

## **Supplemental Statement Regarding RTR Fingerprinting Hours**

The most recent clearance revision for Part 73 was submitted to OMB on March 20, 2008 and approved on June 24, 2008. The supporting statement for the 2008 revision incorporated changes in information collections contained in Commission Orders issued April 30, 2007 (Fingerprinting Orders for Unescorted Access to Research and Test Reactors). The Orders were issued to enhance security programs in response to the threat environment following the attacks of September 11, 2001.

The approved hours for licensees fulfilling fingerprinting requirements under these Orders were 450 reporting hours and 240 recordkeeping hours (total of 690 hours for fulfilling requirements under the Orders).

The current proposed rule seeks to codify in 10 CFR Part 73 the requirements that were previously issued under these Orders. Licensees are already conducting the activities in the proposed rule under Orders, and the hours for the activities are already covered under the Part 73 clearance. As a result, this rule represents no increase in burden to licensees.

**The supporting statement for the proposed rule documents that the burden for the activities conducted under the proposed rule would be 690 hours (240 hours recordkeeping plus 450 hours reporting). However, because these hours are already included in NRC's current inventory, the data entry in ROCIS shows a change of zero hours for the proposed rule.**