

DRAFT SUPPORTING  
STATEMENT FOR  
10 CFR PART 19  
"NOTICES, INSTRUCTIONS, AND REPORTS TO WORKERS: INSPECTION  
AND INVESTIGATIONS"  
(3150-0044)  
---  
REVISION

DESCRIPTION OF THE INFORMATION COLLECTION

This information collection is primarily addressing the licensee third-party disclosure requirements in Title 10 of the *Code of Federal Regulations* (10 CFR) Part 19. Less than 12 percent of the burden for this clearance is associated with recordkeeping and reporting requirements. Licensees are required to post information regarding this regulation, their license, applicable notices of violation, and the role of the U.S. Nuclear Regulatory Commission (NRC). Licensees are also required to instruct workers on matters related to radiological working conditions. This instruction ranges from a tour of the workplace pointing out hazards to a 1-week intensive course on radiation protection involving the preparation of training material. Workers need to be educated about health risks from occupational exposure to radioactive materials or radiation, precautions or procedures to minimize exposure, worker responsibility to report promptly to the Commission any licensee conditions which may lead to or cause a violation of Commission regulations, and the individual radiation exposure reports which are available to them. The licensee is required to control radiation doses to individuals in restricted areas so that, with the exception of planned special exposures under 10 CFR 20.1206, no one receives an annual dose which exceeds the limits established by 10 CFR 20.1201. The annual limit shall be the more limiting of the total effective dose equivalent being equal to 5 rems or the sum of the deep-dose equivalent and the committed dose equivalent to any individual organ or tissue other than the lens of the eye being equal to 50 rems. The annual limit to the lens of the eye is 15 rems, and 50 rems to the skin, or to any extremity.

The individual should be informed of the radiation dose he or she receives because: (a) that information is needed by both a new employer and the individual when the employee changes jobs in the nuclear industry; (b) the individual needs to know the radiation dose received as a result of an accident or incident (if this dose is in excess of the 10 CFR Part 20 limits) so that he or she can seek counseling about future work involving radiation, medical attention, or both, as desired; and (c) since long-term exposure to radiation may be an adverse health factor, the individual needs to know whether the accumulated dose is being controlled within the NRC limits.

Pursuant to 10 CFR 19.16, a worker may notify the Commission about radiological working conditions he believes are in violation of the Atomic Energy Act, the regulations, or license, and the worker may request an inspection. Upon receipt of such notice, the Commission must determine whether the complaint meets certain requirements specified in 10 CFR Part 19, and

either request an inspection or determine that an inspection is not warranted and so notify the complainant in writing.

## A. JUSTIFICATION

### 1. Need for and Practical Utility of the Collection of Information

10 CFR 19.11 requires NRC licensees and applicants for NRC licenses to post notices for workers and describes how this information must be made available to workers. These requirements are described more specifically below.

10 CFR 19.11(a) states – “Each licensee (except for a holder of an early site permit under subpart A of part 52 of this chapter, or a holder of a manufacturing license under subpart F of part 52 of this chapter) shall post current copies of the following documents: (1) The regulations in this part and in part 20 of this chapter; (2) The license, license conditions, or documents incorporated into a license by reference, and amendments thereto; (3) The operating procedures applicable to licensed activities; (4) Any notice of violation involving radiological working conditions, proposed imposition of civil penalty, or order issued pursuant to subpart B of part 2 of this chapter, and any response from the licensee.”

10 CFR 19.11(b) states – “Each applicant for and holder of a standard design approval under subpart E of part 52 of this chapter, each applicant for an early site permit under subpart A of part 52 of this chapter, each applicant for a standard design certification under subpart B of part 52 of this chapter, and each applicant for and holder of a manufacturing license under subpart F of part 52 of this chapter shall post: (1) The regulations in this part; (2) The operating procedures applicable to the activities regulated by the NRC which are being conducted by the applicant or holder; and (3) Any notice of violation, proposed imposition of civil penalty, or order issued under subpart B of part 2 of this chapter, and any response from the applicant or holder.”

