

## NUCLEAR REGULATORY COMMISSION

Documents Containing Reporting or Record Keeping  
Requirements; Office of Management and Budget Review

AB 35-1  
March 29, 1985

AGENCY: Nuclear Regulatory Commission.

ACTION: Notice of the Office of Management and Budget review of  
information collection.

SUMMARY: The Nuclear Regulatory Commission has recently submitted to the  
Office of Management and Budget (OMB) for review the following proposal  
for the collection of information under the provisions of the Paperwork  
Reduction Act (44 U.S.C. Chapter 35).

1. Type of submission, new, revision or extension: New
2. The title of the information collection: Licenses and Radiation  
Safety Requirements for Well-Logging Operations, 10 CFR Part 39
3. The form number if applicable: Not applicable.
4. How often the collection is required: On occasion.
5. Who will be required or asked to report: NRC licensees in oil and gas  
industry.
6. An estimate of the number of responses: 10 per year.
7. An estimate of the total number of hours needed annually to complete  
the requirement or request: 14,539 hours per year.
8. An indication of whether Section 3504(h), Pub. L. 96-511 applies:  
Not applicable.
9. Abstract: The Nuclear Regulatory Commission is proposing a new 10 CFR  
Part 39 that would provide a single source of application, recordkeeping,  
reporting, and radiation safety requirements for the use of licensed  
radioactive material in well-logging operations by the oil and gas  
industry.

Summary Sheet - 10 CFR Part 39: Licenses and  
Radiation Safety Requirements  
for Well-Logging Operations

NRC is requesting OMB review and approval of information collections contained in a proposed new 10 CFR Part 39. Ten (10) reports are anticipated annually from a universe of 180 respondents with an estimated total annual burden of 14,539 hours.

The new 10 CFR Part 39 would provide a single source of application, recordkeeping, reporting, and radiation safety requirements for the use of licensed radioactive material in well-logging operations by the oil and gas industry.

AB 35-1  
March 29, 1985

SUPPORTING STATEMENT FOR

10 CFR PART 39

LICENSES AND RADIATION SAFETY REQUIREMENTS FOR WELL-LOGGING OPERATIONS

GENERAL DISCUSSIONS

The Nuclear Regulatory Commission is proposing a regulation that would specify radiation safety requirements for the use of licensed material in well-logging operations. The proposed regulation would provide: (1) comprehensive and consistent regulations applicable to well-logging operations by consolidating essential radiation safety requirements in a new Part 39, (2) uniform safety requirements in NRC and Agreement States regulations, and (3) safety requirements designed to reduce the likelihood of accidents involving the rupture of radioactive sources in well-logging operations.

ORGANIZATION OF THE SUPPORTING STATEMENT

The supporting statement is divided into the following two parts:

Part 1--Summary Statement

A summary statement is included to summarize the burdens of the recordkeeping and reporting requirements. In addition, brief descriptions of the requirements and their section numbers are also included.

Part 2--Detailed Statement

A detailed supporting statement on each recordkeeping and reporting requirement is included. Section numbers are marked on the right upper corner of each

page. Included in the detailed statement are: the description of the requirement, the justification, the records retention period, the reporting schedule, the number of respondents, the burden to respondents, and the burden to the Federal government.



SUMMARY STATEMENT FOR 10 CFR PART 39

RECORDKEEPING REQUIREMENTS

<u>Section</u>	<u>Subject</u>	<u>Record Retention Period</u>	<u>Burden to Respondents (hrs/yr)</u>	<u>Burden to Federal Government (\$/yr)</u>
39.13	Internal inspection records	3 years	360	900
39.15	1. Agreements with well owner	3 years	190	900
	2. Identification plaque for irretrievable sources	fixed at well site - life		
39.31	Labels on devices and containers	fixed on devices or containers - life	120	900
39.33	Survey instrument calibration records	3 years	150	900
39.35	Sealed source leak test records	3 years	300	900
39.37	Physical inventory records	3 years	300	900
39.39	Radioactive source utilization records	3 years	4,500	900
39.41	Sealed source performance certification	3 years	30	900
39.43	Inspection and maintenance records	3 years	1,080	900
39.49	Labels on uranium sinker bars	fixed on bars - life	3	100
39.61	Training records	3 years following termination of employment	540	2,700

SUMMARY STATEMENT FOR 10 CFR PART 39 (CONTINUED)

RECORDKEEPING REQUIREMENTS

<u>Section</u>	<u>Subject</u>	<u>Record Retention Period</u>	<u>Burden to Respondents (hrs/yr)</u>	<u>Burden to Federal Government (\$/yr)</u>
39.65	Personnel monitoring records	until Commission terminates the license	1,440	1,800
39.67	Radiation survey records	3 years	5,000	1,800
39.73	Documents to be kept at field stations	until the termination of well-logging at the station	540	2,700
39.75	Documents to be kept at temporary jobsites	until the job is completed	450	3,000
SUBTOTAL BURDEN (RECORDKEEPING)			14,503	20,200

SUMMARY STATEMENT FOR 10 CFR PART 39  
REPORTING REQUIREMENTS

<u>Section</u>	<u>Subject</u>	<u>Report Frequency</u>	<u>Burden to Respondents (hrs/yr)</u>	<u>Burden to Federal Government (\$/yr)</u>
39.11	Filing application on Form NRC 313	at the time of applica- tion for a well-logging license	covered under 3150-0120	covered under 3150-0120
39.35	Reporting source leaking radioactive material	within 5 days after leak test	10	1,200
39.77	Reporting of incidents and lost sources	immediate telephone report and follow-up written report	26	1,700
TOTAL BURDEN (REPORTING)			36	2,900
GRAND TOTAL BURDEN (RECORDKEEPING AND REPORTING)			14,539	23,100

SUPPORTING STATEMENT FOR  
10 CFR 39.11 AND 39.13  
APPLICATION FOR A SPECIFIC LICENSE FOR WELL-LOGGING OPERATIONS

REQUIREMENTS

Section 39.11 would require an applicant for a specific license to use licensed material in well-logging operations to submit Form NRC 313, "Application for Material License." NRC 313 has been cleared by OMB separately under 3150-0120.

Section 39.13 would require an applicant to submit the following information, which also has been cleared by OMB under 3150-0120:

Paragraph 39.13(b)--Schedule and description of training programs;

39.13(c)--Radiation safety program;

39.13(d)--Internal inspection program;

39.13(e)--Overall organizational structure;

39.13(f)--(1) Description of procedures for leak testing sealed  
sources, or

(2) Manufacturer and model number of a leak test  
kit.

Paragraph (d) would require a licensee to keep internal inspection records for 3 years.

1. Justification

a. Need for the Information Collection

Reporting: In order to assess the ability of an applicant to protect public health and safety from radiation hazard, it is necessary that an applicant provide pertinent information, including training, radiation safety programs, and leak test procedures, to NRC for determining whether a specific license should be issued. If the information is not provided, the NRC would not be able to determine if a person who wishes to possess and use byproduct and source material is qualified by training and experience and has the equipment, facilities, and procedures which are adequate to protect health and minimize danger to life or property.

