

FINAL SUPPORTING STATEMENT FOR  
10 CFR PART 55, OPERATORS' LICENSES

(OMB CLEARANCE NO. 3150-0018)

REVISION

DESCRIPTION OF THE INFORMATION COLLECTION

The regulations in 10 CFR 55 establish: (1) procedures and criteria for the issuance of licenses to operators and senior operators of utilization facilities (which are licensed pursuant to the Atomic Energy Act of 1954, as amended, 10 CFR 50, and 10 CFR 52); (2) the terms and conditions upon which the Commission will issue or modify those operators' licenses; and (3) the terms and conditions to maintain and renew those operators' licenses.

The majority of the information collection requirements related to 10 CFR 55 apply to the holders of and applicants for utilization facility operating licenses (as defined in 10 CFR 50). Several of the information collections apply to the holders of or applicants for an individual operator's license (i.e., operators and senior operators as defined in 10 CFR 55). The information collections are necessary to permit the timely examination of applicants, operators, and senior operators as well as the timely issuance and renewal of operators' licenses.

This supporting statement provides a comprehensive overview of the information collection requirements specified in 10 CFR 55. Note that the burden hours associated with NRC Form 396 (OMB Clearance No. 3150-0024), NRC Form 536 (OMB Clearance No. 3150-0131), and NRC Form 398 (OMB Clearance No. 3150-0090) are contained in the supporting statements for the associated OMB Clearances. However, all of those information collection requirements are identified in this Supporting Statement, as summarized in Table 12.

In addition to the rules, three NRC Regulatory Guides and two NUREG reports provide guidance on acceptable methods of implementing the regulations. These Regulatory Guides and NUREG reports are:

1. Regulatory Guide 1.134 - Medical Evaluation of Licensed Personnel for Nuclear Power Plants (Revision 3). This Regulatory Guide was revised in March 1998, but facility licensees may continue to use the earlier version.
2. Regulatory Guide 1.149 - Nuclear Power Plant Simulation Facilities for Use in Operator License Examinations (Revision 3). This Regulatory Guide was revised in October 2001, but facility licensees may continue to use the earlier versions.
3. Regulatory Guide 1.8 - Qualification and Training of Personnel for Nuclear Power Plants (Revision 3). This Regulatory Guide was revised in May 2000, but facility licensees may continue to use the earlier version.
4. NUREG-1021 - Operator Licensing Examination Standards for Power Reactors (Revision 9, Supplement 1). This report provides guidance necessary for power reactor facility licensees to voluntarily prepare their operator licensing examinations.

5. NUREG-1478 – Operator Licensing Examiner Standards for Research and Test Reactors (Rev.2). This NUREG was revised in June 2007, and provides Guidance necessary for non-power reactor facility examinations to be prepared by NRC examiners.

A. JUSTIFICATION

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

- a. Holders of facility operating licenses and applicants for such operating licenses (numbering 70 nuclear power facilities located at 65 sites and 32 non-power reactor facilities) shall:

- (1) submit the following items in accordance with the indicated section of 10 CFR 55:

§55.11: Application for exemption from the requirements of the regulations in 10 CFR 55. Facility licensees are expected to comply with the regulations unless they provide sufficient information for the Commission to determine that a specific exemption is authorized by law, will not endanger life or property, and is otherwise in the public interest.

§55.23, 55.31(a)(6), and 55.57(a)(6): NRC Form 396, "Certification of Medical Examination by Facility Licensee" (currently approved under OMB Clearance No. 3150-0024).

§55.25: Notification to the Commission within 30 days of learning of the diagnosis of a licensed operator's permanent physical or mental disability. Submittal of NRC Form 396 is required if a license restriction is requested (currently approved under OMB Clearance No. 3150-0024).

§55.27: Report medical qualifications data to Commission upon request (currently approved under OMB Clearance No. 3150-0024).

§55.31(a): Written request that a written examination and operating test be administered and certification on NRC Form 398, "Personal Qualification Statement - Licensee," that the applicant has completed the facility licensee's requirements for licensing (currently approved under OMB Clearance No. 3150-0090). In practice, per NUREG-1021, power reactor facility licensees must also submit a written request for the NRC to administer the generic fundamentals examination (GFE) in advance of the formal license application.

