

Request for OMB Review

FDR
Certification Designated Official
J. Smith

Important

Read instructions before completing form. Do not use the same SF 83 to request both an Executive Order 12291 review and approval under the Paperwork Reduction Act.

Answer all questions in Part I. If this request is for review under E.O. 12291, complete Part II and sign the regulatory certification. If this request is for approval under the Paperwork Reduction Act and 5 CFR 1320, skip Part II, complete Part III and sign the paperwork certification.

Send three copies of this form, the material to be reviewed, and for paperwork—three copies of the supporting statement, to:

Office of Information and Regulatory Affairs
Office of Management and Budget
Attention: Docket Library, Room 3201
Washington, DC 20503

PART I.—Complete This Part for All Requests.

1. Department/agency and Bureau/office originating request U. S. Nuclear Regulatory Commission	2. Agency code 3 1 5 0
3. Name of person who can best answer questions regarding this request Paul Goldberg	Telephone number (301) 415-7842
4. Title of information collection or rulemaking Regulatory Impact Survey of Materials Licensees	
5. Legal authority for information collection or rule (cite United States Code, Public Law, or Executive Order) 42 USC 2201(c) or _____	
6. Affected public (check all that apply)	5 <input checked="" type="checkbox"/> Federal agencies or employees
1 <input type="checkbox"/> Individuals or households	6 <input checked="" type="checkbox"/> Non-profit institutions
2 <input checked="" type="checkbox"/> State or local governments	7 <input checked="" type="checkbox"/> Small businesses or organizations
3 <input type="checkbox"/> Farms	4 <input checked="" type="checkbox"/> Businesses or other for-profit

PART II.—Complete This Part Only if the Request is for OMB Review Under Executive Order 12291

7. Regulation Identifier Number (RIN) _____ or, None assigned

8. Type of submission (check one in each category)	Stage of development	Type of review requested
Classification	1 <input type="checkbox"/> Proposed or draft	1 <input type="checkbox"/> Standard
1 <input type="checkbox"/> Major	2 <input type="checkbox"/> Final or interim final, with prior proposal	2 <input type="checkbox"/> Pending
2 <input type="checkbox"/> Nonmajor	3 <input type="checkbox"/> Final or interim final, without prior proposal	3 <input type="checkbox"/> Emergency
9. CFR section affected _____ CFR	4 <input type="checkbox"/> Statutory or judicial deadline	10. Does this regulation contain reporting or recordkeeping requirements that require OMB approval under the Paperwork Reduction Act and 5 CFR 1320? <input type="checkbox"/> Yes <input type="checkbox"/> No
11. If a major rule, is there a regulatory impact analysis attached? If "No," did OMB waive the analysis?	1 <input type="checkbox"/> Yes 2 <input type="checkbox"/> No	3 <input type="checkbox"/> Yes 4 <input type="checkbox"/> No

Certification for Regulatory Submissions

In submitting this request for OMB review, the authorized regulatory contact and the program official certify that the requirements of E.O. 12291 and any applicable policy directives have been complied with.

Signature of program official	Date
Signature of authorized regulatory contact	Date

12. (OMB use only) **9406010051 940525**
PDR ORG EUSOMB
PDR

SUPPORTING STATEMENT
FOR
REGULATORY IMPACT SURVEY OF MATERIALS LICENSEES

Description of the Information Collection

NRC proposes to systematically obtain a broad sample of licensees' views of the efficacy and impact of NRC regulation through a mail survey of 600 materials licensees in a range of categories. The attached questionnaire is intended to elicit licensees views on the following five areas of regulation:

1. Regulations, policy, and regulatory guidance
2. Licensing
3. Inspection
4. Reporting requirements
5. Enforcement

In the first phase of the Regulatory Impact Survey, the staff interviewed, at length, representatives of nine large licensees in three license categories, using a structured questionnaire. The information obtained was used to help direct NRC's regulatory program. Licensees were willing, and indeed eager, to participate, and have generally expressed favorable views of the first phase, the resulting report, and the changes made as a result.

The Commission has directed the staff to obtain information from a larger and more diverse sample of licensees which would enable the staff to systematically integrate consideration of the impact of NRC regulation on licensees' operations into the regulatory program. Licensees may offer comments about both beneficial and deleterious effects of NRC regulation.

