

FINAL SUPPORTING STATEMENT
FOR
10 CFR PART 75
SAFEGUARDS ON NUCLEAR MATERIAL -
IMPLEMENTATION OF US/IAEA AGREEMENT
(3150-0055)

EXTENSION

Description of the Information Collection

The United States (U.S.), as a party to the Treaty on the Non-Proliferation of Nuclear Weapons (NPT), has joined with other nations in an effort to limit the spread of nuclear weapons. To encourage widespread adherence to the NPT by non-nuclear-weapon States, in 1967 President Johnson announced that the U.S. would permit the International Atomic Energy Agency (IAEA) to apply its safeguards to nuclear activities in this country. This policy has been reaffirmed by each succeeding President. The US/IAEA Safeguards Agreement (*Agreement Between the United States of America and the IAEA for the Application of Safeguards in the United States of America and its Initial Protocol*) (INFCIRC/288) contains provisions which parallel agreements between the IAEA and non-nuclear-weapon States, the principal difference being the exclusion of national security activities. In 1998 the U.S. signed an Additional Protocol based on the IAEA Model Additional Protocol (INFCIRC/540) which came into force in 2009. Title 10 of the *Code of Federal Regulations* (10 CFR) Part 75 establishes requirements to implement the US/IAEA Safeguards Agreement (and its Initial Protocol) and the Additional Protocol (AP) for the application of safeguards in the U.S. The requirements of Part 75 apply to all 261 persons licensed or certified by the U.S. Nuclear Regulatory Commission (NRC) or Agreement States who are defined to be facilities under Section 75.4 and specified on the U.S. eligible list as determined by the Secretary of State or his designee and filed with the NRC. Currently, four out of the 261 licensees have been chosen to participate in the US/IAEA Safeguards Agreement. NRC expects one licensee will be added over the next three years.

A. Justification

1. Need for and Practical Utility of the Information Collection

Regulations that implement the US/IAEA Safeguards Agreement (and Initial Protocol) and Additional Protocol are found in 10 CFR Part 75. As covered by the present clearance and described below, 10 CFR Part 75 requires selected licensees to permit inspections by IAEA representatives, follow written material accounting and control procedures, give immediate notice to the NRC in specified situations involving the possibility of loss of nuclear material, and give notice for imports and exports of nuclear material. In addition, the regulations allow licensees to request an exemption from Part 75 requirements.

Section 75.3(a) states that the Commission may, upon application of any interested person or upon its own initiative, grant exemptions from the requirements of this part under specified conditions.

Section 75.6 requires each licensee subject to the provisions of Part 75 which has been given notice that its facility or location is required to report under the Safeguards Agreement shall make its initial and subsequent reports.

Section 75.7a requires each licensee to inform the Commission before beginning an activity that may be subject to the Safeguards Agreement or within 30 days of beginning an activity subject to the Additional Protocol.

Section 75.10(a)¹ requires each licensee subject to the provisions of Part 75 to submit facility information to the Commission in response to a written request. IAEA Form N-71 (and the appropriate associated IAEA Form) or IAEA Form N-91 is used to collect this information. The use of IAEA Form N-71 (and the appropriate associated IAEA Form) or IAEA Form N-91 has previously been approved by the Office of Management and Budget (OMB) under clearance number 3150-0056, which should be referred to for information collection burden and supporting data.

Section 75.10(b) requires each licensee to identify the facility information which includes: 1) labeling its general character, purpose, nominal capacity (thermal power level), and geographic location, and the name and address to be used for routine purposes; 2) a description of the general arrangement and layout of equipment within the installation; 3) a description of features of the facility relating to material accounting, containment, and surveillance; and 4) a description of the existing and proposed procedures at the facility for nuclear material accounting and control, with special reference to material balance areas established by the licensee, measurement of flow, and procedures for physical inventory taking; (5) a map of the site and information on buildings on the site. (See OMB clearance number 3150-0056 for information collection burden and supporting data.)

Section 75.10(c) requires each licensee to submit to the Commission information with respect to any modification or change at the facility affecting the information given under Section 75.10(a). This information is required in order to ensure that the current information is provided to IAEA. (See OMB clearance number 3150-0056 for information collection burden and supporting data.)

