

EMERGENCY CLEARANCE REQUEST					
Enclosure	Requirement	Respondents	Responses per Respondent	Total Responses	Burden Per Response
Enclosures 1 – 5	Confirmation of Receipt	104	1	104	2.6
Enclosures 1 – 5	Response indicating inability to comply with information request	0	0	0	1
Enclosure 1: Recommendation 2.1: Seismic Reevaluation	Submit risk assessment approach or confirm use of generic approach	104	1	104	170
Enclosure 1: Recommendation 2.1: Seismic Reevaluation	Submit hazard reevaluation (seismic), Central and Eastern US (CSUS)	96	1	96	1420
Enclosure 1: Recommendation 2.1: Seismic Reevaluation	Submit hazard reevaluation (seismic), Western US (WUS)	8	1	8	2850
Enclosure 1: Recommendation 2.1: Seismic Reevaluation	Submit seismic risk assessment, high priority plants	35	1	35	6410

Enclosure 1: Recommendation 2.1: Seismic Reevaluation	Submit seismic risk assessment, all other plants	69	1	69	2020
Enclosure 2: Recommendation 2.1 Flooding Reevaluation	Submit integrated assessment approach or confirm use of generic approach	104	1	104	130
Enclosure 2: Recommendation 2.1 Flooding Reevaluation	Submit hazard reevaluation (flooding)	104	1	104	1170
Enclosure 2: Recommendation 2.1 Flooding Reevaluation	Submit integrated assessment for flooding hazards	104	1	104	2700
Enclosure 3: Recommendation 2.3: Seismic Walkdowns	Submit seismic walkdown procedures or confirm use of NRC-endorsed procedures	104	1	104	200
Enclosure 3: Recommendation 2.3: Seismic Walkdowns	Submit seismic walkdown final report	104	1	104	1800
Enclosure 4: Recommendation 2.3: Flooding Walkdowns	Submit flooding walkdown procedures or confirm use of NRC-endorsed procedures	104	1	104	200
Enclosure 4: Recommendation 2.3: Flooding Walkdowns	Submit flooding walkdown final report	104	1	104	1800
Enclosure 5: Recommendation 9.3: Emergency Preparedness	Submit communications analysis	104	1	104	50

Enclosure 5: Recommendation 9.3: Emergency Preparedness	Submit initial staffing analysis	104	1	104	25
Enclosure 5: Recommendation 9.3: Emergency Preparedness	Submit final staffing analysis	104	1	104	25
TOTAL		104		1,456	
ANNUALIZED TOTAL		104		485.3	

CURRENT REQUEST					
Burden	Requirement	Respondents	Responses per Respondent	Total Responses	Burden Per Response
270	Confirmation of Receipt	110	1	110	2.6
0	Response indicating inability to comply with information request	110	1	110	40
17,680	Submit risk assessment approach or confirm use of generic approach	106	1	106	170
136,320	Submit hazard reevaluation (seismic), Central and Eastern US (CSUS)	98	1	98	1,420
22,800	Submit hazard reevaluation (seismic), Western US (WUS)	8	1	8	2,850
224,350	Submit seismic risk assessment, high priority plants conducting SPRA	27	1	27	5,500
	Submit seismic risk assessment, high priority plants conducting SMA	10	1	10	1,750

139,380	Submit seismic risk assessment conducting SMA	43	1	43	1,400
13,520	Submit integrated assessment approach or confirm use of generic approach	106	1	106	170
121,680	Submit hazard reevaluation (flooding)	106	1	106	1,520
280,800	Submit integrated assessment for flooding hazards	106	1	106	2,350
20,800	Submit seismic walkdown procedures or confirm use of NRC-endorsed procedures	104	1	104	200
187,200	Submit seismic walkdown final report	104	1	104	1,800
20,800	Submit flooding walkdown procedures or confirm use of NRC-endorsed procedures	104	1	104	260
187,200	Submit flooding walkdown final report	104	1	104	2,340
5,200	Submit communications analysis	110	1	110	250

2,600	Submit initial staffing analysis	110	1	110	125
2,600	Submit final staffing analysis	110	1	110	125
1,383,200		110		1,576	
461,066.7		110		525.3	

CHANGE IN BURDEN ESTIMATES					
Burden	Respondents	Responses per Respondent	Total Responses	Burden Per Response	Burden
286	6	0	6	0	16.0
4,400	110	1	110	39	4,400.0
18,020	2	0	2	0	340.0
139,160	2	0	2	0	2,840.0
22,800	0	0	0	0	0.0
148,500	2	0	2	-1924	-75,850.0
17,500					

60,200	-26	0	-26	-620	-79,180.0
18,020	2	0	2	40	4,500.0
161,120	2	0	2	350	39,440.0
249,100	2	0	2	-350	-31,700.0
20,800	0	0	0	0	0.0
187,200	0	0	0	0	0.0
27,040	0	0	0	60	6,240.0
243,360	0	0	0	540	56,160.0
27,500	6	0	6	200	22,300.0

13,750	6	0	6	100	11,150.0
13,750	6	0	6	100	11,150.0
1,372,506	6	0	120	0	-28,194.0
457,502	6		40		-3,564.7

Comments

Increase of 6 respondents (4 COL units and 2 reactors resuming licensing)

Due to a dependence btw recent rulemaking and requirements, all respondents indicating an inability to meet initial due dates. Additional time per response was added based on burden to respond and incorporate relevant rule information

No change in burden estimates, increase in number of respondents

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Increase of 2 respondents in the high priority category. The initial submission combined all high priority plants into one burden estimate regardless of whether they were conducting a higher burden SPRA (25% of plants conduct this at 8,000 hrs/response) or lower burden SMA (50% of plants conduct this at 1,500 hr/response), with an weighted average burden of 6,410 hours.

The current submission is broken down by type of analysis. The estimate for SPRA as increased by 30% from 8,000 hrs to 11,000 hours based on comments from NEI. However, only 50% of this effort will be conducted during the clearance period (5,500 hrs). The estimate for SMA was increased by 30% from 2,700 hrs to 3,500 hrs based on comments from NEI. Only 50% of this effort will occur during the clearance period (1750 hrs).

The overall decrease for this item is due to the consideration of the time period in which the analyses will be conducted - half of the work will occur during the current clearance period and half will occur during the next clearance cycle.

The previous submission included all remaining plants, who would perform an SMA (2,700 hrs) or no analysis at all (0 hrs), using a weighted average of 2020 hrs/respondent. The current submission includes only those plants anticipated to submit an SMA resulting in a reduction of 26 responses. The burden estimate for conducting an SMA increase by 30% from 2,700 hrs to 3,500 hrs as a result of NEI comments. However, only 40% of the work on these analysis will occur during the current clearance period (1,400 hrs).

The primary reason for the reduction in burden for this requirement is the consideration of the time period in which the analyses will be conducted.

Burden increased by 30% based on NEI comments. Two additional respondents.

Burden increased by 30% based on NEI comments. Two additional respondents.

The original submission assumed all burden would be incurred during the first three years; however, only 2/3 of burden will be incurred in the current clearance period. This reduced the burden from 2,700 hours to 1,800 hours. NRC then increased this estimate by 30% based on NEI comments, to 2,350 hours.

Burden per response increased by 30% based on NEI comments.

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Burden per response increased from 50 hours to 250 hours based on NEI comments.

Burden per response increased from 25 hours to 125 hours based on NEI comments.

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The current submission increases the burden estimates for a number of requirements by 30% in response to comments from NEI; however, the current submission considers the burden accrual over time (some analyses will be conducting during both the current clearance period and the next clearance period), which results in a decrease in overall burden.