Recordkeeping: The information would document that the licensee conducted annual internal inspections. The internal inspection is needed to ensure that the safety requirements are followed by the licensees logging supervisors and logging assistants. The information would also permit NRC inspectors to verify that the licensee conducted annual internal inspections.

b. Practical Utility of the Information Collection

The information will permit the NRC license reviewers to assess the applicant's ability to protect health and minimize danger to life or property. The information will also permit NRC inspectors to verify, after the license is issued, the compliance of the licensee in imple-



menting the programs. A license should be issued within 30 days of receipt of the application if there are no deficiencies in the application.

c. Duplication with Other Collections for Information

None.

d. Consultations Outside the NRC

The draft proposed rule and the draft regulatory analysis were sent to the following groups for review and comment:

Agreement States;

Conference of Radiation Control Program Directors--Task  
Force on Well-Logging.

No comments on information collection were received.

e. Other Supporting Information

None.

2. Description of the Information Collection

a. Number and Type of Respondents

Reporting: This information collection requirement applies only to applicants who plan to perform well-logging operations. Based on past experience, it is estimated to be about 10 applicants per year.



Recordkeeping: The records will be retained by 180 well-logging licensees.

b. Reasonableness of the Schedule for Collecting Information

Reporting: The information must be submitted to NRC at the time of application for a new specific license such that the NRC license reviewers would have sufficient information to determine whether a license should be issued. An application for a byproduct or source material license is usually reviewed by the NRC's Materials Licensing Branch within 30 days of receipt of the application. If there are no deficiencies in the application, a license is issued. If there are deficiencies, their resolution is by correspondence with the applicant. The average time for issuance of a license if there are deficiencies is approximately 60-90 days depending on how quickly the applicant provides the information needed to resolve the deficiencies.

Recordkeeping: Records would be kept for 3 years because the NRC inspection period is every 3 years for well-logging licensees.

c. Method of Collecting the Information

The applicant is the only source of the information. There is no alternative method for collecting the information. The information

is collected by requiring an applicant to submit Form NRC 313 with attached supplementary documentation and to keep internal inspection records.

d. Record Retention Period

Record retention period would be 3 years after the internal inspection.

e. Reporting Period

At the time the license application is submitted for a new specific license.

f. Copies Required to be Submitted

The applicant would be required to send two (2) copies of NRC 313 to the NRC regional office. The regional office would distribute one copy to NRC headquarters.

g. Format of Information to be Maintained or Submitted

Use Form NRC 313 with attached supplemental documentation for the application.

3. Estimate of Burden

a. Estimated Hours Required to Respond to the Collection

Reporting: The burden on the reporting requirement is covered under 3150-0120.

Recordkeeping: It is estimated that, on the average, a licensee would need 2 hours per year to keep annual inspection records. The total burden would be:

$$180 \text{ licensees} \times 2 \text{ hrs/yr} = 360 \text{ hrs/yr.}$$

b. Estimated Cost Required to Respond to the Collection

Estimated cost-- $360 \text{ hrs/yr} \times \$60/\text{hr} = \$21,600/\text{yr.}$

c. Source of Burden Data and Method for Estimating the Burden

The burden data and estimates are based on the experience of NRC staff.

d. Reasonableness of Burden Estimates

The burden data and estimates are based on the experience of NRC staff.

4. Estimate of the Cost to the Federal Government

Reporting: Federal government cost is covered under 3150-0120.

Recordkeeping: The time for NRC inspectors to inspect selected internal inspection records is estimated to be about 15 minutes per licensee. Assuming the NRC inspects one-third of well-logging licensees per year, the estimated cost would be:

$$180 \text{ licensees} \times .33/\text{yr} \times .25 \text{ hr/licensee} \times \$60/\text{hr} = \$900/\text{yr.}$$

SUPPORTING STATEMENT FOR  
10 CFR 39.15  
AGREEMENT WITH WELL OWNER OR OPERATOR

REQUIREMENTS

Paragraph (a) of this section would require that a licensee retain a copy of the written agreement for 3 years after the completion of the well-logging operation.

Paragraph (b) of this section specifies the content of the written agreement.

Subparagraph (b)(4)(iii) would require a permanent identification plaque.

1. Justification

a. Need for the Information Collection

The agreement is needed to identify the responsibility of each party for the recovery of a sealed source lost in a well and for any necessary decontamination. The records are needed to verify that the written agreement exists and is valid. The identification plaque is needed to provide a visual warning that a sealed source was abandoned in the well.

b. Practical Utility of the Information Collection

The information would document that the written agreement was executed. The information would also permit NRC inspectors to verify that the licensee has a copy of the written agreement. Inspections are conducted at least every 3 years.

c. Duplication with Other Collections for Information

None.

d. Consultations Outside the NRC

The draft proposed rule and the draft regulatory analysis were sent to the following groups for review and comment:

Agreement States;

Conference of Radiation Control Program Directors--Task

Force on Well-Logging.

No comments on information collection were received.

e. Other Supporting Information

None.

2. Description of the Information Collection

a. Number and Type of Respondents

The agreements will be retained by 180 well-logging licensees.

The respondents for identification plaques will be about five per year because, based on past experience, there are about five irretrievable well-logging sources per year for NRC licensees.



b. Reasonableness of the Schedule for Collecting Information

A copy of the written agreement would be kept by the licensee before starting well-logging operations to assure that the responsibilities of the licensee and the well owner or operator are documented. The agreement would be kept for 3 years because the NRC inspection period is every 3 years for well-logging licensees.

c. Method of Collecting the Information

The licensee is the only source of information. A single copy of the written agreement would be kept at the licensee's address as stated on Form NRC 313.

d. Record Retention Period

Record retention period for the written agreements is 3 years after the completion of the well-logging operation.

The identification plaque would be fixed at the well site for life.

e. Reporting Period

None.

f. Copies Required to be Submitted

None.



g. Format of Information to be Maintained or Submitted

The format of information to be maintained is a written agreement executed by the licensee and the well owner or operator.

3. Estimate of Burden

a. Estimated Hours Required to Respond to the Collection

It is estimated that each licensee would need 1 hour per year for copying and filing the agreement with various well owners or operators. The burden would be:

$$180 \text{ licensees} \times 1 \text{ hr/yr} = 180 \text{ hrs/yr.}$$

It is estimated that a licensee would need 2 hours to mark a plaque. Assuming five plaques per year, the burden would be:

$$5 \text{ plaques/yr} \times 2 \text{ hrs/plaque} = 10 \text{ hrs/yr.}$$

$$\text{Total burden: } 180 \text{ hrs/yr} + 10 \text{ hrs/yr} = 190 \text{ hrs/yr.}$$

b. Estimated Cost Required to Respond to the Collection

$$\text{Estimated cost--} 190 \text{ hrs/yr} \times \$60/\text{hr} = \$11,400/\text{yr.}$$

c. Source of Burden Data and Method for Estimating the Burden

The burden data and estimates are based on the experience of NRC staff.

d. Reasonableness of Burden Estimates

The burden data and estimates are based on the experience of NRC staff.

