

Date: September 10, 2003

SUMMARY OF INFORMATION COLLECTION REQUEST

Title: 10 CFR Part 71, Packaging and Transportation of Radioactive Material, Final OCP

Current Burden/Responses: 63,837 hours/1,106 responses

Proposed Burden/Responses: 42,301 hours/600 responses

Frequency of Response: On occasion

Number of Respondents: 250

Reasons for Changes in Burden/Responses: The overall burden decrease by 21,536 hours from 63,837 to 42,301 because of the staff's re-estimates of burden and responses based on recent history over the past 3 years.

Reporting Burden decreased by 19,711 hours from 57,012 to 37,301 because of :

- Section 71.12(c)(3) burden decreased from 200 to 50 hours based on the actual data indicating approximately 50 notifications of first use of a package were received annually instead of the 200 notifications;
- Section 71.31 burden decreased from 30,000 to 29,400 based on the actual number of responses received which dropped from 100 to 98;
- Section 71.39 burden decreased from 20,000 to 4,500 because of the decrease in the burden per response from 1,000 to 100 hours to provide additional information even though the number of responses increased from 20 to 45. The requests for additional information may consist of 1 simple question or may have several questions and which require detailed technical explanations and the burden revision is based on staff's best judgement, recent history and expected future activity;
- Sections 71.101 - 71.137 burden decreased from 4,200 to 240 hours because of a reduction in the number of respondents and responses from 35 to 2. Previously the respondents included non-licensure, non-certificate holder fabricators and radiographers, but currently do not considered fabricators and radiographers as respondents under the quality assurance program approvals for Part 71.
- Although the burden for the above sections decreased, the burden increased for the following sections: Section 71.5 burden increased from 1 to 100 hours based on recent history and staff judgement that modification, waivers or exemptions filed under this section will involve the same processes and similar burden as those filed under 71.8;
- Section 71.38(c) the burden increased from 2,000 to 2,400 hours based on the actual number of responses received 60 instead of 40 and the burden per response decreased from 50 hours to 40 hours.

Recordkeeping Burden decreased by 1,825 hours, from 6,825 to 5,000 because of:

- The requirement for each package to be uniquely identified has been met and circumstances no longer exist which require the markings under Section 71.13 to be performed, reducing the burden from 350 to 0 hours.
- Section 71.91, the hours per recordkeeper was rounded up from 18.5 to 20 hours to avoid the appearance of an accuracy that could not be substantiated, but there was also a decrease in the number of recordkeepers from 350 to 250, thereby decreasing the burden by 1,475 hours.

The changes in burden cost reflects a increase in NRC's recoverable fee rate increased from \$143/hr to \$152/hr.

Level of Concurrence: Branch Chief
Rulemaking and Guidance Branch
Division of Industrial and Medical Nuclear Safety
Office of Nuclear Materials Safety and Safeguards

Recordkeeping Requirements in Accordance with the Retention Periods for Records/Rule:
Recordkeeping retentions are in accordance with standard record retention periods.

Search of the Information Requirements Control Automated System (IRCAS):
IRCAS was searched, no duplication was found.

Abstract: NRC regulations in 10 CFR Part 71 establish requirements for packing, preparation for shipment, and transportation of licensed material, and prescribe procedures, standards, and requirements for approval by NRC of packaging and shipping procedures for fissile material and for quantities of licensed material in excess of Type A quantities.

cc: B. St. Mary