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UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

JUN 16 1993

MEMORANDUM FOR: C. J. Heltemes, Jr., Deputy Director for
Generic Issues and Rulemaking
Office of Nuclear Regulatory Research

FROM: Gerald F. Cranford, Director
Office of Information Resources Management

SUBJECT: OFFICE CONCURRENCE ON PART 34 (RADIOGRAPHY)
PROPOSED RULEMAKING

We have reviewed the subject proposed rule for compliance with the Paperwork Reduction Act of 1980, (44 U.S.C. 3501 et seq.) and we cannot concur in its issuance at this time. Our concerns with the rulemaking have been communicated to the RES Information Management Coordinator, Mark Au, as indicated in the attached May 25, 1993, memorandum from Brenda Jo. Shelton.

We have also reviewed the draft OMB supporting statement for the rulemaking and indicated in the aforementioned memorandum that certain issues must be resolved and the supporting statement resubmitted to IRM for review. Note that under current procedures, the OMB clearance package must be submitted to the Executive Director for Operations as part of the rulemaking package.

Please resubmit the OMB clearance package and Federal Register Notice in sufficient time to obtain IRM approval before the rule's scheduled publication date. Publication of the rule has been placed on hold with the Office of Administration pending IRM approval of the clearance package.

Should you have any questions or need to discuss our concerns further, please contact Brenda Jo. Shelton at 492-8132.

Gerald F. Cranford, Director
Office of Information Resources Management

Enclosure:
As stated

cc: M. Au, RES
D. Nellis, RES
M. Thomas, RES

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MAY 23 1993

MEMORANDUM FOR: Mark Au
 Information Management Coordinator
 Office of Nuclear Regulatory Research

FROM: Brenda J. Shelton, Chief
 Information and Records Management Branch
 Division of Information Support Services
 Office of Information Resources Management

SUBJECT: 10 CFR 34, LICENSES FOR RADIOGRAPHY AND RADIATION SAFETY
 REQUIREMENTS FOR RADIOGRAPHIC OPERATIONS, PROPOSED RULE

We appreciate your response to our memorandum of March 5, 1993. We have reviewed the revised subject rule and the draft supporting statement and have provided additional comments on the rule, as indicated below, and comments on the draft supporting statement, as annotated on the enclosed copy.

Comments on the rulemaking:

Section 34.8: Not all sections that contain information collections are included. In addition, please replace the wording of paragraph (c) with Enclosure 1. We have deleted §34.11 from paragraph (b) because it is covered by paragraph (c).

Section 34.31(a): As worded, the section appears to require a record of inspection to be made only when defects are found. However, §34.73 states that a record should be made of each inspection. You may wish to modify §34.31(a).

Section 34.41(b): The RSO is responsible for establishing operating, emergency and ALARA procedures. Establishment of the first two procedures is covered in §34.45. ALARA procedures are not included. Should these procedures be included in §34.45?

Section 34.43(a) and (b): The statement that the radiographer and radiographer's assistant should receive "copies of and instruction in NRC regulations" is unclear and should be reworded. Do you mean, "receive copies of the following NRC regulations: and training in their interpretation."?

Section 34.61 requires that licensees maintain a copy of their license until the Commission terminates the license. It makes no mention of superseded material. The supporting statement supplied for the rule indicates that the licensee shall maintain a copy of the license and amendments until superseded or the NRC terminates the license. The rule should address the handling of superseded material.

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MAY 25 1993

M. Au

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Comments on the OMB Supporting Statement:

Because this rulemaking will replace the current 10 CFR Part 34 in its entirety when it is codified, the OMB clearance package should include all information collection requirements with their full burden, irrespective of whether or not they are currently covered by OMB approval. Include each section that has any modified requirements, documentation, retention, or burden, e.g., the extension of requirements to source assemblies in §34.20.

Because this rulemaking also modifies application requirements that are covered by the clearance for the NRC Form 313, please include the change in burden for the NRC Form 313 in the supporting statement.

Please include the need for each specific information collection by section or subsection and include the retention period for each record.

If you have any questions regarding our comments on the rule or the OMB clearance package, please contact Beth St. Mary on 492- 8540.

Brenda Jo. Shelton, Chief
Information and Records Management Branch
Division of Information Resources Management
Office of Information Resources Management

Enclosures:
As stated

cc: M. Thomas, RES
M. Lesar, ADM

DOCUMENT NAME:

(CHECK the "E" to receive a copy of this document without enclosures; CIRCLE the "E" to receive a copy with enclosures)

OFFICE	IRM/IRMB	E	IRM/IRMB	E		E		E		E
NAME	BSTMARY		B. SHELTON							
DATE	05/ /93		05/25/93							

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34.8 Information collection requirements: OMB approval

(a) The Nuclear Regulatory Commission has submitted the information collection requirements contained in this part to the Office of Management and Budget (OMB) for approval as required by the Paperwork Reduction Act of 1980 (44 U.S.C. 3501 et seq.). OMB has approved the information collection requirements contained in this part under control number 3150-0023.

(b) The approved information collection requirements contained in this part appear in §§ 34.13, 34.15, 34.20, 34.25, 34.27, 34.29, 34.31, 34.33, 34.35, 34.41, 34.43, 34.45, 34.47, 34.49, 34.61, 34.63, 34.65, 34.67, 34.69, 34.71, 34.73, 34.75, 34.79, 34.81, 34.83, 34.85, 34.87, 34.89, 34.91, 34.101, and 34.111.

(c) This part contains an information collection requirement in addition to those approved under the control number specified in paragraph (a) of this section. The information collection requirement and the control number under which it is approved is as follows:

(1) In §34.11, NRC Form 313 is approved under control number 3150-0120.