10 CFR 19.11(d) provides an alternative to posting most documents from the manner specified in 10 CFR 19.11 (a) and (b) – “If posting of a document specified in paragraphs (a)(1), (2) or (3), or (b)(1) or (2) of this section is not practicable, the licensee or regulated entity may post a notice which describes the document and states where it may be examined.”

10 CFR 19.11(e)(1) states – “Each licensee, each applicant for a specific license, each applicant for or holder of a standard design approval under subpart E of part 52 of this chapter, each applicant for an early site permit under subpart A of part 52 of this chapter, and each applicant for a standard design certification under subpart B of part 52 of this chapter shall prominently post NRC Form 3, "Notice to Employees," dated August 1997. Later versions of NRC Form 3 that supersede the August 1997 version shall replace the

previously posted version within 30 days of receiving the revised NRC Form 3 from the Commission.”

10 CFR 19.11(g) tells applicants for and holders of NRC licenses the timeframe in which documents described by 10 CFR 19.11 (a)(4) or (b)(3) must be posted – “Commission documents posted under paragraphs (a)(4) or (b)(3) of this section shall be posted within 2 working days after receipt of the documents from the Commission; the licensee's or regulated entity's response, if any, shall be posted within 2 working days after dispatch by the licensee or regulated entity. These documents shall remain posted for a minimum of 5 working days or until action correcting the violation has been completed, whichever is later.”

10 CFR 19.12 requires NRC licensees to give reports to workers as follows: "All individuals who in the course of employment are likely to receive in a year an occupational dose in excess of 100 mrem (1 mSv) shall be (1) kept informed of the storage, transfer, or use of radiation and/or radioactive material; (2) instructed in the health protection problems associated with exposure to radiation and/or radioactive material, in precautions or procedures to minimize exposure, and in the purposes and functions of protective devices employed; (3) instructed in, and required to observe, to the extent within the worker's control, the applicable provisions of Commission regulations and licenses for the protection of personnel from exposure to radiation and/or radioactive material; (4) instructed of their responsibility to report promptly to the licensee any condition which may lead to or cause a violation of Commission regulations and licenses or unnecessary exposure to radiation and/or radioactive material; (5) instructed in the appropriate response to warnings made in the event of any unusual occurrence or malfunction that may involve exposure to radiation and/or radioactive material; and (6) advised as to the radiation exposure reports which workers may request pursuant to § 19.13. The extent of these instructions shall be commensurate with potential radiological health protection problems present in the work place.”

10 CFR 19.13 - "Notifications and Reports to Individuals," requires NRC licensees to give written reports of exposure to radiation as described in the following subsections from that regulation. The records of exposure to radiation referenced by 10 CFR 19.13 are maintained in accordance with the requirements of 10 CFR Part 20.

10 CFR 19.13(a) - “Radiation exposure data for an individual, and the results of any measurements, analyses, and calculations of radioactive material deposited or retained in the body of an individual, shall be reported to the individual as specified in this section. The information reported shall include data and results obtained pursuant to Commission regulations, orders or license conditions, as shown in records maintained by the licensee pursuant to Commission regulations. Each notification and report shall: be in writing; include appropriate identifying data such as the name of the licensee, the name of the

individual, the individual's social security number; include the individual's exposure information; and contain the following statement:

This report is furnished to you under the provisions of the Nuclear Regulatory Commission regulation 10 CFR Part 19. You should preserve this report for further reference."

10 CFR 19.13(b) - "Each licensee shall make dose information available to workers as shown in records maintained by the licensee under the provisions of 10 CFR 20.2106. The licensee shall provide an annual report to each individual monitored under 10 CFR 20.1502 of the dose received in that monitoring year if: (1) The individual's occupational dose exceeds 1 mSv (100 mrem) TEDE or 1 mSv (100 mrem) to any individual organ or tissue; (2) The individual requests his or her annual dose report."

10 CFR 19.13(c)(1)(i), (ii) and (2) - "At the request of a worker formerly engaged in licensed activities controlled by the licensee, each licensee shall furnish to the worker a report of the worker's exposure to radiation and/or to radioactive material: (i) as shown in records maintained by the licensee pursuant to § 20.2106 for each year the worker was required to be monitored under the provisions of § 20.1502; and (ii) for each year the worker was required to be monitored under the monitoring requirements in effect prior to January 1, 1994. (2) This report must be furnished within 30 days from the time the request is made or within 30 days after the exposure of the individual has been determined by the licensee, whichever is later. This report must cover the period of time that the worker's activities involved exposure to radiation from radioactive material licensed by the Commission and must include the dates and locations of licensed activities in which the worker participated during this period."

