

DRAFT SUPPORTING STATEMENT
FOR
EXPORT AND IMPORT OF NUCLEAR EQUIPMENT AND MATERIAL
10 CFR PART 110
(3150-0036)

EXTENSION

DESCRIPTION OF THE INFORMATION COLLECTION

The U.S. Nuclear Regulatory Commission (NRC), under the Atomic Energy Act of 1954, as amended (AEA), and Title II of the Energy Reorganization Act of 1974, as amended, has authority for exercising export and import controls over nuclear equipment and material as specified in 10 CFR §§ 110.8, 110.9, and 110.9a. Any person who wishes to export or import nuclear equipment and material under the provisions in 10 CFR Part 110 must provide certain information collection elements to enable the NRC and the Executive Branch to make required export and import licensing determinations. In support of the reporting requirements pursuant to 10 CFR 110.50(c), optional NRC forms 830, 830A, 831, and 831A have been developed to assist licensees in submitting prior shipment notifications.

A. JUSTIFICATION

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

All persons who wish to export or import nuclear equipment and material as specified in 10 CFR §§ 110.8, 110.9, and 110.9a must provide certain information collection elements to enable the NRC and the Executive Branch to make required export and import licensing determinations to ensure compliance with NRC regulations and to satisfy statutory requirements of the AEA. Information collections in 10 CFR 110 are as follows:

Section 110.7a(a) states information provided to the Commission by an applicant for a license or by a licensee or information required by statute or by the Commission's regulations, orders, or license conditions to be maintained by the applicant or the licensee shall be complete and accurate in all material respects.

Section 110.7a(b) requires that each applicant or licensee notify the Administrator of the appropriate NRC Regional Office within two working days of identifying any information that has a significant implication for public health and safety or common defense and security on a regulated activity.

Section 110.20(a) states that a person may use an NRC general license as authority to export or import nuclear equipment or material, if the nuclear equipment or material to be exported or imported is covered by the NRC general licenses described in §§ 110.21 through 110.27. If an export or import is not covered by the NRC general licenses described in §§ 110.21 through 110.27, a person must file an application with the Commission for a specific license in accordance with §§ 110.31 through 110.32. This requirement is covered under the clearance for NRC Form 7, "Application for NRC Export/Import License, Amendment, Renewal or Consent Request," OMB 3150-0027.

Section 110.23(a)(5)(iii) states that all exports of americium are subject to the reporting requirements listed in 110.54(b).

Section 110.23(a)(6) states that all exports of neptunium are subject to the reporting requirements listed in 110.54(b).

Section 110.26(d) states that the general license does not authorize the export of essentially complete reactors through piecemeal exports of facility components. When individual exports of components would amount in the aggregate to export of an essentially complete nuclear reactor, a facility export license is required.

Section 110.26(e) states that all exports of nuclear reactor components under paragraph (a) of this section are subject to the reporting requirements in 110.54(c).

Section 110.27(d) states that persons using the general license for imports of formula quantities of strategic special nuclear material (as defined in 73.2 of this chapter) under this general license shall provide the notifications required in § 73.27 and § 73.72 of this chapter.

Section 110.31(a) states that a person shall file an application for a specific license to export or import with the Deputy Director of the NRC's Office of International Programs (OIP) using an appropriate method listed in § 110.4.

Section 110.31(b) states that applications for an export, import, amendment or renewal licenses or a request for an exemption from a licensing requirement under this part shall be filed on NRC Form 7. This requirement is covered under the clearance for NRC Form 7, "Application for NRC Export/Import License, Amendment, Renewal or Consent Request," OMB 3150-0027.

Section 110.31(c) states that an application for a specific license to export and import or a request for an exemption from a licensing requirement must be accompanied by the appropriate fee in accordance with the fee schedules in § 170.21 and § 170.31. A license application will not be processed unless the specified fee is received. This requirement is covered under the clearance for NRC Form 7, "Application for NRC Export/Import License, Amendment, Renewal or Consent Request," OMB 3150-0027.