4. Estimate of the Cost to the Federal Government

The time for NRC inspectors to inspect selected written agreements is estimated to be about 15 minutes per licensee. Assuming the NRC inspects one-third of well-logging licensees per year, the estimated cost is:

$$180 \text{ licensees} \times .33/\text{yr} \times .25 \text{ hr/licensee} \times \$60/\text{hr} = \$900/\text{yr}.$$

SUPPORTING STATEMENT FOR  
10 CFR 39.31  
LABELS ON DEVICES OR CONTAINERS

REQUIREMENTS

Paragraph (a) of this section would require a licensee to label (1) source, source holder, or logging tool containing radioactive materials; and (2) storage or transport container.

1. Justification

a. Need for the Information Collection

The labels are needed to warn people that these devices or containers contain radioactive materials.

b. Practical Utility of the Information Collection

The labels would warn people that these devices or containers contain radioactive materials and that persons should notify civil authorities or the company if they find a labeled device or container.

c. Duplication with Other Collections for Information

None.

d. Consultations Outside the NRC

The draft proposed rule and the draft regulatory analysis were sent to the following groups for review and comment:

Agreement States;

Conference of Radiation Control Program Directors--Task  
Force on Well-Logging.

No comments on information collection were received.

e. Other Supporting Information

None.

2. Description of the Information Collection

a. Number and Type of Respondents

The respondents will be 180 well-logging licensees.

b. Reasonableness of the Schedule for Collecting Information

The labels would be fixed for the life of the device or the container for warning people that these devices or containers contain radioactive materials.

c. Method of Collecting the Information

The labels would be fixed to (1) sealed sources, source holders, or logging tools, and (2) storage or transport containers.

d. Record Retention Period

For the life of these devices or containers.

e. Reporting Period

None.

f. Copies Required to be Submitted

None.

g. Format of Information to be Maintained or Submitted

The content of the labels is specified in the proposed rule.

3. Estimate of Burden

a. Estimated Hours Required to Respond to the Collection

It is assumed that a licensee needs 3 minutes to attach a label to a device or a container (annualized over 3-year clearance). Assuming there are, on the average, 20 devices and 20 containers per licensee, the burden would be:

$$\begin{aligned} &180 \text{ licensees} \times 40 \text{ items/licensee} \times 1/3 \text{ yrs} \times \\ &0.05 \text{ hr/item} = 120 \text{ hrs/yr.} \end{aligned}$$

b. Estimated Cost Required to Respond to the Collection

Estimated cost--70 hrs/yr x \$60/hr = \$4,200/yr.

c. Source of Burden Data and Method for Estimating the Burden

The burden data and estimates are based on the experience of NRC staff.

d. Reasonableness of Burden Estimates

The burden data and estimates are based on the experience of NRC staff.

4. Estimate of the Cost to the Federal Government

The time for NRC inspectors to inspect selected labels is estimated to be about 15 minutes. Assuming the NRC inspects one-third of the well-logging licensees per year, the estimated cost is:

$$180 \text{ licensees} \times .33/\text{yr} \times .25 \text{ hr/licensee} \times \$60/\text{hr} = \$900/\text{yr}.$$



SUPPORTING STATEMENT FOR  
10 CFR 39.33(d)  
RADIATION SURVEY INSTRUMENTS--RECORDKEEPING

REQUIREMENTS

Section 39.33(d) would require the licensee to maintain calibration records for a period of 3 years after the date of calibration of a radiation survey instrument at each field station and temporary job site.

1. Justification

a. Need for the Information Collection

This information collection is needed to verify that a licensee conducts calibration of radiation survey instruments every 6 months. Calibration of radiation survey instruments is necessary to ensure that these instruments function properly.

b. Practical Utility of the Information Collection

The information would document that the calibrations were performed. The information would also permit NRC inspectors to verify that the licensee is keeping a calibrated and operable radiation survey instrument at each field station and temporary jobsite to make required radiation surveys. Inspections are conducted at least every 3 years.

c. Duplication with Other Collections for Information

None.

d. Consultations Outside the NRC

The draft proposed rule and the draft regulatory analysis were sent to the following groups for review and comment:

Agreement States;

Conference of Radiation Control Program Directors--Task  
Force on Well-Logging.

No comments on information collection were received.

e. Other Supporting Information

None.

2. Description of the Information Collection

a. Number and Type of Respondents

The records will be retained by 180 well-logging licensees.

b. Reasonableness of the Schedule for Collecting Information

Records would be kept for 3 years after the calibration. A 3-year period would be required because the inspection period is every 3 years for well-logging licensees.

c. Method of Collecting the Information

The licensee is the only source of information. Copies of the record would be kept at the field station where the radiation survey instrument is kept.

d. Record Retention Period

Record retention period would be 3 years after the date of calibration.

e. Reporting Period

None.

f. Copies Required to be Submitted

None.

g. Format of Information to be Maintained or Submitted

None specified.

3. Estimate of Burden

a. Estimated Hours Required to Respond to the Collection

It is estimated that a licensee needs 5 minutes to complete each calibration record. Assuming, on the average, five survey instruments per licensee, total burden would be:

$$180 \text{ licensees} \times 5 \text{ instr./licensee} \times 2 \text{ records/instr.-yr} \times \\ .08 \text{ hr/record} = 150 \text{ hrs/yr.}$$

b. Estimated Cost Required to Respond to the Collection

Estimated cost--150 hrs/yr x \$60/hr = \$9,000/yr.

c. Source of Burden Data and Method for Estimating the Burden

The burden data and estimates are based on the experience of NRC staff.

d. Reasonableness of Burden Estimates

The burden data and estimates are based on the experience of NRC staff.

4. Estimate of the Cost to the Federal Government

The time for NRC inspectors to inspect the calibration record is estimated to be about 15 minutes per licensee. Assuming the NRC inspects one-third of well-logging licensees per year, the estimated cost is:

$$180 \text{ licensees} \times .33/\text{yr} \times .25 \text{ hr/licensee} \times \$60/\text{hr} = \$900/\text{yr}.$$

SUPPORTING STATEMENT FOR  
10 CFR 39.35  
LEAK TESTING OF SEALED SOURCES

REQUIREMENTS

Paragraph (a) of Section 39.35 would require a licensee to keep records of the leak test results for sealed sources containing licensed material.

Paragraph (d)(2) of Section 39.35 would require a licensee to file a report to NRC if the test showed that a source is leaking licensed material.

1. Justification

a. Need for the Information Collection

The recordkeeping requirement is needed to indicate the results of leak testing of sealed sources. The leak testing is needed to ensure the sealed source maintain their integrity. The reporting requirement is needed to inform the NRC that the licensee has taken actions to remove the leaking source from service and to check for radioactive contamination.

b. Practical Utility of the Information Collection

The information contained in the record would document that the leak tests were performed. The information would also permit NRC inspectors to verify that licensees have the source tested for leakage at least every 6 months and record the leak test results in units of microcuries. Inspections are conducted at least every 3 years.



The information contained in the report would allow NRC regional offices to determine, within approximately one week, whether an inspector should be sent to check potential problems that may affect public health and safety.

c. Duplication with Other Collections for Information

None.

d. Consultations Outside the NRC

The draft proposed rule and the draft regulatory analysis were sent to the following groups for review and comment:

Agreement States;

Conference of Radiation Control Program Directors--Task  
Force on Well-Logging.

