FINAL SUPPORTING STATEMENT FOR

TECHNICAL SPECIFICATIONS CONTAINED IN LICENSES TO OPERATE NUCLEAR POWER PLANTS AND RESEARCH AND TEST REACTORS AND THEIR REPORTING AND RECORDKEEPING REQUIREMENTS

10 CFR 50.36(a), 10 CFR 50.36(b), 10 CFR 50.36(c), 10 CFR 50.36(c)(7), 10 CFR 50.36(c)(8) (excluding 10 CFR 50.73 information), 10 CFR 50.36a, 10 CFR 50.36a(a)(2), 10 CFR 50.36b, AND 10 CFR 50 APPENDIX I¹

DESCRIPTION OF THE INFORMATION COLLECTION

The Section 2 Supporting Statement reflects the reporting and recordkeeping requirements for nuclear power plants, research and test reactors (RTRs), and permanently shutdown reactors.

10 CFR 50.36 requires licensees to maintain technical specifications with administrative controls. Administrative controls are the provisions relating to organization and management, procedures, recordkeeping, review and audit, and reporting necessary to ensure operation of the facility in a safe manner. These reporting and recordkeeping requirements are set forth in the Technical Specifications (TS), Appendix A to the operating license for each facility license. Pursuant to 10 CFR 50.36b, environmental reporting and recordkeeping requirements are set forth in Appendix B to the operating license for each facility license or in each licensee's environmental protection plans. (A few facilities have a single appendix that contains the combined aspects of both Appendices A and B).

10 CFR 50.36(a) requires each applicant for a license authorizing operation of a production or utilization facility to include in its application proposed TS. A summary statement of the bases or reasons for such specifications, other than those covering administrative controls, shall also be included in the application.

10 CFR 50.36(b) requires each license authorizing operation of a production or utilization facility to include TS. The TS are derived from the analyses and evaluations included in the safety analysis report, and amendments thereto, submitted pursuant to 10 CFR 50.34. (See Section 1 Supporting Statement).

10 CFR 50.36(c) requires TS to include:

- 50.36(c)(1) safety limits, limiting safety system settings, and limiting control settings;
- 50.36(c)(2) limiting conditions for operation;
- 50.36(c)(3) surveillance requirements;

¹¹⁰ CFR 50 Appendix I consists of numerical guides for design objectives and limiting conditions for plant operation to meet the criterion "as low as is reasonably achievable" for radioactive material in light-water-cooled reactor effluents.

- 50.36(c)(4) design features; and
- 50.36(c)(5) administrative controls, and also states that each licensee shall submit any reports to the Commission pursuant to approved technical specifications as specified in §50.4.

10 CFR 50.36(c)(6), "Decommissioning," requires nuclear power reactor facilities that have submitted the certifications required by §50.82(a)(1) and non-power reactor facilities which are not authorized to operate, to develop on a case-by-case basis technical specifications involving safety limits, limiting safety system settings, and limiting control system settings; limiting conditions for operation; surveillance requirements; design features; and administrative controls.

10 CFR 50.36(c)(7) "Initial notification," requires that initial notification for licensees with an installed Emergency Notification System (ENS) reports made to the Commission in response to the requirements of 10 CFR 50.36 shall be made to the NRC Operations Center in accordance with §50.72, and all other licensees shall make the initial notification by telephone to the Administrator of the appropriate regional office. (See Section 29 of this submittal for more details).

10 CFR 50.36(c)(8) "Written Reports," requires that licensees for nuclear power reactors licensed under 10 CFR 50.21(b) and 10 CFR 50.22 to submit written reports to the Commission in accordance with 10 CFR 50.73 for events described in 10 CFR 50.36(c)(1) and (c)(2). The burden associated with 10 CFR 50.73 reporting requirements cleared separately under NRC Form 366, "Licensee Event Report" (OMB Clearance No. 3150-0104).

10 CFR 50.36(c)(8) "Written Reports," also requires all licensees to submit any special reports required, as appropriate.

