FINAL SUPPORTING STATEMENT
FOR
VOLUNTARY REPORTING OF PERFORMANCE INDICATORS
3150-0195

EXTENSION

Description of the Information Collection

The U.S. Nuclear Regulatory Commission (NRC) collects performance indicator (PI) information from commercial nuclear power plant licensees in accordance with the NRC's Reactor Oversight Process (ROP). Licensees have voluntarily submitted information related to selected performance attributes (i.e., PIs) to the NRC on a quarterly basis for each power reactor since the NRC began implementing the ROP in 2000. Licensees submit PIs electronically to reduce burden on themselves and the NRC. The NRC meets approximately monthly with public stakeholders, industry representatives, and the Nuclear Energy Institute (NEI)[1] to improve the PI program. NEI issues updated guidance to licensees for use in collecting and reporting PI data to the NRC based on the results of these meetings.

A. JUSTIFICATION

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

In 1998, the nuclear power industry offered to voluntarily send PIs to the NRC to improve the NRC's regulatory oversight process for nuclear reactors. Power reactor licensees were already collecting and reporting PI data to various industry groups. In April 2000, the NRC began implementing the ROP, which uses PI information to inform NRC conclusions regarding plant performance and regulatory response. The ROP provides for risk-informed, objective, predictable, and understandable oversight of commercial nuclear power plants. The ROP uses PIs and inspection results to provide objective indications of licensee performance and to inform the NRC's regulatory response. PIs measure the performance of plant systems and licensee programs in a risk-informed manner, where applicable. The use of PIs allows for a more effective allocation of industry and NRC resources needed to support NRC oversight.

Licensees retain PI records as long as necessary to calculate specific indicators but do not have to retain these records for more than three years.

Licensees report PIs to the NRC that provide the number of unplanned scrams and power changes per 7,000 hours of critical operation, unplanned scrams with complications over the previous four quarters, safety system functional failures over the previous four quarters,

[1] NEI is a nuclear industry group whose mission is to "foster and encourage the continued safe utilization and development of nuclear energy in order to meet the nation's energy, environmental, and economic goals."

non-conformances with 10 CFR Part 20 requirements for (very) high radiation areas or unintended personnel exposures over the previous four quarters, and occurrences of radiological effluent releases that exceeded values derived from radiological effluent technical specifications or offsite dose calculation manuals over the previous four quarters.

Licensees report PIs to the NRC that provide the unavailability and unreliability of high pressure injection, heat removal, residual heat removal, emergency AC power, and cooling water support systems. Licensees also report PIs to the NRC that provide the percentages of reactor coolant activity and leakage with respect to technical specification limits; successful, accurate, and timely classifications, notifications, and protective action recommendations by the licensee's emergency response organization (ERO) during drills, exercises, and actual events over the previous eight quarters; key ERO members that participated in emergency drills, exercises, or actual events over the previous eight quarters; sirens that operated reliably in the preceding four quarters, and availability of security equipment.

2. Agency Use of Information

The NRC uses PIs to assess licensee performance and determine the appropriate level of regulatory response. With the exception of the Security Cornerstone PI, PI results are made available on the NRC's public Web site and updated on a quarterly basis.

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. It is estimated that approximately 100% of the potential responses are filed electronically.

4. Effort to Identify Duplication and Use Similar Information

No sources of similar information are available that would support efficient implementation of the ROP. 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. Although licensees may report information similar to some PIs to meet other NRC requirements, this information may not be reported in a manner that would allow for timely and adequate implementation of the ROP. The industry expressed and continues to support a strong preference to report PIs separately from other reporting requirements to expedite the development and implementation of the ROP.

5. Effort to Reduce Small Business Burden

   Not applicable.

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

   The NRC could not implement the ROP as it is currently structured if PI information was limited or not available. PI information is a critical element of the ROP. PIs provide an objective basis for assessing licensee performance and allocating NRC inspection resources. The NRC would be forced to increase the number of inspections at licensee facilities to obtain assessment information to the extent that PI information is not available.

7. Circumstances Which Justify Variation from OMB Guidelines

   This information collection does not vary from OMB guidelines.

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 June 17, 2011 (76 FR 35482). No comments were received.

   NRC staff, industry representatives, and public stakeholders meet approximately monthly to improve and interpret PI guidance. As a result of these meetings, the NEI has issued several revisions to the guidance document for industry reporting of PIs since the ROP began implementation in 2000. The current version of the industry guidance is NEI 99-02, "Regulatory Assessment Performance Indicator Guideline," Revision 6. This supporting statement uses a burden estimate developed by industry licensees dated April 1, 2008, and affirmed as still representative by the industry on May 5, 2011.