§55.31(b): Additional information as necessary for the NRC to determine whether to grant or deny the license application or revoke, modify or suspend the license.

§55.35: Certification on NRC Form 398 that the applicant is ready for reexamination and a statement that describes the extent of the applicant's retraining (currently approved under OMB Clearance No. 3150-0090).

§55.40(a) and (d): Information regarding exam content for operators. This information is needed for the NRC to prepare the site-specific written and operating tests that applicants must pass in order to obtain an operator's license.

§55.40(b)(1) and (3): The written examinations required by §55.41 and §55.43 and the operating tests required by §55.45. In lieu of submitting information from which the NRC will prepare the licensing examinations, power reactor facility licensees may prepare the examinations themselves and submit them to the NRC for review and approval.

§55.40(c): Written request for the NRC to prepare, proctor, and grade the required licensing examinations. Preparing a site-specific power reactor licensing examination requires significantly more resources than reviewing and approving a facility-prepared examination; therefore, a written request provides the basis to budget and schedule the resources. NRC Form 536 is used for this purpose; that form is currently approved under OMB Clearance No. 3150-0131.

§55.46(b): Power reactor facility licensees that propose to use a simulation facility, other than a plant-referenced simulator, or the plant in the administration of operating tests under §55.45(b)(1) or (3) shall request approval from the Commission. This is necessary to ensure the consistency and validity of the operating tests upon which licensing decisions are based.

§55.47: Request for waiver of examination and test requirements on NRC Form 398 (currently approved under OMB Clearance No. 3150-0090).

§55.57(a): Certification on NRC Form 398 that the renewal applicant has competently and safely discharged the license responsibilities and satisfactorily completed the requalification program during the effective term of the current license (currently approved under OMB Clearance No. 3150-0090).

§55.59(a)(2)(iii): Support the preparation and administration of for-cause (NRC) requalification examinations if the NRC determines that the facility licensee's examinations are inadequate.

§55.59(c): Have a requalification program and, upon request, submit to the Commission a copy of comprehensive requalification written examinations or annual operating tests. This improves efficiency by enabling the NRC staff to review these materials before traveling to the site for a licensed operator requalification program inspection.

(2) and keep on file:

§55.27: Retain medical qualifications data (currently approved under OMB Clearance No. 3150-0024).

§55.40(b)(2): Establish and maintain procedures to control examination security and integrity. The Commission takes examination security and integrity very seriously and incorporated this on-going requirement when it amended 10 CFR 55 to allow power reactor facility licensees to prepare their own operator licensing examinations.

§55.46(d)(1): The results of the simulation facility performance tests conducted for four years after completing the test or until superseded by updated test results. The NRC staff will review uncorrected performance deficiencies to ensure that the operating tests administered per §55.45(b) are valid.

§55.53(f): Certification that the qualifications and training of a licensee who has not been actively performing the functions of an operator are current. This certification, which, in practice, is not submitted to the NRC but subject to inspection on-site, ensures that licensed operators who have not maintained their watch-standing proficiency are fully qualified before they are allowed to resume licensed duties.

§55.59(a)(2): In order to facilitate the preparation and administration of requalification examinations, power reactor facility licensees maintain banks of written questions and operating test materials.

§55.59(b): Evidence of successful completion of additional training, if necessary. Licensed operators are required to complete a requalification training and examination program to maintain the knowledge, skills, and abilities needed to safely perform licensed duties. If an operator does not complete the program, the Commission retains the right to prescribe and review additional training to ensure the operator's competence prior to returning to licensed duties.

§55.59(c)(5)(i): Maintain records of operator participation in the requalification program until the operator's license is renewed. This enables the facility licensee to certify, pursuant to §55.57(a)(4), that a license renewal applicant has satisfactorily completed the requalification program during the 6-year term of the license.

- b. Holders of or applicants for an individual operator's license (numbering approximately 4500 reactor operators and senior operators) shall submit the following items in accordance with the indicated section of 10 CFR 55:

§55.11: Application for exemption from the requirements of the regulations in 10 CFR 55. Applicants and licensees are expected to comply with the regulations unless they provide sufficient information for the Commission to determine that a specific exemption is authorized by law, will not endanger life or property, and is otherwise in the public interest.

