

AE07-1045

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UNITED STATES  
NUCLEAR REGULATORY COMMISSION

WASHINGTON, D.C. 20555-0001

DEC 28

MEMORANDUM FOR: Donald A. Cool, Chief  
Radiation Protection and Health Effects Branch  
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

We have reviewed the rulemaking issue, SECY-93-317, and the revised OMB clearance package submitted for this rulemaking. We have the following comments on the rule:

We previously indicated that the burden reflected in the Paperwork Reduction Act Statement did not agree with that in the OMB supporting statement. Based on our review of the revised OMB supporting statement, the burden should be approximately 33.7 hours.

In §34.8 Information collections requirements: OMB approval, please delete reference to §34.111. This subsection does not require nor have OMB approval.

Minor comments on the OMB clearance package are annotated on the enclosed copy. We have only enclosed those pages requiring changes. Please make the requested changes and submit the final clearance package to me in sufficient time to ensure its receipt by the Office of Management and Budget (OMB) no later than the date the rule is published in the Federal Register. Publication of the rule is on hold in the Office of Administration pending IRM approval of the clearance package.

Should you require further assistance, please contact Beth St. Mary at 492-8540.

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

Enclosure:  
As stated

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

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and (4) means to be used to determine the radiographer's and radiographer's assistant's knowledge and understanding of and ability to comply with the applicant's operating and emergency procedures. This information is reviewed by the NRC staff to ensure that radiographers and their assistants will have sufficient training to enable them to work safely and in compliance with NRC regulations, license conditions, and licensee operating and emergency procedures.

Paragraph 34.13(c), currently paragraph 34.11(b)(5) has been rewritten, it now requires applicants to establish and submit to the Commission a description of its procedures for verifying and documenting the certification status of its radiographers and for ensuring that the certification of individuals acting as radiographers remains valid. The procedures are intended to ensure the licensee has a program in place for assuring that individuals acting as radiographers are certified as required and that the licensee is aware when re-certification needs to be considered. The NRC reviews the procedures to ensure adequacy. A record of the verification is to be maintained in accordance with § 34.79.

Paragraph 34.13(d), currently paragraph 34.11(c), requires that <sup>the</sup> applicant establish and submit to the Commission satisfactory written operating and emergency procedures. The operating and emergency procedures are intended to provide radiography personnel with step-by-step instructions and procedures so that the performance of industrial radiography will not endanger health or pose a danger to life or property. The preparation of operating and emergency procedures is intended to assure that radiography personnel are aware of specifically what needs to be done and how it should be done, so that there is no misunderstanding of what is required of each person involved in the overall radiography operation.

Paragraph 34.13(e), currently paragraph 34.11(d), requires that the applicant establish and submit its program for annual inspections of the job performance of each radiographer and radiographer's assistant as described in § 34.43(d). The existing rule requires quarterly inspections. The frequency was reduced to annual to reduce the burden on licensees. The inspections are necessary to ensure that radiographers and radiographers' assistants are performing their jobs in accordance with the operating and emergency procedures set forth in their license.

Paragraph 34.13(f), currently paragraph 34.11(e), requires that the applicant submit a description of its overall organizational structure as it applies to the radiation safety responsibilities in radiography, including specified delegations of authority and responsibility. The NRC staff will review this information in order to ensure that the licensee's organization will provide adequate management oversight, supervision and accountability for safe operation of the radiography program and that the lines of authority and responsibility are clear and unambiguous.

Paragraph 34.13(g) is new. It requires the applicant to designate and identify a Radiation Safety Officer (RSO) responsible for implementing the

the licensee is in compliance with regulations stated in this part and in Part 71.

#### § 34.42 Radiation Safety Officer

This is a new section which requires that the Radiation Safety Officer (RSO) meet certain training and documented experience qualifications prior to being designated as the RSO. The RSO is responsible for establishing and overseeing the development of procedures required by § 34.45; ALARA procedures as required by 10 CFR Part 20; overseeing the training program required by § 34.43; and overseeing the performance of radiation surveys and leak tests required by § 34.49 and § 34.27 respectively; that records of personnel monitoring results are maintained and that timely notifications are made as required by § 20.2203. The RSO is to be listed on the license application as required in § 34.13(g).

