

JUSTIFICATION FOR CHANGE IN AN OMB CLEARANCE PACKAGE
10 CFR 19
(3150-0044)

The Nuclear Regulatory Commission (NRC) amended its regulations to include jurisdiction over discrete sources of radium-226, accelerator-produced radioactive materials, and discrete sources of naturally occurring radioactive material, as required by the Energy Policy Act of 2005 (EPAct), which was signed into law on August 8, 2005. This provides a regulatory framework by which to license and regulate byproduct material in accordance with the new, expanded definition. The amended regulations (“the NARM rule”) impacted numerous existing information collections. The NRC packaged all of the impacted information collections into one new information collection which OMB approved and assigned control number 3150-0203.

One of the areas of existing Nuclear Regulatory Commission (NRC) regulations revised was 10 CFR 19. The following sections impacted the existing information collections cleared under OMB number 3150-0044:

A. JUSTIFICATION

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

Section 19.12 requires that instructions be provided to workers who are likely to receive an occupational dose in excess of 100 mrem (1mSv) per year. With additional radioactive material included as byproduct material, the universe of licensees affected by this regulation is increased by an estimated 165 licensees. There is an annual and a one-time implementation burden for this section.

Sections 19.13(b), (c) and (e) require written occupational exposure reports be provided to workers annually, on request, or at employment termination. The universe of licensees affected by this regulation is increased by 165 but only 24 licensees are affected by 10 CFR 19.13(c) and (e).

The currently approved burden for Part 19 is as follows:

| | |
|--------------|-------------------|
| Responses: | 4,877 responses |
| Respondents: | 4,650 respondents |
| Burden Hours | 24,792 hours |

Burden hour increase as a result of the final rule (see Tables):

| | |
|---------------|--|
| Responses: | 330 (165 responses + 165 additional record keepers) |
| Respondents: | 165 (28 NRC + 95 Agreement State) |
| Burden Hours: | 432 hours (33 hours reporting + 399 hours recordkeeping) |

TOTAL REQUESTED BURDEN HOURS FOR PART 19
(Currently approved burden plus final rule):

| | |
|--------------|-------------------|
| Responses: | 5,207 responses |
| Respondents: | 4,815 respondents |
| Burden Hours | 25,224 hours |

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Annual Reporting Requirements for NRC Licensees

| Section | No. Of Rspndts | Rsp. Per Rspndt | Total Responses | Brdn per Response | Total Annual Burden Hours |
|--------------------------------|----------------|-----------------|-----------------|-------------------|---------------------------|
| 19.12 | 165 | 1 | 165 | 0.2 | 33 |
| Total Part 19 Reporting | | Not Applicable | 165 | | 33 |

Recordkeeping Requirements for NRC Licensees

| Section | Number of Recordkeepers | Burden Hrs. Per Recordkeeper | Total Annual Burden Hours |
|------------------------------------|-------------------------|------------------------------|---------------------------|
| 19.13(b) | 165 | 1.462 | 241 |
| 19.13(c) | 24 | 2.14 | 51 |
| 19.13(e) | 24 | 4.47 | 107 |
| Total Part 19 Recordkeeping | | | 399 |