10 CFR 19.13(d) - "When a licensee is required pursuant to §§ 20.2202, 20.2203 or 20.2204 of this chapter to report to the Commission any exposure of an individual to radiation or radioactive material, the licensee shall also provide the individual a report on his or her exposure data included in the report to the Commission. This report must be transmitted at a time not no later than the transmittal to the Commission."

10 CFR 19.13(e) - "At the request of a worker who is terminating employment with the licensee that involved exposure to radiation or radioactive materials, during the current calendar quarter or the current year, each licensee shall provide at termination to each worker, or to the worker's designee, a written report regarding the radiation dose received by that worker from operations of the licensee during the current year or fraction thereof. If the most recent individual monitoring results are not available at that time, a written estimate of the dose must be provided together with a clear indication that this is an estimate."

10 CFR 19.16(a) - "Any worker or representative of workers who believes that a violation of the [Atomic Energy] Act, the regulations in this chapter, or license conditions exists or has occurred in license activities with regard to radiological working conditions in which the worker is engaged, may request an inspection by giving notice of the alleged violation to the

Administrator of the appropriate Commission Regional Office, or to Commission inspectors. Any such notice shall be in writing, shall set forth the specific grounds for the notice, and shall be signed by the worker or representative of workers.

A copy shall be provided the licensee by the Regional Office Administrator or the inspector no later than at the time of inspection except that, upon the request of the worker giving such notice, his name and the name of individuals referred to therein shall not appear in such copy or on any record published, released or made available by the Commission, except for good cause shown."

2. Agency Use of the Information

With the exception of 10 CFR 19.12 and 19.16, Part 19 information collections are not provided to the Commission; notices, instructions, and reports required by Part 19 are provided by NRC licensees to individuals participating in licensed activities. Some information collections may require an annual report to the NRC. As stated above, notices received pursuant to 10 CFR 19.16 must be reviewed by the Commission to determine whether the complaint meets certain requirements specified in 10 CFR Part 19. The Commission will then either request an inspection or determine that an inspection is not warranted and so notify the complainant in writing.

3. Reduction of Burden Through Information Technology

The NRC has issued Guidance for Electronic Submissions to the NRC which provides direction for the electronic transmission and submittal of documents to the NRC. Electronic transmission and submittal of documents can be accomplished via the following avenues: the Electronic Information Exchange (EIE) process, which is available from the NRC's "Electronic Submittals" Web page, by Optical Storage Media (OSM) (e.g. CD-ROM, DVD), by facsimile or by e-mail. It is estimated that approximately 25 percent of the potential responses are filed electronically.

4. Effort to Identify Duplication and Use Similar Information

No sources of similar information are available. There is no duplication of requirements.

5. Effort to Reduce Small Business Burden

There is no feasible way of reducing the burden on small businesses while still accomplishing the objective of informing individuals of their exposure to radiation. However, the burden is small and should have no significant impact on operating costs. apply/approved for the small business entity fee waiver. For the most recent fiscal year, approximately 684 small entity adjustments were granted by the NRC in regard to licensing fees.

6. Consequences to Federal Program or Policy Activities if the Collection is Not Conducted or is Conducted Less Frequently

If the information collection were not conducted, workers would not be aware of their total radiation dose.

7. Circumstances which Justify Variation from OMB Guidelines

This action does not vary from OMB guidelines.

8. Consultations Outside the NRC

Opportunity for public comment on the information collection requirements for this clearance package was published in the Federal Register.

9. Payment or Gift to Respondents

Not applicable.

10. Confidentiality of the Information

Confidential and proprietary information is protected in accordance with NRC regulations at 10 CFR 9.17 (a) and 10 CFR 2.390 (b). However, no information normally considered confidential or proprietary is requested.

11. Justification for Sensitive Questions

Not applicable.