10 CFR 50.36(c) also requires that certain records be maintained as described in A.1.I of this Supporting Statement.

10 CFR 50.36a requires each nuclear power reactor license and each applicant for a design certification or a manufacturing license to include TS on effluents. 10 CFR 50.36a(a)(1) requires that operating procedures be established and maintained until the Commission terminates the license, with any superseded procedures retained for three years from the date they were superseded.

10 CFR 50.36a(a)(2) requires the licensee to submit to NRC an annual report of radionuclides released as liquid and gaseous effluents to unrestricted areas (see "Radioactive Effluent Report," below).

10 CFR 50.36b allows each license authorizing operation of a production or utilization facility, and each license for a nuclear power reactor facility for which the certification of permanent cessation of operations required under §50.82(a)(1) has been submitted, which is of a type described in §50.21(b) (2) or (3) or §50.22 or is a testing facility, to include conditions to protect the environment to be set out in an attachment to the license, which is incorporated in, and made a part of, the license. These conditions will be derived from information contained in the environmental report and the supplement to the environmental report submitted pursuant to §§51.50 and §51.53 of this chapter as analyzed and evaluated in the NRC record of decision,

and will identify the obligations of the licensee in the environmental area, including, as appropriate, requirements for reporting and recordkeeping of environmental data, and any conditions and monitoring requirement for the protection of the nonaquatic environment. These conditions are derived from information contained in the environmental report and the supplement to the environmental report. (See Supporting Statement for 10 CFR Part 51, OMB Clearance 3150-0021.)

The recordkeeping discussed below refers to improved standard technical specifications (iSTS) and non-iSTS plants. Plants that have converted to iSTS typically have fewer reporting requirements than non-converted plants. The July 19, 1995, final rule on TS for nuclear power reactors (60 FR 36953) codified the criteria identified in the final policy statement for determining the content of TS. Each licensee covered by these regulations may voluntarily use the criteria as a basis to propose relocation of existing TS that do not meet any of the criteria from the facility license to licensee-controlled documents. The NRC encourages licensees to implement a program to upgrade their TS consistent with the final rule. One way is complete adoption of iSTS. Guidelines also exist for adopting significant portions of the ISTS, or for adopting specific items called Technical Specification Task Force (TSTF) Travelers (e.g. TSTF-369 discussed in item #12 below). The adoptions typically reduce reporting burden. These guidelines are published in the Federal Register upon their availability.

A. <u>JUSTIFICATION</u>

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

Unless stated otherwise, all reports listed are required to be submitted by all converted and non-converted nuclear power plants and all RTRs during this clearance period. Those reports required by permanently shutdown reactors are so identified. The reporting and recordkeeping burdens, with associated justifications, are explained below.

For nuclear power plant licensees holding operating licenses without Appendix B environmental TS or environmental protection plans, the unique reporting requirements section of the Appendix A TS include those reports identified in Regulatory Guide 1.21, Rev. 2, "Measuring, Evaluating, and Reporting Radioactivity in Solid Wastes and Releases of Radioactive Materials in Liquid and Gaseous Effluents from Light-Water-Cooled Nuclear Power Plants," and Regulatory Guide 4.1, Rev. 2, "Programs for Monitoring Radioactivity in the Environs of Nuclear Power Plants."

For RTRs, the American National Standards Institute (ANSI)/American Nuclear Society (ANS) Standard 15.1-1990 provides the guidance for technical specifications, including reporting and recordkeeping. Startup reports, annual operating reports, and special reports are typically in RTR TS. Typically an annual operating report is included. Topics in the annual operating reports for RTRs are determined by the individual licensee's TS; topics include: a summary of reactor operating experience and the hours the reactor was critical, unscheduled shutdowns and corrective actions, safety-significant preventive and corrective maintenance, major changes in the facility and procedures, reviews of experiments, a summary of the nature and amount of radioactive effluents released, a summary

of environmental surveys performed outside the facility, and a summary of excessive radiation exposures.

a. Radioactive Effluent Reports

The Radioactive Effluent Reports are divided into Exceeding Design Objectives Reports and Annual Effluent Reports. Both of these reports are required to be submitted by converted and non-converted plants and reviewed by the NRC. The RTRs and permanently shutdown reactors are required to submit only the Annual Effluent Report for NRC review.

