

SUPPORTING STATEMENT FOR
INFORMATION COLLECTIONS CONTAINED IN
MODERNIZING NRC REGULATIONS FOR BYPRODUCT MATERIAL USE PROPOSED RULE

10 CFR PARTS 30, 31, 32, 34, 39, 40, NRC FORMS 241, 483, 313, and 1003
3150-0017, 3150-0016, 3150-0001, 3150-0007, 3150-0130, 3150-0020, 3150-0013,
3150-0038, 3150-0120, and 3150-XXXX

(RIN 3150-AL39)

NEW

DESCRIPTION OF INFORMATION COLLECTION

The U.S. Nuclear Regulatory Commission (NRC) is proposing to amend its regulations for the licensing of byproduct material, some source material, and some special nuclear material. The NRC's goal in amending these regulations is to modernize the safe, effective, and efficient use of licensed material. This action will reduce the licensing burden and the need for exemptions from existing regulations; address other deregulatory issues deemed relevant by the NRC; and support the NRC's Principles of Good Regulation, including openness, clarity, and reliability. This effort is consistent with, and implements direction in, the Accelerating Deployment of Versatile, Advanced Nuclear for Clean Energy Act of 2024 (ADVANCE Act), and recently issued Executive Order (EO) 14300, "Ordering the Reform of the Nuclear Regulatory Commission."

The proposed rule covers a wide range of topics, including the following that would result in a reduction in recordkeeping and reporting requirements:

- establishing a low burden class of general licenses
- Revising the decommissioning financial assurance tables.
- Addressing anti-competitive barriers.
- Reducing reporting of distribution to exempt persons.
- Removing or modifying redundant and unnecessary regulations.
- Reducing the burden for filing amended NRC Form 241's for work activities conducted in offshore waters.

This supporting statement includes burden reduction associated with revised information collection in Part 30, 31, 32, 34, 39, 40, and Forms 241, 483, and 313. It also includes burden associated with new information collections in proposed Part 31 and proposed NRC Form 1003.

Affected Entities

The respondents to the information collections are applicants and licensees who use byproduct, source, and special nuclear material. This includes a diverse set of entities such as commercial and industrial firms, research, educational and medical institutions.

Part 30 Appendix B. Quantities of Licensed Material Used to Assess Financial Assurance for Decommissioning

The NRC is revising its regulations for decommissioning financial assurance (DFA) for sealed and unsealed radioactive materials so that licensees would not have to apply the appendix's default values to calculate decommissioning funding requirements as often. The proposed rule

would revise the current table in appendix B, "Quantities of Licensed Material Requiring Labeling," to 10 CFR part 30 by replacing it with applicable values from the table in appendix C, "Quantities of Licensed Material Requiring Labeling," to 10 CFR part 20, "Standards for Protection against Radiation." This would add radionuclides not currently listed in appendix B to 10 CFR part 30, including radionuclides associated with industrial technologies and current and emerging medical uses. In addition, the NRC would remove all radionuclides with a half-life of 120 days or less from the appendix since these radionuclides are not considered when developing DFA, and amend the title of the table to "Quantities of Licensed Material Used to Assess Financial Assurance for Decommissioning," to more accurately reflect its current use for DFA. The default values would remain at the current values of the listed radionuclides: 0.01 microcuries (μCi) for alpha-emitting radionuclides, and 0.1 μCi for the most restricted non-alpha-emitting radionuclides. The potentially affected licensees are those authorized to possess licensed radioactive material.

Appendix B to 10 CFR part 30 provides values used for assessing a licensee's DFA requirements. The values provided in appendix B to 10 CFR part 30 are used to calculate the amount of DFA a licensee is required to maintain and whether a decommissioning funding plan is required in accordance with 10 CFR 30.35. The requirements in 10 CFR 30.35 specify that this information be reviewed by the NRC and maintained by the licensee until the license is terminated.