¹ In the previous renewal, the requirements for 75.10 were incorrectly attributed to 75.11. This has been corrected in the current submission. This change has not resulted in a change in burden. There has been no change in the requirements associated with 10 CFR 75 since the last renewal. Submission of information related to the U.S. obligations under the US/IAEA Safeguards Agreement (and its Initial Protocol) are more closely identified in 10 CFR 75.10.

Section 75.10(d) specifies that the information required by (a) and (c) above, submitted on IAEA Form N-71 (and the appropriate associated IAEA Form), IAEA Form N-91, or other forms, must include: 1) identification of features of facility and nuclear material in sufficient detail to facilitate verification, 2) determination of material balance areas and key measurement points, 3) establishment of nominal timing and procedures for physical inventory, 4) record and report requirements and evaluation procedures, 5) establishment of requirements and procedures for verification of the quantity and location of nuclear material, 6) selection of containment and surveillance methods and techniques at the strategic points at which they are to be applied, and 7) information on organizational responsibility for material control and accounting. This information is collected by NRC and forwarded to the IAEA. (See OMB clearance number 3150-0056 for information collection burden and supporting data.)

Section 75.10(e) specifies that the licensee must submit a map of the site and information on buildings on the site as specified for DOC/NRC Form AP-A and associated forms.²

Section 75.10(f) specifies that the licensee's detailed security measures for the physical protection of a facility shall be included in the facility information only when and to the extent specifically requested by the Commission. This information, when requested, is necessary for IAEA to safeguard nuclear material. (See OMB clearance number 3150-0056 for information collection burden and supporting data.)

Section 75.10(g) specifies that health and safety rules that are to be observed by IAEA inspectors at the facility must be included in the facility information provided to the Commission.

Section 75.10(h) specifies that information must be provided on the need to manage IAEA access to the facility to protect health and safety or to protect classified, proprietary, or other sensitive information or other protective measures.

Section 75.11(a) as required by the Additional Protocol, licensees or certificate holders shall submit location information to the Commission as specified in the instructions for DOC/NRC Form AP-1 and associate forms. (See OMB Clearance No. 0694-0135 for information collection burden and supporting data.)

Section 75.11(b) requires that under the Additional Protocol, licensees or certificate holders provide location information on nuclear fuel cycle-related: 1) research and development, 2) manufacturing or construction information,

²Removal of reference to 10 CFR 75.14 was necessary due to its non-existence. Additionally, 10 CFR 75.10(e), (g) & (h) were included in this revision to capture these requirements.

3) uranium and thorium mine and concentration plant information, 4) impure source material possession information, 5) imports and exports of source material for non-nuclear end uses, 6) IAEA exempted and terminated nuclear

material information, 7) imports and exports of non-nuclear material and equipment. (See OMB Clearance No. 0694-0135 for information collection burden and supporting data.)

Section 75.11(c) requires that under the Additional Protocol information submitted concerning location of activities must be supplied as specified for DOC/NRC Forms AP-1 and associated forms. If the information has not changed, a "No change" report must be provided. NRC should also be notified when the activity is no longer performed. (See OMB Clearance No. 0694-0135 for information collection burden and supporting data.)

Section 75.11(d) requires that under the Additional Protocol information must be provided by the licensee or certificate holder which provides a description of the need to manage IAEA access to the location. Managing IAEA access is to protect health and safety or to protect classified, proprietary or other sensitive information. (See OMB Clearance No. 0694-0135 for information collection burden and supporting data.)

Section 75.12(b)(1) requires that a licensee submit a request from the Commission that allows for some information of particular sensitivity or is customarily held in confidence will not be transmitted physically to the IAEA, but held on-site. The licensee will identify the pertinent document or part thereof and make a full statement of the reasons supporting the request. The licensee will retain a copy of the request and all documents related to the request as a record until the Commission terminates the license for the licensee involved or is it is no longer under IAEA safeguards. Superseded material must be retained for 3 years after each change is made.

