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May 20, 2005

SUMMARY OF INFORMATION COLLECTION REQUEST

Title: 10 CFR 20, "Standards for Protection Against Radiation," Clearance Extension (Final OCP)

Current Burden/Responses: 322,851 hours/5,733 responses (685 + 5,048 recordkeepers)

Proposed Burden/Responses 128,669 hours/5,019 responses (507 + 4,512 recordkeepers)

Frequency of Response: On occasion, annually

Reasons for Changes in Burden/Responses:

The overall burden decreased by 194,182 hours from 322,851 hours (319,008 recordkeeping and 3,843 reporting) to 128,669 hours (123,760 recordkeeping and 4,909 reporting) because of a decrease in the number of licensees from 5,048 to 4,512. The recordkeeping burden decreased by 195,248 hours from 319,008 to 123,760 hours due to a reduction of burden hours per recordkeeper from 40 hours to 4 hours for Section 20.1202(a) & (b) because a one-time requirement has been completed.

The reporting burden increased by 1,066 hours from 3,843 to 4,909 hours because approximately 90 reactor licensees are expected to request authorization from the NRC under Sections 20.1703(b) and 20.1705(a) and (b) over the next 3 years (at a burden of 1,200 hours) to use and take credit for certain air-supplied suits for worker respiratory protection. After this 3-year period, the burden for the aforementioned sections is expected to return to zero for reactor licensees. Therefore, the net burden change is a 194,182 hour decrease (195,248 hour burden decrease for recordkeeping plus 1,066 hour increase for reporting). Also there is a change in cost because the hourly rate has increased from \$144/hr to \$157/hr.

Level of Concurrence:

Director
Division of Industrial and Medical Nuclear Safety
Office of Nuclear Material Safety and Safeguards

Recordkeeping Requirements in Accordance with the Retention Periods for Records Rule:

Retentions are in accordance with standard retention periods.

Abstract:

10 CFR Part 20 establishes standards for protection against ionizing radiation resulting from activities conducted under licenses issued by the NRC. These standards require the establishment of radiation protection programs, maintenance of radiation records, recording of radiation received by workers, reporting of incidents which could cause exposure to radiation, submittal of an annual report to NRC of the results of individual monitoring, and submittal of license termination information. These mandatory requirements are needed to protect occupationally exposed individuals from undue risks of excessive exposure to ionizing radiation and to protect the health and safety of the public.

cc: B. St. Mary

B-11

Addressees: Scott Moore, NMSS
Vonna Ordaz, NSIR
Stu Treby, OGC
Christiana Liu, RES
Ted Quay, NRR

As you know, NRR has been leading an effort to revise the regulations as summarized below. In the course of development of the rulemaking package, different views have been expressed about the issues of labeling requirements and notifications and reports to individuals (see bolded CFR sections below). In order to come to consensus on the appropriate scope and particulars of this section, NRR/RPRP proposes a management meeting to discuss this specific topic. Managers are asked to come to the meeting prepared to make decisions for their respective offices. We propose that the meeting be held during the week of August 22 - please provide time frames when you would be available (or if you prefer, when not available), so we can schedule a mutually convenient time. Responses on scheduling should be directed to Stewart Schneider, x4123.

Collection, Reporting, and Labeling of Information and Clarification of Dose Terminology

Objective: This proposed rulemaking addresses the regulatory actions suggested by the nuclear power industry to reduce unnecessary regulatory burden related to radiation protection. The following regulations would be revised by this proposed rulemaking.

- **10 CFR 19.13, "Notifications and reports to individuals," to amend the provisions to require licensees to provide annual occupational dose reports only to workers if they meet certain criteria. Conforming changes would be made to 10 CFR 20.2205, "Reports to individuals of exceeding dose limits."**
- 10 CFR 20.1003, "Definitions," to change the definition of total effective dose equivalent (TEDE) to be more consistent with the requirements in Part 20 by clarifying that TEDE is the sum of the effective dose equivalent (for external exposures) and the committed effective dose equivalent (for internal exposures).
- **10 CFR 20.1905, "Exemptions to labeling requirements," to add an exemption from the requirements in 10 CFR 20.1904, "Labeling containers," for the labeling of certain containers within posted areas in nuclear power reactor facilities.**
- 10 CFR 20.2104, "Determination of prior occupational dose," to remove the requirement that licensees attempt to obtain the records of cumulative occupational radiation dose for an individual and add the requirement that licensees obtain the complete cumulative dose record for individuals being authorized to receive a planned special exposure.

cc: Roger Pedersen - NRR
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