#### § 34.43 Training and § 34.79 Records of training and certification.

Paragraph 34.43(a)(2) is new. It requires that radiographers be certified by a certifying entity according to the criteria in 10 CFR Part 34, Appendix A. An independent organization must submit a request to NRC to be recognized as a certifying entity.

Paragraph 34.43(a)(3), currently 34.31(a)(2), contains a new requirement for the licensee to provide radiographers with copies of pertinent sections of Parts 30 and 71, and instructions in applicable Department of Transportation regulations as referenced in 10 CFR Part 71, in addition to the existing requirement to provide copies of pertinent sections of Parts 19, 20, and 34; the NRC license; and operating and emergency procedures. This is needed to ensure that radiographers are sufficiently knowledgeable of NRC regulations prior to using licensed material.

Paragraph 34.43(b)(1), currently 34.31(b)(1), contains a new requirement for the licensee to provide radiographer's assistants with copies of pertinent sections of Parts 30, and 71, and instructions in applicable Department of Transportation regulations as referenced in 10 CFR Part 71, and the NRC license under which the assistant will perform radiography, in addition to the existing requirement to provide copies of pertinent sections of Parts 19, 20, and 34; and operating and emergency procedures. This is needed to ensure that radiographer's assistants are sufficiently knowledgeable of NRC regulations prior to using licensed material.

Paragraph 34.43(c) is a new requirement to conduct annual safety reviews for radiographers and radiographers' assistants, with records maintained in accordance with paragraph 34.43(e). This requirement replaces the requirement in paragraph 34.13(b) for periodic training and was revised to make it clear what was meant by periodic training.

Paragraph 34.43(d), currently 34.20(d)(1), which requires inspection and recording of job performance on a quarterly basis, has been reduced to annually

to reduce the administrative burden on the licensee. For individuals who have not performed radiographic operations for more than six months, an inspection of job performance would be required as in the existing rule at the time they next participate in a radiographic operation. This reduction was done primarily in response to comments made at the Radiography Workshop conducted in November, 1992.

Paragraph 34.43(e) requires that the licensee maintain records of training to include certification documents, written and field examinations, annual safety reviews, and annual inspections of job performance. The licensee shall maintain records of the aforementioned items in § 34.79, which is currently required in § 34.31(c) with the addition of the new requirement for documenting the information covered in annual safety reviews. The existing regulation does not have a specific recordkeeping requirement except for tests administered. The revised rule requires licensees to keep track of when and what training was provided, who provided the training, and who received the training. This is needed to enable licensees to demonstrate compliance with NRC requirements. The records of the annual inspections of job performance will be used by the licensee to keep track of deficiencies, if noted, so that they can be corrected. Section 34.79 requires that the licensee retain these records for a period of 3 years after the record is made so that the NRC can inspect to ensure that these individuals are properly trained.

§ 34.45 Operating and emergency procedures and § 34.81 Records of operating and emergency procedures.

Paragraph 34.45(a), currently 34.32, requires that licensees develop procedures for routine operations and emergencies for employees to follow in performing safety functions. These include the safe handling and use of sealed sources and radiographic exposure devices; conducting radiation surveys; controlling access to radiographic areas; locking and securing radiographic exposure devices, storage containers, and sealed sources; personnel monitoring; transporting sealed sources; inspection and maintenance of radiographic exposure devices and storage containers; steps to be taken if a pocket dosimeter is off-scale; procedures for identifying and reporting defects and noncompliance; accident procedures; minimizing exposure; a source recovery procedure if the licensee will perform this function rather than using a consultant (which is a new requirement); and maintenance of records. Paragraph 34.45(a)(6), currently 34.32(f), is not new, the word "posting" has been changed to "placarding" to fit better when discussing transportation issues, and the reference to the Department of Transportation, 49 CFR Parts 171, 172, and 173 has been added to provide further information regarding transportation of radioactive materials. The requirement for a source recovery procedure in paragraph 34.45(a)(12) is new. It is necessary for the licensee to have this procedure if the licensee is going to recover sources on their own.

Paragraph 34.45(b) requires that the licensee maintain copies of current operating and emergency procedures in § 34.81 which is unchanged from the requirements currently in § 34.32. *and*

the records must also include a list of the questions asked and any non-compliances observed.