Section 75.12(b)(4) specifies that the Commission will determine a location where information in 75.12(b) will remain readily available for examination by the IAEA and will so inform the licensee. The licensee is required to retain this information as a record until the Commission terminates the license or until the Commission notifies the licensee that they are no longer subject to the IAEA Safeguards Agreement.

Section 75.12(d) specifies that the Commission may at its own initiative or at the request of the licensee, determine that any information submitted under Part 75.10 and 75.11 shall not be physically transmitted to, or made available for examination by the IAEA.

Section 75.21(b) specifies that required material accounting and control procedures retained by the licensee shall include, as appropriate: 1) a

measurement system for the determination of the quantities of nuclear material, 2) evaluation of precision and accuracy of measurements, 3) procedures for identifying, reviewing and evaluating differences in shipper/receiver measurements, 4) procedures for physical inventory taking, 5) evaluation of unmeasured inventory and unmeasured losses, 6) system of accounting and operating records.

Section 75.22 requires that a licensee maintain accounting records for each IAEA material balance area. The accounting records shall allow for taking of book inventory, inventory changes, physical inventory, adjustments/corrections and all appropriate information on nuclear material items and batches.

Section 75.23 requires that a licensee keep operating records for each IAEA material balance area. The operating records will provide operating data used to establish changes in the quantities and composition of nuclear material. Additionally, data on calibration of tanks and instruments, preparations for taking of the physical inventory, and actions taken to ascertain the magnitude and cause of any accidental or unmeasured nuclear material loss.

Section 75.24 requires that a licensee will retain all records associated with IAEA Safeguards be retained for at least five years.

Section 75.31 requires that a licensee which has been informed in writing that its facility has been identified under the IAEA Agreement must make an initial inventory report on DOE/NRC Form 742, and must thereafter make accounting reports. In addition, a licensee who has been given notice pursuant to Section 75.41 that its facility is subject to the application of IAEA safeguards must make the special reports described in Section 75.36, based on the records kept in accordance with Section 75.21. At the request of the Commission, the licensee must amplify or clarify in writing, within 20 days, any report relevant to implementation of the Agreement. This information is necessary to provide required information to IAEA in accordance with the Agreement.

Section 75.32 requires that the initial inventory report, on DOE/NRC Form 742, in accordance with printed instructions for completing the form, must show the quantities of nuclear material contained in or at a facility as of the initial inventory reporting date. That date is the last day of the calendar month in which the Commission gives the licensee notice that an initial inventory report is required. The initial inventory report must be dispatched within 20 days after the initial inventory reporting period. DOE/NRC Form 742 is used to collect this information. The use of DOE/NRC Form 742 has previously been approved by OMB under clearance number 3150-0004, which should be referred to for information collection burden and supporting

data. This form is now required to be submitted in computer-readable format, as more fully described below and in OMB Clearance 3150-0004.

Section 75.33 requires that the accounting reports for each IAEA material balance area shall consist of inventory change reports on DOE/NRC Form 741 and material status reports on DOE/NRC Form 742. The use of DOE/NRC Forms 741 and 742 has previously been approved by OMB under clearance numbers 3150-0003 and 3150-0004, which should be referred to for information collection burden and supporting data. These forms are now required to be submitted in computer-readable format, as more fully described below and in OMB Clearances 3150-0003 and 3150-0004.

Section 75.34 requires that inventory change reports be submitted on DOE/NRC Form 741, in accordance with printed instructions for completing the form. Form 741 serves as shipping and transfer document for special nuclear material and source material as required of NRC and Agreement State licensees. This requirement is needed to enable the U.S. to fulfill its responsibilities as an IAEA participant. DOE/NRC Form 741 is used to collect this information. The use of DOE/NRC Form 741 has previously been approved by OMB under clearance number 3150-0003, which should be referred to for information collection burden and supporting data. This form is now required to be submitted in computer-readable format, as more fully described below and in OMB Clearance 3150-0003.

