

March 17, 2010

Supporting Statement for Paperwork Reduction Act Submissions

OMB Control Number: 1660-NEW

**Title: Radiological Emergency Preparedness Program Alert and
Notification Phone Survey**

Form Number(s): FEMA Form 111

General Instructions

A Supporting Statement, including the text of the notice to the public required by 5 CFR 1320.5(a)(i)(iv) and its actual or estimated date of publication in the Federal Register, must accompany each request for approval of a collection of information. The Supporting Statement must be prepared in the format described below, and must contain the information specified in Section A below. If an item is not applicable, provide a brief explanation. When Item 17 or the OMB Form 83-I is checked "Yes," Section B of the Supporting Statement must be completed. OMB reserves the right to require the submission of additional information with respect to any request for approval.

Specific Instructions

A. Justification

1. Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection. Attach a copy of the appropriate section of each statute and regulation mandating or authorizing the collection of information. Provide a detailed description of the nature and source of the information to be collected.

Immediately following activation of a nuclear power plant's alert and notification system as a part of a demonstration that the system meets the requirements of 44 CFR 350.9(a), FEMA will conduct a telephone survey of a sample of residents within that nuclear power plant's emergency planning zone (EPZ). The purpose of this survey is to estimate the proportion of households within the EPZ alerted by a nuclear power plant's alert and notification system.

Relevant FEMA Guidance:

FEMA-REP-10, Guide for the Evaluation of Alert and Notification Systems for Nuclear Power Plants, provides guidance on planning standards, evaluation criteria, and requirements that apply to alert and notification. It establishes that FEMA Regions are responsible for reviewing alert and notification system design submittals as part of FEMA's evaluation and approval process of State and local radiological emergency

plans. NUREG-0654/FEMA REP-1 is part of FEMA-REP-10. It is the “Criteria for Preparation and Evaluation of Radiological Emergency Response Plans and Preparedness in Support of Nuclear Power Plants.” This guidance document provides the basis for the development of radiological emergency response plans and preparedness by State and local governments and the NRC licensees for dealing with accidents at commercial nuclear power plants. Appendix 3 of NUREG-0654/FEMA-REP-1 states that NRC licensees are required to install alert and notification systems around commercial nuclear power plants and that activation of these systems is the responsibility of the State and local governments and that any nuclear power plant scheduled for operation is required to have an alert and notification system installed prior to commercial operation of the facility.

FEMA and the NRC jointly developed this federal criteria, published in November 1980, for assessing both onsite and offsite nuclear power plant radiological emergency planning and preparedness in a document titled Criteria for Preparation and Evaluation of Radiological Emergency Response Plans and preparedness in Support of Nuclear Power Plants, NUREG-0654/FEMA-REP-1, Revision 1. FEMA has overall federal responsibility for offsite radiological emergency planning and preparedness functions. This responsibility was officially assigned to FEMA by the President in December 1979. The Nuclear Regulatory Commission (NRC), which is responsible for onsite safety, assesses overall nuclear power plant safety, using FEMA’s findings on offsite radiological emergency planning and preparedness. The NRC is responsible for determining whether new commercial nuclear power plants should be licensed and whether existing plants should continue operating. However, new plants can be licensed to begin operating, and existing plants can continue to operate without formal FEMA approval and certification to the NRC on the adequacy of offsite radiological emergency planning and preparedness.

2. Indicate how, by whom, and for what purpose the information is to be used. Except for a new collection, indicate the actual use the agency has made of the information received from the current collection. Provide a detailed description of: how the information will be shared, if applicable, and for what programmatic purpose.

This telephone survey collection, as a part of the Alert and Notification (A&N) System review for all commercial nuclear power plant facilities in the United States, is used by FEMA Headquarters as one of the many required parameters used in the review and evaluation of the ANS.

