

DRAFT OMB SUPPORTING STATEMENT
FOR
10 CFR PART 72
LICENSE AND CERTIFICATE OF COMPLIANCE TERMS
PROPOSED RULE
OMB 3150-0132

Description of the Information Collection

The Nuclear Regulatory Commission (NRC) regulations in 10 CFR Part 72 establish requirements, procedures, and criteria for the issuance of licenses to receive, transfer, and possess power reactor spent fuel and other radioactive materials associated with spent fuel storage, in an independent spent fuel storage installation (ISFSI). The regulations also establish requirements, procedures and criteria for the issuance of licenses to the Department of Energy (DOE) to receive, transfer, package, and possess power reactor spent fuel, high-level radioactive waste, power reactor-related greater than Class C (GTCC) waste, and other radioactive materials associated with spent fuel and high-level radioactive waste storage, in a monitored retrievable storage (MRS) installation. The proposed rule contains reporting and recordkeeping requirements which are necessary to provide safety assurance and to comply with complementary NRC regulations for environmental protection (10 CFR Part 51) and safeguards requirements (10 CFR Part 73).

This supporting statement addresses changes in information collections contained in the proposed rule, "License and Certificate of Compliance Terms." Specifically, the draft proposed rule results in changes to information collection requirements in §§ 72.42, 72.212, and 72.240.

The proposed rule amends 10 CFR Part 72 to clarify the terms for dry spent fuel storage cask designs, or Certificates of Compliance (CoCs), and ISFSI licenses. Specifically, the proposed rule changes would allow for longer initial and renewal terms for Part 72 CoCs and licenses, clarify the general license storage term, and clarify the difference between CoC "approval" and "renewal." In addition, the proposed rule also allows Part 72 general licensees to implement changes authorized by an amended CoC to a cask loaded under the initial CoC or an earlier amended CoC (a "previously loaded cask") without express NRC approval, provided the cask then conforms to the terms, conditions, and specifications of the amended CoC.

This rulemaking is needed to improve the regulatory efficiency of 10 CFR Part 72 which provides requirements for: (a) site-specific ISFSI licenses; (b) Part 50 or 52 licenses for the storage of spent fuel in ISFSIs at reactor sites, and (c) CoCs for spent nuclear fuel dry storage systems. This proposed rulemaking would extend the initial and renewal license durations for general and site-specific ISFSI licenses from a term not to exceed 20 years to a term not to exceed 40 years. Any initial and license renewal application would be required to include a time-limited aging analysis that considers the effects of aging on structures, systems, and components (SSCs) important to safety for the requested initial or renewal term. In approving the renewed site-specific licenses for the Surry and H.B. Robinson ISFSIs, the staff imposed certain aging management requirements. At the present time, there are no similar requirements for general licensees. Because the same approved cask design (CoC) could be used at both site-specific ISFSI sites and general license

ISFSI sites, it is necessary and appropriate to impose the same aging management requirements on general licensees.

The rulemaking would establish a term not to exceed 40 years as the initial and renewal durations for CoCs, whereas the current regulation does not specify a term. The current regulation, however, limits a general license to 20 years after the date that a particular cask model was first used by a general licensee to store spent fuel, unless the cask's CoC is renewed, in which case the general license expires 20 years after the cask CoC renewal date. The rulemaking would remove the 20 year limit and instead would link the general license term to that of the CoC. Thus, the general license initial and renewal terms, the CoC initial and renewal terms, and the site-specific license initial and renewal terms would be for durations not to exceed 40 years, thereby achieving regulatory consistency.

Under 10 CFR Part 72, dry storage cask fabricators may periodically upgrade a cask's design and seek NRC approval of CoC amendments. The NRC approval process for CoC amendments ensures that a proposed design upgrade will continue to result in a cask that can safely store spent fuel assemblies (i.e., within the cask's analyzed condition). This rulemaking would resolve a question concerning the application of changes authorized by a CoC upgrade amendment to a previously loaded cask. Under the current regulations, a previously loaded cask is bound by the terms, conditions, and technical specifications of the CoC applicable to that cask at the time the licensee loaded the cask. A general licensee seeking to implement changes from a later CoC amendment to a previously loaded cask must obtain NRC approval in the form of an exemption. The proposed rulemaking would allow general licensees to apply the changes of a CoC amendment to a previously loaded cask, without prior NRC approval (provided the cask conforms to the amended CoC and, thus, remains in the analyzed condition). Allowing licensees to apply the changes of a CoC amendment to a previously loaded cask, rather than requiring them to seek an exemption, results in a burden hour savings for licensees.