A. Justification

1. Need for and Agency Use of the Information Collection

The principal purpose of the Regulatory Impact Survey is to determine the impact of NRC's regulatory program on safety at licensed sites. The survey focuses on whether, and to what extent, regulation intended to improve safety is actually having the intended effect, whether it is, on the contrary, having the effect of degrading safety, and whether there is an appropriate balance between the burden imposed on licensees by NRC regulation and the level of safety achieved.

NRC needs this information to assess the efficacy of its programs. On the basis of analysis of these views and other relevant considerations, staff would have the opportunity to consider changes in NRC's regulation of those licensees. The staff would consider the information obtained in developing the regulatory program as, for example, in changing regulations or guidance to licensees, and in changing internal guidance to license reviewers and inspectors. While it is difficult to determine precisely what

changes might be made before the information is obtained, NRC will consider changes to regulatory approaches in the five areas listed above. A number of changes have been made and continue to be made as a result of the initial phase of the Regulatory Impact Survey.

2. Reduction of Burden Through Information Technology

There are no legal or technical obstacles to reducing the burden associated with this information collection. Since the survey will be processed and analyzed automatically, its format will be simplified to permit respondents to complete it relatively easily and quickly.

3. Effort to Identify Duplication

While licensees express views on questions in the survey questionnaire in a variety of fora, there is no other means of collecting and analyzing these views. NRC has not previously conducted a survey of this scope or nature for materials licensees. The Information Requirements Control Automated System (IRCAS) was searched to identify duplication. None was found.

4. Effort to Use Similar Information

The information which licensees provide to NRC in the course of licensing, inspection, comments on requirements and guidance, workshops, public meetings, and other fora cannot be elicited, gathered, or organized in a systematic fashion for analysis. NRC uses these other sources of licensee views to shape policy on the particular matters at hand while the present initiative is broader and more fundamental.

5. Effort to Reduce Small Business Burden

The majority of licensees who use byproduct material are small businesses. The survey questionnaire is designed to obtain only essential information to assess the regulatory program. This will minimize the burden on small licensees. It was pretested on a small sample of licensees and the results of the pretest were incorporated into the survey design to make the survey more efficient and easier to complete.

6. Consequences of Less Frequent Collection

NRC expects to collect this information only once. If NRC did not collect this information, there would be little basis for assessing NRC's regulatory program from the perspective of licensees.

7. Circumstances Which Justify Variation from OMB Guidelines

There is no variation from OMB guidelines.

8. Consultations Outside the NRC

NRC has consulted with its contractor, Battelle Pacific Northwest Laboratory (PNL), in designing the survey. PNL, acting on NRC's behalf, contacted nine licensees to ask them to pretest the questionnaire. The comments of the respondents and the results of the pretest were incorporated into the survey design to make the survey more efficient and easier to complete.

10. Confidentiality of Information

As noted in the confidentiality statement in the cover letter to licensees, all information provided will be treated as confidential. NRC will obtain the responses only as aggregated data.

11. Sensitive Questions

None.

12. Estimate of Burden

Number of licensees to be surveyed: 600

Expected response rate: 70%

Expected number of responses: 420

Estimated time for each respondent to complete the questionnaire:
45 minutes (0.75 hours)

Total Burden = No. of responses x time to complete questionnaire:
420 respondents x 0.75 hours/respondent = **315 hrs**

Estimated total industry cost = No. of responses x time to complete
questionnaire x hourly rate: 420 x 0.75 x \$132 = \$41,580

13. Reasons for Change in Burden

There is no change in burden.

14. Estimate of Cost to Federal Government

NRC Contract Administration and Staff Review:

0.5 FTE -- 1100 hours @ \$132/hr.: \$145,200

Contract Cost: \$157,000

Total cost to the Government: \$302,200

This cost is fully recovered by fee assessments to NRC licensees pursuant to 10 CFR Parts 170 and/or 171.