Part 31 New Classes of General Licenses and Modernization of current Classes of General Licenses

The NRC is establishing a new class of general licenses, called standard general licenses. The proposed framework permits general licenses for portable gauges, additional fixed gauges, a subset of diagnostic medical uses, additional analytical instruments, and additional in vitro testing. The standard general licenses are granted by regulation upon submission of a registration, fee, and certification of understanding. Rule language, found in § 31.13 - 31.18, is based on standard license conditions and essential standard commitments related to programs necessary for radiological safety and security. Conforming changes were made in other parts of 10 CFR parts 30 and 32 to ensure radioactive materials can be distributed to/from the standard general licenses. The standard general license pathway would be an optional licensing pathway with equivalent recordkeeping and reporting requirements to the specific licensing pathway that these persons are currently subject to. The specific license pathway for entities wishing to conduct activities in a non-standard manner or outside of the normal conditions would be preserved as to not limit flexibility.

Additionally, the NRC is amending requirements in 10 CFR part 31 to: permit electronic transmission of registrations for § 31.5 registerable devices, harmonize holding periods with decommissioning timelines in § 30.36, align physical inventory frequencies with equivalent physical inventory limits for specific licenses, and harmonize in vitro test vial limits with labeling limits in 10 CFR part 20.

Part 32 and 40 Consumer Products Containing Small Quantities of Radioactive Material: Modified Reporting and Recordkeeping Requirements

The NRC is amending several regulations governing the distribution of exempt byproduct material. The reporting and recordkeeping requirements for licensees distributing byproduct material to persons exempt from licensing are being changed, certain regulatory provisions are being modified to address the change. Aspects of this rule will affect distributors of exempt

byproduct material. These actions are intended to make the licensing of distribution to exempt persons more effective and efficient and reduce unnecessary regulatory burden.

Part 34 Reduce anti-competitive barriers and administrative requirements for Industrial Radiography

The NRC is amending the rules associated with industrial radiography in 10 CFR part 34. As part of these revisions, the NRC is eliminating the requirement in 10 CFR 34.101(c) which requires any licensee conducting radiographic operations or storing radioactive material at any location not listed on the license for a period in excess of 180 days in a calendar year, to notify the NRC. Other proposed revisions in part 34 to reduce administrative burden on licensees reflect a reduction in recordkeeping.

Part 39 Streamlining Well Logging Regulations

The NRC is amending the rules associated with well logging in 10 CFR part 39. These revisions to the rule remove or modify redundant and unnecessary regulations regarding the use of nuclear material in well logging operations that support the oil and gas exploration industry. These changes will reduce the regulatory burden on licensees and provide added regulatory efficiencies.

Form 241

The NRC is amending the reciprocity requirements in 10 CFR 150.20 to lessen the administrative burden on Agreement State licensees that work in offshore waters. The change to 150.20(b)(2) would remove the requirement to submit amended NRC Form 241s for changes in location for work performed in offshore waters.

A. JUSTIFICATION

1. Need for the Collection of Information

Overall, the changes made by the proposed rule are needed to modernize the safe, effective, and efficient use of licensed material. This action will reduce licensing burden and the need for exemptions from existing regulations while also eliminating unnecessary requirements. These actions support the NRC's Principles of Good Regulation, particularly efficiency, clarity, and reliability, while continuing to protect workers, the public, and the environment.

2. Agency Use and Practical Utility of Information

The information collections required by Parts 30, 31, 32, 34, 39, 40, and 150 are used by the NRC during inspections, license renewals, and license amendment reviews to assess licensee compliance with NRC radiation safety requirements for the possession and use of byproduct and source material. These records enable NRC staff to verify that licensees are meeting regulatory obligations and maintaining appropriate safety standards.

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 through the Electronic Information Exchange process, which is available from the NRC's "Electronic Submittals" webpage, by Optical Storage Media (e.g., CD-ROM, DVD), by facsimile, or by email. The following are the estimates for the percentage of electronic submissions for each collection:

Information collection	Percent of electronic submissions
10 CFR Part 30	90%
10 CFR Part 31	5%
10 CFR Part 32	100%
10 CFR Part 39	90%
10 CFR Part 40	75%
10 CFR Part 150	99%
NRC Form 241	80%
NRC Form 313	90%
NRC Form 483	0%
NRC Form 1003	90%

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

While a number of the licensees are considered small businesses, the health and safety consequences of improper use of radioactive material are the same for large and small entities. Therefore, it is not possible to reduce the burden on small businesses by less frequent submission or less complete summary applications. The NRC staff estimates that 20 percent of respondents are small businesses.

