

J. L. Shepherd and Associates, Inc, response to docket NRC–2024–0158, Information Collection: NRC Form 7, Application for NRC Export/Import License, Amendment, Renewal, or Consent Request(s).

1. Is the proposed collection of information necessary for the NRC to properly perform its functions?

Yes, for compliance with International Atomic Energy Agency’s Code of Conduct on the Safety and Security of Radioactive Sources and their supplemental Guidance of the Import and Export of Radioactive Sources, using the NRC’s Form 7, Application for NRC Export/Import License, Amendment, Renewal, or Consent Request(s), is easily understood and prepared. The NRC’s Form 7 is required to obtain an authorization to export or import certain nuclear equipment and material under NRC jurisdiction, per 10 CFR §110, Appendix P.

2. Is the burden estimate accurate?

Yes, per our experience, we believe burden estimate is reasonable and accurate. In the past, when we needed to work directly with international end users and their regulators, coordination and information gathering could take weeks or months, in some instances. Under the current system, the data collected provides the Commission with the information needed to efficiently process the requests and issue an Export/Import License.

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

No, the NRC’s Form 7 instructions are clear, the form is easily filled out, and the electronic submission system is efficient.

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

We have no idea, as we have not found a source of similar types of information