15. Publication for Statistical Use

The analysis plan calls for descriptive statistics including: number of respondents, and mean responses and frequency distributions for all closed questions. Selected cross-tabulations by licensee type and size, level of knowledge of NRC Regulations, and type of most recent interaction will be performed. The use of inferential statistics (such as the chi square test) is planned to ascertain the level of significance of, for example, varying response by licensee type or size and perceived impact of the regulatory condition. Other inferential tests may be used, depending on the results of the frequency distribution and preliminary cross-tabulation. This analysis will identify the major themes or patterns of licensees' responses. The statistical analyses will be supported by graphic materials including charts, tables, and figures.

B. Collection of Information Employing Statistical Methods

The collection of this information will employ statistical methods. The regulatory impact survey to be administered by the Nuclear Regulatory Commission is designed to provide a representative sample of current materials licensees. These licensees are involved with the medical, academic, industrial and commercial uses of radiation. A stratified random sampling process will be employed to assure that a representative set of licensees is included in the survey. The sample will be stratified by licensee type, and within licensee type, a simple random sample will be drawn. The major licensee types are: academic; medical institution (broad); medical other (private practice, teletherapy, etc.); pharmacy; well logging; gauges; manufacturing and distribution; services; industrial radiography; irradiators; R & D.

The survey will be administered by a professional survey research firm. They will print and mail the questionnaire along with a personalized cover letter on their own letterhead as well as a generic cover letter from the NRC. This should ensure that the licensee respondents will feel comfortable providing honest feedback, as they will be ensured anonymity from the organization they are evaluating.

The approach to be taken will involve a mailing to approximately 600 licensees. An initial mailing will be carried out, with a follow-up reminder postcard to all licensees, and a second mailing of the questionnaire to those licensees who have not yet responded. This approach achieved an 80% response rate on a recently completed NRC licensee survey. NRC anticipates a 70% response rate on this survey.



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

MEMORANDUM FOR: NRC Materials Licensees

FROM: Carl Paperiello, Director
Division of Industrial and Medical Nuclear Safety

SUBJECT: REGULATORY IMPACT SURVEY

The Purpose of this survey is to determine your perceptions of the overall impact of NRC Regulatory Activities on the safe operation of your facility.

NRC will evaluate the information gathered through this survey in considering, what, if any, changes should be made to our approach to regulating materials licensees. This survey is being administered to a sample of licensees, selected at random, to provide us with data to make those changes. Your participation is very important in obtaining licensee views on the effect of NRC's activities.

We will be asking you a series of questions about your views on NRC Regulations, Policies, and Regulatory Guidance; on licensing activities and the licensing process; on NRC inspections; on NRC reporting requirements; and on the NRC enforcement actions. Space is provided at the end of the survey for any additional comments that you may wish to provide.

We anticipate that it will take approximately 45 minutes to complete. The survey is being administered for the NRC by Pacific Northwest Laboratory, an NRC contractor. If you have any questions regarding this questionnaire, please call Robin Conger or Mark Hatrup, PNL survey administrators, at (509) 372-4687.

Carl Paperiello, Director
Division of Industrial and Medical Nuclear Safety

CONFIDENTIALITY STATEMENT: THE RESULTS OF THIS SURVEY WILL BE USED TO ASSIST THE NRC IN BETTER DETERMINING THE EFFECT OF ITS REGULATORY PROGRAM ON NUCLEAR SAFETY. ALL INFORMATION PROVIDED WILL BE TREATED AS CONFIDENTIAL. ONLY MEMBERS OF THE SURVEY TEAM AND DESIGNATED ANALYSTS WILL BE PERMITTED ACCESS TO THE QUESTIONNAIRE DATA. YOUR RESPONSES WILL BE GROUPED WITH ALL OTHER RESPONDENTS FOR PURPOSES OF ANALYSIS AND WILL NOT BE REPORTED AS INDIVIDUAL ANSWERS.

This survey contains information collections that are subject to the Paperwork Reduction Act of 1980 (44 U.S.C. 3501 et seq.). These information collections were approved by the Office of Management and Budget, approval number 3150- _____, which expires _____.

The public reporting burden for this collection of information is estimated to average 45 minutes per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding this burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to the Information and Records Management Branch, U.S. Nuclear Regulatory Commission, Washington, DC 20555-0001, and to the Desk Officer, Office of Information and Regulatory Affairs, NEOB-3G19, (3150-0011), Office of Management and Budget, Washington, DC 20503.