§55.31(a) and (d): NRC Form 398, "Personal Qualification Statement -- Licensee," to apply for a license (currently approved under OMB Clearance No. 3150-0090).

§55.31(b): Additional information as necessary for the NRC to determine whether to grant or deny the license application or revoke, modify or suspend the license.

§55.35: Reapplication on NRC Form 398 (currently approved under OMB Clearance No. 3150-0090).

§55.47: Request for waiver of examination and test requirements on NRC Form 398 (currently approved under OMB Clearance No. 3150-0090).

§55.53(g): Notification of conviction of a felony within 30 days. This is the only direct means by which the NRC can ensure that felony conviction cases, which may have a bearing on the operator's trustworthiness, reliability, judgment, integrity, competence, and fitness-for-duty are evaluated to determine whether the operator poses sufficient risk to public health and safety to warrant suspension or revocation of the operator's license.

§55.57(a): Application for renewal of license on NRC Form 398 (currently approved under OMB Clearance No. 3150-0090).

§55.59(b): Evidence of successful completion of additional training, if necessary. Licensed operators are required to complete a requalification training and examination program to maintain the knowledge, skills, and abilities needed to safely perform licensed duties. If an operator does not complete the program, the Commission retains the right to prescribe and review additional training to ensure the operator's competence prior to returning to licensed duties.

## 2. Agency Use of Information

The NRC will use the reports and records required by 10 CFR 55 for one or more of the following purposes:

- the preparation, review, and approval of the written examinations and operating tests used to determine whether the applicants for operators' licenses have learned to operate the facility competently and safely and, additionally, for senior operators, whether the applicants have learned to safely and competently direct the activities of licensed operators;
- the review and approval of operator license applications (initial and renewal);
- the review and evaluation of the licensed operator requalification programs conducted by facility licensees; and

- the review of facility licensees' plans for and performance testing of simulation facilities.

To the extent possible, the facility licensees and applicants are required to maintain documentation rather than submit reports to the NRC.

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 (68FR58791), consistent with the Government Paperwork Elimination Act, which allows its 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. It is estimated that fewer than 40% of the potential responses for 10 CFR Part 55 are filed electronically; however, the majority of the most voluminous responses (i.e., the power reactor licensing examinations and reference materials), which constitute the majority of the total information collection burden, are filed electronically.

4. Effort to Identify Duplication and Use Similar Information

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.

5. Effort to Reduce Small Business Burden

No small businesses are affected by these information collection requirements.

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

The information collections under 10 CFR 55 are conducted "one time only" or "as required." No other frequency of collection is assigned. If the information collections were not conducted, the NRC would not be able to fulfill its statutory responsibility to determine the qualifications of applicants for operator licenses, including the preparation and approval of initial operator licensing examinations, or to oversee simulator and requalification training and examination programs.

7. Circumstances Which Justify Variation from OMB Guidelines

Procedures must be retained for the life of the license. Operators licensed for 6 years must retain certifications and other data associated with licensees for inspection by the NRC to ensure operational safety at nuclear reactor facilities.

8. Consultations Outside the NRC

Opportunity for public comment on the information collection requirements for this clearance package was published in the Federal Register on March 6, 2009, (74 FR 9832). No comments were received.

9. Payment or Gift to Respondents

Not applicable.

10. Confidentiality of Information

The NRC provides no pledge of confidentiality for this collection of information other than those records which are covered under NRC 16 - Facility Operator Licensees Record Files (10 CFR Part 55), System of Records.

The NRC will withhold from public disclosure, until after their administration, the operator licensing examinations and tests that power reactor facility licensees submit to the NRC for approval pursuant to 10 CFR 55.40(b).

11. Justification for Sensitive Questions

No sensitive information is requested for this information collection.