The telephone survey is to be completed within one hour of the sounding of a power plants’ alert and notification siren system. Telephone surveys are used during periodically scheduled radiological emergency preparedness exercises to estimate the proportion of households within the 10-mile emergency planning zone (EPZ) alerted by a nuclear power plant’s alert and notification system. The telephone survey is to be used as a tool to estimate the proportion of households which were actually alerted by ANS. The

data received is one of the components necessary to compare to the 94 percent average annual operability standard to determine the effectiveness of the ANS. Households reporting in a telephone survey that they either were, or were not, notified during an ANS test, provide valuable information concerning the effectiveness or potential issues with the ANS itself, as well as other external factors affecting the ANS. FEMA must utilize all means possible to assure the public is notified properly of pending danger. The telephone survey is used to test if the public can be properly alerted and notified.

A telephone survey is conducted of residents within a nuclear power plants EPZ within one hour of the sounding of a power plants' alert and notification siren system. The telephone survey data is a needed data source used in the compilation and evaluation to determine if the ANS achieves the required results. The Licensees are responsible for assisting in alert and notification system telephone surveys and promptly correcting system problems. If the system is found to have adequate alerting coverage, a date for the telephone survey will be established by FEMA Headquarters that is agreeable to the Regional Office, State and local governments, technical assistance contractor, and the NRC licensee. If the system is found to have inadequate alerting coverage or other problems the State and/or utility will be notified through the FEMA Regional Office that further documentation to support the alert and notification system design is required.

As part of the review process, the technical assistance contractor will conduct a telephone survey of permanent residents within the 10-mile plume exposure emergency planning zone (EPZ) after a scheduled activation of the alert and notification system. The objective of this survey is to estimate the proportion of households within the EPZ alerted by the ANS. Households will be polled to ascertain whether or not they were alerted during the activation of the system

FEMA Regions are responsible for receiving the results of alert and notification system tests from State and local governments, reviewing those results and reporting them to FEMA Headquarters.

3. Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques or other forms of information technology, e.g., permitting electronic submission of responses, and the basis for the decision for adopting this means of collection. Also describe any consideration of using information technology to reduce burden.

This is a 100% automated collection. It is a telephone survey and does not involve paper submission of responses. Automated, electronic, or technological collection techniques are involved. As telephone interviewing progresses, interviewers key all responses into computer terminals, and running totals are kept on completed interviews for those households that were alerted and those households that were not alerted. This used telephone technology and computer technology is only on the side of the interviewer.

4. Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purposes described in Item 2 above.

This information is not collected in any form, and therefore is not duplicated elsewhere.

5. If the collection of information impacts small businesses or other small entities (Item 5 of OMB Form 83-I), describe any methods used to minimize.

This information collection does not have an impact on small businesses or other small entities.

6. Describe the consequence to Federal/FEMA program or policy activities if the collection of information is not conducted, or is conducted less frequently as well as any technical or legal obstacles to reducing burden.

The absence of the survey results contained within the determination record may lead to faulty decisions that harm the credibility of the Agency. There are no technical nor legal obstacles. Well-developed emergency plans, and associated Alert and Notification Systems (ANS) include substantial involvement by local, state and federal authorities. ANS use the Telephone Survey to collect feedback from residents. Results of telephone surveys, along with approved plans and preparedness, are used by the agency to determine if the emergency plans in place adequately protect the public health and safety. The results of telephone surveys are an integral part of the Agency's determination of reasonable assurance that the residents living within the Emergency Planning Zone grant of approval for operations, in addition to the Agency's provision of reasonable assurance that appropriate protective measures can be taken offsite in the event of a radiological emergency.

7. Explain any special circumstances that would cause an information collection to be conducted in a manner:

(a) Requiring respondents to report information to the agency more often than quarterly.

There is no requirement for respondents to report more often than quarterly.

(b) Requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it.

There is no requirement to provide a written response to the collection in less than 30 days after receipt of it.

(c) Requiring respondents to submit more than an original and two copies of any document.

