

From: Timothy McLaughlin

Sent: Friday, April 19, 2019 11:08 AM

To: Howe, Donna-Beth <Donna-Beth.Howe@nrc.gov>

Subject: RE: [Ext] FW: Opportunity to review and comment on an NRC Office of Budget and Management (OMB) information collection for NRC Form 313 "Application for Materials License"

Ms. Howe,

My apologies for not replying more promptly or in providing a formal response.

Upon review, it does not appear that the proposed changes will greatly impact our information collection time or process. Generally speaking, we often only identify a single onsite RSO and do not have a need for ARSO's or other "Authorized" persons to be spelled out on license applications. Additionally, much of our employees training, certifications, and experience are captured in internal corporate databases. Our largest time consumption is in gathering this data internally and compiling into a single CV or application. That process would not go away.

With respect to any "Reduction of Burden" through Information Technology, any initiative, program, or standard is welcome. However, because our dealings include numerous Agreement States at varying levels of implementation, we continue to create hard copy documents and scans. We maintain both of these centrally via "Correspondence Binders" as well as archive on an internal SharePoint site. This does cause minimal additional time but greatly reduces the burden and time to search a traditional filing system.

Please let me know if we can be of any further assistance.

Best regards,
Tim

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