Section 110.31(g) states that the applicant shall withdraw an application when it is no longer needed. The Commission's official files retain all documents related to a withdrawn application. This requirement is covered under the clearance for NRC Form 7, "Application for NRC Export/Import License, Amendment, Renewal or Consent Request," OMB 3150-0027.

Section 110.32, 'Information required in an application for a specific license/NRC Form 7,' specifies the data elements and supplemental documentation required from an applicant used to determine whether or not to grant a license.

Section 110.50(a)(8) states that a licensee shall not proceed to export or import and shall notify the Commission promptly if he knows or has reason to believe that the packaging requirements of part 71 of this chapter have not been met.

Section 110.50(b)(3) states that unless a license specifically authorizes the export of certain foreign-obligated nuclear material or equipment, a licensee may not ship such material or equipment until the licensee has requested and the Commission has issued an amendment to the license authorizing such shipment; or the licensee has given at least 40 days advance notice of the intended shipment in writing to the Deputy Director, OIP; and the Deputy Director, OIP has obtained confirmation, through either the Department of Energy or State, that the foreign government in question has given its consent to the intended shipment pursuant to its agreement for cooperation with the United States; and communicated this in writing to the licensee.

Section 110.50(c), 'Advanced notification,' states that a licensee authorized to export or import the radioactive material listed in Appendix P to this part is responsible for notifying NRC and, in cases of exports, the government of the importing country in advance of each shipment. A list of points of contact in importing countries is available at NRC's Office of International Programs Web site, accessible on the NRC Public Web site at <http://www.nrc.gov>.

NRC Form 830 "Report of Import" (and continuation sheet 830A) is a voluntary form that licensees may use to comply with the requirements of 110.50(c) and report the import of radioactive material. NRC Form 831, "Report of Export" (and continuation sheet 831A) is a voluntary form that licensees may use to report the export of radioactive material. These forms are designed to assist licensees in complying with the reporting requirement.

Section 110.51, 'Amendment and renewal of licenses,' states that applications for amendment of a specific license be filed on NRC Form 7 in accordance with §§ 110.31 and 110.32 and shall specify the respects in which the licensee desires the license to be amended and the grounds for such amendment. This requirement is covered under the clearance for NRC Form 7, "Application for NRC Export/Import License, Amendment, Renewal or Consent Request," OMB 3150-0027.

Section 110.52(b), 'Revocation, suspension, and modification,' states that the Commission may require further information from a licensee to determine whether a license should be revoked, suspended, or modified.

Section 110.53(b)(1), 'United States address, records, and inspections,' states that each license applicant or licensee (general or specific) shall maintain records concerning his exports or imports. The licensee shall retain these records for five years after each export or import except that byproduct material records must be retained for three years after the date of each export or import shipment.

Section 110.53(b)(2) states that records which must be maintained pursuant to this part may be the original or a reproduced copy or microform if such reproduced copy or microform is duly authenticated by authorized personnel and the microform is capable of producing a clear and legible copy after storage for the period specified by Commission regulations. The record may also be stored in electronic media with the capability for producing legible, accurate, and complete records during the required retention period. Records such as letters, drawings, specifications, must include all pertinent information

such as stamps, initials, and signatures. The licensee shall maintain adequate safeguards against tampering with and loss of records.

Section 110.54(a), Reporting requirements, states that reports of exports of nuclear facilities and equipment, nuclear grade graphite for nuclear end use, and deuterium shipped during the previous quarter must be submitted by licensees making exports under the general license or specific license of this part by January 15, April 15, July 15, and October 15 of each year on Forms AP-M, "Exports of specified equipment and non-nuclear material" or AP-13, "Exports of specified equipment and non-nuclear material," and associated forms, submitted to OMB by U.S. Department of Commerce, Bureau of Industry and Security and cleared under #0694-0135. The reports must contain information on all nuclear facilities, equipment, and non-nuclear materials (nuclear grade graphite for nuclear end use and deuterium) listed in Annex II of the Additional Protocol.