Section 75.35 requires that material status reports must be submitted and must include a material balance report on DOE/NRC Form 742, and attached thereto a physical inventory listing on DOE/NRC Form 742C listing all batches separately and specifying material identification and batch data for each batch, accompanied by a DOE/NRC Form 740M, Concise Note, in accordance with printed instructions for completing the forms. The material status reports must be dispatched as soon as possible and in any event within 30 days after the start of the physical inventory. The use of those forms has previously been approved by OMB under the following clearance numbers, which should be referred to for information collection burden and supporting data:

DOE/NRC Form 742	OMB No. 3150-0004
DOE/NRC Form 742C	OMB No. 3150-0058
DOE/NRC Form 740M	OMB No. 3150-0057

Those forms are now required to be submitted in computer-readable format, as more fully described below and in the OMB clearances cited.

Section 75.36 requires that a licensee which has been informed in writing that its facility has been identified under the US-IAEA Safeguards Agreement shall immediately make a report to the Commission in cases where: 1) loss of special nuclear material in excess of specified limits, 2)

unexpected changes in containment to the extent that unauthorized removal of nuclear material has become possible.

Section 75.43(a) requires a licensee who has been given notice under § 75.7 shall give advance written notification to the Commission regarding the international and domestic transfers specified in this section.

Section 75.43(b) requires that notification be given of any proposed shipment of nuclear material for peaceful purposes under an export license issued pursuant to 10 CFR Part 110 in any amount exceeding one effective kilogram, directly or indirectly to any non-nuclear weapon state.

Section 75.43(c)(1) requires that notification shall be given (to the fullest extent possible on the basis of available information) with respect to nuclear material which immediately prior to export is subject to safeguards, under an agreement with the IAEA, in the country from which the material, directly or indirectly, is being exported. Such notification is only required, however, if the quantities of nuclear material are as specified in paragraph (c)(2) of this section.

Section 75.43(c)(2) requires that notification shall be given with respect to any proposed import of nuclear material described in paragraph (c)(1) of this section in an amount exceeding one effective kilogram. If the licensee anticipates that it will receive two or more shipments of such nuclear material, within any 90-day period from points of origin in the same country, notification shall be given with respect to each shipment if the aggregate quantity of such nuclear material to be received exceeds one effective kilogram

Section 75.43(d) requires that notification be given regarding any shipments of nuclear material (other than small quantities in the form of samples containing less than 0.01 effective kilogram per sample) to a non-eligible destination. As used in this paragraph, a *non-eligible destination* means any destination in the United States other than a facility on the Eligible Facilities List.

Section 75.44(a)(1) specifies that notification to the Commission shall be given in the case of exports and domestic transfers, at least 20 days in advance of the preparation of the nuclear material for shipment from the facility

Section 75.44(a)(2) specifies that notification to the Commission shall be given in the case of imports, at least 12 days in advance of the unpacking of nuclear material at the facility

Section 75.44(c) specifies that the licensee shall inform the Commission, by phone, as soon as possible, with respect to any delay in the receipt (or unpacking) or the shipment (or preparation for shipment) of nuclear material

for which advance notification is required. New dates should be provided, if known.

Section 75.45 specifies that the notifications required by § 75.43 must include the element weight of nuclear material being received or shipped, the chemical composition and physical form, the isotopic composition (to the extent specified by license conditions), the estimated date and place at the reporting facility where the nuclear material is to be un-packaged or prepared for shipment (and where the quantity and composition can be verified), the applicable IAEA material balance area at the reporting facility, the approximate number of items to be received or shipped, and the probable dates of receipt or shipment.

2. Agency Use of Information

In order to fulfill U.S. obligations under the US/IAEA Safeguards Agreement, the NRC is required to collect the information and make it available to the IAEA. The NRC would not be able to fulfill its responsibilities without the information.

Licensees must notify the NRC promptly, by telephone, whenever an IAEA inspector arrives at a facility without advance notification. The NRC uses this information to verify the credentials of the visitor.

Information on material control and accounting operations is reviewed by NRC and IAEA to evaluate the licensee's material control and accounting programs. In addition, accounting records are used by the IAEA to determine whether there has been a diversion of material. The NRC uses information about the possibility of loss of nuclear material to determine whether any immediate response or corrective action is necessary.