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

If the information were not collected, or were collected less frequently, NRC would not have the information needed to assure that licensees are maintaining records and those licensees will continue to operate programs in a manner that will assure adequate protection of the public health and safety. Required reports are collected and evaluated on a continuing basis as events occur. Applications for new licenses and amendments are submitted only once. Applications for renewal of licenses are submitted every 10 years. Information submitted in previous applications may be referenced without being resubmitted.

7. Circumstances which Justify Variations from OMB Guidelines

Part 30

The regulations at 10 CFR 30.35(g) require that licensees keep records important to the safe and effective decommissioning of the facility until the site is released for unrestricted use. The NRC reviews the information to ensure that adequate funds will be available to ensure that the applicant will conduct decontamination efforts in a timely manner and minimize exposure of workers to radioactive material.

Part 31

Paragraphs 31.14(c)(9)(iv)(B), 31.15(c)(8)(iv)(B), and 31.17(c)(5)(iv)(B) require that licensees shall submit a report within 5 days of receiving the results of a sealed source that is leaking. The requirement to provide a report within 5 days is necessary to ensure that the NRC is made aware of any significant safety information associated with events or transfers so as to take prompt action to protect the public health and safety.

Paragraphs 31.14(c)(2)(ii), 31.14(c)(3)(ii), 31.15(c)(2)(ii), 31.15(c)(3)(ii), 31.16(c)(1)(iii), 31.16(c)(2)(iii), 31.17(c)(2)(ii), 31.18(c)(1)(ii), 31.18(c)(2)(ii), require that licensees retain records for 5 years to align with inspection frequency so that the NRC can provide oversight of radiation safety officer and authorized user training and experience.

8. Consultations Outside the NRC

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

9. Payment or Gift to Respondents

Not applicable.

10. Confidentiality of 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, licensees are advised and discouraged from submitting information that is proprietary, confidential, or that involves trade secrets.

11. Justification for Sensitive Questions

Not applicable.

12. Estimated Burden and Burden Hour Cost

The estimated respondents to the proposed rule are as follows:

	Respondents
Part 30	423
Part 31	1,095
Part 32	-109
Part 34	-548
Part 39	-2
Part 40	-27
NRC Form 241	-25
NRC Form 313	-398
NRC Form 483	60
NRC Form 1003	398
Total	867¹

The estimated burden and responses for the proposed rule are as follows:

Total Burden Hours for Modernizing NRC Regulations for Byproduct Material Use Proposed Rule				
	Reporting	Recordkeeping	Third Party	Total
Part 30	23,590.0	146.6	0.0	23,736.6
Part 31	118.5	1,371.8	0.0	1,490.3
Part 32	-34.5	0.0	0.0	-34.5
Part 34	-14.5	-274.0	0.0	-288.5
Part 39	-4.0	0.0	0.0	-4.0
Part 40	-13.5	0.0	0.0	-13.5
NRC Form 241	-106.3	0.0	0.0	-106.3
NRC Form 483	10.2	0.0	0.0	10.2
NRC Form 313	-1,711.4	0.0	0.0	-1,711.4
NRC Form 1003	881.5	0.0	0.0	881.5
Total	22,716.1	1,244.4	0.0	23,960.4

¹ The respondents total does not include respondents to Form 1003 and Form 313, as these are a subset of the Part 31 respondents.

Total Responses for Modernizing NRC Regulations for Byproduct Material Use Proposed Rule				
	Reporting	Recordkeeping	Third Party	Total
Part 30	423	147	0	570
Part 31	354	1,095	0	1,449
Part 32	-109	0	0	-109
Part 34	-29	-548	0	-577
Part 39	-8	0	0	-8
Part 40	-27	0	0	-27
NRC Form 241	-425	0	0	-425
NRC Form 483	60	0	0	60
NRC Form 313	-398	0	0	-398
NRC Form 1003	1,289	0	0	1,289
Total	1,130	694	0	1,824

Responses = reporting responses + third party responses + number of recordkeepers

The total estimated burden cost is \$3,689,902 (23,960.4 hours x \$154 per hour). The NRC's average labor rate of \$154 per hour for FY 2026 was used to calculate burden costs to the public because it aligns with 2024 Bureau of Labor Statistics data showing comparable hourly mean wages across five key occupational groups (executives, management, technical staff, licensing staff, and physicists) within the nuclear industry.