REGULATIONS, POLICIES AND REGULATORY GUIDANCE

The purpose of this section of the survey is to obtain your perceptions regarding 1) the cost of NRC regulations, 2) the usefulness of NRC regulations, and 3) the safety impact of NRC regulations.

1. How would you describe your level of knowledge of each of the following NRC regulatory documents applicable to your licensed activities? *(Please circle one response per document type.)*

	very low	low	average	high	very high
Regulations	1	2	3	4	5
Regulatory Guides	1	2	3	4	5
Policy Statements	1	2	3	4	5
License Conditions	1	2	3	4	5
Branch Technical Positions	1	2	3	4	5
Information Notices	1	2	3	4	5

2. During the past 2 years, how many times have you used outside consultants to assist you in each of the following areas? *(Please indicate the approximate number of times in the space provided; if you have not used a consultant, enter a "0".)*

Need for Consultants	Number of Times Used:
To understand regulations	
To understand the new 10 CFR Part 20	
To conduct training	
To conduct internal audits	
To submit a license application	
To submit a license amendment	
To submit a license renewal request	
Other (specify): _____	

3. Thinking back over the past 3 years, do you believe that the number of NRC regulations applicable to your licensed activity has... (Please circle only one response.)

1. increased significantly
2. increased somewhat
3. remained about the same
4. decreased somewhat
5. decreased significantly

4. Thinking back over the past 3 years, do you believe the cost of complying with NRC regulations has... (Please circle only one response.)

1. increased significantly
2. increased somewhat
3. remained about the same
4. decrease somewhat
5. decrease significantly

5. NRC is interested in obtaining your perceptions about the cost of complying with some specific NRC regulations versus the overall safety impact of those regulations on your facility.

To what extent does each of the regulations listed below contribute to the safe operation of your facility? (Please circle the number that best represents your opinion. Use NA if the regulation does not apply to your licensed activity.)

	no contribution			very high contribution			
	1	2	3	4	5		
a. PART 19 - Communication/Reports to Workers	1	2	3	4	5	NA	
b. PART 20 - Radiation Protection (new Part 20)	1	2	3	4	5	NA	
c. PART 30 - Byproduct Material Licensing	1	2	3	4	5	NA	
d. PART 33 - Broad Scope	1	2	3	4	5	NA	
e. PART 34 - Radiography	1	2	3	4	5	NA	
f. PART 35 - Medical Use	1	2	3	4	5	NA	
g. PART 36 - Irradiators	1	2	3	4	5	NA	
h. PART 39 - Well Logging	1	2	3	4	5	NA	
i. PART 40 - Source Material	1	2	3	4	5	NA	
j. PART 70 - Special Nuclear Material	1	2	3	4	5	NA	
k. PART 71 - Transportation	1	2	3	4	5	NA	

6. How would you rate the cost of complying with each of the NRC regulations listed below? (Please circle the number that best represents your opinion. Use NA if the regulation does not apply to your licensed activity.)

	low					high
a. PART 19 - Communication/Reports to Workers	1	2	3	4	5	NA
b. PART 20 - Radiation Protection (new Part 20)	1	2	3	4	5	NA
c. PART 30 - Byproduct Material Licensing	1	2	3	4	5	NA
d. PART 33 - Broad Scope	1	2	3	4	5	NA
e. PART 34 - Radiography	1	2	3	4	5	NA
f. PART 35 - Medical Use	1	2	3	4	5	NA
g. PART 36 - Irradiators	1	2	3	4	5	NA
h. PART 39 - Well Logging	1	2	3	4	5	NA
i. PART 40 - Source Material	1	2	3	4	5	NA
j. PART 70 - Special Nuclear Material	1	2	3	4	5	NA
k. PART 71 - Transportation	1	2	3	4	5	NA

7. Are there any sections within the regulations listed in the previous table that you believe are particularly effective at enhancing the safe operation of your facility? (Please identify the sections (e.g., 19.13(d), 20.1601, 35.1-35.10) and explain in the space provided.)

8. Are there any sections within the regulations listed in the previous table that you believe are counterproductive to the safe operation of your facility? (Please identify the sections (e.g., 19.13(d), 20.1601, 35.1-35.10) and explain in the space provided.)

