

February 13, 2011

FINAL SUMMARY OF INFORMATION COLLECTION REQUEST

Title: 10 CFR Part 20, "Standards for Protection Against Radiation" (3150-0014)

Current Burden/Responses: 110,244 hours/5,502 responses (1,762 reporting responses + 3,740 recordkeepers)

Proposed Burden/Responses: 640,521 hours/43,505 responses (11,732 reporting responses + 10,773 third party disclosure responses+ 21,000 recordkeepers)

	Hours	Responses
NRC Licensee Reporting	5,476	1,676
NRC Licensee 3rd Party Disclosure	342	1,539
NRC Licensee Recordkeeping	85,685	3,000
Agreement State Reporting	32,856	10,056
Agreement State 3rd Party Disclosure	2,052	9,234
Agreement State Recordkeeping	514,110	18,000
TOTAL	640,521	43,505

Burden Attributable to Third Party Collections: 10,773 hours

Frequency of Response: Annually and on occasion

Number of Respondents: 21,000 (3,000 NRC licensees + 18,000 AS licensees)

Reasons for Changes in Burden/Responses:

NRC Licensees

The burden estimate for NRC licensees changed from 110,244 to 91,503 hours, a decrease of 18,741 hours. This decrease of 18,741 hours is attributed to a decrease in the number of NRC licensees subject to Part 20 requirements. The previous burden estimates were based on 3,740 licensees, the current request is based on 3,000 licensees required to report and keep records. Data on the number of NRC licensees is taken from the NRC's License Tracking System, which shows the actual number of NRC licensees at any given time.

The estimated number of NRC licensee responses changed from 5,502 responses (1,762 reporting responses plus 3,740 recordkeepers) to 6,215 responses (1,676 reporting responses plus 1,539 third party disclosure responses plus 3,000 recordkeepers), an increase of 713 responses. The primary reason for the increase in the number of responses is that the third party disclosure requirements have been broken out into a separate table; whereas in the previous submission they were included on the recordkeeping table. As a result, 1,539 third-party disclosure responses were added to the total.

Agreement State Licensees

The current submission corrects an omission in the previous submissions of the Part 20 information collection. Previous submissions of Part 20 did not include estimates of Agreement state licensees' burden and responses. As a result, all Agreement state licensee burden (549,018 hours and 37,290 responses) is new burden. In addition, the inclusion of Agreement state licensees in the totals adds 18,000 additional respondents.

Other NRC information collections for which the NRC can relinquish regulatory authority to a state have historically included estimates for Agreement State licensee burden (for example, 10 CFR Parts 32, 32, and 35). The NRC believes it is appropriate to include this burden in Part 20 because of the compatibility requirements for this Part (Agreement State licensees must fulfill the same requirements as NRC licensees).

Total

The total burden estimate increased from 110,244 hours to 640,521 hours, and the respondents increased from 3,740 to 21,000. The increase in the burden is due to the inclusion of burden for Agreement State licensees, which was not included in previous submissions of this collection. The NRC is seeking to correct this omission in the current submission.

Responses increased from 5,502 responses to 43,505 responses, primarily due to the addition of Agreement State licensee responses. In addition, the responses increased due to the separation of 3rd party reporting requirements, which were previously included in recordkeeping totals.

In addition, there is an increase in the hourly rate from \$238 to \$273.

Level of Concurrence: Branch Chief
 Rulemaking Branch A
 Division of Intergovernmental Liaison and Rulemaking
 FSME

Recordkeeping Requirements in Accordance with the Retention Periods for Records Rule

Records pertaining to the radiation doses and radionuclide intakes by individual workers and to effluents released to air and water and the resultant radiation exposure of members of the public must be retained for the life of the license and transferred to the NRC upon termination of the license. This retention is required so that the past exposure history of any worker can be reconstructed to allow the worker to move from licensed facility to licensed facility and to permit the identification of trends, so that declining licensee performance can be detected and corrected.

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 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.

ADAMS Accession Numbers

Final FRN: ML120260355
Final SS: ML120260339
Final Package: ML120260333