As of August 2008, there were 15 ISFSI site-specific licensees, 37 ISFSI general licensees, and five certificate holders (five companies hold the 15 NRC-approved CoCs).¹ The proposed rule would affect these 57 entities. However, in any given year, only a fraction of these licensees and CoC holders may be affected by these proposed requirements because renewals of Part 72 licenses and CoCs depend on the license or CoC expiration date. These expiration dates vary by license and CoC. In addition, CoC holders periodically submit CoC amendments, and licensees may seek to apply these amendments to casks covered by the CoC. Therefore, the rule's new requirements for periodic recordkeeping and reporting requirements related to renewals and CoC amendments impose burdens that do not accrue to all licensees and CoC holders on an annual basis. This analysis estimates the number of respondents and recordkeepers expected per year.

The proposed rule re-numbers some sections of the existing rule, but does not change the recordkeeping or reporting burden associated with these requirements. This analysis addresses only those proposed rule requirements that contain an incremental change to the existing rule's burden.

¹ The proposed rule does not increase the universe of respondents. When the renewal of the information collection for Part 72 was submitted in June 2008, NRC reported 50 respondents. However, 5 Certificate of Compliance holders were inadvertently left out of the total. Since that time, there have been 2 additional licensees. Therefore, the total for Part 72 should be 57 respondents. NRC estimates that the proposed rule affects 46 of these licensees within the three-year period, based on knowledge of expiration dates for CoCs and Part 72 licenses.

A. JUSTIFICATION

1. Need for and Practical Utility of the Information Collection

In order to obtain or renew a license under 10 CFR Part 72, an applicant must submit technical information. Such information is needed both to provide safety assurance and to comply with complementary NRC regulations for environmental protection (10 CFR Part 51) and safeguards requirements (10 CFR Part 73).

Specific new requirements for reports and records in the proposed amendments to Part 72 are identified below. The proposed rule does not increase the number of affected licensees; NRC estimates that 46 licensees and CoC holders are affected by Part 72 reporting and recordkeeping requirements.

Section 72.7 provides that the Commission may grant exemptions from the requirements of Part 72 under specified conditions, upon the application of any interested person or on its own initiative. Applications under this section are examined by the NRC staff to determine whether the requested exemption is authorized by law and ensure it will not endanger life or property or the common defense and security, and to determine if it is otherwise in the public interest. The proposed rulemaking does not change the requirement in Section 72.7, however, the proposed rulemaking would reduce the number of exemptions sought by licensees as a result of the new reporting requirement described under Section 72.212(b)(4), which allows general licensees to apply changes authorized by an amended CoC to a previously loaded cask, without applying for an exemption. This analysis assumes that the existing 37 general licensees currently submit such exemption requests once every 10 years (or 0.1 on an annual basis). Given this assumption, the analysis estimates that the proposed rule would result in the reduction of 4 exemption applications annually. Therefore, as a result of this proposed rule, the NRC estimates a reduced reporting burden associated with Section 72.7.

Section 72.42(a)-(b) allows ISFSI licenses to be renewed for a period up to 40 years (previously 20 years), upon application by the licensee. The proposed rule language adds requirements for applications for license renewal including: (1) a time-limited aging analysis, (2) a description of how issues associated with aging will be managed, and (3) design bases information as documented in the licensee's most recently updated Final Safety Analysis Report (FSAR). Although there are 15 site-specific licensees in total, NRC estimates that these new requirements will affect approximately 4 licensees over the three year period covered by this clearance. Between 2010 and 2013, four site-specific licenses will expire, so NRC expects these licensees to renew the licenses under the requirements of the proposed rule. NRC expects to receive a total of approximately 1.3 annual renewal applications (4 renewal applications divided by three years).

Section 72.212(b)(2) is a modification of a requirement previously contained in Section 72.212(b)(1)(ii). This section requires that a general licensee register the use of each cask with NRC no later than 30 days after using the cask to store spent fuel. Currently, registration is accomplished by submitting a letter containing a variety of information to NRC. Under the proposed rule, there is an additional requirement for licensees to report the amendment number associated with the loaded cask. Registration of

cask use will enable NRC to schedule any necessary inspections and will permit NRC to maintain an independent record of use for each cask. The NRC anticipates receiving 100 annual registrations from 37 general licensees.