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). However, the NRC does not request confidential information normally considered confidential or proprietary for PI reporting purposes. The NRC provides PI information that is not security-related on its publicly available Web site.

11. Justification for Sensitive Questions

    Not applicable.

12. Estimated Burden and Burden Hour Cost

Table 1 reflects licensee burden to provide PI information and is based on information from industry. The estimates include only additional hours needed above those already expended by licensees to report indicators to the Institute of Nuclear Power Operations or to comply with other regulatory requirements, such as the Maintenance Rule or event reporting.

There are currently 104 operating reactors. An additional reactor, Watts Bar Unit 2, may commence operation in the 2013 or 2014 timeframe. Because this extension will be applicable until January 1, 2015, the NRC conservatively assumes that this extension will apply to 105 reactors. The NRC assumes there will be one response per reactor unit on a quarterly basis (4 x 105 = 420 annual responses) and that each response will require 200 hours of effort. Thus, the total reporting burden is 84,000 hours (420 responses x 200 hrs/response), and costs are estimated at $21,756,000 (84,000 hours x $259/hr).

Table 2 reflects the licensee recordkeeping burden. The recordkeeping estimate includes time to maintain utility procedures and occasionally refine the PIs and related procedures to incorporate improvements learned from experience. Procedure development and recordkeeping are performed by each utility or parent company. Based on the information provided in Appendix D of NUREG-1350, “2010-2011 Information Digest,” Volume 22, dated August 2010, 26 parent companies currently exist for operating reactors. The industry estimates 50 hours of annual recordkeeping time annually per parent company, for a total of 1,300 hours (26 recordkeepers x 50 hours per recordkeeper) and a cost of $336,700 (1,300 hrs x $259/hr).

The total reporting and recordkeeping burden is 85,300 hours (84,000 hours of reporting and 1,300 hours of recordkeeping), and the total cost is $22,092,700 (85,300 hours x $259/hr).

13. Estimate of Other Additional Costs

The NRC has determined that the quantity of records to be maintained is roughly proportional to the recordkeeping burden and, therefore, can be used to calculate approximate records storage costs. Based on the number of pages maintained for a typical clearance, the records storage cost has been determined to be equal to 0.0004 times the recordkeeping burden cost. Because the recordkeeping burden is estimated to be 1,300 hours, the storage cost for this clearance is $135.00 (1,300 hours x 0.0004 x $259/hour).

14. Estimated Annualized Cost to the Federal Government

The information provided by these indicators was reviewed as a routine part of the previous inspection process and, therefore, incur minimal incremental cost to the government. This cost is fully recovered through fee assessments to NRC licensees pursuant to 10 CFR Parts 170 and/or 171.

15. Reasons for Change in Burden or Cost

The burden is projected to slightly increase from 84,500 hours for 416 responses to 85,300 hours for 420 responses, which is an increase in 800 hours and 4 responses. The previous burden of 84,500 hours was based on 104 licensees responding quarterly at 200 hours per response (83,200 hours), plus 26 recordkeepers at 50 hours per recordkeeper (1,300 hours), for a total of 84,500 hours. The current burden of 85,300 hours is based on the projection of an additional reactor, Watts Bar Unit 2, which may commence operation in the 2013 or 2014 timeframe. Because this extension will be applicable until January 1, 2015, the NRC conservatively assumes that this extension will apply to 105 reactors. Thus, 105 licensees responding quarterly at 200 hours per response (84,000 hours) and 26 recordkeepers at 50 hours per recordkeeper (1,300 hours), for a total of 85,300 hours.

16. Publication for Statistical Use

Not applicable.

17. Reason for Not Displaying the Expiration Date

The expiration date will be displayed.

18. Exceptions to the Certification Statement

Not applicable.

B. COLLECTIONS OF INFORMATION EMPLOYING STATISTICAL METHODS

Not applicable.

TABLE 1
Annual Reporting Burden

	Number of Respondents	Responses per Respondent	Total Responses	Burden per Response	Total Annual Burden Hours	Cost at $259/hour
PI Reporting	105	4	420	200	84,000	$21,756,000

TABLE 2
Annual Recordkeeping Burden

	Number of Recordkeepers	Hours per Recordkeeper	Total Annual Burden Hours	Cost at $259/hour
PI Recordkeeping	26	50	1,300	$336,700

Total Annual Burden: 85,300 (84,000 reporting hours plus 1,300 recordkeeping hours)
Total Burden Hour Cost: $22,092,700 (85,300 hours x $259/hour)
Total Responses: 446 (420 responses plus 26 recordkeepers)