10 CFR 50.36a specifies that, to keep releases of radioactive materials to unrestricted areas as low as is reasonably achievable, each nuclear power reactor license must include TS. The NRC staff has developed "Radiological Effluent Technical Specifications (RETS) for PWRs" (NUREG-0472) and "Radiological Effluent Technical Specifications for BWRs" (NUREG-0473). Generic Letter 89-01, "Implementation of Programmatic Controls for Radiological Effluent Technical Specifications in the Administrative Controls Section of the Technical Specifications and the Relocation of the Procedural Details of RETS to the Offsite Dose Calculation Manual (ODCM) or to the Process Control Program (PCP)," permits relocation of the description of the radioactive effluent report content to the ODCM or the PCP. The contents of these three documents (as applicable) and the reporting requirements specified therein are being made part of the Appendix A TS for new operating licenses. These same requirements are also being added to existing operating licenses as license amendments. (Appendix A TS are approved by the NRC, incorporated in the facility operating license, and are conditions of the license.)

Routine radioactive effluent release reports covering the operation of the nuclear power plant during the previous 12 months of operation are to be submitted prior to May 1 of each year covering the prior year. This report includes a summary of the quantities of radioactive liquid and gaseous effluents released to the environment and solid waste shipped from the site. This report is known as the Annual Effluent Report.

Exceeding Design Objectives Report is required if, during any calendar quarter, resulting radiation exposure exceeds one-half of the design objective. For example, when certain conditions exist or parameters are exceeded, e.g., when the radiation dose for any calendar quarter is equal to or greater than one half the actual limit, or the annual dose exceeds twice the annual limit or when the liquid, gaseous or solid rad-waste treatment system or the building ventilation system are inoperable for more than 31 days. This report is required within 30 days from the end of the quarter during which the release occurred.

a. Startup Report

The Startup Report is not required to be submitted by converted plants or by permanently shutdown reactors. Non-converted plants and all RTRs are required to submit this report if certain conditions are met. For example, research reactors submit the report if a major change to the core (e.g. new fuel design) occurred.

This report is submitted within (1) 90 days following completion of the startup test program, (2) 90 days following resumption or commencement of commercial power operation, or (3) 9 months following initial criticality, whichever is earliest. The report addresses each test identified in the Final Safety Analysis Report (FSAR) and should include a description of the test and the test conditions, the measured values of the operating conditions or characteristics obtained during the test program, and a comparison of these values with design predictions and specifications.

The startup report provides the staff with evidence that the plant systems are functioning as designed and can be expected to perform as planned in the safe operation of the plant.

The report is necessary to identify design deficiencies and to obtain data on plant operation to verify (or provide a basis to modify) TS limits for operation. The data is also necessary for guidance in determining core reload requirements based on physics data obtained in testing to reveal areas where additional performance verification testing is required or where further guidance is needed through additional regulatory guides or revision to existing guides.

c. <u>Sealed Source Leakage Report</u>

Non-converted plants and RTRs had a requirement that a report shall be prepared and submitted to the Commission on an annual basis if sealed source or fission detector leakage tests reveal the presence of certain levels of removable contamination. The Sealed Source Leakage Report is not required to be submitted by some of the more recent plant TS and by converted plants.

Records documenting sealed source leakage data are to be maintained by the licensee for at least 5 years. Depending on the degree and circumstances of the sealed source leakage, a report may still be required by other 10 CFR requirements (e.g., 10 CFR 20).

Information on any sealed source that exceeds the limitation on removable contamination should be reported annually for the licensed nuclear facility. If such information was not received, the quality assurance record for sealed sources used in operating a nuclear facility would be incomplete and failures would not be reported. Thus, the manufacturing process for maintaining the integrity of sealed sources under various operating conditions could be unknowingly deficient.

d. Quarterly Operating Reports (Formerly Monthly Operating Reports)

The Monthly Operating Reports were applicable only to operating nuclear power plants, not to the RTRs, nor to permanently shutdown reactors. In 2004, the NRC provided a means to eliminate the monthly report, as described below.