No comments on information collection were received.

e. Other Supporting Information

None.

2. Description of the Information Collection

a. Number and Type of Respondents

The records will be retained by 180 well-logging licensees.



The number of respondents for reporting requirements will be about 20 per year (assuming 20 leaky sources per year).

b. Reasonableness of the Schedule for Collecting Information

Recordkeeping: The period of 3 years for recordkeeping is specified because the inspection period for well-logging licensees is every 3 years.

Reporting: The report must be filed within 5 days to permit the NRC regional office to receive the report, review the situation and, if necessary, would allow NRC to take action in a relatively quick manner.

c. Method of Collecting the Information

The licensee is the only source of information. The licensee would submit a written report.

d. Record Retention Period

Record retention period is 3 years after the required leak test is performed.

e. Reporting Period

Reporting would be required only if the test reveals the presence of 0.005 microcurie or more of removable radioactive material.

f. Copies Required to be Submitted

One copy.

g. Format of Information to be Maintained or Submitted

None specified.

3. Estimate of Burden

a. Estimated Hours Required to Respond to the Collection

Recordkeeping: Assuming a licensee would take 5 minutes to complete a record and have ten sources per licensee, the estimated burden would be:

$$\begin{aligned} &180 \text{ licensees} \times 10 \text{ sources/licensee} \times 2 \text{ records/year} \times \\ &0.08 \text{ hr/record} = 300 \text{ hrs/yr.} \end{aligned}$$

Reporting: Assuming 20 leaky sources per year and 30 minutes to complete a report, the estimated burden would be:

$$20 \text{ leaky sources/yr} \times .5 \text{ hr/leaky source} = 10 \text{ hrs/yr.}$$

$$\text{Total burden: } 300 \text{ yrs/yr} + 10 \text{ hrs/yr} = 310 \text{ hrs/yr.}$$

b. Estimated Cost Required to Respond to the Collection

$$\text{Estimated cost--} 310 \text{ hrs/yr} \times \$60/\text{hr} = \$18,600/\text{yr.}$$

c. Source of Burden Data and Method for Estimating the Burden

The burden data and estimates are based on the experience of NRC staff.

d. Reasonableness of Burden Estimates

The burden data and estimates are based on the experience of NRC staff.

4. Estimate of the Cost to the Federal Government

Recordkeeping: The time for NRC inspectors to inspect selected leak test records is estimated to be about 15 minutes. Assuming the NRC inspects one-third of well-logging licensees per year, the estimated cost is:

$$180 \text{ licensees} \times .33/\text{yr} \times .25 \text{ hr/licensee} \times \$60/\text{hr} = \$900/\text{yr}.$$

Reporting: The time for receiving, reviewing and filing a report is estimated to be one hour. The estimated cost is:

$$20 \text{ reports/yr} \times 1 \text{ hr/report} \times \$60/\text{hr} = \$1,200/\text{yr}.$$

$$\text{Total Cost: } \$900/\text{yr} + \$1,200/\text{yr} = \$2,100/\text{yr}.$$

SUPPORTING STATEMENT FOR  
10 CFR 39.37  
PHYSICAL INVENTORY

REQUIREMENTS

Section 39.37 would require a licensee to keep records of each semiannual physical inventory to account for all licensed material received and possessed under the license.

1. Justification

a. Need for the Information Collection

This information is needed to indicate that the licensee has conducted semiannual physical inventories to account for licensed material received and possessed under the license.

b. Practical Utility of the Information Collection

This information would document that sources possessed under the license were accounted for at the time of inventory. The information would also permit NRC inspectors to verify that the licensee has conducted an inventory at least every 6 months. Inspections are conducted at least every 3 years.

c. Duplication with Other Collections for Information

None.

d. Consultations Outside the NRC

The draft proposed rule and the draft regulatory analysis were sent to the following groups for review and comment:

Agreement States;

Conference of Radiation Control Program Directors--Task  
Force on Well-Logging.

No comments on information collection were received.

e. Other Supporting Information

None.

2. Description of the Information Collection

a. Number and Type of Respondents

The records will be retained by 180 well-logging licensees.

b. Reasonableness of the Schedule for Collecting Information

The period of 3 years for recordkeeping is specified because the inspection period for well-logging licensees is every 3 years.

c. Method of Collecting the Information

The licensee is the only source of information. Records would be kept at the field station where the source is kept.



d. Record Retention Period

Record retention period would be 3 years from the date of the inventory.

e. Reporting Period

None.

f. Copies Required to be Submitted

None.

g. Format of Information to be Maintained or Submitted

None specified.

3. Estimate of Burden

a. Estimated Hours Required to Respond to the Collection

Assuming a licensee would take 5 minutes to complete a record and assuming ten sources per licensee, the burden would be:

$$180 \text{ licensees} \times 10 \text{ sources/licensee} \times 2 \text{ records/yr} \times$$

$$0.08 \text{ hr/record} = 300 \text{ hrs/yr.}$$

b. Estimated Cost Required to Respond to the Collection

Estimated cost--300 hrs/yr x \$60/hr = \$18,000/yr.

c. Source of Burden Data and Method for Estimating the Burden

The burden data and estimates are based on the experience of NRC staff.

d. Reasonableness of Burden Estimates

The burden data and estimates are based on the experience of NRC staff.

4. Estimate of the Cost to the Federal Government

The time for NRC inspectors to inspect the inventory record is estimated to be about 15 minutes. Assuming the NRC inspects one-third of well-logging licensees per year, the estimated cost is:

$$180 \text{ licensees} \times .33/\text{yr} \times .25 \text{ hr/licensee} \times \$60/\text{hr} = \$900/\text{yr}.$$

SUPPORTING STATEMENT FOR  
10 CFR 39.39  
UTILIZATION RECORD

REQUIREMENTS

Section 39.39 would require a licensee to keep utilization records for sources of licensed material.

1. Justification

a. Need for the Information Collection

This information is needed to indicate that the licensee recorded the required information on the use of licensed materials. The utilization record is needed for tracing the record of using each source location.

b. Practical Utility of the Information Collection

This information would permit the licensee to trace the history of the use of sources, radioactive markers, or unsealed licensed material if there are any questions concerning licensed material.

This information would also permit NRC inspectors to verify that the licensee is utilizing licensed material appropriate to particular well-logging operations. Inspections are conducted at least every 3 years.

c. Duplication with Other Collections for Information

None.

d. Consultations Outside the NRC

The draft proposed rule and the draft regulatory analysis were sent to the following groups for review and comment:

Agreement States;

Conference of Radiation Control Program Directors--Task

Force on Well-Logging.

No comments on information collection were received.

e. Other Supporting Information

None.

2. Description of the Information Collection

a. Number and Type of Respondents

The records will be retained by 180 well-logging licensees.

b. Reasonableness of the Schedule for Collecting Information

The period of 3 years for recordkeeping is specified because the inspection period for well-logging licensees is every 3 years.

c. Method of Collecting the Information

The licensee is the only source of information. The record would be kept at the field station where the licensed material is kept.

d. Record Retention Period

Record retention period would be 3 years from the date of the recorded event.

e. Reporting Period

None.

f. Copies Required to be Submitted

None.

g. Format of Information to be Maintained or Submitted

None specified.