12. Estimated Industry Burden and Burden Hour Cost

a. The annual reporting and recordkeeping burdens are summarized in Table 1 and 2. As reflected in Item 1 above, some of the reporting requirements apply to the 102 power and non-power facility licensees as well as the 4,500 individual license holders (a total of 4,602 possible respondents). At the respondents' discretion, these requirements may be satisfied directly by the individual license holders, as a collaborative effort between the individual and facility license holders, or by the facility licensees on their individual license holders' behalf. The estimated burden per response should be approximately the same regardless which respondent completes the required report.

b. Those burden estimates that have changed since the last supporting statement for this clearance are identified with a bracketed [ c ] in the appropriate column of the table. The reason for each change is discussed in the corresponding paragraph in Item 15 below.

13. Estimate of Other Additional Costs

The annual cost to reproduce and transmit the material for the initial operator licensing program is estimated to be \$6,375. This estimate includes \$2,250 for reproduction costs (45 licensees x 1000 pages per examination x \$.05 per page), plus \$1,125 for packaging and shipping (45 x \$25) for those facility licensees that write their own examinations.

For those facility licensees that the NRC writes the examinations the annual cost to

reproduce and transmit the material for the initial operator licensing program is estimated \$2,500 (5 licensees x 8,000 pages of reference material per examination x \$.05 per page for reproduction costs) plus \$500 (5 x \$100) for packaging and shipping.

Facility licensees may submit their materials in electronic format, which would significantly reduce the reproduction and transmittal costs.

NRC has determined that the storage and equipment costs per square foot are approximately \$45. The quantity of records to be maintained is proportional to the recordkeeping burden. Based on the number of pages maintained for a typical clearance, the records storage cost has been determined to be equal to 0.04 percent of the recordkeeping burden cost. Therefore, the storage cost for this clearance is \$2,701 (28,369 recordkeeping hours x \$238 per hour x .0004).

Total Other Additional Costs are \$9,076 (\$6,375 + \$2,701).

#### 14. Estimated Annualized Cost to the Federal Government

The total annual cost to the Federal Government is estimated to be \$3,671,150 as shown in Table 3. This cost is fully recovered by fee assessments to NRC licensees pursuant to 10 CFR 171.

Those cost estimates that have changed since the last supporting statement for this clearance are identified with a bracketed [c] in the "Number of Responses" column. The reason for each change is discussed in the corresponding paragraph in Item 15 below.

The burden to the Federal Government includes 280 hours to process the registrations (4 hours per facility response), \$320,000 per year for a contractor to prepare and grade the examinations, and 300 hours for the staff to review the examinations and administer the program (75 hours per GFE x 4 exams per year).

#### 15. Reasons for Change in Burden or Cost

The overall burden has increased by 53,317 hours from 67,060 to 120,377 hours for several reasons as identified below. This increase is based on NRC staff experience, and the results of licensees surveyed indicating a more realistic burden estimate in consideration of the time required for facility prepared examinations.

#### **Burden Increases:**

##### Reporting Burden:

The reporting burden increased due to two reasons:



- (1) It was estimated during the last OMB Clearance Extension Request that the 103 power and non-power licensees would submit approximately 30-35 examinations per year and expend about 1200 hours per examination or about 42,000 hours annually.

Over the last three years, in accordance with §55.40(b)(1) and (3), nearly 45 power reactor facility licensees have prepared the examinations themselves and have submitted them to the NRC for review and approval in lieu of submitting information from which the NRC will prepare the licensing examinations, increasing the projected number of annual submittals by 10 (from 35 currently to 45 projected submittals).

Through consultations with seven licensees, the estimated level of effort required to produce these examinations has increased from the previous estimate of 1,200 hours to 2,000 hours per examination, increasing the overall burden of each facility by 800 hours. This has raised the total burden reporting estimate for this collection by 48,000 hours ( $[800 \text{ hours} \times 35 \text{ previous respondents} = 28,000 \text{ hours}] + [2,000 \times 10 \text{ new respondents} = 20,000 \text{ hours}]$ ), thereby increasing the overall burden for these submittals from the previous request (from 42,000 to 90,000 hours).

- (2) It was estimated during the last OMB Clearance Extension Request that 22 non-power facilities requested examinations in accordance with §55.40(a) and (d), this information is needed for the NRC to prepare the site-specific written and operating tests that applicants must pass in order to obtain an operator's license. Additionally, it was estimated each facility would expend 4 hours (4 x 22) for a total burden of 88 hours.