There is no requirement to submit more than an original and two copies of any document.

(d) Requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records for more than three years.

There is no requirement to retain records for more than three years.

(e) In connection with a statistical survey, that is not designed to produce valid and reliable results that can be generalized to the universe of study.

The survey in this collection is designed to produce valid and reliable results that can be generalized to the universe of study.

(f) Requiring the use of a statistical data classification that has not been reviewed and approved by OMB.

There is no use of statistical data classification in this collection.

(g) That includes a pledge of confidentiality that is not supported by authority established in statute or regulation, which is not supported by disclosure and data security policies that are consistent with the pledge, or which unnecessarily impedes sharing of data with other agencies for compatible confidential use.

There is no pledge of confidentiality that is not supported by authority established in statute or regulation for this data collection.

(h) Requiring respondents to submit proprietary trade secret, or other confidential information unless the agency can demonstrate that it has instituted procedures to protect the information's confidentiality to the extent permitted by law.

There is no requirement for respondents to submit proprietary trade secrets, or other confidential information for this data collection.

8. Federal Register Notice:

a. Provide a copy and identify the date and page number of publication in the Federal Register of the agency's notice soliciting comments on the information collection prior to submission to OMB. Summarize public comments received in response to that notice and describe actions taken by the agency in response to these comments. Specifically address comments received on cost and hour burden.

A 60-day Federal Register Notice inviting public comments was published on Nov. 6th, 2009, Volume 74, Number 214, pp. 57508. Two comments were received related to if telephone survey results can obtain information about each of the following: siren

operability, completing Alert Notification System results in accordance with procedures, and siren operability in the last 12 months. One comment related to cost of 0.00 and sample size was received. See attached copy of the published notice included in this package.

A 30-day Federal Register Notice inviting public comments was published on March 17th, 2010, Volume 75, Number 51 pp. 12770. No comments were received.

b. Describe efforts to consult with persons outside the agency to obtain their views on the availability of data, frequency of collection, the clarity of instructions and recordkeeping, disclosure, or reporting format (if any), and on the data elements to be recorded, disclosed, or reported.

Consultations with State and local officials are also held biennially as part of the requirement for review of their emergency plans and preparedness. The design of this survey is very narrow and defined in the regulations, with the circumstances giving rise to it clear and planned. A consultation with State and local officials occurs, at a minimum, biennially. During these consultations FEMA receives, reviews and submits recommendations for State and local officials related to the general acceptance criteria for special alerting systems, and institutional alerting methods used as part of their respective A&N systems.

c. Describe consultations with representatives of those from whom information is to be obtained or those who must compile records. Consultation should occur at least once every three years, even if the collection of information activities is the same as in prior periods. There may be circumstances that may preclude consultation in a specific situation. These circumstances should be explained.

This information is to be obtained from members of the public living in the EPZ of a new nuclear power plant. We do not consult with the public before giving them the survey.

9. Explain any decision to provide any payment or gift to respondents, other than remuneration of contractors or grantees.

There are no payments or gifts to respondents for this data collection.

10. Describe any assurance of confidentiality provided to respondents. Present the basis for the assurance in statute, regulation, or agency policy.

A PTA was completed for this collection on Privacy Threshold Analysis was completed June 30th, 2009. It was determined that a PIA was needed as well. A PIA investigation is under review and near conclusion as of March 1st, 2010. Respondents are not provided with any assurance of confidentiality.

11. Provide additional justification for any question of a sensitive nature (such as sexual behavior and attitudes, religious beliefs and other matters that are commonly considered private). This justification should include the reasons why the agency considers the questions necessary, the specific uses to be made of the information, the explanation to be given to persons from whom the information is requested, and any steps to be taken to obtain their consent. There are no questions of a sensitive nature required in this data collection.