Section 72.212(b)(4) is a new requirement for a general licensee applying changes authorized by an amended CoC to a previously loaded cask to register the use of each such cask with NRC no later than 30 days after applying the changes authorized by the amended CoC. Registration of cask use will enable NRC to schedule any necessary inspections and will permit NRC to maintain an independent record of use for each cask. Previously, licensees could not apply changes authorized by an amended CoC to a previously loaded cask, and had to apply for an exemption under Section 72.7 if they sought to apply an amendment to a previously loaded cask. This analysis assumes that the existing 37 general licensees would apply changes authorized by an amended CoC to a previously loaded cask once every 10 years (or 0.1 on an annual basis). Given this assumption, the analysis estimates that the proposed rule would result in 4 annual registration letters applying changes authorized by an amended CoC to a previously loaded cask.

Sections 72.212(b)(5) & (6) is a modification of a requirement previously contained in Sections 72.212(b)(2) and 72.212(b)(3). The proposed rule would require a general licensee to perform written evaluations prior to applying the changes authorized by an amended CoC to a previously loaded cask. The current regulation only requires written evaluations for initial CoCs. Under the proposed rule, these requirements also would apply to amended CoCs. The evaluations must establish that (a) terms, conditions, and specifications of an amended CoC have been met; (b) cask storage pads and areas have been designed to adequately support the static and dynamic loads of the casks; and (c) the requirements of § 72.104 (regarding radioactive material in effluents, and direct radiation) have been met. This evaluation is necessary to show that storage of spent fuel is in accordance with the amended CoC. Although this requirement would affect all 37 general licensees, the NRC estimates that on an annual basis, an average of eight general licensees would need to retain the record required under these proposed subparagraphs.

Section 72.212(b)(7) is a modification of a requirement previously contained in Section 72.212(b)(2)(ii). This section requires a general licensee to evaluate any changes to the site parameters determination and analyses as a result of an amended CoC. A copy of the evaluation must be retained as a record until spent fuel is no longer stored under the general license. Although this requirement would affect all 37 general licensees, the NRC estimates that on an annual basis, an average of eight general licensees would need to retain the record required under this proposed subparagraph.

Section 72.212(b)(11) is a modification of a requirement previously contained in Section 72.212(b)(7). This section requires a general licensee to maintain a copy of the amended CoC for those casks to which the licensee has applied the changes of an amended CoC and documents referenced in the amended certificate for each cask used for storage of spent fuel. Previously this section applied only to CoCs, and not amended CoCs. The cask is an item that is important to safety and maintaining these documents permits the licensee and NRC inspectors to ensure that use of the cask is in compliance with conditions in the cask certificate. Although this requirement would affect all 37 general licensees, the NRC estimates that on an annual basis, an average of eight general licensees would need to retain the record required under this proposed subparagraph.

Section 72.240(c) requires that an applicant for cask design renewal must submit an application accompanied by a Safety Analysis Report (SAR). The previous requirement stated that the SAR may reference the original SAR for the cask design; however, the proposed rule would add requirements that the SAR must include: (1) design bases information as documented in the most recently updated FSAR, (2) a time-limited aging analysis, and (3) a description of the program for management of issues associated with aging. The information in the SAR would be reviewed by the NRC staff to determine whether there is reasonable assurance that the type of cask will continue to provide adequate protection for public health and safety. The NRC estimates that this requirement affects five CoC holders, and expects to receive one cask design renewal over the three year period covered by this clearance.

In addition, the proposed rule would re-number some subparagraphs in Section 72.212, but would not change the recordkeeping or reporting burden associated with these requirements. The proposed renumbering would improve the organization and clarity of the rule. These changes are documented in the table below.

Proposed Rule	Current Rule
§ 72.212(b)(1)	§ 72.212(b)(1)(i)
§ 72.212(b)(5)(i)	§ 72.212(b)(2)(i)(A)
§ 72.212(b)(8)	§ 72.212(b)(4) (modified)
§ 72.212(b)(9)	§ 72.212(b)(5)
§ 72.212(b)(9)(i)	§ 72.212(b)(5)(i)
§ 72.212(b)(9)(ii)	§ 72.212(b)(5)(ii)
§ 72.212(b)(9)(iii)	§ 72.212(b)(5)(iii)
§ 72.212(b)(9)(iv)	§ 72.212(b)(5)(iv)
§ 72.212(b)(9)(v)	§ 72.212(b)(5)(v)
§ 72.212(b)(10)	§ 72.212(b)(6)
§ 72.212(b)(12)	§ 72.212(b)(8)(i)
§ 72.212(b)(12)(i)	§ 72.212(b)(8)(i)(A)
§ 72.212(b)(12)(ii)	§ 72.212(b)(8)(i)(B)
§ 72.212(b)(12)(iii)	§ 72.212(b)(8)(i)(C)
§ 72.212(b)(13)	§ 72.212(b)(9)
§ 72.212(b)(14)	§ 72.212(b)(10)
§ 72.212(c)	§ 72.212(b)(8)(ii) (modified)
§ 72.212(d)	§ 72.212(b)(8)(iii) (modified)
§ 72.212(e)	§ 72.212(b)(1)(iii)