Actual facility experience over the last three years has shown an increase of respondents - 3 non-power facilities for a total of 25 non-power facilities. This increase in respondents ( $25 \times 4 = 100$ ) - ( $22 \times 4 = 88$ ) has increased the total burden annually by 12 hours.

#### Recordkeeping:

The recordkeeping burden also increased for two reasons:

- (1) Based on facility personnel input there has been an increased use of simulators. The simulator performance testing data recordkeeping requirements covered under section 55.46(d)(1) has increased from 2,100 (70 x 30 hours) to 2,800 (70 x 40 hours) thereby increasing the total burden hours by 700.
- (2) The recordkeeping requirements covered under section 55.59(c)(5)(i) in maintaining records documenting the participation of each licensed operator/senior operator in the facilities requalification programs were previously underestimated by 11,596 hours (70 x 160 power reactors = 11,200) + (33 x 12 non-power reactors = 396), from the former estimate of 432 hours.

Actual experience shows an increase of 90 hours for power reactors, and 5 hours for non-power reactors: (70 x 250 power reactors = 17,500) + (32 x 17 non-power reactors = 544) for a total of 18,044. Thereby increasing the total burden hours under 55.59 (c)(5)(i) by 6,448 hours.

The number of non-power facilities requiring information regarding content for operators that is necessary for the NRC to prepare power facility written examinations and operating tests covered under section 55.40(a) and (d) decreased from 33 to 32. However, with the increase of 3 non-power examinations per year, it was determined that this decrease in number of facilities did not effect a reduction to the non-power burden. The number of power facility examinations requiring information regarding content for operators that is necessary for the NRC to prepare power facility written examinations and operating tests covered under section 55.40 (a) and (d) has decreased from 15 to 5. Of these, 10 exams have been eliminated, decreasing the annual burden by 19,500 (10 x 1,950), and the number of burden hours for the remaining 5 examinations have decreased by 7,250 (5 x 1450). The total burden hour reduction under section 55.40(a) and (d) is 26,750.

Establishing and maintaining security procedures is covered under section 55.40 (b)(2). Based on facility personnel input, all facilities have established NRC approved security procedures, basically eliminating the need for these recordkeeping burden hours and allowing a reduction of 100 hours. Once established, the facilities continue to review and revise their security procedures biennially and estimate that the total burden hours for maintenance of security procedures has decreased by 275 hours. Total burden hours reduced under section 55.40 (b)(2) is 375 hours.

The number of power facility examinations requiring information requiring NRC preparation power facility written examinations and operating tests covered under section 55.40(a) and (c) has decreased by 10, which in turn reduced the cost to the Federal Government by total burden hours of 4,000.

Cost estimates have changed since the last clearance, as a result of an increase in the fee per hour from \$205 to \$238/hour.

16. Publication for Statistical Use

This information will not be published for statistical use.

17. Reason for Not Displaying the Expiration Date

The requirements are 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

Not applicable.

TABLE 1: ANNUAL REPORTING REQUIREMENTS

Section	Number of Respondents	Responses Per Respondent	Total Number of Responses	Burden Per Response	Total Burden Hours	Cost at \$238/Hour
55.11	4 (out of 4,602)	1	4	40	160	\$38,080
55.23 - Currently approved under OMB No. 3150-0024						
55.25 - Currently approved under OMB No. 3150-0024						
55.27 - Currently approved under OMB No. 3150-0024						
55.31(a) & (d) - Currently approved under OMB No. 3150-0090						
55.31(a)	70	1	70	10	700	\$166,600
55.31(a)(6) - Currently approved under OMB No. 3150-0024						
55.31(b)	50(out of 4,602)	1	50	4	200	\$47,600
55.35 - Currently approved under OMB No. 3150-0090						