9. How useful is each of the regulatory guides listed below? (Please circle the number that best represents your opinion. Use NA if the regulatory guide does not apply to your licensed activity.)

	not useful					very useful
	1	2	3	4	5	NA
a. Bioassay Program (8.9)	1	2	3	4	5	NA
b. Prenatal Radiation Exposure (8.13)	1	2	3	4	5	NA
c. Radiation Safety Survey at Medical Institutions (8.23)	1	2	3	4	5	NA
d. Calibration of Air Sampling Instruments (8.25)	1	2	3	4	5	NA
e. Occupational Radiation Exposure Risk (8.29)	1	2	3	4	5	NA
f. Tritium Bioassay Program (8.32)	1	2	3	4	5	NA
g. Quality Management Program (8.33)	1	2	3	4	5	NA
h. Occupational Radiation Dose Calculation (8.34)	1	2	3	4	5	NA
i. Radiation Doses to Embryo/Fetus (8.36)	1	2	3	4	5	NA
j. ALARA Levels of Effluents (8.37)	1	2	3	4	5	NA
k. Preparation of Application for Licensed Activity (Division 10 Guides)	1	2	3	4	5	NA
l. Other (Please specify) _____	1	2	3	4	5	NA

10. Have you ever provided comments on proposed NRC regulations or guidance documents? (Please circle all that apply for each document type.)

	Regulations	Guidance Documents
yes	R	GD
no, because the process is too time consuming	R	GD
no, because the process is too expensive	R	GD
no, because my input will have no impact	R	GD
no, because the process is too difficult to understand	R	GD
no, because I was not aware of them in time to comment	R	GD
no, because I had no comments to make	R	GD
no, other (Please specify) _____	R	GD

11. How valuable is the NMSS newsletter to you? (Please circle only one.)

1. very valuable
2. somewhat valuable
3. not very valuable
4. no value
5. do not receive it

LICENSING

The purpose of the next set of questions is to determine how effectively and efficiently the NRC performs its licensing functions.

12. Based on your licensing action(s) in the past 12 months (e.g., issuance, renewal, amendment), to what extent do you agree with each of the statements in the table below? (Please circle one response per line.) If you have not had a licensing action in the last 12 months, please skip to Question 19.

	strongly disagree	disagree	neutral	agree	strongly agree	
a.						
I understand the review process the NRC uses to						
issue a license	1	2	3	4	5	NA
renew a license	1	2	3	4	5	NA
amend a license	1	2	3	4	5	NA
b.						
The guidance provided by the NRC enables me to file the following in an efficient manner						
new applications	1	2	3	4	5	NA
amendments	1	2	3	4	5	NA
renewals	1	2	3	4	5	NA
c.						
The guidance provided by the NRC enables me to feel confident that most information I provide will be accepted by an NRC license reviewer.	1	2	3	4	5	NA

13. What was the last type of licensing action you had with the NRC? (Please circle only one.)

1. license issuance
2. license renewal
3. license amendment

14. Thinking back to that last licensing action, to what extent do you agree with each of the statements in the table below? (Please circle only one response per statement.)

		strongly disagree	disagree	neutral	agree	strongly agree	
a.	The reviewers were professional in their conduct.	1	2	3	4	5	NA
b.	The reviewers were helpful.	1	2	3	4	5	NA
c.	The reviewers asked clear questions.	1	2	3	4	5	NA
d.	The reviewers asked only for relevant information.	1	2	3	4	5	NA
e.	The reviewers applied regulations consistently with what I believe NRC intended.	1	2	3	4	5	NA
f.	The reviewers asked reasonable questions.	1	2	3	4	5	NA
g.	The reviewers had sufficient knowledge of my operation and institution to do their job adequately.	1	2	3	4	5	NA
h.	The reviewers were competent in relevant technical fields.	1	2	3	4	5	NA

15. How timely was the NRC response to any license applications, amendments, and/or renewal requests you made in the last twelve months? (Please circle one response for each type of licensing action.)

	not at all timely				very timely		
	1	2	3	4	5		
Application	1	2	3	4	5		NA
Amendment	1	2	3	4	5		NA
Renewal	1	2	3	4	5		NA

16. If you have experienced delays in NRC responses to license amendments or other licensing requests, how have they affected your facility? (Please circle only one response.)