The TS used to require licensees to submit a monthly report of operating statistics and shutdown experience. Information contained in the "Monthly Operating Report" includes (1) Average Daily Unit Power Level; (2) Operating Data; (3) Unit Shutdowns and Power Reductions; and (4) Spent Fuel Storage Capacity, and is used as performance indicators.

The NRC made a model license amendment available to remove the monthly reporting requirement from TS (see 69 FR 35067-35071, dated June 23, 2004; also TSTF-369, "Removal of Monthly Operating Report and Occupational Radiation Exposure Report"). All power reactors have adopted this amendment. By adopting the amendment, the information will be provided quarterly instead of monthly (although the operating data will still be divided by month) and the form of the reporting will be from a consolidated database instead of in correspondence from individual licensees.

e. Non-Routine Environmental Reports

The Non-Routine Environmental Reports are not required to be submitted by converted plants. These reports have been removed from the iSTS because they fall within the jurisdiction of other agencies. The removed reports do not meet any of the established criteria for inclusion in the iSTS. However, non-converted operating and permanently shutdown plants must continue to comply with the requirements in their current TS. Nineteen non-converted plants still have this report listed in their TS.

Examples of issues in non-routine environmental reports are: wild ducks that were entrained in the intake cribs of a nuclear power plant as reported to US Fish and Wildlife Service (ADAMS Accession No. ML050330406), and a damaged fuel line for a regulated tank that caused oil-contaminated soil as reported to a state department of environmental protection (ADAMS Accession No. ML051190723).

RTRs are not required to submit this report unless an event occurs at the facility, which is beyond the TS or 10 CFR 20 requirements.

The Non-Routine Report provides information, which specifies and quantifies data concerning unusual events and provides the basis for recommending appropriate action. It provides data in a timely fashion so that changes in operating procedures or design modifications can be implemented as soon as possible. The NRC staff performs a detailed analysis of each event warranting such a study.

f. <u>Annual Environmental Operating Report</u>

10 CFR 50.36b authorizes conditioning of applicable licenses to protect environmental values, e.g., commercial and sport fisheries, rare and endangered species, recreational land, and water use. Nonradiological license conditions are generally incorporated in the license as Appendix B Environmental Technical Specifications or environmental protection plans. These conditions include requirements for an Annual Environmental Operating Report.

The purpose of nonradiological environmental monitoring is to confirm the environmental assessments presented in the Final Environmental Statement (FES), which described the impact of the proposed facility. The nonradiological programs are also designed to detect unanticipated adverse impacts (i.e., adverse impacts which exceed predictions of the FES or impacts that were not predicted) soon enough to take appropriate action.

Monitoring programs are usually incorporated to assess the magnitude of predicted adverse impacts. If the impacts are different from those anticipated, the licensee or staff can take action to change the TS, plant design, or operating procedures to more adequately account for the actual effects of facility operation.

g. <u>Annual Radiological Environmental Operating Report</u>

Each reactor license includes a TS requiring submission of annual radiological environmental operating reports. This report covers the operation of the plant during the previous calendar year and shall be submitted by May 15 of each year for nuclear power plants and as required by TS for RTRs. The material in the report is outlined in the Offsite Dose Calculation Manual (ODCM), and in 10 CFR 50, Appendix I.

The annual radiological environmental operating reports include summaries, interpretations, and an analysis of trends of the results of the radiological environmental surveillance activities for the report period, including a comparison with pre-operational studies, operational controls (as appropriate), and previous environmental surveillance reports, and an assessment of the observed impacts of the plant operation on the environment. The reports also include the results of land use censuses required by the TS and/or ODCM. If harmful effects or evidence of irreversible damage are detected by the monitoring, the report provides an analysis of the problem and a planned course of action to alleviate the problem.

The annual radiological environmental operating reports include summarized and tabulated results in the format of the table in the "Radiological Assessment Branch Technical Position," Revision 1, November 1979², of all radiological environmental samples taken during the report period. In the event that some results are not available for inclusion with the report, the report is submitted noting and explaining the reasons for the missing results. The missing data is submitted as soon as possible in a supplementary report.

The report also includes the following: a summary description of the radiological environmental monitoring program; a map of all sampling locations keyed to a table giving distances and directions from the reactor; and, the results of licensee participation in the Interlaboratory Comparison Program, required by the TS.

