

**From:** [Heather Westra](#)  
**To:** [Drucker, David](#)  
**Cc:** [Talley, Sandra](#)  
**Subject:** [External\_Sender] Re: Please respond to survey questions regarding advance Tribal notification  
**Date:** Friday, May 7, 2021 11:17:53 AM

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From: Drucker, David <David.Drucker@nrc.gov>  
My responses are in bold, below each question.

Sent: Monday, May 3, 2021 5:11 PM  
To: Heather Westra  
Cc: Talley, Sandra  
Subject: RE: Please respond to survey questions regarding advance Tribal notification

It would be great to have your responses by the end of this week. Thank you!

From: Drucker, David  
Sent: Monday, May 03, 2021 6:08 PM  
To: Heather.Westra@piic.org  
Cc: Talley, Sandra <Sandra.Talley@nrc.gov>  
Subject: Please respond to survey questions regarding advance Tribal notification

Hi Heather,

Thank you for volunteering to respond to the four questions below regarding the advance Tribal notification in 10 CFR Part 71, "Packaging and Transportation of Radioactive Material," and 10 CFR Part 73, "Physical Protection Plants and Materials":

1. Is the proposed collection of information necessary for the NRC to properly perform its functions? Does the information have practical utility?

Based on the draft Supporting Statement, I do not believe that the proposed data collection effort is necessary.

2. Is the burden estimate accurate?

As shown at numbers 12 and 13 in the attached document, the NRC staff estimates that the time and costs to a tribe to participate in advance notification is: (1) 5.5 hours for the initial request to participate in the advance notification program, (2) 2 hours for subsequent requests, such as when there is a change in the Tribal official or Tribal official's designee, (3) \$250 for a shredder, and (4) \$500 for a filing cabinet.

I think the estimate is reasonable. Remember that Tribes are governments, dealing with sensitive information already, so they may have shredders and a locking filing cabinet.

3. Is there a way to enhance the quality, utility, and clarity of the information to be collected?

It's not clear (to me) why the NRC wants to collect the information. How will collected data be used? Many of the sections could benefit from editing. Sections are not clear, are redundant. Should be concise.

4. How can the burden of the information collection be minimized, including the use of automated collection techniques or other forms of information technology?

Again, to minimize the burden, it would be good to understand why the data is being sought in the first place. How

will tribes benefit?

A better use of the NRC's time would be to understand why so few tribes are participating in the Advance Notification program.

Heather

David (Currently on Rotation to NMSS/REFS/MRPB)?

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