2. Agency Use of Information

Generally, the information included in the applications, reports, and records is reviewed by the NRC staff to ensure the provision of an adequate level of protection of public health and safety, common defense and security, and the environment.

The information submitted in an application for renewal will be reviewed by the NRC licensing staff to make determinations with regard to safety, environmental protection, financial responsibility, and other matters.

Registration of cask use will enable NRC to schedule any necessary inspections and will permit NRC to maintain an independent record of use for each cask.

NRC will use information from licensees' written evaluations (performed prior to applying the changes authorized by an amended CoC to a previously loaded cask) to assess that storage of spent fuel is in accordance with the amended CoC.

3. Reduction of Burden Through Information Technology

There are no legal obstacles to reducing the burden associated with this information collection. The NRC encourages respondents to use information technology when it would be beneficial to them. NRC issued a regulation on October 10, 2003 (68 FR 58791), consistent with the Government Paperwork Elimination Act, which allows 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. However, because of the types of information (e.g., engineering analyses unique to each licensee) and the infrequency of submission, the applications and other reports do not lend themselves readily to the use of automated information technology for submission. The NRC estimates that none of the submissions under Part 72 are electronic.

4. Effort to Identify Duplication and Use Similar Information

No sources of similar information have been found. 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.

In general, information required by NRC in applications, reports, or records concerning the transfer, receipt, possession, or use of nuclear material does not duplicate other Federal information collection requirements and is not available from any source. Section 72.18 specifically provides an opportunity for the applicant to avoid repetition in filing licensing submittals. The applicant may incorporate by reference information contained in previous applications, statements, or reports filed with the Commission, provided that such references are clear and specific.

5. Effort to Reduce Small Business Burden

The NRC has determined that the affected entities are not small entities or businesses. This proposed rule affects only nuclear power plant licensees and the manufacturers of dry cask spent fuel storage systems. These entities do not fall within the scope of the definition of "small entities" set forth in the Regulatory Flexibility Act or the size standards established by the NRC (10 CFR 2.810).

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

Applications are required to be submitted only for the initial license, for the CoC, for amendments, and for renewal every 40 years (per the revisions in the proposed rule). The application process requires that applicants and licensees perform comprehensive safety and environmental reviews to assure that all activities will be or are being conducted safely and in accordance with NRC regulations. The review and submission of the information required for the application is essential to NRC's determination of whether the applicant has the equipment, facilities, and procedures adequate to protect the public health and safety.

7. Circumstances Which Justify Variation from OMB Guidelines

Section 72.212(b)(7) requires that licensees retain records of written evaluations until the spent fuel is no longer stored under the general license (i.e., longer than three years). The records of the evaluations are needed to establish that (1) conditions in the CoC have been met, (2) cask storage pads and areas have been designed to adequately support the static load of the stored casks, and (3) the requirements of § 72.104 (regarding radioactive material in effluents and direct radiation) have been met. The written evaluations also are needed to demonstrate whether the licensee's site parameters are enveloped by the cask design capability, and whether activities related to storage of spent fuel under the general license involve any unreviewed facility safety question or change in the facility technical specifications, as provided in § 50.59.

10 CFR 72.212(b)(11) requires that licensees retain, for longer than three years, a copy of the CoC and amended CoC, and documents referenced in the certificate for each cask used for storage of spent fuel. The cask is an item that is important to safety and maintaining a copy permits the licensee and NRC inspectors to ensure that use of the cask is in compliance with conditions in the cask certificate.

8. Consultations Outside the NRC

An opportunity to comment on the Information Collection Requirements in this proposed rule has been published in the Federal Register.

9. Payment or Gift to Respondents

Not applicable.

10. Confidentiality of Information

Confidential and proprietary information is protected in accordance with NRC regulations at

10 CFR 9.17(a) and 10 CFR 2.390(b).

11. Justification for Sensitive Questions

No sensitive information is requested under these regulations.