12. Estimated Industry Burden and Burden Hour Cost

The regulations in 10 CFR Part 19 establish requirements for notices, instructions, and reports by licensees and regulated entities to individuals participating in NRC-licensed and regulated activities. As such, the majority of the requirements under this Part represent third-party disclosure notifications, in which the licensees are providing information to workers about the dose received. In this renewal, third-party disclosure notifications have been captured as such in the burden tables.

NRC Licensees

A total of 3,000 NRC licensees respond to the Part 19 information collections. These are licensees in states who are directly regulated by the NRC and includes materials licensees (dockets 30, 40, 70, and 72) plus the number of reactor licensees is approximately 3,000 licensees. The number of NRC licensees is expected to remain at or near the current number over the coming 3 years.

Data on the number of workers receiving third-party notifications from these licensees was obtained from the NRC's Radiation Exposure Information and Reporting System.

The burden for NRC licensees to respond to the collection is shown in Tables 1-4. The total burden for NRC licensees is 135,747.3 hours (0.5 hours reporting + 3,000 hours annual recordkeeping + 1,881 hours one-time recordkeeping + 130,865.8 hours third-party disclosures) at a cost of \$37,873,505 (135,747.3 hours x \$279/hour).

#### Agreement State Licensees

Section 274 of the Atomic Energy Act of 1954 provides a statutory basis under which NRC relinquishes to the States portions of its regulatory authority to license and regulate byproduct materials (radioisotopes); source materials (uranium and thorium); and certain quantities of special nuclear materials. The mechanism for the transfer of NRC's authority to a State is an agreement signed by the Governor of the State and the Chairman of the Commission, in accordance with section 274b of the Act. Licensees operating in these "Agreement States" are referred to in this supporting statement as "Agreement State Licensees." A map of Agreement States and non-Agreement States is located on NRC's Web site at <https://scp.nrc.gov/rulemaking.html>.

The NRC has established compatibility requirements for Agreement States to implement their own regulations in a manner consistent with NRC regulations. Annually, the Agreement States provide the NRC with an estimate of the total number of licensees within their states. The total number of Agreement State licensees is based on the annual estimate provided by the Agreement States. For this renewal, the NRC used an estimate of 16,500 Agreement State licensees, based on the most recent reporting by Agreement States to the NRC. The number of Agreement licensees is expected to remain at or near the current number over the coming 3 years.

However, the number of Agreement State licensees subject to each individual section within Part 19 is not known, and must be estimated. NRC uses the ratio of the total of NRC licensees (subject to Part 19) to the total number Agreement State licensees to estimate the number of Agreement State respondents for each section. The current ratio, is 1:5.9 (NRC licensees: Agreement State licensees)

The burden for Agreement State licensees to respond to the collection is shown in Tables 5-8. The total burden for Agreement State licensees is 443,913.3 hours (3 hours reporting + 16,500 hours annual recordkeeping + 11,097.9 hours one-time recordkeeping + 416,312.4 hours third-party disclosures) at a cost of \$123,851,819 (443,913.3 x \$279/hour). The following table is a summary of the burden:

	Total Burden for Part 19					
	NRC Licensees		Agreement State		TOTAL	
	Hours	Responses	Hours	Responses	Hours	Responses
<b>Reporting</b>	0.5	1.0	3.0	6.0	3.5	7.0
<b>Recordkeeping</b>	3,000.0	3,000.0	16,500.0	16,500.0	19,500.0	19,500.0
<b>Third-party disclosures</b>	130,865.8	363,201.8	416,312.4	1,516,526.3	547,178.3	1,879,728.1
<b>One-time recordkeeping burden</b>	1,881.0	-	11,097.9	-	12,978.9	-
<b>TOTAL</b>	<b>135,747.3</b>	<b>366,202.8</b>	<b>443,913.3</b>	<b>1,533,032.3</b>	<b>579,660.7</b>	<b>1,899,235.1</b>

Note: The one-time recordkeepers are also annual recordkeepers, and therefore are not counted twice in the responses total.

The \$279 hourly rate used in the burden estimates is based on the Nuclear Regulatory Commission's fee for hourly rates as noted in 10 CFR 170.20 "Average cost per professional staff-hour." For more information on the hourly rate, see the Revision of Fee Schedules; Fee Recovery for Fiscal Year 2020 (85 FR 37250, June 19, 2020).