Section 110.54(b) requires that persons making exports under the general license established by § 110.23(a) or under a specific license shall submit by February 1 of each year one copy of a report of all americium and neptunium shipments during the previous calendar year. This report shall be submitted to the Deputy Director, OIP, at the address provided in § 110.4. The report must include a description of the material, including quantity in TBq and gram, approximate shipment dates and a list of recipient countries, end users, and intended use keyed to the items shipped.

Section 110.54(c) requires that persons making exports under the general license established by § 110.26(a) shall submit by February 1 of each year one copy of a report of all components shipped during the previous calendar year. This report shall be submitted to the Deputy Director, Office of International Programs at the address provided in § 110.4. This report must include a description of the components keyed to the categories listed in appendix A to this part, approximate shipment dates, and a list of recipient countries and end users keyed to the items shipped.

2. Agency Use of Information

The information submitted pursuant to 10 CFR Part 110 is necessary to ensure that radioactive sources are being exported/imported to licensed entities, and only to the entities listed on the license. Without this information, the United States would not be in compliance with the International Atomic Energy Agency's 'The Code of Conduct on the Safety and Security of Radioactive Sources.' The NRC ensures the information is complete, accurate and timely. If not, staff often contact the licensee and asks that they correct the information. A failure of any of these criteria can lead to Enforcement action. Each record is reviewed for accuracy and filed by licensee. In addition, all import records subject to this requirement are reviewed and logged into an electronic spreadsheet.

The requirement of § 110.7a (a), that information provided to the Commission by an applicant for a license or by a licensee or information required by statute or by the Commission's regulations, orders, or license conditions to be maintained by the applicant or the licensee shall be complete and accurate in all material respects is essential to ensure that licensees not withhold or misrepresent material facts which could impact a license determination.

The notification requirement in § 110.7a (b) enhances the capability of the Commission to respond rapidly and effectively if such a threat were to materialize on a regulated activity.

The information obtained from persons who wish to export or import nuclear equipment and material as specified in 10 CFR §§ 110.8, 110.9, and 110.9a is necessary to make required export and import licensing determinations, as well as to ensure compliance with NRC regulations which satisfy statutory requirements of the AEA.

Section 110.20(a) explains how the regulations work to determine if a person may use a NRC general license as authority to export or import nuclear equipment or material, and if the nuclear equipment or material to be exported or imported is covered by the NRC general licenses described in §§ 110.21 through 110.27. If an export or import is not covered by the NRC general licenses described in §§ 110.21 through 110.27, a person must file an application with the Commission for a specific license in accordance with §§ 110.31 through 110.32.

The requirement in Section 110.23(a)(5)(iii) to provide annual reports of americium exported under general license required by § 110.54(b) provide the NRC with data which the U.S. Government must report to the International Atomic Energy Agency (IAEA).

The requirement in Section 110.23(a)(6) to provide annual reports of neptunium exported under general license required by § 110.54(b) provide the NRC with data which the U.S. Government must report to the IAEA.

Section 110.26(d) is necessary in order to prevent the export of a complete reactor system through piecemeal exports of separate components under the NRC general license. In such an instance, a facility export license is required.

The requirement in Section 110.26(e) to provide annual reports of components exported under general license required by § 110.54(c) provide NRC with additional assurance against the improper accumulation of sensitive components in the country of import.

The notice of import of a formula quantity of strategic special nuclear material required by § 110.27(d) is used to ensure that the material is adequately protected at all times within the geographical limits of the U.S.

License applications required by §§ 110.31 and 110.32 are used by the Commission and the Executive Branch to make required export and import licensing determinations. If applicable statutory, regulatory, and policy considerations are satisfied, the NRC will issue a license authorizing the export or import.