3. Estimate of Burden

a. Estimated Hours Required to Respond to the Collection

Assuming, on the average, a licensee records 5 sources per day for 150 days per year, and assuming it would take 2 minutes/source to record, the burden would be:

$$\begin{aligned} &180 \text{ licensees} \times 5 \text{ sources/licensee-day} \times 150 \text{ days/yr} \times \\ &\quad .033 \text{ hr/source} = 4,500 \text{ hrs/yr.} \end{aligned}$$



b. Estimated Cost Required to Respond to the Collection

Estimated cost--4,500 hrs/yr x \$60/hr = \$270,000/yr.

c. Source of Burden Data and Method for Estimating the Burden

The burden data and estimates are based on the experience of NRC staff.

d. Reasonableness of Burden Estimates

The burden data and estimates are based on the experience of NRC staff.

4. Estimate of the Cost to the Federal Government

The time for NRC inspectors to inspect the utilization record is estimated to be about 15 minutes. Assuming the NRC inspects one-third of well-logging licensees per year, the estimated cost is:

$180 \text{ licensees} \times .33/\text{yr} \times .25 \text{ hr/licensee} \times \$60/\text{hr} = \$900/\text{yr}.$

SUPPORTING STATEMENT FOR  
10 CFR 39.41  
DESIGN AND PERFORMANCE CRITERIA FOR SEALED SOURCES

REQUIREMENTS

Paragraph (c) of section 39.41 would require a licensee to keep the certification documents of sealed sources.

1. Justification

a. Need for the Information Collection

This information is needed to indicate that the sealed sources meet the criteria prescribed in section 39.41.

b. Practical Utility of the Information Collection

This information would document that sealed sources used by well-logging licensees are certified by manufacturer or qualified testing organizations. The information would also permit NRC inspectors to verify that the licensee uses certified sources. Inspections are conducted at least every 3 years.

c. Duplication with Other Collections for Information

None.

d. Consultations Outside the NRC

The draft proposed rule and the draft regulatory analysis were sent to the following groups for review and comment:

Agreement States;

Conference of Radiation Control Program Directors--Task  
Force on Well-Logging.

No comments on information collection were received.

e. Other Supporting Information

None.

2. Description of the Information Collection

a. Number and Type of Respondents

The records will be retained by 180 well-logging licensees.

b. Reasonableness of the Schedule for Collecting Information

The period of 3 years for recordkeeping is specified because the inspection period for well-logging licensees is every 3 years.

c. Method of Collecting the Information

The licensee is the only source of information. The records would be kept at the licensee's address as stated in the license.

d. Record Retention Period

Record retention period would be 3 years after transfer or disposal of the source or its abandonment in a well.

e. Reporting Period

None.

f. Copies Required to be Submitted

None.

g. Format of Information to be Maintained or Submitted

None specified.

3. Estimate of Burden

a. Estimated Hours Required to Respond to the Collection

Assuming each licensee has, on the average, two new sources per year and it would take 5 minutes to file the manufacturer's certificate, at the licensee's address, the burden would be:

$$180 \text{ licensees} \times 2 \text{ sources/licensee-yr} \times .083 \text{ hr/source} = \\ 30 \text{ hrs/yr.}$$

b. Estimated Cost Required to Respond to the Collection

Estimated cost--30 hrs/yr x \$60/hr = \$1,800/yr.

c. Source of Burden Data and Method for Estimating the Burden

The burden data and estimates are based on the experience of NRC staff.

d. Reasonableness of Burden Estimates

The burden data and estimates are based on the experience of NRC staff.

4. Estimate of the Cost to the Federal Government

The time for NRC inspectors to inspect selected certification documents is estimated to be about 15 minutes. Assuming the NRC inspects one-third of well-logging licensees per year, the estimated cost is:

$$180 \text{ licensees} \times .33/\text{yr} \times .25 \text{ hr/licensee} \times \$60/\text{hr} = \$900/\text{yr}.$$



SUPPORTING STATEMENT FOR  
10 CFR 39.43  
INSPECTION AND MAINTENANCE OF SEALED SOURCES OR HOLDERS

REQUIREMENTS

Paragraph (b) of section 39.43 would require a licensee to maintain records of semiannual inspection and maintenance for 3 years.

1. Justification

a. Need for the Information Collection

This information is needed to indicate that a licensee conducts the required inspection and maintenance of sealed sources and holders. The inspection and maintenance are needed to ensure that the sealed source and source holders are in good working condition.

b. Practical Utility of the Information Collection

This information would document that semiannual inspections and maintenance of equipment were performed. The information would also permit NRC inspectors to verify that the licensee conducted the required semiannual inspection and maintenance. Inspections are conducted at least every 3 years.

c. Duplication with Other Collections for Information

None.

d. Consultations Outside the NRC

The draft proposed rule and the draft regulatory analysis were sent to the following groups for review and comment:

Agreement States;

Conference of Radiation Control Program Directors--Task  
Force on Well-Logging.

No comments on information collection were received.

e. Other Supporting Information

None.

2. Description of the Information Collection

a. Number and Type of Respondents

The records will be retained by 180 well-logging licensees.

b. Reasonableness of the Schedule for Collecting Information

The period of 3 years for recordkeeping is specified because the inspection period for well-logging licensees is every 3 years.

c. Method of Collecting the Information

The licensee is the only source of information. The records would be kept at the field station where the equipment is kept.

d. Record Retention Period

Record retention period would be 3 years.

e. Reporting Period

None.

f. Copies Required to be Submitted

None.

g. Format of Information to be Maintained or Submitted

None specified.

3. Estimate of Burden

a. Estimated Hours Required to Respond to the Collection

It is estimated that each licensee would need 1 hour per inspection/maintenance to record the inspection or maintenance information for each field station. Assuming, on the average, three field stations per licensee, the total burden would be:

$$\begin{aligned} &180 \text{ licensees} \times 3 \text{ field stations/licensee} \times \\ &2 \text{ inspections/field station-yr} \times 1 \text{ hr/inspection} \\ &= 1080 \text{ hrs/yr.} \end{aligned}$$

b. Estimated Cost Required to Respond to the Collection

Estimated cost--1080 hrs/yr  $\times$  \$60/hr = \$64,800/yr.

c. Source of Burden Data and Method for Estimating the Burden

The burden data and estimates are based on the experience of NRC staff.

d. Reasonableness of Burden Estimates

The burden data and estimates are based on the experience of NRC staff.

4. Estimate of the Cost to the Federal Government

The time for NRC inspectors to inspect selected inspection and maintenance records is estimated to be about 15 minutes. Assuming the NRC inspect one-third of well-logging licensees per year, the estimated cost is:

$$180 \text{ licensees} \times .33/\text{yr} \times .25 \text{ hr/licensee} \times \$60/\text{hr} = \$900/\text{yr}.$$

SUPPORTING STATEMENT FOR  
10 CFR 39.49  
LABELS ON URANIUM SINKER BARS

REQUIREMENTS

Section 39.49 would require a licensee to label uranium sinker bars.