The report provides a record of environmental radiation around the plant. The report is reviewed by the NRC staff to determine whether radioactive material released routinely by nuclear power plants may have resulted in excessive environmental radiation. Without the report, the NRC staff could not provide adequate assurance that the public is being protected from such environmental radiation.

h. <u>Occupational Radiation Exposure Report (ORER)</u>

There are no 10 CFR regulations that explicitly required the submittal of the ORER data. Historically, TS required licensees to submit annual ORERs to the NRC. The reports, developed in the mid-1970s, supplement the reporting requirements currently defined in 10 CFR 20.2206, "Reports of Individual Monitoring," by providing a tabulation of data by work areas and job functions. The data from the 10 CFR 20 reports are sufficient to support the NRC trending programs, radiation related studies, and preparation of reports such as NUREG-0713. Accordingly, the NRC's limited use of the ORER submitted pursuant to the existing TS requirements no longer warrants the regulatory burden imposed on licensees. The NRC made a model license amendment available to remove the reporting requirement from TS (see 69 FR 35067-35071, dated June 23, 2004, also TSTF-369, "Removal of Monthly Operating Report and Occupational Radiation Exposure Report"). All power reactors have adopted TSTF-369, so licensees no longer submit this report.

i. Special Reports

Special Reports may be required by TS for inspection, test, and maintenance activities. Special Reports shall be submitted in accordance with 10 CFR 50.4 within the time period specified for each report. These special reports are determined for each licensee individually, as specified in the TS.

² This document pertains to the radioactive effluent reporting requirements discussed in Paragraph a.

Examples of Special Reports are:

(1) Emergency Core Cooling System (ECCS) Events Report

This report refers to ECCS events that actuate and inject water into the Reactor Coolant System (RCS) in MODE 1, 2, or 3. It describes the circumstances of the actuation and the total accumulated actuation cycles to date. This special report is not required to be submitted by converted power plants, nor by permanently shutdown reactors. Non-converted power plants are required to submit this report. RTRs are required to submit this report in accordance with their TS.

(2) Post Accident Monitoring Report for Nuclear Power Plants

When a special report is required by TS Limiting Condition for Operation, "Post Accident Monitoring (PAM) Instrumentation," a report shall be submitted within the following 14 days from the time the action is required. When required, this report is in lieu of a plant shutdown requirement and ensures that the NRC is notified that alternate actions are identified before loss of functional capability occurs with the potential to impact public health and safety.

(3) <u>Steam Generator Tube Inspection Report for Nuclear Power Plants</u>

Previously, plants had the following requirements: Following each in-service inspection of steam generator (SG) tubes, in accordance with the SG Tube Surveillance Program, the number of tubes plugged and tubes sleeved in each SG shall be reported to the NRC within 15 days. This report ensures that the NRC promptly responds to situations with the potential to seriously impact public health and safety. The complete results of the SG tube in-service inspection shall be submitted to the NRC within 12 months following the completion of the inspection. Results of SG tube inspections that fall below a prescribed standard shall be reported to the NRC prior to resumption of plant operation.

In 2006, through NRC Generic Letter 2006-01 "Steam Generator Tube Integrity and Associated Technical Specifications," and TSTF-449, "Steam Generator Tube Integrity," the NRC has issued model license amendments for plants to change the requirements to eliminate the 15-day report. If there is serious SG tube degradation (i.e., tubing fails to meet the structural integrity or accident induced leakage criteria) then 10 CFR 50.72 or 50.73 requires reporting. In addition, TS 5.5.9 is revised to 180 days after the initial entry into MODE 4 after performing a SG inspection.

All operating pressurized water reactor plants (69) have adopted TSTF-449.