12. Estimated Burden and Burden Hour Cost

The total burden change to NRC licensees as a result of the proposed rule is a decrease of 39 hours. At \$257/hr, this results in a total net savings to the industry of \$10,023.

The burden associated with the information collections are given in Table 1 for reporting burden and Table 2 for recordkeeping burden.

The proposed rule affects information collection requirements in §§ 72.7, 72.42, 72.212, and 72.240. The factors that account for the changes in burden include the following requirements for licensees:

- Section 72.7 The proposed rulemaking does not change the requirement in Section 72.7, however, the proposed rule language would reduce the number of exemptions sought by licensees as a result of the new reporting requirement described under Section 72.212(b)(4). The NRC estimates that as a result of this proposed rule, NRC will receive 4 fewer exemption requests annually. Because exemption requests for applying changes authorized by an amended CoC to a previously loaded cask are estimated to take 40 hours, this results in a reduction of 160 hours of reporting burden.²
- Section 72.42(a)-(b) The proposed rule language adds requirements for applications for license renewal including: (1) a time-limited aging analysis, (2) a description of how issues associated with aging will be managed, and (3) design bases information as documented in the licensee's most recently updated FSAR. The NRC estimates that these requirements take 40 hours, and will affect 4 licensees over the course of three years (1.33 respondents annually), resulting in a burden increase of 53 annual burden hours (40 hours x 1.33 respondents).
- Section 72.212(b)(2) This section requires that a general licensee register the use of each cask with NRC no later than 30 days after using the cask to store spent fuel. Furthermore, there is an additional requirement for licensees to report the amendment number associated with the loaded cask. The NRC anticipates receiving 100 responses related to this requirement, at .2 hours each, for an additional burden of 20 hours.
- Section 72.212(b)(4) The proposed rule language allows for a general licensee applying changes authorized by an amended CoC to a previously loaded cask to register the use of each such cask with NRC no later than 30 days after applying the changes authorized by the amended CoC. Currently, licensees must apply for an exemption under Section 72.7 in order to apply a CoC amendment to a previously

² Section 72.7 includes exemption requests for all Part 72 requirements. The current estimate for Section 72.7 is for 5 annual respondents and 200 hours per exemption request for a total of 1,000 hours annually. As a result of the proposed rule, the number of requests will be reduced from 5 to 1 annually, with a burden estimate of 840 hours for this request.

loaded cask. This requirement is expected to affect 4 licensees annually, at one hour per registration, for an increase in burden of 4 hours.

- Sections 72.212(b)(5) & (6) These sections require a general licensee to perform written evaluations prior to applying the changes authorized by an amended CoC to a previously loaded cask. The evaluations must establish that (a) terms, conditions, and specifications of an amended CoC have been met; (b) cask storage pads and areas have been designed to adequately support the static and dynamic loads of the casks; and (c) the requirements of § 72.104 (regarding radioactive material in effluents, and direct radiation) have been met. This requirement affects 8 licensees annually, at 2 hours per recordkeeper, for an increase of 16 hours.
- Section 72.212(b)(7) This section requires a general licensee to evaluate any changes to the site parameters determination and analyses. A copy of the evaluation must be retained as a record until spent fuel is no longer stored under the general license. This requirement affects 8 licensees annually, at 1 hour per recordkeeper, for an increase of 8 hours.
- Section 72.212(b)(11) This section requires a general licensee to maintain a copy of the amended CoC for those casks to which the licensee has applied the changes of an amended CoC and documents referenced in the amended certificate for each cask used for storage of spent fuel. This requirement affects 8 licensees annually, at 1 hour per recordkeeper, for an increase of 8 hours.
- Section 72.240(c) This section requires that an applicant for cask design renewal must submit an application accompanied by a SAR that includes: (1) design bases information as documented in the most recently updated FSAR; and (2) a time-limited aging analysis. The NRC anticipates receiving one application over the next three years (.3 respondents annually), at 40 hours per application, for an increase of 12 hours annually.