13. Estimate of Other Additional Costs

The quantity of records to be maintained is roughly proportional to the recordkeeping burden and therefore can be used to calculate approximate records storage costs. Based on the number of pages maintained for a typical clearance, the records storage cost has been determined to be equal to \$0.12 per recordkeeping burden hour. Therefore, the storage cost for this clearance is estimated to be the following:

	Additional costs
Part 30	\$18
Part 31	\$165
Part 34	-\$33
Total	\$150

14. Estimated Annualized Cost to the Federal Government

The staff has developed estimates of annualized costs to the Federal Government for conducting this information collection. These estimates are based on staff experience and subject-matter expertise and include the burden of reviewing, analyzing, and processing the collected information and any relevant operational expenses.

	Cost to the Federal government
Part 30	-\$135,520
Part 31	\$-493,139
Part 32	-\$8,393
Part 34	-\$2,156
Part 39	-\$308
Part 40	-\$2,156
Form 241	-\$41,580
Total	-683,252

15. Reasons for Changes in Burden or Cost

The NRC is amending its regulations to modernize the safe, effective, and efficient use of byproduct material. This action will reduce the need for license amendment requests and exemptions from existing regulations; address other deregulatory issues deemed relevant by the NRC; and support the NRC's Principles of Good Regulation, including openness, clarity, and reliability. This effort is consistent with, and implements direction in the ADVANCE Act, and recently issued EO 14300, "Ordering the Reform of the Nuclear Regulatory Commission."

16. Publication for Statistical Use

Not applicable.

17. Reason for Not Displaying the Expiration Date

The reporting and recordkeeping requirements for this information collection are associated with regulations and are not submitted on instruments such as forms or surveys. For this reason, there are no data instruments on which to display an OMB expiration date. Further, amending the regulatory text of the CFR to display information that, in an annual publication, could become obsolete would be unduly burdensome and too difficult to keep current.

The expiration date is displayed on NRC Forms 241, 313, 483, and 1003.

18. Exceptions to the Certification Statement

None.

B. COLLECTIONS OF INFORMATION EMPLOYING STATISTICAL METHODS

Not applicable

DESCRIPTION OF INFORMATION COLLECTIONS CONTAINED IN
MODERNIZING NRC REGULATIONS FOR BYPRODUCT MATERIAL USE PROPOSED RULE

Paragraph 30.34(h)(1) would specify that standard general licensees who are required to register under Part 31 subpart C for a standard general license must notify the appropriate NRC Regional Administrator, in writing, immediately following the filing of a voluntary or involuntary petition for bankruptcy under any chapter of title 11 (Bankruptcy) of the United States Code. This requirement previously applied to this group of licensees when they were licensed as specific licensees, the language is updated to reflect that this continues to apply to them as standard general licensees. (Amended, no change in burden)

Paragraph 30.35(g) would specify that standard general licensees required to maintain decommissioning records. This requirement previously applied to this group of licensees when they were licensed as specific licensees, the language is updated to reflect that this continues to apply to them as standard general licensees. (Amended, no change in burden)

Appendix B to 10 CFR part 30, "Quantities of Licensed Material Requiring Labeling" contains a table specifying the quantities of licensed material requiring labeling. For each listed byproduct material (radioisotope), the table provides the minimum activity (in microcuries) that triggers certain regulatory labeling requirements. The proposed rule would set new threshold values in Appendix B to 10 CFR part 30 when applied to requirements in 30.35(a) and (b) allowing licensees to take advantage of lower DFA requirements. This, however, requires the licensees to submit a new updated DFA to take advantage of the lower DFA amounts under 30.35(a)&(b) and 70.25. Funding plans are described in 30.35(e) and financial instruments are described in 30.35(f). This also would require recordkeeping of the updated DFA as required by 10 CFR part 30.35(g). (Amended)

The updated values in Appendix B to 10 CFR part 30 also apply to licensees submitting financial assurance for decommissioning under 70.25; however, this rulemaking assumes that Part 70 licensees are not impacted because their authorized possession limits already exceed the table values and therefore, they are already required to submit a site-specific decommissioning funding plan.