12. Provide estimates of the hour burden of the collection of information. The statement should:

a. Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated for each collection instrument (separately list each instrument and describe information as requested). Unless directed to do so, agencies should not conduct special surveys to obtain information on which to base hour burden estimates. Consultation with a sample (fewer than 10) of potential respondents is desired. If the hour burden on respondents is expected to vary widely because of differences in activity, size, or complexity, show the range of estimated hour burden, and explain the reasons for the variance. Generally, estimates should not include burden hours for customary and usual business practices.

The time burden for this information collection is 56 burden hours with a total annual respondent cost of \$1,228.21. Respondents give one response which takes them the average response time of 10 minutes. It is estimated that 338 respondents per year will spend an average time of 10 minutes for answering this telephone survey.

b. If this request for approval covers more than one form, provide separate hour burden estimates for each form and aggregate the hour burdens in Item 13 of OMB Form 83-I.

c. Provide an estimate of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories. The cost to the respondents of contracting out or paying outside parties for information collection activities should not be included here. Instead this cost should be included in Item 13.

Table A.12: Estimated Annualized Burden Hours and Costs

Type of Respondent	Form Name / Form Number	No. of Respondents	No. of Responses per Respondent	Avg. Burden per Response	Total Annual Burden (in hours)	Avg. Hourly Wage Rate*	Total Annual Respondent Cost
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				(in hours)			
Individuals in Households	FEMA Nuclear Power Plant Alerting And Notification System: Public Telephone Survey, FEMA Form 111	338	1	10 minutes (0.1667 hours)	56	21.80	\$1,228.21
Total		338			56 hours		\$1,228.21

* Note: The "Avg. Hourly Wage Rate" for each respondent includes a 1.4 multiplier to reflect a fully-loaded wage rate.

According to the U.S. Department of Labor, Bureau of Labor Statistics website (www.bls.gov) the wage rate category for all occupations is estimated to be (\$15.57 per hour, 21.80 with the 1.4 multiplier applied, therefore, the estimated burden hour cost to respondents is estimated to be \$1,228.21 annually.

13. Provide an estimate of the total annual cost burden to respondents or recordkeepers resulting from the collection of information. The cost of purchasing or contracting out information collection services should be a part of this cost burden estimate. (Do not include the cost of any hour burden shown in Items 12 and 14.)

The cost estimates should be split into two components:

a. Operation and Maintenance and purchase of services component. These estimates should take into account cost associated with generating, maintaining, and disclosing or providing information. Include descriptions of methods used to estimate major cost factors including system and technology acquisition, expected useful life of capital equipment, the discount rate(s), and the time period over which costs will be incurred.

Capital and Start-up-Cost should include, among other items, preparations for collecting information such as purchasing computers and software, monitoring sampling, drilling and testing equipment, and record storage facilities.

There is no cost to respondents resulting from recordkeeping or reporting obligations involved in this information collection. Respondents' only cost is the one associated with the actual response to the telephone questionnaire (survey) state in Item 12 above.

Annual Cost Burden to Respondents or Record-keepers

Data Collection Activity/Instrument	*Annual Capital Start-Up Cost (investments in overhead, equipment and other one-time expenditures)	*Annual Operations and Maintenance Cost (such as recordkeeping, technical/professional services, etc.)	Annual Non-Labor Cost (expenditures on training, travel and other resources)	Total Annual Cost to Respondents
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	None		None	0
Total	None		None	0

14. Provide estimates of annualized cost to the federal government. Also, provide a description of the method used to estimate cost, which should include quantification of hours, operational expenses (such as equipment, overhead, printing and support staff), and any other expense that would have been incurred without this collection of information. You may also aggregate cost estimates for Items 12, 13, and 14 in a single table.