13. Estimate of Other Additional Costs

NRC has determined that the records storage cost is roughly proportional to the recordkeeping burden cost. Based on a typical clearance, the records storage cost has been determined to be equal to 0.0004 times the recordkeeping burden cost. Therefore, the records storage cost for this clearance is \$3,624.65 (32,478.9 hours x 0.0004 x \$279/hr).

14. Estimated Annualized Cost to the Federal Government

There is no cost to the Federal government except for those that involve requests by workers for inspections. Approximately one worker requests an inspection each year pursuant to 10 CFR 19.16. Each request takes an average of 3 hours to resolve. Thus, the estimated annual cost to the Federal government is \$837 (1 report/year x 3 hours/report x \$279/hour).

The staff has developed estimates of annualized costs to the Federal Government related to the conduct of this collection of information. These estimates are based on staff experience and subject matter expertise and include the burden needed to review, analyze, and process the collected information and any relevant operational expenses.

15. Reasons for Changes in Burden or Cost

Total

The total burden estimate increased from 320,968.9 hours to 579,660.7 hours and the respondents decreased from 20,300 to 19,500 (3,000 NRC licensees + 16,500 AS licensees). Responses increased from 1,401,163.0 responses to 1,899,235.1. In this submission, the NRC staff identified third-party disclosure requirements in 19.11 for posting notices to workers. The burden for these requirements was not captured in the last submission of this information collection.

The omission has been corrected in the current submission. The inclusion of these requirements has increased the overall total by 275,700 hours and 609,500 responses.

The current submission does not represent any changes in the requirements for licensees.

The following table is a summary of the change in burden from the 2017 renewal to the current request:

	Burden Change from 2017 to Current Request					
	2017 Renewal		Current Request		Burden Change	
	Hours	Responses	Hours	Responses	Hours	Responses
<b>Reporting</b>	3.5	7.0	3.5	7.0	-	-
<b>Recordkeeping</b>	20,300.0	20,300.0	19,500.0	19,500.0	(800.0)	(800.0)
<b>Third-party disclosures</b>	287,498.4	1,380,856.0	547,178.3	1,879,728.1	259,679.9	498,872.1
<b>One-time burden</b>	13,167.0	-	12,978.9	-	(188.1)	-
<b>TOTAL</b>	<b>320,968.9</b>	<b>1,401,163.0</b>	<b>579,660.7</b>	<b>1,899,235.1</b>	<b>258,691.8</b>	<b>498,072.1</b>

Note: The one-time recordkeepers are also annual recordkeepers, and therefore are not counted twice in the responses total.

### NRC Licensees

The burden estimate for NRC licensees changed from 51,447.3 hours to 135,747.3 hours, an increase of 84,300 hours. This increase is attributed to an increase in third-party disclosures, as previously discussed.

The estimated number of NRC licensee responses changed from 251,702.8 responses (1 reporting response + 3,000 recordkeepers + 248,701.8 third-party disclosure responses) to 366,202.8 responses (1 reporting response + 3,000 recordkeepers + 363,201.8 third-party disclosure responses), an increase of 114,500 responses. This increase is attributed to an increase in third-party disclosures, as previously discussed.

### Agreement State Licensees

The burden estimate for Agreement State licensees changed from 269,521 hours to 443,913.3 hours, an increase of 174,392.3 hours. This increase is attributed to an increase in third-party disclosures, as previously discussed.

The estimated number of Agreement State licensee responses changed from 1,149,460.2 responses (6 reporting response + 17,300 recordkeepers + 1,132,154.2 third-party disclosure responses) to 1,533,032.3 responses (6 reporting response + 16,500 recordkeepers + 1,516,526.3 third-party disclosure responses), an increase of 383,572.1 responses. This increase is attributed to an increase in third-party disclosures, as previously discussed.

16. Publication for Statistical Use

NRC does not publish this information for statistical use.

17. Reason for Not Displaying the Expiration Date

The requirement is contained in a regulation. Amending the *Code of Federal Regulations* to display information that, in an annual publication, could become obsolete would be unduly burdensome and too difficult to keep current.