Section 31.5(c)(14) requires general licensees to notify NRC within 30 days of changes of address for the location of use (including change of name of general licensee) of devices. This requirement allows the NRC to track general licensees for contact or inspection purposes. The change would allow electronic submission of the report, which would be less burdensome for respondents. No change is being made to the content or frequency of the report. (Amended)

Paragraph 31.11(e) requires that a general licensee under this section report in writing any change in a previously validated registration certificate. The licensee must report the change to the NRC within 30 days after the effective date of such a change. Under the proposed rule, the activity limits would increase and some licensees would no longer need a specific license. These licensees would be general licensees submitting an NRC Form 483. Burden for NRC Form 483 has been increased as a result. (Amended)

New Paragraph 31.13 would establish standard general license requirements:

Paragraph 31.13(a)(1) and (b)(2) This section would require standard general licensees to notify the NRC 30 days before commencing activities under 10 CFR 31 Subpart C. This requirement allows the NRC to track general licensees for oversight purposes,

including inspections. Licensees would be required to submit NRC Form 1003 for this purpose, rather than the NRC Form 313, "Application for Materials License" which was previously used. The content includes basic information such as contact information, locations, and a certification of understanding. (New)

Paragraph 31.13(f)(1) would require standard general licensees to notify the NRC within 60 days of beginning decommissioning procedures using NRC Form 1003. This requirement allows the NRC to track general licensees for oversight purposes, including ensuring proper decommissioning of facilities. Previously, licensees would have used NRC Form 313 or NRC Form 314 for this purpose. The content includes basic information such as contact information, locations, a certification of understanding, and information demonstrating adequate decommissioning of facilities. (New)

Paragraph 31.13(f)(2) would require standard general licensees to submit a decommissioning plan to the NRC in certain circumstances in which decommissioning activities could increase potential health and safety impacts to workers or to the public. This requirement would allow the NRC to track general licensees for oversight purposes, including ensuring safe decommissioning of facilities. The change is a transfer from NRC Form 313 and/or NRC Form 314 since this population of licensees would utilize NRC Form 1003 as required by the regulation instead of NRC Form 313 or NRC Form 314. The content includes basic information such as contact information, locations, a certification of understanding, and a decommissioning plan. (New)

Paragraph 31.13(f)(5) would require the licensee to request license termination as soon as practicable but no later than 24 months following the initiation of decommissioning. (New)

Paragraph 31.13(f)(6) would require the licensee to submit an NRC Form 1003 to certify the disposition of all licensed material, including accumulated wastes, by filing a submittal containing an NRC Form 1003. Previously the Form 314 would have been used for this purpose. The licensee would be required to conduct a radiation survey of the premises where the licensed activities were carried out and submit a report of the results of this survey, unless the licensee could demonstrate in some other manner that the premises are suitable for release in accordance with the criteria for decommissioning in 10 CFR part 20, subpart E. (New)

Paragraph 31.13(g) would allow general standard licensees to request an extension of the timeframes for decommissioning. (New)

Paragraph 31.13(h) would require standard general licensees to notify the NRC using the NRC Form 1003 when they are terminating their standard general license. This requirement allows the NRC to track general licensees for oversight purposes. Previously, licensees would have used NRC Form 314 for this purpose. (New)

Paragraphs 31.14(c)(9)(iv)(A) and (B), 31.15(c)(8)(iv)(A) and (B), and 31.17(c)(5)(iv)(A) and (B) would require reports to be made to the NRC under certain circumstances in which licensee detect leakage on sealed sources. This requirement allows the NRC to respond to emergent events and assess industry wide issues with sealed sources. The report requires basic information such as information on the source and the circumstances leading to the leakage. (New)

Paragraph 31.14(c), 31.15(c), 31.16(c), 31.17(c), and 31.18(c) require recordkeeping for a variety of radiation safety program elements. Records include those related to training and experience, procedures, inventories, and radiation surveys. This requirement allows the NRC to assess licensee performance and is fundamental to the NRC's oversight process.