#### § 34.81 Records of operating and emergency procedures.

This new section requires that the licensee retain records of operating and emergency procedures until the Commission terminates the license and that the licensee retain copies of superseded material for 3 years after each change. The records allow the operators to have access to an up-to-date set of written operating procedures so that they can operate the radiography equipment properly. The NRC inspectors review these procedures to ensure that current instructions are being provided.

#### § 34.83 Records of personnel monitoring.

Section 34.83 revises the current § 34.33(b) and requires licensees to maintain records of alarm ratemeter calibrations, pocket dosimeter readings and operability checks for 3 years from the date the record was made, and to maintain records of film badge, or TLD reports, and records of estimates of exposures as a result of off-scale pocket dosimeters or lost or damaged film badges or TLDs until the Commission terminates the license.

The records serve as an important mechanism for controlling exposure on a day-to-day basis, provide indications of inadvertent exposure, and provide a backup record of estimated exposure in case a film badge or thermoluminescent dosimeter is lost. Pocket dosimeter readings are often the first indication a radiographer has of an overexposure or an improperly stored source. Records of pocket dosimeter readings are needed in investigations of incidents and overexposures, since they are the only available record for the exposure received that day.

#### § 34.85 Records of radiation surveys.

This new section requires that the licensee maintain records of each exposure device survey conducted before placing the device in storage, in accordance with § 34.49(e) for 3 years after the record is made, if that survey is the last one performed in the work day. The records allow NRC inspectors to verify that the required radiation surveys have been done and that the radiation dose limits are being complied with.

#### § 34.87 Forms of records.

This section describes allowable forms for official records. This section (currently at § 34.4) is not new. The word "maintenance" was changed to "form" in keeping with the latest language used in NRC regulations. It requires that the records required by Part 34 be legible throughout the specified retention period. The record may be the original or a reproduced copy or a microform provided that the copy or microform is authenticated by authorized personnel and that the microform is capable of reproducing a clear copy throughout the required retention period. The record may also be stored

in electronic media with the capability for producing legible, accurate, and complete records during the required retention period. Records, such as letters, drawings, and specifications, must include all pertinent information, such as stamps, initials, and signatures. The licensee shall maintain adequate safeguards against tampering with and loss of records.

§ 34.89 Documents and records required at field stations and permanent installations.

This new section adds the requirement to maintain copies of the following records at field stations to demonstrate compliance with NRC regulations in conducting radiographic operations and to ensure that adequate information is available to safely handle radioactive material:

- (a) A copy of Parts 19, 20, and 34 of NRC Regulations;
- (b) The license authorizing the use of licensed material;
- (c) Operating and emergency procedures required by § 34.45;
- (d) The record of radiation survey instrument calibrations required by § 34.65;
- (e) Records of leak test results required by § 34.67;
- (f) Quarterly inventory records required by § 34.69;
- (g) Utilization records required by § 34.71;
- (h) Records of inspection and maintenance required by § 34.73;
- (i) For permanent installations, records of alarm system and entrance control checks required by § 34.75.
- (j) Training and certification records required by § 34.79;
- (k) Survey records required by § 34.85.
- (l) Personnel monitoring records as required by § 34.83; and
- (m) Records of receipt and transfer of sealed sources required by § 34.63.

§ 34.91 Documents and records required at temporary jobsites and use or storage locations exceeding 180 days.

This new section adds the requirement that each licensee conducting operations at a temporary jobsite shall maintain copies of the following documents and records at the temporary jobsite in order to have the information available to safely perform radiographic operations:

- (a) Operating and emergency procedures required by § 34.45.
- (b) Evidence of latest calibration of the radiation survey instruments in use at the site required by § 34.65.
- (c) Evidence of latest calibration of alarm ratemeters and operability checks of pocket dosimeters required by § 34.83.
- (d) Latest survey records required by § 34.85.
- (e) The shipping papers for the transportation of radioactive materials required by § 71.5 of this chapter; and
- (f) When operating under reciprocity pursuant to § 150.20 of this chapter, a copy of the Agreement State license authorizing use of licensed materials.