(4) Tendon Surveillance Report

Any abnormal degradation of the containment structure detected during the tests required by the Pre-stressed Concrete Containment Tendon Surveillance Program shall be reported to the NRC within 30 days. The report shall include a description of the tendon condition, the condition of the concrete (especially at tendon anchorages), the inspection procedures, the tolerances on cracking, and the corrective action taken.

j. <u>Core Operating Limits Report (COLR) for Nuclear Power Plants</u>

Core operating limits are established prior to each reload cycle (generally 18 or 24 months), or prior to any remaining portion of a reload cycle, and are documented in the COLR. The core operating limits are determined such that all applicable limits (e.g., fuel thermal mechanical limits, core thermal hydraulic limits, ECCS limits, nuclear limits such as SDM, transient analysis limits, and accident analysis limits) of the safety analysis are met.

The COLR reduces NRC and industry burden. The COLR includes core operating limits that vary from cycle to cycle and are determined through a NRC-approved methodology. By having these limits located in the COLR, which is referenced by TS, the need for a license amendment after each refueling is reduced and hence all the effort associated with a license amendment is reduced.

k. Reactor Coolant System (RCS) Pressure and Temperature Limits Report (PTLR)

RCS pressure and temperature limits for heat up, cooldown, low temperature operation, criticality, and hydrostatic testing, LTOP arming, and PORV lift settings as well as heatup and cooldown rates shall be established and documented in the PTLR. The PTLR shall be provided to the NRC upon issuance for each reactor vessel fluence period and for any revision or supplement thereafter.

The PTLR reduces NRC and industry burden. The PTLR includes pressure and temperature limits determined through an NRC-approved methodology. By having these limits located in the PTLR, which is referenced by TS, the need for a license amendment for any revision or supplement thereafter is reduced and hence all the effort associated with a license amendment is reduced.

I. Recordkeeping Requirements

NRC regulations in 10 CFR 50.36 and 10 CFR 50.36a establish requirements for recording results of reviews of events reported to the Commission, including those reported in accordance with 10 CFR 50.36(c) (See below) and 10 CFR 50.72 and 10 CFR 50.73, and requirements for recordkeeping as part of administrative controls. These records are maintained primarily for the life of the plant. Certain records are only retained for 3 years or as specified in TS.

10 CFR 50.36(c)(1)(i)(A) requires recording the results of reviews of nuclear reactor events in which a safety limit has been exceeded.

10 CFR 50.36(c)(1)(i)(B) requires recording the results of the reviews of fuel reprocessing plant events in which a safety limit has been exceeded.

10 CFR 50.36(c)(1)(ii)(A) requires recording the results of reviews of nuclear reactor events in which an automatic safety system does not function as required.

10 CFR 50.36(c)(1)(ii)(B) requires recording the results of reviews of fuel reprocessing plant events in which an automatic alarm or protective device does not function as required.

10 CFR 50.36(c)(2) requires recording the results of reviews of events in nuclear reactors and fuel reprocessing plants in which a limiting condition for operation is not met. Each of the above records of review must include the cause of the condition and the basis for corrective action taken to preclude recurrence.

10 CFR 50.36(c)(5) requires that administrative controls, including recordkeeping, be included in the TS of a production or utilization facility as necessary to assure operation of the facility in a safe manner. Details of recordkeeping are delineated in Section 5.6 of Standard Technical Specification NUREG-1433 for General Electric BWR/4 and NUREG-1434 for BWR/6 reactors, NUREG-1432 for Combustion Engineering pressurized water reactors, NUREG-1430 for Babcock and Wilcox pressurized water reactors, and NUREG-1431 for Westinghouse pressurized water reactors. Recordkeeping requirements for RTRs are specified in their Technical Specifications. Guidance for the technical specifications is delineated in ANSI/ANS 15.1-1990 for research and test reactors.

The records required by 10 CFR 50.36(c)(5) include the following:

The following records shall be retained for at least 3 years:

- 1. All Licensee Event Reports required by 10 CFR 50.73;
- 2. Records of changes made to the procedures required by Specification 5.4.1; and,
- 3. Records of radioactive shipments.