The proposed rule would update the regulations in 10 CFR 32.12, 32.16, 32.20, 32.25(c), 32.29(c), 32.32(c) to remove the annual reporting requirements. Currently specific licensees that distribute consumer products to users exempt from licensing requirements must provide a report of all the products transferred under their exempt distribution license. With this proposed change, licensees will be required to maintain the records of transfer per the record retention policy in 10 CFR 30.51 and make the information available to NRC upon request. Licensees will no longer have to submit an annual report to the NRC. Record retention policy will change from 1 year to 3 years following the regulations in 10 CFR 30.51 for byproduct material. (Removed)

Paragraph 32.72(a) currently provides requirements for an application for a specific license to manufacture, prepare, or transfer for commercial distribution radioactive drugs. This paragraph would be amended to include applications to prepare or transfer for commercial distribution microspheres. This section would now include microspheres, such as radioactive microspheres, within its scope, which would allow commercial radiopharmacies to prepare and distribute these materials under this provision. The proposed rule would expand eligibility to any applicant legally authorized under applicable federal or state law to manufacture, compound, prepare, or distribute radioactive drugs or medical devices, providing flexibility for future distribution pathways authorized by the U.S. Food and Drug Administration (FDA) or state regulatory bodies. The applications for these sources have been submitted on the NRC Form 313, and would continue to be submitted on this form. There is no change in burden on the NRC Form 313. In addition, the language related to labeling of microspheres would be added to this paragraph; however, these sources were previously required to be labeled by license condition. (Amended, no change in burden)

Paragraph 34.89(b) would be amended to remove the requirement for licensees to maintain 10 CFR parts 19, 20, and 34 of NRC regulations. In addition, the proposed rule would remove the requirement to maintain records of equipment problems identified in daily checks of equipment as required by § 34.73(a) (Removed).

The proposed rule would eliminate the requirement in 10 CFR 34.101(c) which requires any licensee conducting radiographic operations or storing radioactive material at any location not listed on the license for a period in excess of 180 days in a calendar year, notifying the NRC. (Removed)

The proposed rule would eliminate the requirement in 10 CFR 39.77(c)(1) that the licensee notify the appropriate NRC Regional Office by telephone of the circumstances that resulted in the inability to retrieve the source and obtain NRC approval to implement abandonment procedures. The removal of § 39.77(c)(1) will eliminate the notification and duplicative approval process for implementing abandonment procedures. (Removed)

Paragraph 10 CFR 40.53(c) would be amended to remove the annual reporting requirements. Currently specific licensees that distribute consumer products to users exempt from licensing requirements must provide a report of all the products transferred under their exempt distribution license, covering the preceding calendar year, on or before January 31 of each year, even if no transferred of products have taken place, at the time of renewal, and when ceasing distribution. With this proposed change, licensees will be required to maintain the records of

transfer per the record retention policy in 10 CFR 40.61 and make the information available to NRC upon request. This proposed change will affect specific licensees who maintain a license under 40.52 for distribution of consumer products under Part 40. Licensees will no longer have to submit an annual report to the NRC. Record retention policy will change from 1 year to 3 years following the regulations in 10 CFR 40.61, for source material. (Removed)

The NRC is amending the rules in 10 CFR part 150.14 to remove the requirement for Agreement State licensees using special nuclear material of low strategic significance to meet the physical protection requirements in 10 CFR part 73.

Paragraph 150.20(b)(1) would amend the requirement to submit NRC Form 241 to reduce the amount of time an Agreement State licensee has to file for reciprocity before initiation of work activities in NRC jurisdiction. Respondents could file the form one day before engaging in activities, rather than 3 days in advance. This action will reduce recordkeeping burden on the applicant and additional regulatory efficiencies will be gained by revising the guidance documentation. (Amended, No change in burden)

Paragraph 150.20(b)(2) would be amended to remove the requirement that Agreement State licensees engaging in activities offshore amend the NRC Form 241 for changes in work locations. This proposed change will affect Agreement State licensees working in offshore waters by significantly decreasing the number of amended NRC Form 241s submitted. (Amended)

Section 150.20 would be amended to allow Agreement State standard general licenses, in addition to Agreement State specific licenses, to be used for the basis of reciprocity. The proposed change would not change the number of recordkeepers since the standard general licensees are currently specific licensees. (Amended, No change in burden)