18. Exceptions to the Certification Statement

Not applicable.

B. COLLECTIONS OF INFORMATION EMPLOYING STATISTICAL

METHODS

Not applicable.

Section	Respondents	Responses per Respondent	Total Responses	Burden Hours per Response	Total Burden	Cost at \$279/hr
19.16(a)	1	1.0	1.0	0.5	0.5	\$ 140
Total	1		1.0		0.5	\$ 140

Section	Number of Recordkeepers	Hours per Recordkeeper	Total Annual Burden Hours	Cost at \$279/hr
19.12 (Training materials)	99	19.0	1,881.0	\$ 524,799

Section	Number of Recordkeepers	Hours per Recordkeeper	Total Annual Burden Hours	Cost at \$279/hr
19.12 (Training materials)	3,000	1.0	3,000.0	\$ 837,000
Total	3,000		3,000.0	\$ 837,000

<b>Table 4: NRC Licensee Third-Party Disclosures</b>							
Section	Description	Respondents	Responses per Respondent	Total Responses	Burden Hours per Response	Total Burden Hours	Cost at \$279/hr
19.11(a)	Posting applicable documents (most licensees)	2,950	10.0	29,500.0	1.00	29,500.00	\$8,230,500
19.11(b)	Posting applicable documents (subset of applicants and licensees)	50	500.0	25,000.0	2.00	50,000.00	\$13,950,000
19.11(d)	Alternate posting instructions	see 19.11(a) & (b)					
19.11(e)	Posting NRC Form 3	3,000.0	20.0	60,000.0	0.08	4,800.00	\$1,339,200
19.11(g)	Timeframe for posting applicable documents	see 19.11(a) & (b)					
19.12	Worker instructions	3,000	1.0	3,000.0	8.00	24,000.00	\$6,696,000
19.13(b)	Annual worker dose report (monitored reportable workers)	180	650.0	117,000.0	0.08	9,360.00	\$2,611,440
19.13(b)	Annual worker dose report (monitored nonreportable workers)	3,000	16.0	48,000.0	0.08	3,840.00	\$1,071,360
19.13(c)	Former worker dose report on demand (commercial transient)	100	78.14	7,814.0	0.17	1,328.38	\$370,618
19.13(c)	Former worker dose report on demand (other transient)	80	0.76	60.8	1.50	91.20	\$25,445
19.13(d)	Copies of reports under 20.2202, 20.2203, 20.2204, and 20.2206 given to worker	1	1.0	1.0	0.17	0.17	\$47
19.13(e)	Terminating worker dose report (commercial transient)	100	520.9	52,090.0	0.08	4,167.20	\$1,162,649
19.13(e)	Terminating worker dose report (other licensee transient workers)	80	5.0	400.0	0.08	32.00	\$8,928
19.13(e)	Terminating worker dose report (commercial terminating)	100	120.0	12,000.0	0.083	996.00	\$277,884
19.13(e)	Terminating worker dose report (other terminating)	80	19.6	1,568.0	0.33	517.44	\$144,366
19.13(e)	Terminating worker dose report (nonreportable terminating workers)	2,820	2.4	6,768.0	0.33	2,233.44	\$623,130
Total		3,000		363,201.8		130,865.83	\$ 36,511,567

<b>Table 5: Agreement State Annual Reporting Burden</b>						
Section	Respondents	Responses per Respondent	Total Responses	Burden Hours per Response	Total Burden Hours	Cost at \$279/hr
19.16(a)	6	1.0	6.0	0.5	3.0	\$ 837
Total	6		6.0		3.0	\$ 837

<b>Table 6: Agreement State Licensee One-Time Recordkeeping</b>				
Section	Number of Recordkeepers	Hours per Recordkeeper	Total Annual Burden Hours	Cost at \$279/hr
19.12 (Training materials)	584	19.0	11,097.9	\$ 3,096,314

<b>Table 7: Agreement State Licensee Annual Recordkeeping</b>				
Section	Number of Recordkeepers	Hours per Recordkeeper	Total Annual Burden Hours	Cost at \$279/hr
19.12 (Training materials)	16,500	1.0	16,500.0	\$ 4,603,500
Total	16,500		16,500.0	\$ 4,603,500