Licensees may request an exemption to the requirements to submit information to the IAEA. The NRC uses information provided in these requests to determine whether the requested exemption is authorized by law. NRC staff ensures that granting the exemption will not endanger life or property or the common defense and security, and it determines if granting the request is in the public interest. If the licensee has requested that sensitive information be withheld from the IAEA, the NRC uses information in the request to attempt to achieve an effective balance between legitimate concerns of licensees (including protection of the competitive position of the owner of the information) and the U.S. responsibility to cooperate with the IAEA and implement the safeguards provided for in the US/IAEA Safeguards Agreement.

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 95% 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

NRC has determined that the affected entities are not small entities or businesses.

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

The data collection times are established by an international Agreement and cannot be changed except by modifying the Agreement. If the information were not collected, the United States would not be able to meet its obligations under the US/IAEA Safeguards Agreement or Additional Protocol.

7. Circumstances Which Justify Variation from OMB Guidelines

Contrary to the OMB Guidelines in 5 CFR 1320.5(d), licensees must submit certain information to NRC in less than 30 days:

- If the NRC requests that a licensee amplify or clarify a report relevant to the implementation of the US/IAEA Safeguards Agreement, the licensee must submit the information within 20 days. These requirements are necessary in order to meet the time requirements for notification to IAEA under the US/IAEA Safeguards Agreement.
- Licensees that have been given notice pursuant to Section 75.36 must make a special report to the NRC immediately by telephone and telegraph, mailgram or facsimile in certain specified situations involving the possibility of loss of nuclear material in excess of specified limits and in case of unexpected changes in containment to the extent that unauthorized removal of nuclear material has become possible. Requiring that this information be reported in less than 30

days is necessary so that the information may be promptly evaluated by NRC to determine whether any immediate response or corrective action may be necessary.

- Licensees must notify the NRC for exports, imports, and domestic transfers of nuclear material in less than 30 days. These requirements are necessary in order to meet the time requirements under the US/IAEA Safeguards Agreement.

In addition, licensees must retain a number of records for longer than is specified in the OMB guidelines in 5 CFR 1320.5(d) in the following cases:

- Licensees who request that sensitive information not be submitted to the IAEA must retain this sensitive information as a record for examination by the IAEA until the NRC terminates the license or until the licensee is notified by the NRC that it is no longer covered by the US/IAEA Safeguards Agreement. This extended retention period is necessary so that the records are available and arrangements may be made for the IAEA to review them if circumstances require.
- A licensee notified in writing by the NRC that its facility has been identified under the US/IAEA Safeguards Agreement must retain written material accounting and control procedures as a record until the NRC terminates the license or until the NRC notifies the licensee that it is no longer selected under the Agreement. Superseded material must be retained for three years. It is necessary that the procedures be retained for more than three years so that they may be used by the licensee to carry out its material control and accounting operations. The procedures are also reviewed by NRC to ensure the adequacy of the licensee's material control and accounting programs.
- Material control and accounting records required by Sections 75.22 and 75.23 must be retained for five years. This requirement is necessary to comply with the US/IAEA Safeguards Agreement.

8. Consultations Outside the Agency

Opportunity for public comment on the information collection requirements for this clearance package was published in the Federal Register on April 21, 2014 (79 FR 22167). No comments were received.

9. Payment or Gifts 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).

11. Justification for Sensitive Questions

None.

12. Estimated Burden and Burden Hour Cost

Currently, four out of the 261 licensees have been chosen to participate in the US/IAEA Safeguards Agreement. NRC expects one licensee will be added over the next three years. On average five licensees per year will be under IAEA safeguards (4 licensees during the first year, 5 during the second year, and 5 during the third year). It is estimated that five participants will be required to perform reporting and recordkeeping activities while 2 participants will be required to perform only reporting activities (under INCIRC/288).

Approximately 30 licensees are required to report information required by the U.S. Additional Protocol (*Protocol Additional to the Agreement between the United States of America and the International Atomic Energy Agency for the Application of Safeguards in the United States of America*), resulting in an approximately 180 reports. The burden for these reports is included in Department of Commerce clearance 0694-0135.

