

1FINAL SUPPORTING STATEMENT
FOR
REVIEW OF OUTREACH EFFORTS RELATED TO THE NRC'S SAFETY CULTURE POLICY
STATEMENT
(3150-XXXX)
NEW

Description of the Information Collection

A. JUSTIFICATION

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

In June 2011, the Nuclear Regulatory Commission (NRC) issued its Safety Culture Policy Statement, which describes the Commission's expectation that the NRC's regulated community maintain a positive safety culture. The Commission approved the implementation plan for the Safety Culture Policy Statement that staff submitted in SECY-12-0008, dated January 19, 2012, and available in the Agencywide Documents Access and Management System (ADAMS) under Accession Number ML11334A073. In accordance with that plan, staff has been conducting communications and outreach activities to engage and educate the regulated community on the contents of the policy statement and the importance of a positive safety culture. Examples of activities include: development of educational tools (e.g., brochure, case studies, and posters) to enhance understanding of the Safety Culture Policy Statement; presentations at licensee and industry meetings and workshops, and other forums with stakeholders in the regulated communities; sharing the key messages from the Safety Culture Policy Statement during licensing and inspection meetings with licensees; and sharing information through newsletter articles and a generic communication to all NRC licensees and the Agreement State Radiation Control Program Directors. Similarly, Agreement States (i.e., States that have signed formal agreements with the NRC to assume regulatory responsibility over certain byproduct and source nuclear materials, as well as small quantities of special nuclear materials) have conducted a variety of outreach and communications activities and made use of many of the tools described above. The implementation plan in SECY 12-0008 also described plans to review the effectiveness of the outreach and communications efforts.

The NRC continues to seek ways to engage with stakeholders, licensees, members of the public, and the international community to provide outreach and education on the Safety Culture Policy Statement. As outlined in the implementation plan, staff plans to conduct a review of the effectiveness of outreach and communications activities related to the Safety Culture Policy Statement. The NRC needs to gather feedback on its efforts to determine if the outreach and communication activities have been effective in promoting awareness of the Safety Culture Policy Statement, and to determine if changes to current activities and/or new activities are necessary and appropriate. To support this review, staff plans to conduct a voluntary survey of its regulated community, specifically materials users and organizations involved in

the fuel cycle. Staff also invited Agreement States to participate by voluntarily administering the survey to materials users that they regulate, and 8 States have agreed to participate.

The NRC has determined that a standardized voluntary survey is the most practical means of gathering feedback on outreach and communications regarding the Safety Culture Policy Statement. Using a survey approach for the review allows for input to be solicited from a wide range of licensees in an efficient and consistent manner. The NRC will determine the effectiveness of outreach efforts by gathering feedback from licensees regarding their awareness of the Safety Culture Policy Statement, whether they have received safety culture materials from the NRC or Agreement States, satisfaction with the outreach and education products they have received, and overall satisfaction with the level and quality of communications from the NRC or Agreement States about safety culture.

2. Agency Use of Information

The NRC staff plans to use the results to identify if any changes to current activities and/or any new outreach and communications activities related to the Safety Culture Policy Statement are necessary and appropriate. The participating Agreement States will also review the results from their licensees and may consider taking actions based on the information.

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. 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.

5. Effort to Reduce Small Business Burden

Efforts to reduce the burden on small businesses include making the information collection survey a voluntary activity, only asking for one respondent from each organization, and making the survey available through a web-based interface. Approximately 27% of respondents are estimated to be small businesses.

6. Consequences to Federal Program or Policy Activities if the Collection Is Not Conducted or Is Conducted Less Frequently

This information collection activity supports ongoing review of the effectiveness of outreach and communications related to the NRC's Safety Culture Policy Statement. If this information collection is not conducted then the staff will not be able to efficiently gather feedback from a wide range of stakeholders in the NRC's and participating Agreement States' regulated communities. Consequently, the NRC and participating Agreement States will not have the information needed to perform a review of Safety Culture Policy Statement outreach activities, and will not be able to efficiently make adjustments to their outreach and communication activities to more effectively reach its regulated community.

7. Circumstances Which Justify Variation from OMB Guidelines

There are no variations 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 January 27, 2014 (79 FR 4359). No comments were received.

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, no information normally considered confidential or proprietary is requested.

11. Justification for Sensitive Questions

Not applicable.

12. Estimated Burden and Burden Hour Cost

The total estimated annualized burden is 338.69 hours and estimated annualized burden hour cost is \$92,124 (338.69 hrs x \$272/hr, see Table 1). This information collection activity is voluntary, therefore the burden hour and cost estimates assume a 50% response rate from the 6,125 NRC and participating Agreement State licensees who will be invited to participate. The burden hour estimate also assumes that the survey will take no more than 20 minutes (.33 hours) to complete for each respondent. The survey will be conducted one time during the three year clearance period. There are no recordkeeping or storage requirements associated with this activity. See Table 1.

13. Estimate of Other Additional Costs

None.

14. Estimated Annualized Cost to the Federal Government

The estimated annualized cost to the Federal Government is \$54,715.33. The cost includes approximately 300 professional staff hours at a rate of \$272/hour over the three year clearance period (annualized to 100 hours at \$272/hr = \$27,200), and annualized costs for contractor support of the information collection activity of approximately \$27,515.33.

15. Reasons for Change in Burden or Cost

The NRC is requesting clearance for a voluntary survey to review outreach efforts related to NRC's safety culture policy statement. This survey would result in 338.69 hours of burden. The NRC staff plans to use the results to identify if any changes to current activities and/or any new outreach and communications activities related to the Safety Culture Policy Statement are necessary and appropriate.

16. Publication for Statistical Use

Not applicable.

17. Reason for Not Displaying the Expiration Date

Not applicable.

18. Exceptions to the Certification Statement

None.

TABLE 1
ANNUALIZED REPORTING BURDEN

Section	Number of Respondents Invited	Responses per Respondent (50% response rate)	Total Number of Responses	Burden Hours per Response	Total One-Time Reporting Burden (Hrs)	Annualized Reporting Burden	Cost at \$272/hr
Individuals or Households	29.00	0.50	14.50	0.33	4.785	1.595	\$ 434
Private Sector	5793.00	0.50	2896.50	0.33	955.845	318.615	\$ 86,663
State, Local, or Tribal Government	336.00	0.50	168.00	0.33	55.44	18.48	\$ 5,027
TOTAL	6158.00		3079.00		1016.07	338.69	\$ 92,124

TOTAL BURDEN HOURS: 338.7
TOTAL BURDEN HOUR COST: \$92,124
RESPONDENTS: 1026.3 respondents (6158 invited respondents x 50% response rate = 3079 one-time respondents / 3 yr clearance period)
RESPONSES: 1026.3 responses (3079 one-time responses / 3 yr clearance period)