### 34.101 Notifications.

This section, currently at § 34.30, contains notification requirements. Sections 34.101(a) and (b) specify requirements for notifying the NRC within 30 days of significant health and safety events and are unchanged from the current rule. A new subparagraph, 34.101(c), has been added that requires the licensee to notify the appropriate NRC regional office in writing within 30 days prior to conducting radiographic operations or storing radioactive material at any location not listed on the license in excess of 180 days. This requirement is necessary in order to provide the NRC with information in a timely manner to permit inspection of radioactive material at these locations to ensure that they are in compliance with NRC safety regulations.

### Appendix A

Appendix A would specify the requirements to be an independent organization and certification program criteria all organizations must address. Appendix A does not impose new requirements on NRC's radiography licensees. Part I of this Appendix provides the requirements to be an independent certifying organization. Parts II and III of Appendix A provide the requirements for the certification program and written examinations for a certifying entity, including the Agreement States. NRC anticipates that certifying entities will maintain their program procedures as long as the organization is identified by NRC as a certifying entity.

Appendix A, Part I, item 3 would require that an independent certifying organization have a certification program that is open to non-members. This is necessary to uphold 10 CFR Part 4, Subpart A -- Regulations Implementing Title VI of the Civil Rights Act of 1964 and Title IV of the Energy Reorganization Act of 1974 with respect to prohibiting discriminatory actions.

Appendix A, Part I, item 5 would require that an independent certifying organization have a permanent full-time staff, a viable system for financing its operations, and a policy- and decision-making review board. This ensures that the organization will have the resources to maintain an adequate program.

Appendix A, Part I, item 6 would require that an independent certifying organization have a set of written organizational by-laws and policies that provide adequate assurance of lack of conflict of interest and a system for monitoring and enforcing those by-laws and policies. The procedures are intended to ensure the independent certifying organization has a program in place for monitoring and enforcing its by-laws and policies. The NRC reviews the procedures to ensure adequacy.

Appendix A, Part I, item 9 would require that an independent certifying organization have written procedures describing all aspects of its certification program, maintain records of the current status of each individual's certification, and on the administration of its certification program. The procedures are intended to ensure the independent certifying organization has an adequate certification program. The NRC reviews the

procedures to ensure adequacy. The records are necessary for the certifying organization to maintain an awareness of each individual's certification, and to record its activities on the administration of its certification program. The records would be reviewed during periodic program reviews.

Appendix A, Part I, item 10 would require that an independent certifying organization have procedures to ensure that certified individuals are provided due process with respect to the administration of its certification program, including the process of becoming certified and any sanctions imposed against certified individuals. The procedures are intended to ensure the independent certifying organization provide certified individuals adequate due process. The NRC reviews the procedures to ensure adequacy.

Appendix A, Part I, item 11 would require that an independent certifying organization have procedures to ensure that the individuals proctoring each examination are not employed by the same company or corporation (or a wholly-owned subsidiary of such company or corporation) as any of the examinees. The procedures are intended to help ensure fairness in the examination process. The NRC reviews the procedures to ensure adequacy.

Appendix A, Part I, item 12 would require that an independent certifying organization exchange information about certified individuals with the Commission and the Agreement States and allow periodic review of its certification program and related records. The exchange of information and periodic review are to ensure that all individuals' certifications are current and valid.

Appendix A, Part I, item 13 would require that an independent certifying organization provide a description to the Commission of its procedures for choosing examination sites and for providing an appropriate examination environment. The procedures are intended to ensure that the independent certifying organization provide for appropriate examination sites and environments. The NRC reviews the procedures to ensure adequacy.

Appendix A, Part II, item 2 would require that a certification program must require applicants for certification to provide documentation that demonstrates that the applicant: (a) ~~has~~ received training in the topics set forth in Appendix A to this part; (b) satisfactorily completed a minimum period of on-the-job training; and (c) ~~has~~ received verification by an Agreement State or a NRC licensee that the applicant has demonstrated the capability of independently working as a radiographer. Submission of this documentation is necessary for the certifying entity to verify an applicant's training and to determine that the applicant meets certain certification criteria. NRC would review the program description to ensure that it include this element.