Notices of defective packaging required by § 110.50(a)(8) facilitate NRC's ability to enforce the packaging requirements of 10 CFR Part 71 and to take possible enforcement action against licensees for packaging violations.

The requirement in § 110.50(b)(3) to notify the NRC in writing at least 40 days prior to shipment of foreign nuclear equipment or material unless a license specifically authorizes the export of foreign nuclear equipment or material enables the U.S.

Government to obtain confirmation that the foreign government has given its consent to the intended export.

Prior notification of shipments of radioactive materials listed in Appendix P required by § 110.50(c) is used to track this material within the U.S. and to detect any diversions of the material.

The additional information that the Commission may require from licensees as specified in § 110.52(b) is used by the NRC to make necessary statutory, regulatory, and policy determinations in connection with prospective actions to revoke, suspend or modify an export or import license.

Applications for amendments required by §§ 110.51 are used by the Commission and the Executive Branch to make required export and import licensing determinations. If applicable statutory, regulatory, and policy considerations are satisfied, the NRC will issue an amended license authorizing the export or import.

Shipment records required by § 110.53(b) are used for NRC inspection to ensure compliance with regulations and are necessary in connection with prospective enforcement actions against possible violators of 10 CFR Part 110.

The requirement in Section 110.54(b) to submit annual reports of americium and neptunium exported under general license provide the NRC with data which the U.S. Government must report to the IAEA.

The requirement in Section 110.54(c) to submit annual reports of components exported under general license provide NRC with additional assurance against the improper accumulation of sensitive components in the country of import.

3. Reduction of Burden Through Information Technology

There are no legal obstacles to reducing the burden associated with this information collection. The NRC encourages respondents to use information technology when it would be beneficial to them. NRC issued a regulation on October 10, 2003 (68 FR 58791), consistent with the Government Paperwork Elimination Act, which allows licensees, vendors, applicants, and members of the public the option to make submissions electronically via CD-ROM, e-mail, special Web-based interface, or other means. The mandatory prior notifications under § 110.50(c) can be submitted electronically, and optional reporting forms for import and export notifications are now available from the NRC web site. All of these notifications are now being transmitted to the NRC either by telefax or email. It is estimated that more than 90 percent of the potential responses are filed electronically.

4. Effort to Identify Duplication and Use Similar Information

No sources of similar information are available. There is no duplication of requirements. NRC has in place an ongoing program to examine all information collections with the goal of eliminating all duplication and/or unnecessary information collections.

The Department of Energy's (DOE) reporting requirements under 10 CFR 810 and the NRC's reporting requirements under 10 CFR 110 are entirely separate purposes and there is no overlap in the information that must be reported to DOE or NRC. The Department of Energy (DOE) regulations at 10 CFR Part 810, "Assistance to Foreign Atomic Energy Activities" pertain to the export of unclassified nuclear technology and assistance (provision of information or technical services) to foreign destinations. The NRC's 10 CFR Part 110 regulates the export of actual nuclear materials, radioactive sources and/or nuclear facilities/equipment (physical commodities) to foreign destinations. NRC reporting records come from private companies that use radioactive materials. DOE's records are derived from government-funded and licensed entities.

5. Effort to Reduce Small Business Burden

The requirements specified in 10 CFR Part 110 are the same for large and small businesses, because the proliferation and policy concerns are the same; thus, all businesses must provide the same data. The NRC staff estimates that less than 10% of all businesses subject to the information collections in this Part are small businesses.

6. Consequences to Federal Program or Policy Activities if the Collection is Not Conducted or is Conducted Less Frequently

Failure to provide complete and accurate information on all applications as specified in § 110.7a could result in an unreliable applicant obtaining an import or export authorization.

Failure to fully comply with § 110.7a(b) could result in a licensee not providing information that has significant implications for public health and safety or common defense and security.

Failure to fully comply with §§ 110.8, 110.9, and 110.9(a) could result in unauthorized and unregulated import or export of material and equipment subject to NRC licensing jurisdiction.