1. Justification

a. Need for the Information Collection

The labels are needed to warn people that the bar contains uranium.

b. Practical Utility of the Information Collection

The labels are needed to warn people that these uranium sinker bars contain radioactive materials and that persons should notify civil authorities or the company if they find a labeled uranium sinker bar.

c. Duplication with Other Collections for Information

None.

d. Consultations Outside the NRC

The draft proposed rule and the draft regulatory analysis were sent to the following groups for review and comment:

Agreement States;

Conference of Radiation Control Program Directors--Task

Force on Well-Logging.



No comments on information collection were received.

e. Other Supporting Information

None.

2. Description of the Information Collection

a. Number and Type of Respondents

The number of respondents would be 18 well-logging licensees (assume 10% of NRC licensees use uranium sinker bars).

b. Reasonableness of the Schedule for Collecting Information

The licensee would be required to ensure that, within one year after the effective date of the final rule, the sinker bars contain the warning words as specified in this Section.

c. Method of Collecting the Information

The words would be impressed on uranium sinker bars.

d. Record Retention Period

For the life of these bars.

e. Reporting Period

None.

f. Copies Required to be Submitted

None.

g. Format of Information to be Maintained or Submitted

The words are specified in the proposed rule.

3. Estimate of Burden

a. Estimated Hours Required to Respond to the Collection

It is estimated that a licensee needs 10 minutes to check the words on a sinker bar. Assuming 10% of licensees have sinker bars, the burden would be:

$$18 \text{ licensees} \times 0.17 \text{ hr/licensee} = 3 \text{ hrs/yr.}$$

b. Estimated Cost Required to Respond to the Collection

$$\text{Estimated cost} = 3 \text{ hrs/yr} \times \$60/\text{hr} = \$180/\text{yr.}$$

c. Source of Burden Data and Method for Estimating the Burden

The burden data and estimates are based on the experience of NRC staff.

d. Reasonableness of Burden Estimates

The burden data and estimates are based on the experience of NRC staff.

4. Estimate of the Cost to the Federal Government

The time for NRC inspectors to inspect selected labels on sinker bars is estimated to be about 5 minutes. Total burden is:

$$18 \text{ licensees/yr} \times 0.1 \text{ hr/licensee} \times \$60/\text{hr} = \$100/\text{yr.}$$

SUPPORTING STATEMENT FOR  
10 CFR 39.61  
TRAINING

REQUIREMENTS

Paragraph (d) of section 39.61 would require that a licensee maintain records of training for logging supervisors and logging assistants.

Subparagraphs (a)(2) and (b)(2) would require that certain documents be provided to trainees.

1. Justification

a. Need for the Information Collection

The recordkeeping is needed to indicate that the logging supervisors and logging assistants received training.

The documents to be provided to trainees are needed to ensure proper training.

b. Practical Utility of the Information Collection

This information would document the training received by logging supervisors and logging assistants. The information would also permit NRC inspectors to verify that the licensee has trained logging supervisors and logging assistants. Inspections are conducted at least every 3 years.

c. Duplication with Other Collections for Information

None.

d. Consultations Outside the NRC

The draft proposed rule and the draft regulatory analysis were sent to the following groups for review and comment:

Agreement States;

Conference of Radiation Control Program Directors--Task  
Force on Well-Logging.

No comments on information collection were received.

e. Other Supporting Information

None.

2. Description of the Information Collection

a. Number and Type of Respondents

The records will be retained by 180 well-logging licensees.

b. Reasonableness of the Schedule for Collecting Information

The period of 3 years for recordkeeping is specified because the inspection period for well-logging licensees is every 3 years.

c. Method of Collecting the Information

The licensee is the only source of information. The records would be kept at the field station from which the logging supervisor and logging assistants were dispatched.

d. Record Retention Period

Training records for an employee would be retained until 3 years following the termination of the employment.

e. Reporting Period

The documents would be provided to the trainee at the time of training.

f. Copies Required to be Submitted

One copy per trainee.

g. Format of Information to be Maintained or Submitted

None specified.

3. Estimate of Burden

a. Estimated Hours Required to Respond to the Collection

It is estimated that a licensee needs 1 hour per year per field station to complete training records and to provide documents to trainees. The total burden would be:

180 licensees x 3 field stations/licensee x  
1 hr/licensee-yr = 540 hrs/yr.

b. Estimated Cost Required to Respond to the Collection

Estimated cost--540 hrs/yr x \$60/hr = \$32,400/yr.

c. Source of Burden Data and Method for Estimating the Burden

The burden data and estimates are based on the experience of NRC staff.

d. Reasonableness of Burden Estimates

The burden data and estimates are based on the experience of NRC staff.

4. Estimate of the Cost to the Federal Government

The time for NRC inspectors to inspect selected training records is estimated to be about 15 minutes. Assuming the NRC inspects one-third of field stations per year, the estimated cost is:

180 licensees x 3 field stations/licensee x .33/yr x  
.25 hr/field station x \$60/hr = \$2,700/yr.



SUPPORTING STATEMENT FOR  
10 CFR 39.65  
PERSONNEL MONITORING

REQUIREMENTS

Paragraph (c) of section 39.65 would require that a licensee keep reports received from the badge or TLD processor and from the bioassay service lab.

1. Justification

a. Need for the Information Collection

This information collection is needed to verify that the licensee has subscribed to dosimetry and bioassay services. The badge, TLD and bioassay are needed to measure radiation exposure received by workers during well-logging operations.

b. Practical Utility of the Information Collection

This information would document the radiation doses received by the licensee's employees. This information would also permit NRC inspectors to verify that the licensees kept dosimetry and bioassay records. Inspections are conducted at least every 3 years.

c. Duplication with Other Collections for Information

None.

d. Consultations Outside the NRC

The draft proposed rule and the draft regulatory analysis were sent to the following groups for review and comment:

Agreement States;

Conference of Radiation Control Program Directors--Task  
Force on Well-Logging.

No comments on information collection were received.

e. Other Supporting Information

None.

2. Description of the Information Collection

a. Number and Type of Respondents

The records will be retained by 180 well-logging licensees.

b. Reasonableness of the Schedule for Collecting Information

The personnel monitoring records would be kept until the Commission terminates the licensee because the records are needed to verify the cumulative exposures received by the employees.

c. Method of Collecting the Information

The records would be kept at the licensee's address stated on the license.

d. Record Retention Period

These records would be maintained until the Commission terminates the license.

e. Reporting Period

None.

f. Copies Required to be Submitted

None.

g. Format of Information to be Maintained or Submitted

None specified.

3. Estimate of Burden

a. Estimated Hours Required to Respond to the Collection

It is estimated that each licensee would need 1 hour to file the exposure record each month for badges, or 1 hour each quarter to file TLD records. Assuming one-half of the licensees use film badges and the other half use TLD, the total burden would be:

$$\begin{aligned} & (90 \text{ licensees} \times 12 \text{ months/yr} + 90 \text{ licensees} \times 4 \text{ quarters/yr}) \\ & \times 1 \text{ hr/record} = 1440 \text{ hrs/yr.} \end{aligned}$$

b. Estimated Cost Required to Respond to the Collection

Estimated cost--1440 hrs/yr x \$60/hr = \$86,400/yr.

c. Source of Burden Data and Method for Estimating the Burden

The burden data and estimates are based on the experience of NRC staff.

d. Reasonableness of Burden Estimates

The burden data and estimates are based on the experience of NRC staff.