1. haven't experienced any delays
2. created serious operational problems
3. created moderate operational problems
4. created minor operational problems
5. created no operational problems

17. If you have ever disagreed with a license reviewer's position on an issue, what did you do to resolve it? (Please circle all that apply.)

1. never disagreed with a reviewer's position
2. called the reviewer
3. wrote a letter to the reviewer
4. met with the reviewer
5. contacted the reviewer's management at NRC
6. took no action
7. other (Please specify) _____

18. How free would you feel to notify NRC management if you disagreed with a license reviewer's position? (Please circle only one response.)

not at all free 1 2 3 4 5 completely free

INSPECTIONS

The purpose of this part of the questionnaire is to determine how effectively and efficiently the NRC conducts its inspection activities.

19. How familiar are you with the NRC's inspection process? (Please circle only one response.) If you have not been inspected in the last 12 months, please skip to Question 28.

not familiar at all 1 2 3 4 5 very familiar

20. Thinking back to the last inspection you've had, to what extent do you agree with the following statements. (Please use the scale provided and circle the appropriate response.)

	strongly disagree	disagree	neutral	agree	strongly agree
a. The inspectors were professional in their conduct.	1	2	3	4	5
b. The inspectors were knowledgeable of NRC regulations.	1	2	3	4	5
c. The inspectors were knowledgeable of my license conditions.	1	2	3	4	5
d. The inspectors were competent in relevant technical fields.	1	2	3	4	5
e. The inspectors had sufficient knowledge of my operation and institution to do their job adequately.	1	2	3	4	5
f. The inspectors focused on safety issues.	1	2	3	4	5
g. The inspectors used their time effectively at my facility.	1	2	3	4	5
h. The inspectors left me with a clear understanding of their findings.	1	2	3	4	5
i. The inspectors applied regulations consistently with what I believe NRC intended.	1	2	3	4	5
j. The inspectors asked reasonable questions.	1	2	3	4	5
k. Inspections have provided me with valuable information.	1	2	3	4	5

21. Are there areas of inspections that could be cut and that would have little or no effect on the safe operation of your facility? (Please circle your response.)

1. No.

2. Yes. (If yes, please describe): _____

22. Are there areas that are being ignored by inspectors that you believe are important to the safe operation of your facility? (Please circle your response.)

- 1. No.
- 2. Yes. (If yes, please describe): _____

23. If you have ever disagreed with an inspectors's position on an issue, what did you do to resolved it? (Please circle all that apply.)

- 1. never disagreed with an inspector's position
- 2. called the inspector
- 3. wrote a letter to the inspector
- 4. met with the inspector
- 5. contacted the inspector's management at NRC
- 6. took no action
- 7. other (Please specify) _____

24. How free would you feel to notify NRC management if you disagreed with an inspector's findings? (Please circle only one response.)

not at
all free 1 2 3 4 5 completely
free

25. Has an inspector's supervisor or manager ever participated in an inspection at your facility? (Please circle only one response.)

- 1. yes
- 2. no
- 3. Do not know.

26. How would you describe the frequency of NRC inspections. (Please circle only one response.)

- 1. NRC inspections occur too often.
- 2. NRC inspections occur about as often as they should.
- 3. NRC inspections don't occur often enough.

27. How would you describe the length of your NRC inspections. (Please circle only one response.)

- 1. NRC inspections take too long.
- 2. NRC inspections take about the right amount of time.
- 3. NRC inspections should take longer than they do.

REPORTING REQUIREMENTS

The purpose of these questions is to determine your views regarding the effectiveness of NRC reporting requirements.

28. How familiar are you with the NRC's reporting requirements? *(Please circle only one response.)*

not familiar 1 2 3 4 5 very familiar

29. Has your facility been cited by the NRC for failing to make a required report? *(Please circle as many as apply.)*

1. My facility has never been cited for failing to make a required report.
2. My facility was cited because I, or someone at my facility, misinterpreted the requirement.
3. My facility was cited because a report was made in an incorrect manner.
4. My facility was cited because a report was not made on time.
5. My facility was cited because a required report was not filed.
6. Other (please describe) _____

30. Have you ever made a telephone report of a significant event to the NRC? *(Please circle only one.)*

1. Yes
2. No

If yes, how would you describe NRC's requests for additional information? *(Please circle only one.)*

asked for no additional information 1 2 3 4 5 asked for an excessive amount of additional information

31. How courteously are you treated when you make a telephone report to the NRC? *(Please circle only one.)*

1. I am always treated courteously.
2. I am usually treated courteously.
3. I am occasionally treated courteously.
4. I am rarely treated courteously.
5. I am never treated courteously.
6. I have never made a telephone report.