The information requested in §§ 110.31-32 is the minimum amount necessary for NRC to fulfill the statutory and regulatory requirements governing exports and imports of nuclear material and equipment. The information is submitted only when deemed necessary and is keyed to the decision criteria that guides the NRC in approving or denying applications. Schedules are not imposed. If the collection is less frequent, a person who wishes to export or import under 10 CFR Part 110 would be unable to do so because the NRC could not make the necessary determinations to approve applications.

If the collection in § 110.50(a)(8) is less frequent, the licensee could possibly ship improperly packaged nuclear materials which may endanger the health and safety of the public.

If the collection in § 110.50(b)(3) is less frequent, the U.S. Government might violate the provisions of U.S. bilateral agreements with other Governments. The report is not frequently required because the origin of the material is normally identified before the export license is issued, and, accordingly, is authorized for export on the face of the license.

The records maintained in § 110.53 are largely common business records and do not contain any special requirements, therefore, the regulatory impact is minimal. If the information is provided less frequently, the NRC would be unable to verify compliance with requirements in a timely manner.

The reporting requirements in 110.54 provide trade statistics for strategic exports and support international obligations to report certain exports under general license authorizations. The information requested in § 110.54(b) must be collected on a yearly basis to comply with a U.S. Government reporting commitment to the IAEA. The reporting requirement in § 110.54(c) is reasonable and less burdensome on exporters than submitting specific license applications.

7. Circumstances Which Justify Variation From OMB Guidelines

The reason for retaining records for five years for each export or import except for byproduct material, where records shall be retained for three years, is that these exports or imports are relatively more important with respect to nuclear nonproliferation.

Requiring the applicant or licensee to notify the Commission within two days of identifying information having a significant implication for public health and safety or common defense and security on a regulated activity enables the Commission to respond rapidly and effectively to a threat to the public health and safety or the common defense and security. This collection requirement is contained in other parts of NRC's regulations. No notifications are expected.

8. Consultations Outside the NRC

Opportunity for public comment on the information collection requirements for this clearance package has been published in the Federal Register.

9. Payment or Gift to Respondents

Not applicable.

10. Confidentiality of the Information

Confidential and proprietary information is protected in accordance with NRC regulations at 10 CFR 9.17(a) and 10 CFR 2.390(b).

11. Justification for Sensitive Questions

Not applicable.

12. Estimated Burden and Burden Hour Cost

There are approximately 150 record keepers for exporters/importers of nuclear material and equipment. All licensees comply equally with the collections in §§ 110.23(a)(5)(iii), 110.23(b)(6), 110.26(e), 110.27(d), 110.31(f), 110.50(a)(8), 110.50(b)(3), 110.50(c), 110.51, 110.52(b) and 110.54.

The estimated annual burden for this collection is 957 hours (807 hours reporting and 150 hours recordkeeping). The total cost for the collection is \$267,003 (957 hours x \$279/hr). See tables 1 – 3 for a detailed breakdown of licensee burden for each requirement under Part 110.

13. Estimate of Other Additional Costs

For licensees subject to 10 CFR Part 110, it is most likely that any purchases of equipment and services were made before October 1, 1995, in order to achieve regulatory compliance with requirements not associated with this information collection, for reasons other than to provide information or keep records for the government, or as part of customary and usual business or private practices.

NRC estimates that the storage and equipment costs for licensees subject to this information collection are approximately \$22.50 per license, based on a rate of \$45 per square foot of filing space. The recordkeeping burden is roughly proportional to the quantity of records to be maintained. Based on the number of active licenses issued annually, the total annual records storage cost is estimated to be equal to the per license rate of (\$22.50) x (150 record keepers) x (an average of 1.16 licenses issued per year per record keeper) x (5 years of required record retention) or \$19,575.