4. Estimate of the Cost to the Federal Government

The time for NRC inspectors to inspect selected exposure records is estimated to be about 30 minutes. Assuming the NRC inspects one-third of well-logging licensees per year, the estimated cost is:

$$180 \text{ licensees} \times .33/\text{yr} \times .5 \text{ hr/licensee} \times \$60/\text{hr} = \$1,800/\text{yr}.$$

SUPPORTING STATEMENT FOR  
10 CFR 39.67  
RADIATION SURVEYS

REQUIREMENTS

Paragraph (f) of section 39.67 would require a licensee to maintain radiation survey records.

1. Justification

a. Need for the Information Collection

This information collection is needed to indicate that a licensee conducts radiation surveys. Radiation Survey is needed to warn the workers of the level of radiation exposure at that location.

b. Practical Utility of the Information Collection

The information would document that the licensee conducted radiation surveys. The information would also permit NRC inspectors to verify that the licensee complies with the survey requirements. Inspections are conducted at least every 3 years.

c. Duplication with Other Collections for Information

None.

d. Consultations Outside the NRC

The draft proposed rule and the draft regulatory analysis were sent to the following groups for review and comment:

Agreement States;

Conference of Radiation Control Program Directors--Task  
Force on Well-Logging.

No comments on information collection were received.

e. Other Supporting Information

None.

2. Description of the Information Collection

a. Number and Type of Respondents

The records will be retained by 180 well-logging licensees.

b. Reasonableness of the Schedule for Collecting Information

The period of 3 years for recordkeeping is specified because the inspection period for well-logging licensees is every 3 years.

c. Method of Collecting the Information

The licensee is the only source of information. The records would be kept at field stations.

d. Record Retention Period

Record retention period is 3 years after the surveys are made.



e. Reporting Period

None.

f. Copies Required to be Submitted

None.

g. Format of Information to be Maintained or Submitted

None specified.

3. Estimate of Burden

a. Estimated Hours Required to Respond to the Collection

It is estimated that each licensee would need 15 minutes to record survey results per well-logging operation. Assuming 20,000 well-logging operations per year are conducted by NRC licensees, the total burden would be:

$$20,000 \text{ operations/yr} \times .25 \text{ hr/operation} = 5,000 \text{ hrs/yr.}$$

b. Estimated Cost Required to Respond to the Collection

Estimated cost--5000 hrs/yr x \$60/hr = \$300,000/yr.

c. Source of Burden Data and Method for Estimating the Burden

The burden data and estimates are based on the experience of NRC staff.

d. Reasonableness of Burden Estimates

The burden data and estimates are based on the experience of NRC staff.

4. Estimate of the Cost to the Federal Government

The time for NRC inspectors to inspect selected radiation survey records is estimated to be about 30 minutes. Assuming the NRC inspects one-third of well-logging licensees per year, the estimated cost is:

$$180 \text{ licensees} \times .33/\text{yr} \times .5 \text{ hr/licensee} \times \$60/\text{hr} = \$1,800/\text{yr}.$$

SUPPORTING STATEMENT FOR  
10 CFR 39.73  
DOCUMENTS AND RECORDS REQUIRED AT FIELD STATIONS

REQUIREMENTS

Section 39.73 would require a licensee to maintain certain documents and records at each field station.

1. Justification

a. Need for the Information Collection

This information is needed so that the licensee's operating personnel can have easy access to the documents they need to perform the job safely. Also, when an NRC inspector inspects a field station, the information would provide the inspector indications that the licensee complies with NRC requirements.

b. Practical Utility of the Information Collection

This information would provide information on safety requirements and procedures to the licensee's personnel at the field station. The information would also permit NRC inspectors to inspect these records at the field station. Inspections are conducted at least every 3 years.

c. Duplication with Other Collections for Information

None.

d. Consultations Outside the NRC

The draft proposed rule and the draft regulatory analysis were sent to the following groups for review and comment:

Agreement States;

Conference of Radiation Control Program Directors--Task  
Force on Well-Logging.

No comments on information collection were received.

e. Other Supporting Information

None.

2. Description of the Information Collection

a. Number and Type of Respondents

Assuming on the average three field stations per licensee, the information would be maintained by  $180 \times 3 = 540$  locations.

b. Reasonableness of the Schedule for Collecting Information

The information is needed as long as the licensed materials are stored and used or dispatched to the temporary jobsite from the field stations because the field station personnel would need to consult regulations, the license, operating or emergency procedures, and would need to assure that safety requirements, such as calibration of

survey instruments and leak testing of sealed sources, are performed according to the regulation.

c. Method of Collecting the Information

The licensee is the only source of information. The records would be kept at the field station.

d. Record Retention Period

Record retention periods would be 3 years for subparagraphs (d)-(j). The records required by subparagraphs (a)-(c) would be maintained at the field station until the licensee terminates its well-logging operations at the field station.

e. Reporting Period

None.

f. Copies Required to be Submitted

None.

g. Format of Information to be Maintained or Submitted

None specified.



3. Estimate of Burden

a. Estimated Hours Required to Respond to the Collection

Assuming each field station would need 1 hour per year to file the records, to total burden would be:

$$540 \text{ stations} \times 1 \text{ hr/station-yr} = 540 \text{ hrs/yr.}$$

b. Estimated Cost Required to Respond to the Collection

$$\text{Estimated cost} = 540 \text{ hrs/yr} \times \$60/\text{hr} = \$32,400/\text{yr.}$$

c. Source of Burden Data and Method for Estimating the Burden

The burden data and estimates are based on the experience of NRC staff.

d. Reasonableness of Burden Estimates

The burden data and estimates are based on the experience of NRC staff.

4. Estimate of the Cost to the Federal Government

The time for NRC inspectors to inspect selected records at a field station is estimated to be about 15 minutes. Assuming the NRC inspects one-third of field stations per year, the estimated cost is:

$$540 \text{ stations} \times .33/\text{yr} \times 0.25 \text{ hr/station} \times \$60/\text{hr} = \$2,700/\text{yr.}$$



SUPPORTING STATEMENT FOR  
10 CFR 39.75  
DOCUMENTS AND RECORDS REQUIRED AT TEMPORARY JOBSITES

REQUIREMENTS

Section 39.75 would require a licensee conducting operations at temporary jobsites to maintain certain documents and records at each temporary jobsite.

1. Justification

a. Need for the Information Collection

This information is needed so that the licensee's operating personnel can have easy access to the documents they need to perform the job safely.

b. Practical Utility of the Information Collection

This information would provide information on safety requirements and procedures to the licensee's personnel at the temporary jobsite. The information would also permit NRC inspectors to inspect these records at the temporary jobsite. Inspections are conducted at least every 3 years.

c. Duplication with Other Collections for Information

None.

d. Consultations Outside the NRC

The draft proposed rule and the draft regulatory analysis were sent to the following groups for review and comment:

Agreement States;

Conference of Radiation Control Program Directors--Task  
Force on Well-Logging.