Appendix A, Part II, item 3 would require that a certification program must include procedures to ensure that all examination questions are protected from disclosure. ~~The procedures are intended to ensure that the certification program include provisions for protecting examination questions.~~ NRC would review the program description to ensure that it includes this element.

*You need to indicate when they need to be protected.*



Appendix A, Part II, item 4 would require that a certification program must include procedures whereby an application or certification would be considered null and void if the applicant or certified individual is prohibited from acting as a radiographer by a regulatory agency at the time of making the application. The procedures are intended to ensure that the certification program include provisions for automatically denying certification to an individual if the individual has been prohibited from acting as a radiographer by the NRC or an Agreement State. NRC would review the program description to ensure that it includes this element.

Appendix A, Part II, item 6 would require that a certification program must include procedures for renewing the certifications and, if the procedures allow renewals without examination, require evidence of recent active full-time employment and annual refresher training. The procedures are intended to ensure that the certification program include provisions for certification renewal. NRC would review the program description to ensure that it includes this element.

Appendix A, Part II, item 7 would require that a certification program must include procedures whereby an individual's certification may be revoked, suspended, or restricted for willful or significant failure to comply with his or her employer's operating or emergency procedures, or the Commission's or a Agreement State's regulations. The procedures are intended to ensure that the certification program include provisions for revoking, suspending, or restricting an individual's certification in the event of a willful or significant failure to comply. NRC would review the program description to ensure that it includes this element.

Appendix A, Part II, item 8 would require that a certification program must provide for automatic suspension of an individual's certification, based on Commission or Agreement State action prohibiting the individual from acting as a radiographer. This requirement is intended to ensure that the certification program include a provision for automatic suspension that would prohibit an individual from acting as a radiographer. NRC would review the program description to ensure that it includes this element.

Appendix A, Part II, item 9 would require that a certification program must provide for sanctions imposed against certified individuals that are at least as severe as any action taken by the Commission or an Agreement State. This requirement is intended to ensure that the certification program include a provision to impose sanctions against certified individuals, and would uphold the proposed 10 CFR Part 34, Subpart H -- Violations. NRC would review the program description to ensure that it includes this element.

## 2. Reduction of Burden through Information Technology

# There are no legal obstacles to reducing the burden associated with this information collection. The revision to 10 CFR Part 34 encourages licensees, who so desire, to submit information in electronic format. Records may be retained in electronic format.

# 3. Effort to Identify Duplication

The Information Requirements Control Automated System (IRCAS) was searched and no duplication was found.

# 4. Effort to Use Similar Information

There is no similar information available to the NRC.

# 5. Effort to Reduce Small Business Burden

Many NRC radiography licensees are small businesses. Efforts have been made to keep the requirements for information to a minimum. However, since the consequences of mishandling of a radiography source are likely to be the same for large and small entities, it is not possible to further reduce the burden on small businesses by less frequent or less complete recordkeeping or reporting.

# 6. Consequences of Less Frequent Collection

Applications are only required to be submitted for the initial license, for amendments, and for renewal every 5 years. The application process requires that applicants and licensees perform a comprehensive review of their entire radiation safety program to assure that all activities will be or are being conducted safely and in accordance with NRC regulations. Requests for certification program approval proposed in § 34.43(a)(2) need to be submitted only once. Requests for certification program changes would be submitted on an "as-needed" basis. The submission of the required information is essential to NRC's determination of whether the applicant has procedures that are adequate to protect the public health and safety and meet regulatory guidelines. The review and submission of the information required for the application is essential to NRC's determination of whether the applicant has training, experience, equipment, facilities and procedures for the use of byproduct material that are adequate to protect the public health and safety. Other reporting and recordkeeping requirements are occasioned by specified events such as leak tests, instrument calibrations, and inventories of licensed material. Conduct of these tests and other events and collection of information concerning them at the required frequency is essential to provide the assurance of protection for the health and safety of workers and the public.

# 7. Circumstances Which Justify Variation from OMB Guidelines

Section 34.27(d) varies from OMB guidelines in requiring that licensees report within 5 days of the leak testing any result which would indicate that a source is leaking. This requirement for a report in less than 30 days is necessary because a leaking source could present a radiological hazard to workers and the public, and NRC must be notified promptly in order to be able to assess whether corrective actions initiated by the licensee are adequate.