14. Estimated Annualized Cost to the Federal Government

The collection of information under 10 CFR Part 110 requires approximately 100.9 NRC professional staff hours per year to investigate, review and take action on the reported information associated with the collections referred to above. The annual labor cost to the Federal Government at an average of \$279 per staff hour for reactor and materials licensees is \$28,151.10 (100.9 hours x \$279). The costs for OMB 3150-0036 are recovered fully through fee assessments to NRC licensees pursuant to 10 CFR Parts 170 and 171. Table 4 summarizes costs to the NRC for processing information under this collection:

15. Reasons for Changes in Public Burden or Cost

The estimated annual public burden increased by 177 hours from 780 hours up to 957 hours, while annual responses increased by 375 responses, from 2,598 responses to 2,973 responses. There have been no changes to the requirements under 10 CFR Part 110 that would affect public burden. Furthermore, no change was made to the estimated hours per response, whether or not an NRC form or a custom form was used for submitting notices. NRC increased the estimated number of annual responses in the table to reflect an increase in annual activity subject to the notification requirement. The table of data was also expanded to identify the burden associated with the use of custom reporting forms for notices, the typical practice used by most Ir-192 licensees. These respondents account for the greatest number of annual responses, and essentially expend the same per-response public burden as the respondents who submit notices on the NRC forms. Notices on non-standard forms are typically submitted by licensees with fewer transactions. These notices are not custom-designed, and usually contain other unrelated data. Most respondents use non-standard forms, but they report much less frequently than those that use either custom forms or NRC forms. The number of individual respondents increased from 108 to 150 from the last clearance cycle.

The primary reason for the increase in responses is due to an adjustment in the number of export and import transactions subject to the notification requirement. Use of the NRC notification forms is also increasing. As a result, the number of respondents using neither the NRC form nor a custom form is decreasing. Most of these respondents export and import radioisotopes with longer half-lives such as Am-241 (432.7 years) and Cs-137 (30 years) and therefore, require fewer notifications. As a result, there is less incentive for these respondents to developing a custom form for their notification requirements. On the other hand, respondents that export and import radioisotopes with shorter half-lives such as Ir-192 (74 days) and Se-75 (120 days) make many more shipments and benefitted from development of custom forms and automated notification capabilities. The NRC notification forms only became available years after the notification requirement was implemented. As a result, respondents are reluctant to adopt use of the form as it would be of no benefit. On the other hand, new respondents prefer to use NRC forms, as they serve as a template for the required data elements and therefore, reduce errors.

Lastly, the NRC has increased the follow-up time from 15 minutes to 5 hours for each of 20 annual responses to account for time spent performing additional follow-up steps, to include locating updated foreign authorizations, resubmitting corrected notifications and developing responses to enforcement action taken by NRC for violating key provisions of the notification requirement.

The cost increase also reflects an increase in the annual labor cost for reactor and materials licensees from \$274 to \$279 per hour.

16. Publication for Statistical Use

NRC does not perform statistical analysis of the submissions. The records are reviewed for accuracy and compliance with the regulation. The records are not published or made public.

17. Reason for Not Displaying the Expiration Date

The NRC displays the expiration date of the collection of information on the forms used for submitting notifications of exports and imports subject to this requirement. The annual reporting requirement has no forms, and is contained in a regulation. Amending the Code of Federal Regulations to display information that, in an annual publication, could become obsolete would be unduly burdensome and too difficult to keep current.

18. Exceptions to the Certification Statement

There are no exceptions.

B. COLLECTIONS OF INFORMATION EMPLOYING STATISTICAL METHODS

Statistical methods are not used in this collection of information.