No comments on information collection were received.

e. Other Supporting Information

None.

2. Description of the Information Collection

a. Number and Type of Respondents

Assuming, on the average, 50 temporary jobsites per licensee per year, the information would be maintained by 180 licensees x 50 temporary jobsites/licensee = 9,000 locations.

b. Reasonableness of the Schedule for Collecting Information

The information is needed when the licensee's personnel are conducting well-logging operations at the temporary jobsite. Records must be kept for the radiation surveys performed at the temporary jobsite for the current well-logging operations.

c. Method of Collecting the Information

The licensee is the only source of information. The records would be kept with the crew when they are stationed at the temporary jobsite.

d. Record Retention Period

Records will be maintained at the temporary jobsite until the job is completed.

e. Reporting Period

None.

f. Copies Required to be Submitted

None.

g. Format of Information to be Maintained or Submitted

None specified.

3. Estimate of Burden

a. Estimated Hours Required to Respond to the Collection

Assuming each working crew would need 3 minutes to assemble the records, the total burden would be:

$$9,000 \text{ locations/yr} \times .05 \text{ hrs/location} = 450 \text{ hrs/yr.}$$

b. Estimated Cost Required to Respond to the Collection

Estimated cost--900 hrs/yr x \$60/hr = \$54,000/yr.

c. Source of Burden Data and Method for Estimating the Burden

The burden data and estimates are based on the experience of NRC staff.

d. Reasonableness of Burden Estimates

The burden data and estimates are based on the experience of NRC staff.

4. Estimate of the Cost to the Federal Government

The time for NRC inspectors to inspect selected records at a temporary jobsite is estimated to be about 15 minutes. Assuming the NRC inspects 200 temporary jobsites per year, the estimated cost is:

200 jobsites/yr x 0.25 hr/jobsite x \$60/hr = \$3,000/yr.

SUPPORTING STATEMENT FOR  
10 CFR 39.77  
NOTIFICATION OF INCIDENTS AND LOST SOURCES;  
ABANDONMENT PROCEDURES FOR IRRETRIEVABLE SOURCES

REQUIREMENTS

Paragraph (a) would require a licensee to report a source has been lost in fresh water aquifer or a sealed source has been ruptured.

Paragraph (b) would remind the licensees of the Part 20 reporting requirement for incidents other than those included in paragraphs (a) and (c).

Paragraph (c) would transfer reporting requirements in §30.56 and §70.60 to §39.77. This paragraph would require licensees to notify NRC if a sealed source becomes irretrievable and file a written report on the abandonment of the sealed source.

1. Justification

a. Need for the Information Collection

This information collection is needed so that NRC regional offices would be informed of any incidents involving licensed materials, lost sources or irretrievable well-logging sources.



b. Practical Utility of the Information Collection

This information will permit NRC regional offices to make a determination whether an inspector should be dispatched to a site and to assure that corrective actions have been taken. When the licensee, in consultation with the well owner or operator, determines that a sealed source lost in a well becomes irretrievable, the licensee would be required to notify NRC regional offices by telephone to request approval to implement abandonment procedures. The NRC regional office would, based on the information supplied by the licensee, approve the abandonment if all reasonable effort at recovery had been expended.

c. Duplication with Other Collections for Information

None.

d. Consultations Outside the NRC

The draft proposed rule and the draft regulatory analysis were sent to the following groups for review and comment:

Agreement States;

Conference of Radiation Control Program Directors--Task

Force on Well-Logging.

No comments on information collection were received.

e. Other Supporting Information

None.



2. Description of the Information Collection

a. Number and Type of Respondents

Assuming 10 incidents per year for NRC licensees, the number of respondents would be 10 licensees.

b. Reasonableness of the Schedule for Collecting Information

Paragraph (a) would require immediate telephone notification because the loss of licensed material and rupture of a sealed source could cause extensive radioactive contamination. Immediate notification would permit NRC to judge the severity of the situation and consider whether NRC should take immediate action. The confirmatory letter within 5 days is needed to permit NRC to judge whether the licensee has taken corrective actions and whether NRC should consider follow-up actions.

Paragraph (c) would require licensees to request approval for abandoning a sealed source in a well. The requirement is needed to permit NRC to judge whether all reasonable effort at recovery has been expended. The written report within 30 days is needed to assure that the abandonment procedures are carried out promptly and satisfactorily. Furthermore, the report constitutes a record to alert state regulatory agencies that a sealed source is in the well if permission is requested to reenter the well.

c. Method of Collecting the Information

The licensee is the only source of information.

d. Record Retention Period

None.

e. Reporting Period

The reporting periods would be:

- paragraph (a): (i) telephone report--immediately
- (ii) written report--within 5 days of the event
- paragraph (c): (i) telephone report--when it becomes apparent  
that the source is irretrievable
- (ii) written report--within 30 days after the  
source has been classified as  
irretrievable.

f. Copies Required to be Submitted

Paragraph (a): one copy.

Paragraph (c): one copy to the appropriate NRC regional office and  
one copy to each appropriate State agency that has  
authority over the well drilling.

g. Format of Information to be Maintained or Submitted

None specified.

3. Estimate of Burden

a. Estimated Hours Required to Respond to the Collection

Assuming 2 ruptured sources or sources lost in fresh water aquifers per year, the burden would be:

Telephone notification:  $.5 \text{ hr} \times 2 = 1 \text{ hr}$

Confirmatory letter:  $1 \text{ hr} \times 2 = 2 \text{ hrs}$

Subtotal 3 hrs.

Assuming 5 irretrievable sources per year, the burden would be:

Telephone notification:  $.5 \text{ hr} \times 5 = 3 \text{ hrs}$

Written report:  $4 \text{ hrs} \times 5 = 20 \text{ hrs}$

Subtotal 23 hrs.

Total burden =  $23 + 3 = 26 \text{ hrs.}$

b. Estimated Cost Required to Respond to the Collection

Estimated cost-- $26 \text{ hrs/yr} \times \$60/\text{hr} = \$1,560/\text{yr.}$

c. Source of Burden Data and Method for Estimating the Burden

The burden data and estimates are based on the experience of NRC staff.

d. Reasonableness of Burden Estimates

The burden data and estimates are based on the experience of NRC staff.

4. Estimate of the Cost to the Federal Government

Assuming 2 ruptured or lost sources and 5 irretrievable sources per year and 4 hrs/case for NRC regional offices to receive the telephone calls and to review the reports, the estimated cost is:

$$7 \text{ cases/yr} \times 4 \text{ hrs/case} \times \$60/\text{hr} = \$1,680/\text{yr}.$$

Comm. Paper / Staff Rez. /

Comment

1. Memo from Chilk (DCS)
2. Memo from Zerbe (DCS)  
(to Comm.)
3. Memo from Zerbe (DCS)  
(to R. Cuningham)  
(W/end.)
4. Comm. paper (DCS)  
(W/end.)