Annual Cost to the Federal Government

Item	Cost (\$)
Contract Costs: Each survey is conducted by an experienced independent subcontractor who provides a report of the data with its analysis of the finding (without including personally identifiable data or information). This report on the survey results may also be subjected to further review by a SME or SMEs.	\$50,000
Staff Salaries one of GS 12, Step 1 employee spending approximately 2.5% of time annually researching info and writing justifications for this data collection] (74,827 annually x .025= \$1,870.68) x 1.4 multiplier*= \$2,618.95	\$ 2,618.95
Facilities [cost for renting, overhead, etc. for data collection activity]	None
Computer Hardware and Software [cost of equipment annual lifecycle] The government will receive the survey report and its companying statistical tables in electronic forms that are usable from the normal personal computer software. No new hardware or software is needed for the purpose of using the contractor's reports.	None
Equipment Maintenance [cost of annual maintenance/service agreements for equipment]	None
Travel	None
Printing [number of data collection instruments annually] This is a telephone administered survey.	None
Postage [annual number of data collection instruments x postage]	None
Other	None
Total	\$52,618.00

* Note: The "Avg. Hourly Wage Rate" for each respondent includes a 1.4 multiplier to reflect a fully-loaded wage rate.

15. Explain the reasons for any program changes or adjustments reported in Items 13 or 14 of the OMB Form 83-I in a narrative form. Present the itemized changes in hour burden and cost burden according to program changes or adjustments in Table 5. Denote a program increase as a positive number, and a program decrease as a negative number.

A "Program increase" is an additional burden resulting from an federal government regulatory action or directive. (e.g., an increase in sample size or coverage, amount of information, reporting frequency, or expanded use of an existing form). This also includes previously in-use and unapproved information collections discovered during the ICB process, or during the fiscal year, which will be in use during the next fiscal year.

A "Program decrease", is a reduction in burden because of: (1) the discontinuation of an information collection; or (2) a change in an existing information collection by a Federal agency (e.g., the use of

sampling (or smaller samples), a decrease in the amount of information requested (fewer questions), or a decrease in reporting frequency).

"Adjustment" denotes a change in burden hours due to factors over which the government has no control, such as population growth, or in factors which do not affect what information the government collects or changes in the methods used to estimate burden or correction of errors in burden estimates.

Itemized Changes in Annual Burden Hours						
Data collection Activity/Instrument	Program Change (hours currently on OMB Inventory)	Program Change (New)	Difference	Adjustment (hours currently on OMB Inventory)	Adjustment (New)	Difference
FEMA Form 111, FEMA Nuclear Power Plant Alerting And Notification System: Public Telephone Survey	0	56	+56			
Total(s)	0	56	+56			

Explain: The burden hours for the added forms to this inventory, FEMA FORM -111, were not previously captured as this is a new collection on the OMB Inventory. Therefore, all values are now recorded as positive differences.

Itemized Changes in Annual Cost Burden						
Data collection Activity/Instrument	Program Change (cost currently on OMB Inventory)	Program Change (New)	Difference	Adjustment (cost currently on OMB Inventory)	Adjustment (New)	Difference
FEMA Form 111, FEMA Nuclear Power Plant Alerting And Notification System: Public Telephone Survey	0	\$1,228.21	+\$1,228.21			
Total(s)	0	\$1,228.21	+\$1,228.21			

Explain: The annual cost burden for the added forms to this inventory, FEMA Form-111, were not captured as this is a new collection on the OMB Inventory. Therefore, all values are now recorded as positive differences.

16. For collections of information whose results will be published, outline plans for tabulation and publication. Address any complex analytical techniques that will be used. Provide the time schedule for the entire project, including beginning and ending dates of the collection of information, completion of report, publication dates, and other actions.

This information collection will not be published for statistical purposes.

17. If seeking approval not to display the expiration date for OMB approval of the information collection, explain reasons that display would be inappropriate.

This collection does not seek approval to not display the expiration date for OMB approval.

18. Explain each exception to the certification statement identified in Item 19 “Certification for Paperwork Reduction Act Submissions,” of OMB Form 83-I.

This collection does not seek exception to “Certification for Paperwork Reduction Act Submissions”. Question #3 in the supporting statement justifies the non-use of information technology.