55.40(a) and (d)	5 (out of 70)	1	5 [c-10]	Power Reactors: 100 [c-30]	500	\$119,000
	25 (out of 32)	1	25 [c+3]	Non-power Reactors: 4	100	\$23,800 18,040
55.40(b)(1) and (3)	45 (out of 70)	1	45 [c+10]	2000 [c+800]	90,000	\$21,420,000
55.40(c) - Currently approved under OMB No. 3150-0131						
55.46(b)	1 (out of 70)	1	1	40	40	\$9,520
55.47 - Currently approved under OMB No. 3150-0090						
55.53(g)	5 (out of 4,602)	1	5	4	20	\$4,760
55.57(a) - Currently approved under OMB No. 3150-0090						
55.59(a)(2)(iii)	1 (out of 70)	0	1	Power reactors: 100	100	\$23,800
	1 (out of 32)	1	1	Non-power reactors: 4 [c-18]	4	\$952
55.59(b)	20 (out of 4,602)	1	20	6	120	\$28,560
55.59(c)	16 (out of 70)	1	16	Power reactors: 4	64	\$15,232

	0 (out of 32)	0	0	Non-power reactors: 0	0	\$0
TOTAL REPORTING	102		243		92,008	\$21,897,904

TABLE 2: ANNUAL RECORDKEEPING REQUIREMENTS				
Section	Number of Recordkeepers	Burden Hours Per Recordkeeper	Total Burden Hours	Cost at \$238 / Hour
55.27: Currently approved under OMB No. 3150-0024				
55.40(b)(2) (establish security procedures)	0 (out of 70) [ c-1]	100	0	\$ 0
55.40(b)(2) (maintain security procedures)	35 (out of 70)	11 [c-9]	385	\$91,630
55.53(f)	70	2	140	\$33,320
55.59(a)(2)	70	100	7,000	\$1,666,000
55.46(d)(1)	70	40 [c+10]	2,800	\$666,400
55.59(c)(5)(i)	70	250 for power reactors [c+90]	17,500	\$4,165,000
	32	17 for non-power reactors [c+5]	544	\$129,472
TOTAL FOR PART 55 RECORDKEEPING	102	520	28,369	\$6,751,822
TOTAL BURDEN/COST FOR 10 CFR PART 55			120,377	\$28,649,726

TOTAL BURDEN HOURS: 120,377 hours (92,008 hrs. reporting + 28,369 hrs. recordkeeping)

TOTAL RESPONSES: 345 (243 responses plus 102 recordkeepers)

TOTAL RESPONDENTS: 102



TABLE 3: ESTIMATE OF ANNUAL COST TO THE FEDERAL GOVERNMENT

Report / Record	Subsection	Hours Per Response	Number of Responses	Burden Hours	Cost at \$238/ Hour
Review specific exemption applications	55.11	40	4	160	\$38,080
Process generic fundamentals exam registrations; prepare and grade exams	55.31(a)	4	70	280	\$66,640
	55.41(b) - staff	75	4	300	\$71,400
	55.41(b) - contract	122	4	488	\$116,144
Review additional information	55.31(b)	1	55 [ c ]	55	\$13,090
Prepare initial operator licensing written examinations and operating tests	55.40(a) and (c) (power reactors)	400	5 [ c ]	2,000	\$476,000
	55.40(d) (non-power reactors)	200	25	5,000	\$1,190,000
Review and approve initial operator licensing examinations prepared by power reactor facility licensees (including review of examination security / integrity procedures)	55.40(b)(1) and (4)	130	45 [ c ]	5,850	\$1,392,300
Review requests to use other than a plant reference simulator	55.46(b)	40	1	40	\$9,520

Review/audit simulation facility performance	55.46(d)	12	35	420	\$99,960
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TABLE 3: ESTIMATE OF ANNUAL COST TO THE FEDERAL GOVERNMENT

Report / Record	Subsection	Hours Per Response	Number of Responses	Burden Hours	Cost at \$238 / Hour
Review training and qualification certifications for license reactivation	55.53(f)	1	35	35	\$8,330
Review notification of felony	55.53(g)	1	5	5	\$1,190
Conduct requalification examinations	55.59(a)(2)(iii)	Power reactors:  160	1	160	\$38,080
		Non-power reactors:  120	1	120	\$28,560
Review requalification examinations	55.59(c)	Power reactors:	16	512	\$121,856
		Non-power reactors:	0	0	\$0
TOTAL GOVERNMENT BURDEN			306	15,425	\$3,671,150