Table 1 - Reporting Requirements for Part 72
License and Certificate of Compliance Terms Proposed Rule

Section	No. of Respondents	Responses per Respondent	Number of Responses	Burden Hours per Response	Total Annual Burden Hours	Cost at \$257/hr
Section 72.7	37	(0.11)	(4)	40	(160)	(\$41,120)
Section 72.42(a)-(b)	4	0.3	1.3	40	53	\$13,621
Section 72.212(b)(2)	37	2.7	100	0.2	20	\$5,140
Section 72.212(b)(4)	37	0.11	4	1.0	4	\$1,028
Section 72.240(c)	5	0.06	0.3	40	12	\$3,084
Total	46		101.6		(71)	(\$18,247)

Table 2 - Recordkeeping Requirements for Part 72
License and Certificate of Compliance Terms Proposed Rule

Section	No. of Recordkeepers	Annual Hours per Recordkeeper	Total Annual Burden	Cost at \$257/hr
Section 72.212(b)(5)&(6) -- (G)	8	2.0	16.0	\$4,112
Section 72.212(b)(7) -- (G)	8	1.0	8.0	\$2,056
Section 72.212(b)(11) – (C)	8	1.0	8.0	\$2,056
Total	8		32.0	\$8,224

TOTAL ANNUAL BURDEN / COST: -39 hours (-71 hours reporting + 32 hours recordkeeping) / -\$10,023 (-\$18,247 reporting burden savings + \$8,224 recordkeeping burden)

TOTAL ANNUAL RESPONDENTS: 46

TOTAL ANNUAL RESPONSES: 109.6 (or approximately 329 responses over three years). This includes 101.6 annual responses + 8 annual recordkeepers.

THIRD-PARTY BURDEN: 0 hours

Notes on maintenance period for records:
G = Duration of Gen. License C = Cask life

13. Estimate of Other Additional Costs

The quantity of records to be maintained is roughly 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 .0004 times the recordkeeping burden cost. Therefore, the storage cost for the incremental recordkeeping activities in the proposed rule is \$3 (32 recordkeeping hours x .0004 x \$257/hr).

14. Estimated Annualized Cost to the Federal Government

Table 3 describes the estimated annual cost to the NRC for administration of the reporting and recordkeeping requirements. These costs are fully recovered through fee assessments to NRC licensees pursuant to 10 CFR Parts 170 and 171. The proposed rule would result in some additional burden on the NRC. However, the proposed rule language also would reduce the number of exemptions sought by licensees under Section 72.7 as a result of the new reporting requirement described under Section 72.212(b)(4). The NRC estimates that the savings associated with Section 72.7 more than offsets the additional burden for administration of the reporting and recordkeeping requirements. Therefore, the proposed

rule overall would result in an annual net savings to the NRC of 556 hours or \$142,892.

Table 3 – NRC Burden for Part 72
License and Certificate of Compliance Terms Proposed Rule

NRC Action	No. Actions/Year	Burden Hours/Action	Total Hours	Cost at \$257/hr
Review exemption requests under Section 72.7	(4)	160	(640)	(\$164,480)
Review submittals under Section 72.42(a)-(b)	1.3	16	21	\$5,397
Review submittals under Section 72.212(b)(2)	100	0.5	50	\$12,850
Review submittals under Section 72.212(b)(4)	4	2	8	\$2,056
Review submittals under Section 72.240(c)	0.3	16	5	\$1,285
Total			(556)	\$(142,892)

15. Reason for Changes in Burden or Cost

The proposed rule would result in a total burden hour decrease of 39 hours. This decrease is due to the following:

Reporting:

- The proposed rule would add reporting requirements totaling 89 hours annually, including requirements to conduct aging analyses for license renewal applications, register the use of each cask within 30 days, register the use of each cask when applying changes authorized by an amended CoC, and submit a SAR with cask design renewal applications.
- The proposed rule also would reduce the reporting burden by 160 hours by decreasing the number of exemptions sought by licensees under Section 72.7 as a result of the new rule language in Section 72.212(b)(4) allowing licensees to apply changes authorized by an amended CoC to a previously loaded cask. Previously, licensees seeking to apply changes authorized by an amended CoC would have had to seek an exemption.
- The total reporting burden change is a decrease of 71 hours (+89 hours – 160 hours = -71 hours).

Recordkeeping:

- The proposed rule would add recordkeeping requirements totaling 32 hours, including time to keep records of written evaluations performed prior to applying the changes authorized by an amended CoC to a previously loaded cask and evaluations of site parameter changes, as well as to maintain copies of amended CoCs.

Therefore, the proposed rule overall results in an annual net savings to the industry of 39 hours or \$10,023 (-71 reporting burden hours + 32 recordkeeping burden hours / -\$18,247

reporting burden savings + \$8,224 recordkeeping burden). The NRC estimates that the savings associated with Section 72.7 more than offsets the added reporting and recordkeeping burden.

16. Publication for Statistical Use

None.

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

None.

B. COLLECTIONS OF INFORMATION EMPLOYING STATISTICAL METHODS

Statistical methods are not used in this collection of information.