Section 34.81 varies from OMB guidelines in requiring that licensees retain a copy of current operating and emergency procedures as a record until the Commission terminates the license. It is necessary that these procedures be retained longer than 3 years because the information is used by the licensee

and its employees throughout the period of licensed activity to guide the handling and use of radioactive material in normal and emergency situations.

Sections 34.83(c) and (d) vary from OMB guidelines in requiring that licensees maintain reports received from the film badge or TLD processor and records of estimates of exposures as a result of off-scale pocket dosimeters or lost or damaged film badges or TLDs until the Commission terminates the license.

*reason need to retain longer: This is needed to verify a workers dose in the event other records are lost.*

8. Consultations Outside the NRC  
The American Society for Nondestructive Testing, Inc. (ASNT) was consulted concerning the certification program development and information collection requirements. The revised rule will be published in the Federal Register for public comment.

# 9. Confidentiality of Information  
None, except for proprietary information.

*This report is covered in a separate OMB Clearance for NRC Form 5.*

# 10. Justification for Sensitive Questions  
There are no questions regarding sensitive issues.

*OMB # 3150-0206*

# 11. Estimated Annualized Cost to the Federal Government  
The estimated annual cost professional staff effort for activities other than application review, which is included in OMB Clearance 3150-0120, NRC Form 313, is \$10,925,640 (82,770 hours @ \$132/hr).

# 12. Estimate of Burden  
See Tables 1, 2 and 3. Total 10 CFR Part 34 burden is estimated for recordkeeping and reporting is estimated to be 99,120 hours. Total cost for licensees is estimated at \$13,071,960 (\$132 X 99,120 hrs). In addition, there is an increase in burden for NRC Form 313 of 2 hours each for 700 licensees, or an increase of 1,400 hours and a cost for NRC Form 313 of \$184,800 (\$132 X 1,400 hours).

# 13. Reasons for Change in Burden  
The change in burden is due to the revision of 10 CFR Part 34 in its entirety and additional information to be submitted on NRC Form 313, cleared under OMB Clearance number 3150-0120.

# 14. Publication for Statistical Use  
None.

#### B. COLLECTIONS OF INFORMATION EMPLOYING STATISTICAL METHODS

Statistical methods are not employed in the collection of information.

TABLE 1  
 INFORMATION COLLECTION BURDENS ASSOCIATED WITH  
RECORDKEEPING REQUIREMENTS OF THE REVISED 10 CFR PART 34

SECTION	LIC AFFECTED	HRS/LIC	TOTAL BURDEN	COST AT \$132/HR	REC. RET.	NOTES
34.13(c)	700	1	700	92,400	3 Yrs	
34.20(b)(1)	700	1	700	92,400	3 Yrs	Labels
34.20(f)	700	1	700	92,400	3 Yrs	New, labels
34.25(c)	700		0		3 Yrs	see § 34.65
34.27(b)(2)	700		0		3 Yrs	see § 34.67
34.27(b)(3)	350	1	350	46,200	3 Yrs	
34.27(c)	350	3	1,050	138,600	3 Yrs	
34.27(f)	350	3	1,050	138,600	3 Yrs	
34.29(b)	700		0			see § 34.69
34.31(a)	700		0			see § 34.73
34.31(b)	700		0			see § 34.73
34.33(b)	175		0			see § 34.75
34.35(a)(2)	700	10	7,000	924,000	3 Yrs	
34.42	700		0			see § 34.13(g)
34.43(a) (3)	700	1	700	92,400		some new
34.43(b)	700	1	700	92,400		some new
34.43(c)	700	0	0			see § 34.43(e) new
34.43(d)	700	0	0			see § 34.43(e) new

*Add 34.20(b)(2) 700*

*See OMB Clearance No. 3150-0008*

DRAFT

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Thursday, December 2, 1993 2:12pm

*Although 34.43(a)(3) and 34.43(b)(1) can be lumped together as they are the same/similar activities, 34.43(a)(2) cannot as it is a request to NRC for certification (appears to be a reporting requirement)*

TABLE 1 (cont'd)  
 INFORMATION COLLECTION BURDENS ASSOCIATED WITH THE  
RECORDKEEPING REQUIREMENTS OF THE REVISED 10 CFR PART 34

