs as provided for under §19.13(c) and the worker may not request a report under §19.13(c). But there is no way of knowing; therefore, the total compliance burden on the population of 500 licensees affected by the two requirements could range from 15,000 to 30,000 man-hours per year. (15,000 under the §19.13(d), plus from 0 to 15,000 under §19.13(c).)

Section 19.13(e)

As these reports involve the same assumptions used for §§19.13(c) and 19.13(d), the total compliance burden of §19.13(e) in the population of 500 affected licensees is estimated to be 15,000 man-hours per year.

regarding a specific incident or period of time when his or her radiation exposure exceeded established limits. This information would also be included in the summary type of reports required by §§19.13(b) and 19.13(c).

Section 20.408 requires licensees to provide the NRC with a report of an individual's exposure to radiation at the licensee's facility when the individual terminates employment or work at the licensee's facility. The report to the individual required by §19.13(d) thus provides the individual with a historical record of his or her radiation exposure while employed at the licensee's facility. The requirement is similar to that under §19.13(c), but here the report is furnished automatically without request on the part of the individual worker (as is required by §19.13(c)).

Section 19.13(e) requires licensees to provide, at the request of a worker terminating employment at the licensee's facility, a written report regarding the worker's radiation dose received at the licensee's facility during the calendar quarter in which the worker is terminating employment. This report provides a transient worker with timely information of his or her radiation exposure during the current quarter in order that he or she may continue to work at a new employer's (licensee) workplace. This requirement is explained below in the general summary justification for all of §19.13.

In Summary:

The requirements of §19.13 are links in a chain of regulatory measures to control total occupational radiation doses of workers. Section 20.101, 10 CFR 20, defines radiation dose limits and establishes the requirement for licensees to control total radiation doses to individuals. Section 20.102, 10 CFR 20, requires licensees, before permitting an individual to be exposed to radiation in the licensee's workplace, to determine the individual's prior radiation dose. Section 19.13 thus assures that information is made available to the worker and, thereby, to the worker's new employer.

The information required by §19.13 is thus used by both individual radiation workers and NRC licensees to assure that radiation doses to individuals are maintained within established limits; limits which are set at levels determined to present acceptable and minimal occupational risk. Those limits are established in §20.101, 10 CFR Part 20. Associated requirements for controlling total radiation dose are contained in §20.102, 10 CFR Part 20.

There is no source for the required information other than licensees. Licensees are required to maintain this information by the provisions of §20.401(a), 10 CFR Part 20.

2. Description of Survey Plan

Section 19.13 requires licensees to provide reports to workers. The various requirements under §19.13 affect all NRC licensees (approximately 9000) to differing degrees, as explained in paragraph 6 below.

Section 19.13 does not require information to be reported to the NRC. (The reports to the NRC are required by 10 CFR 20 which is separately justified.)

3. Tabulation and Publication Plans

Not applicable

4. Time Schedule for Data Collection and Publication

Not applicable.

5. Consultations Outside the Agency

As discussed in the original justification of the requirement in §19.13(e), public meetings were held on the subject and it was discussed and reviewed with representatives of industry and worker's unions. Before its adoption, a notice of the proposed requirement was published in the Federal Register and a copy of the proposed rule was sent to all NRC specific licensees. Further information was provided to individuals upon their request.

The agency adopted the requirement in effective (and its present) form after careful consideration of all comments on the notice of proposed rulemaking.

6. Estimation of Compliance Burden

The following explains the change in burden as reported in item 16 of SF-83. The numbers in item 16.a are from the justification of §19.13(e) when it was first issued. Sections 19.13(b), 19.13(c) and 19.13(d) have not been previously justified under this system.

Section 19.13(b).

Approximately 4800 licensees monitor the radiation exposure to their workers. The total population of radiation workers thus monitored is estimated to be 287,000. Assuming that: (1) each worker requests an annual report of his radiation exposure, and (2) each report takes 10 minutes of preparation time, the total compliance burden of §19.13(b) on the population of 4800 licensees is estimated to be 47,833 man-hours per year. (287,000 reports/year X 10 minutes/report = 47,833 hours/year.

Section 19.13(c).

It is estimated that approximately 500 licensees are affected by this requirement. The total number of termination reports per year is estimated to be 90,000. (The total number of employees for which these reports are made is estimated to be 40,000, indicating that some individuals terminate employment more than once during the year - transient workers, for example.)

As discussed immediately above under §19.13(d), the reports under §19.13(d) under certain circumstances may possibly satisfy the requirements and worker's needs provided for under this section (§19.13(e)). But there is no way of knowing; therefore, the total compliance burden on the population of 500 licensees affected by the three requirements (§§19.13(d), 19.13(c) and 19.13(e)) could range from 15,000 to 45,000 man-hours per year. (15,000 under §19.13(d), plus from 0-15,000 under §19.13(c), plus from 0-15,000 under §19.13(e)).

Using the assumptions explained above, the estimated total compliance burden of §19.13 is 92,837 man-hours per year at a maximum, and 62,837 at a minimum. For the purpose of this request, an estimate of 77,837 man-hours is used (by assuming the reports under §19.13(d) satisfy the requirements of §§19.13(c) and 19.13(e) in 50% of the cases).

The total population of licensees affected by §19.13 is 4800. The average burden for all licensees is approximately 19.4 man-hours per year (for 4300 licensees the burden is, on the average, about 10 man-hours per year, and for 500 licensees the burden averages about 100 man-hours per year).

7. Estimate of Cost to the Federal Government

There is no additional cost to the Federal Government.