32. In your opinion, how necessary are each of the reporting requirements listed below?
 (Please circle one response for each reporting requirement. If the reporting requirement is not applicable to your licensed activity, please circle "NA".)

	not at all necessary			very necessary		
	1	2	3	4	5	NA
Part 20 - Immediate Notification for lost, stolen or missing licensed material or overexposure or excessive releases [20.2201(a)(1)(f) and 20.2202(a)]	1	2	3	4	5	NA
Part 20 - 24-Hour Notification for lost, stolen or missing licensed material or overexposure or excessive releases [20.2202(b)]	1	2	3	4	5	NA
Part 20 - 30 Day Notification for lost, stolen or missing licensed material or overexposure or excessive releases [20.2201(a), 20.2201(b), 20.2201(d), 20.2203(a)]	1	2	3	4	5	NA
Part 20 - 2 Week Notification for lost, stolen or missing licensed material or overexposure or excessive releases [Appendix F III.E.2.]	1	2	3	4	5	NA
Part 30 - Bankruptcy, request for termination of license, notification of event that prevents immediate protective actions	1	2	3	4	5	NA
Part 34.25 - Sealed source leak test results	1	2	3	4	5	NA
Part 35.33a2 - Misadministration report	1	2	3	4	5	NA
Part 35.645 - Teletherapy facility safety checks.	1	2	3	4	5	NA
Other Reporting Requirements (please specify) _____	1	2	3	4	5	NA

33. In your opinion, how burdensome are each of the reporting requirements listed below?
 (Please circle one response for each reporting requirement. If the reporting requirement is not applicable to your licensed activity, please circle "NA".)

	very burdensome			not at all burdensome		
	1	2	3	4	5	NA
Part 20 - Immediate Notification for lost, stolen or missing licensed material or overexposure or excessive releases [20.2201(a)(1)(f) and 20.2202(a)]	1	2	3	4	5	NA
Part 20 - 24-Hour Notification for lost, stolen or missing licensed material or overexposure or excessive releases [20.2202(b)]	1	2	3	4	5	NA
Part 20 - 30 Day Notification for lost, stolen or missing licensed material or overexposure or excessive releases [20.2201(a), 20.2201(b), 20.2201(d), 20.2203(a)]	1	2	3	4	5	NA
Part 20 - 2 Week Notification for lost, stolen or missing licensed material or overexposure or excessive releases [Appendix F III.E.2.]	1	2	3	4	5	NA
Part 30 - Bankruptcy, request for termination of license, notification of event that prevents immediate protective actions.	1	2	3	4	5	NA
Part 34.25 - Sealed source leak test results	1	2	3	4	5	NA
Part 35.33a2 - Misadministration report	1	2	3	4	5	NA
Part 35.645 - Teletherapy facility safety checks.	1	2	3	4	5	NA
Other Reporting Requirements (please specify) _____	1	2	3	4	5	NA

38. Based on your participation in enforcement conferences, to what extent do you agree with the statements in the table? (Please circle one response for each statement.)

	strongly disagree	disagree	neutral	agree	strongly agree
The enforcement conference(s) were useful.	1	2	3	4	5
The issues were clearly communicated.	1	2	3	4	5
The final enforcement action(s) were timely.	1	2	3	4	5
The process for submitting an appeal was clear to me.	1	2	3	4	5
The basis of the NRC's final enforcement decision(s) were clearly communicated.	1	2	3	4	5
The root causes of the problem(s) were clearly identified.	1	2	3	4	5
The necessary corrective actions were communicated clearly.	1	2	3	4	5
The NRC process of imposing civil penalties contributes to the overall nuclear safety at my facility.	1	2	3	4	5

39. Have you ever received a fine or civil penalty (CP)? (Please circle only one response.)

1. yes
2. no (skip to Question 40.)