SECTION	LIC AFFECTED	HRS/ LIC	TOTAL BURDEN	COST AT \$132/HR	REC. RET.	NOTES
34.43(e)	700		0			see § 34.79
<i>Ord</i> 34.35(c) 34.45(b)	700		0		RULT <sup>1</sup>	see § 34.81
34.47(b)	700		0		3 Yrs	see § 34.83(a)
34.47(c)	700		0		3 Yrs	see § 34.83(a)
34.47(d)	35		0		RULT <sup>1</sup>	New, see § 34.83(d)
34.47(e)	35		0		RULT <sup>1</sup>	New, see § 34.83(d)
34.47(f)	700		0		RULT <sup>1</sup>	see § 34.83(c)
34.47(g)(5)	700		0		3 Yrs	New, see § 34.83(b)
34.49(f)	700		0		3 Yrs	see § 34.85
34.61	700	1	700	92,400	RULT <sup>1</sup>	New
34.63	700	1	700	92,400	3 Yrs	
34.65	700	3	2,100	277,200	3 Yrs	
34.67	700	2	1,400	184,800	3 Yrs	
34.69	700	4	2,800	369,600	3 Yrs	
34.71(a, b)	700	50	35,000	4,620,000	3 Yrs	some info new
34.73(a, b)	700	14	9,800	1,293,600	3 Yrs	some new info

<sup>1</sup>Retain until license is terminated.

TABLE 2  
 INFORMATION COLLECTION BURDENS ASSOCIATED WITH  
 REPORTING REQUIREMENTS OF THE REVISED 10 CFR PART 34

SECTION	LICENSEES AFFECTED	HOURS/ LICENSEE	TOTAL BURDEN	COST AT \$132/HR	REP. RET.	NOTES
34.13(c)	700	1	700	92,400	RULT <sup>1</sup>	
34.13(g)	700	10	7,000	924,000	RULT <sup>1</sup>	New
34.13(i)	700	10	7,000	924,000	RULT <sup>1</sup>	New <i>This appears to be repeated on the vet 33, d/so, it should be moved there.</i>
34.13(j)	100	1	100	1,320		New
34.27(d)	20	2	40	5,280		
34.101 (a and b)	20	10	100	13,200		
34.101 (c)	700	2	1,400	184,800		New
Appendix A, Part I, item 13	1	10	10	1,320	life of program	
TOTALS	2941	N/A	16,350	2,146,320	N/A	N/A

*Add App A, Pt I item 13*

*Reporting table needs to indicate number of responses x  
 burden per response = total burden. (if this is  
 not correct as marked, please adjust. I do not  
 know where your burden per response in the PRAS came  
 from. Total burden (99,120 hrs) ÷ no. responses (2,242) = 44.2  
 not 13. ~~Some~~ PRAS includes recordkeeping also. See  
 cover note.*

<sup>1</sup>Retain until license is terminated.

TABLE 3  
 INFORMATION COLLECTION BURDENS ASSOCIATED WITH  
REPORTING REQUIREMENTS OF THE REVISED 10 CFR PART 34  
 THAT ARE COVERED BY OMB CLEARANCE NO. 3150-0120

SECTION	LICENSEES AFFECTED	HOURS/LICENSEE	TOTAL BURDEN	COST AT \$132/HR	REP. RET.	NOTES
34.11	700				RULT <sup>1</sup>	See OMB Clearance No. 3150-0120
34.13(b)	700	1	700	92,400	RULT <sup>1</sup>	See OMB Clearance No. 3150-0120
34.13(d)	700				RULT <sup>1</sup>	See OMB Clearance No. 3150-0120
34.13(e)	700				RULT <sup>1</sup>	See OMB Clearance No. 3150-0120
34.13(f)	700				RULT <sup>1</sup>	See OMB Clearance No. 3150-0120
34.13(h)	700	1	700	92,400	RULT <sup>1</sup>	See OMB Clearance No. 3150-0120
34.13(i)	700	10	7000	924,000		
34.43(a) (2)						See OMB Clearance No. 3150-0120
TOTAL	N/A	12	1,400	184,800		

<sup>1</sup>Retain until license is terminated.