**TABLE 1.
ANNUAL REPORTING BURDEN**

Section	Number of Respondents	Responses per Respondent	Responses	Burden Per Response	Burden Hours	Cost at \$279/hr
110.7a(a)&(b)	0	0	0	0.25	0	\$0
110.20(a)	covered under NRC Form 7, "Application for NRC Export/Import License, Amendment, Renewal or Consent Request", OMB 3150-0027					
110.23(a)(5)(iii)	included in 110.54(b)					
110.23(a)(6)	included in 110.54(b)					
110.26(d)	covered under NRC Form 7, "Application for NRC Export/Import License, Amendment, Renewal or Consent Request", OMB 3150-0027					
110.26(e)	included in 110.54(c)					
110.27(d)	included in 73.27 & 73.72, OMB 3150-0002					
110.31	covered under NRC Form 7, "Application for NRC Export/Import License, Amendment, Renewal or Consent Request", OMB 3150-0027					
110.32	covered under NRC Form 7, "Application for NRC Export/Import License, Amendment, Renewal or Consent Request", OMB 3150-0027					
110.50(a)(8)	1	1	1	0.5	0.5	\$ 139.50
110.50(b)(3)	1	1	15	1	15	\$ 4,185
110.50(b)(3)(ii)	5	1	5	1	5	\$ 1,395
110.50(b)(3)(iii)	9	1	9	1	9	\$ 2,511
110.50(c) - no form	39	5	195	0.3	59	\$ 16,461
110.50(c) - Custom form	15	88	1320	0.2	264	\$ 73,656
110.50(c) - with NRC forms ¹	12	100	1200	0.2	240	\$ 66,960
110.50(c) - add'l follow-up	10	2	20	5	100	\$ 27,900
110.51	covered under NRC Form 7, "Application for NRC Export/Import License, Amendment, Renewal or Consent Request", OMB 3150-0027					
110.52(b)	1	1	1	0.5	0.5	\$ 139.50
110.54(a)	Covered under Forms AP-M, "Exports of specified equipment and non-nuclear material" and AP-13, "Exports of specified equipment and non-nuclear material", US Dept of Commerce, OMB 0694-0135					
110.54(b)	28	1	28	2	56	\$ 15,624
110.54(c)	29	1	29	2	58	\$ 16,182
TOTAL	150		2,823		807	\$225,153

¹ 110.50(c) requires licensees exporting radioactive material listed in Appendix P to notify both the NRC and the government of the importing country in advance of each shipment. The licensee fulfills this responsibility by emailing the NRC and copying the importing country on the message. Because this is a single notification sent to two entities, no additional third party burden has been included in this collection. All burden for these notifications is captured as reporting burden under 110.50(c).

TABLE 2
ANNUAL RECORDKEEPING BURDEN

Section	Number of Recordkeepers	Hours per Recordkeeper	Burden Hours	Cost at \$279/hr
110.53(b)(1)&(2)	150	1	150	\$ 41,850

TABLE 3
ANNUAL LICENSEE BURDEN TOTALS

	Responses	Hours	Cost at \$279/hr
Reporting	2,823	807	\$ 225,153
Recordkeeping	150	150	\$ 41,850
TOTAL	2,973	957	\$ 267,003

TABLE 4
COSTS TO THE FEDERAL GOVERNMENT

Section	Number of Respondents	Responses per Respondent	Responses	Time Per Response	Hours	Cost at \$279/hr
110.7a(a)&(b)	0	0	0	0.25	0	\$ -
110.50(a)(8)	1	1	1	0.5	0.5	\$ 139.5
110.50(b)(3)(i)	1	1	1	1	1	\$ 279
110.50(b)(3)(ii)	5	1	5	1	5	\$ 1,395
110.50(b)(3)(iii)	9	1	9	1	9	\$ 2,511
110.50(c)- no form	39	5	195	0.025	5	\$ 1,395
110.50(c)- Custom form	15	88	1,320	0.02	26.4	\$7,365.6
110.50(c)- with NRC forms	12	100	1,200	0.02	24	\$ 6,696
110.50(c)- add'l follow-up	10	10	100	0.2	20	\$ 5,580
110.52(b)	1	1	1	1	1	\$ 279
110.54(b)	28	1	28	0.2	6	\$ 1,674
110.54(c)	29	1	29	0.1	3	\$ 837
TOTAL	150		2,889		100.9	\$28,151.1