The estimated annual cost to licensees to respond to the collection requirements is \$1,077,228.80 (3,960.4 hours x \$272/hour). The cost is calculated at a rate of \$272 per hour, which is based on NRC's fee recovery rate. See Tables 1 and 2 for burden data.

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 3,960 hours, the storage cost for this clearance is \$430.00 (3,960 hours x 0.0004 x \$272/hour).

14. Estimated Annualized Cost to the Federal Government

The cost for NRC professional review is estimated to be 468 professional staff hours at \$272 per hour, or \$127,296. These costs are fully recovered by fees to NRC licensees pursuant to 10 CFR Parts 170 and/or 171.

15. Reasons for Change in Burden or Cost

The burden has increased by 1,560 hours from 2,400 to 3,960 hours due to selection of the uranium enrichment facility for implementation of safeguards and subsequent efforts to develop Transitional Facility Attachment.

The overall cost as a result of an increase in the NRC's fee recovery rate from \$259 per hour to \$272 per hour.

16. Publication for Statistical Use

This information will not be published for statistical use.

17. Reason for Not Displaying the Expiration Date

The requirement is contained in a regulation. Amending the *Code of Federal Regulations* to display information that, in an annual publication, could become obsolete would be unduly burdensome and too difficult to keep current.

18. Exceptions to the Certification Statement

None.

B. Collection of Information Employing Statistical Methods

Not applicable.

TABLE 1: ANNUAL REPORTING BURDEN FOR NRC LICENSEES (PART 75)

Section	No. of Respondents	Annual Responses	Hours Per Response	Total Annual Burden	Comments
75.3(a)	0	0	12	0	
75.6	0	0	0	0	Included in 75.32, 75.34, 75.35, 75.36, 75.10(d), and 75.10(e)
75.7a	2	2	0.2	0.4	
75.10(a)					See OMB Clearance No. 3150-0056
75.10(b)					See OMB Clearance No. 3150-0056
75.10(c)					See OMB Clearance No. 3150-0056
75.10(d)					See OMB Clearance No. 3150-0056
75.10(e)					See OMB Clearance No. 0694-0135
75.10(f)					See OMB Clearance No. 3150-0056
75.10(g)					See OMB Clearance No. 3150-0056
75.10(h)					See OMB Clearance No. 3150-0056
75.11(a)					See OMB Clearance No. 0694-0135
75.11(b)					See OMB Clearance No. 0694-0135
75.11(c)					See OMB Clearance No. 0694-0135
75.11(d)					See OMB Clearance No. 0694-0135
75.12(b)	5	0	12	0	
75.12(d)					Included in 75.12(b)
75.31					Included in 75.33 and 75.36
75.32					See OMB Clearance No. 3150-0004 & 0058
75.33					See OMB Clearance Nos. 3150-0003 and -0004
75.34					See OMB Clearance No. 3150-0003 & 0057
75.35					See OMB Clearance Nos. 3150-0004, -0057 & -0058
75.36	5	0	12	0	
75.43(a)					Included in 75.43(b) and 75.43(c)(2)
75.43(b)	5	0	4	0	
75.43(c)(1)					Included in 75.43(c)(2)
75.43(c)(2)	5	0	4	0	
75.43(d)	5	0	4	0	
75.44(a)(1)					Included in 75.43(b)
75.44(a)(2)					Included in 75.43(c)(2)
75.44(c)					Included in 75.43(b) and 75.43(c)(2)
75.45					Included in 75.43(b) and 75.43(c)(2)
TOTAL		2		0.4	

TABLE 2: ANNUAL RECORDKEEPING BURDEN FOR NRC LICENSEES (PART 75)

Section	Number of Record-keepers	Hours/Record	Total Annual Burden	Comments
75.12(b)(4)	5	12	60	
75.21(a)(b)	5	780	3900	
75.22				Included in 75.21
75.23				Included in 75.21
75.24				Included in 75.21
TOTAL	5	792	3960	

Total Overall Responses = 7 (2 reporting + 5 recordkeepers)

Reporting + Recordkeeping hours = 3,960.4 (0.4 total reporting hours + 3,960 total recordkeeping)

Total Cost to Respondent = \$1,077,228.80 (3,960.4 hours x \$272/hr).