Do you understand how to respond to a CP? (Please circle only one response.)

1. yes
2. no

To what extent do you agree that the issues which result in CP's represent significant safety issues? (Please circle only one response.)

1. strongly disagree
2. disagree
3. neutral
4. agree
5. strongly agree

LICENSEE CHARACTERISTICS

The following questions will allow us to categorize the responses you have provided so that the information can be reported in summary form.

40. Which of the following best describes your licensed activity? *(Please circle only one response.)*
1. academic
 2. medical/academic
 3. medical institution (hospital, medical center, etc.)
 4. medical other
 5. pharmacy/medical distribution only
 6. well logging
 7. gauges (measuring systems)
 8. manufacturing and distribution
 9. services (laundry, decon., calibration, disposal, leak test)
 10. industrial radiography
 11. irradiators
 12. research & development
 13. other source
 14. special nuclear material
41. How many individuals have been issued personal dosimetry monitoring devices for your NRC licensed activities? *(Please write the number in the space provided.)* _____
42. In what state is your licensed facility located? *(Please write the state in the space provided.)* _____
43. What is your job title? *(Please write your title in the space provided.)* _____
44. Do you serve as the Radiation Safety Officer (RSO) for your facility? *(Please circle only one response.)*
1. yes
 2. no
45. Is the RSO position at your facility a full-time RSO dedicated position, or does the RSO also have other job responsibilities? *(Please circle only one response.)*
1. Full-time RSO responsibilities
 2. RSO also has other job responsibilities

46. Please provide any other comments that you wish to make regarding NRC regulations, policies, regulatory guidance, licensing activities, inspections, reporting requirements, and/or enforcement actions.

NUCLEAR REGULATORY COMMISSION

Documents Containing Reporting or Recordkeeping

Requirements: Office of Management and Budget Review

AGENCY: Nuclear Regulatory Commission.

ACTION: Notice of the Office of Management and Budget review of information collection.

SUMMARY: The Nuclear Regulatory Commission (NRC) has recently submitted to the Office of Management and Budget (OMB) for review the following proposal for the collection of information under the provisions of the Paperwork Reduction Act of 1980 (44 U.S.C. Chapter 35).

1. Type of submission, new, revision, or extension: New
2. The title of the information collection:
Regulatory Impact Survey for Materials Licensees
3. The form number if applicable: Not applicable.
4. How often the collection is required: Licensees are requested to respond only once.
5. Who will be required or asked to report: NRC materials licensees selected as part of a sample.
6. An estimate of the number of annual responses: 420
7. An estimate of the total number of hours needed annually to complete the requirement or request: 45 minutes per response. The industry total is 315 hours.
8. An indication of whether Section 3504(h), Pub. L. 96-511 applies:
Not applicable.

9. Abstract: NRC will survey a sample of materials licensees to determine their views of the impact of NRC regulation on the safe operation of their facility. This survey is designed to elicit licensee views of the efficacy of NRC regulation in ensuring safety, the burden on licensees of compliance, and the relationship between these two factors. The results of the survey will be used to help the NRC accomplish its mission while minimizing adverse impacts on licensees.

Copies of the submittal may be inspected or obtained for a fee from the NRC Public Document Room, 2120 L Street, N.W. (Lower Level), Washington, DC.

Comments and questions may be directed by mail to the OMB reviewer:

Troy Hillier

Office of Information and Regulatory Affairs

NEOB-3019

Office of Management and Budget

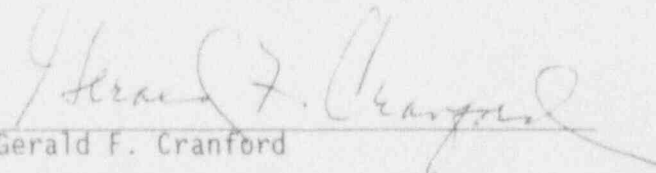
Washington, DC 20503

Comments may also be communicated by telephone at (202) 395-3084.

The NRC Clearance officer is Brenda Jo. Shelton, (301) 415-7232.

Dated at Rockville, Maryland, this *25th* day of *May* 1994.

For the Nuclear Regulatory Commission


Gerald F. Cranford

Designated Senior Official

for Information Resources Management