

PUBLIC SUBMISSION

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Docket: NRC-2024-0158
NRC Form 7, Application for NRC Export/Import License Amendment or Renewal

Comment On: NRC-2024-0158-0001
Information Collection: NRC Form 7, Application for NRC Export/Import License, Amendment, Renewal, or Consent Request(s)

Document: NRC-2024-0158-DRAFT-0003
Comment on FR Doc # 2024-22900

Submitter Information

Organization: International Isotopes Inc.

General Comment

See attached file

Attachments

INIS Comments Docket NRC-2024-0158

To whom it may concern,

International Isotopes Inc. (INIS) is licensed by the U.S. Nuclear Regulatory Commission and imports and exports byproduct material. All of INIS' imports of byproduct material are conducted under the authorization provided by 10 CFR §110.27 General license for imports. The majority of our exports of byproduct material are conducted under the authorization provided by 10 CFR §110.23 General license for the export of byproduct material. Exports of byproduct material listed in Appendix P to Part 110 are conducted under specific export licenses, and it is in this content that comments are provided.

The NRC is seeking comments that address the following questions:

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

Yes – Providing information utilizing NRC Form 7, “Application for NRC Export/Import License, Amendment, Renewal, or Consent Request(s)” is necessary to implement the requirements of the IAEA’s Code of Conduct on the Safety and Security of Radioactive Sources and supplemental Guidance of the Import and Export of Radioactive Sources.

2. Is the estimate of the burden of the information collection accurate? Please explain your answer.

Yes – On average I believe time estimate is accurate. When the importer is located in a developing country coordinating with the end user and regulatory authority can be cumbersome and obtaining the necessary information can take several hours.

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

No – I believe NRC Form 7 is user friendly and the instructions are clear.

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

The NRC can ensure that the link at the bottom of the International Programs web page (<https://www.nrc.gov/about-nrc/international.html>) to the IAEA’s Points of Contact list is maintained up to date. I am not sure what is meant by automated collection techniques, I assume that this might mean completing NRC Form 7 on-line, if this is the case I don’t think there would be any advantage, completing NRC Form 7 as a fillable form and submitting via email is easy enough as is. I don’t foresee a day when there is a global data base that would be accessible to licensees to collect the necessary data.

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