Section	Description	Respondents	Responses per Respondent	Total Responses	Burden Hours per Response	Total Burden Hours	Cost at \$279/hr
19.11(a)	Posting applicable documents (most licensees)	16,500	10.0	165,000.0	1.00	165,000.00	\$46,035,000
19.11(b)	Posting applicable documents (subset of applicants and licensees)	0	500.0	0.0	2.0	0.0	\$0
19.11(d)	Alternate posting instructions	see 19.11(a) & (b)					
19.11(e)	Posting NRC Form 3	16,500	20.0	330,000.0	0.08	26,400.00	\$7,365,600
19.11(g)	Timeframe for posting applicable documents	see 19.11(a) & (b)					
19.12	Worker instructions	16,500	1.0	16,500.0	8.00	132,000.0	\$36,828,000
19.13(b)	Annual worker dose report (monitored reportable workers)	1,062	650.0	690,300.0	0.08	55,224.0	\$15,407,496
19.13(b)	Annual worker dose report (monitored nonreportable workers)	16,500	16.0	264,000.0	0.08	21,120.0	\$5,892,480
19.13(c)	Former worker dose report on demand (other transient)	472	0.76	358.7	1.50	538.1	\$150,124
19.13(d)	Copies of reports under 20.2202, 20.2203, 20.2204, and 20.2206 given to worker	6	1.0	6.0	0.17	1.0	\$285
19.13(e)	Terminating worker dose report (other licensee transient workers)	472	5.0	2,360.0	0.08	188.8	\$52,675
19.13(e)	Terminating worker dose report (other terminating)	472	20.2	9,534.4	0.33	3,146.4	\$877,832
19.13(e)	Terminating worker dose report (nonreportable terminating workers)	16,028	2.4	38,467.2	0.33	12,694.2	\$3,541,675
<b>Total</b>		<b>16,500</b>		<b>1,516,526.3</b>		<b>416,312.4</b>	<b>\$62,750,567</b>

<b>Table 9: Total Burden for Part 19</b>						
	<b>NRC Licensees</b>		<b>Agreement State</b>		<b>TOTAL</b>	
	<b>Hours</b>	<b>Responses</b>	<b>Hours</b>	<b>Responses</b>	<b>Hours</b>	<b>Responses</b>
<b>Reporting</b>	0.5	1.0	3.0	6.0	3.5	7.0
<b>Recordkeeping</b>	3,000.0	3,000.0	16,500.0	16,500.0	19,500.0	19,500.0
<b>Third-party disclosures</b>	130,865.8	363,201.8	416,312.4	1,516,526.3	547,178.3	1,879,728.1
<b>One-time recordkeeping burden</b>	1,881.0	-	11,097.9	-	12,978.9	-
<b>TOTAL</b>	<b>135,747.3</b>	<b>366,202.8</b>	<b>443,913.3</b>	<b>1,533,032.3</b>	<b>579,660.7</b>	<b>1,899,235.1</b>

Note: The one-time recordkeepers are also annual recordkeepers, and therefore are not counted twice in the responses total.

<b>Table 10: Burden Change from 2017 to Current Request</b>						
	<b>2017 Renewal</b>		<b>Current Request</b>		<b>Burden Change</b>	
	<b>Hours</b>	<b>Responses</b>	<b>Hours</b>	<b>Responses</b>	<b>Hours</b>	<b>Responses</b>
<b>Reporting</b>	3.5	7.0	3.5	7.0	-	-
<b>Recordkeeping</b>	20,300.0	20,300.0	19,500.0	19,500.0	(800.0)	(800.0)
<b>Third-party disclosures</b>	287,498.4	1,380,856.0	547,178.3	1,879,728.1	259,679.9	498,872.1
<b>One-time burden</b>	13,167.0	-	12,978.9	-	(188.1)	-
<b>TOTAL</b>	<b>320,968.9</b>	<b>1,401,163.0</b>	<b>579,660.7</b>	<b>1,899,235.1</b>	<b>258,691.8</b>	<b>498,072.1</b>

Note: The one-time recordkeepers are also annual recordkeepers, and therefore are not counted twice in the responses total.