The following records shall be retained for at least 5 years:

- 1. Records and logs of unit operation covering time intervals at each power level;
- 2. Records and logs of principal maintenance activities inspections, repair, and replacement of principal items of equipment related to nuclear safety;
- 3. Records of surveillance activities, inspections, and calibrations required by the TS and the Fire Protection Program;
- 4. Records of sealed source and fission detector leak tests and results; and,
- 5. Records of the annual physical inventory of all sealed source material of record.
 - The following records are generally required to be retained for the duration of a typical operating license:
- 1. Records and drawing changes reflecting unit design modifications made to systems and equipment described in the FSAR;
- 2. Records of new and irradiated fuel inventory, fuel transfers, and assembly burnup histories;
- 3. Records of radiation exposure for all individuals entering radiation control areas;
- 4. Records of gaseous and liquid radioactive material released to the environs:
- 5. Records of transient or operational cycles for those unit components identified in the FSAR;
- 6. Records of reactor tests and experiments;

- 7. Records of training and qualification for members of the unit staff;
- 8. Records of in service inspections performed pursuant to the TS;
- 9. Records of quality assurance activities required by the Operational Quality Assurance (QA) Manual;
- 10. Records of reviews performed for changes made to procedures, equipment, or reviews of tests and experiments pursuant to 10 CFR 50.59;
- 11. Records of the reviews and audits of the QA program required by the TS, includes changes to procedures, programs, systems or equipment that affect nuclear safety, tests or experiments that affect nuclear safety, and changes to TS and the operating license;
- 12. Records of the service lives of all hydraulic and mechanical snubbers, including the date at which the service life commences, and associated installation and maintenance records:
- 13. Records of secondary water sampling and water quality;
- 14. Records of analyses required by the Radiological Environmental Monitoring Program that would permit evaluation of the accuracy of the analysis at a later date (these records should include procedures effective at specified times and QA records showing that these procedures were followed);
- 15. Records of reviews performed for changes made to the Offsite Dose Calculation Manual and the Process Control Program;
- 16. Records of pre-stressed concrete containment tendon surveillance; and,
- 17. Records of steam generator tube surveillance.

These records are used by the licensees, the NRC, and other Federal, State and local government agencies, for the review of a variety of activities in the facility, many of which affect safety. The records are also historical in nature and provide data on which future activities can be based. NRC inspection and enforcement personnel can spot check the records required by 10 CFR 50.36 and 10 CFR 50.36a to determine, for example, if (1) plant modifications were performed satisfactorily, (2) the plant was operated within the TS, (3) personnel training has been kept current, (4) plant effluents have been kept within allowable values, and (5) operating procedures maintained. Because of the multiple-use nature of many of the records, the NRC has estimated only the incremental burden.

2. Agency Use of Information

The NRC uses this information to determine whether releases of radioactive materials to unrestricted areas during normal reactor operations, including expected operational occurrences, are as low as is reasonably achievable. The NRC also uses this information to ensure the protection of the non-radiological environment. The design objectives of the effluent systems are to be examined to assure that the licensee is not using the systems in a manner for which they were not intended.

Moreover, safety limits, limiting safety system settings, and limiting control settings, limiting conditions for operation, surveillance requirements, and design features, are monitored by the TS to ensure that the health and safety of the public are not adversely affected from the operation of nuclear power reactors.

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 50% 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

The subject regulations do not affect small businesses.

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

If the collection is not conducted or is conducted less frequently, the NRC would not be able to ensure that the health and safety of the public is not adversely affected by the operation of nuclear reactors.

7. <u>Circumstances which Justify Variation from OMB Guidelines</u>

A few special reports, such as the Licensee Event Reports, required by 10 CFR 50.36(c), 10 CFR 50.72, and 10 CFR 50.73, the Post Accident Monitoring Report (when required), and the Steam Generator Tube Inspection Report, are required in fewer than 30 days to ensure that the NRC promptly responds to

situations with the potential to seriously impact public health and safety (also see the Section 29 Supporting Statement). Many of the records involved with this information collection are retained longer than 3 years, some for the life of the plant, to establish patterns or base-line performance to anticipate and assess future trends. These variations are deemed necessary to ensure that the health and safety of the public will not be adversely affected by the operation of the plant.

8. Consultations Outside the NRC

Opportunity for public comment on the information collection requirements for this clearance package was published in the <u>Federal Register</u> on May 14, 2013 (78 FR 28244). No comments were received.

9. Payment or Gift to Respondents

Not applicable.

10. Confidentiality of Information

Confidential or 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

The subject regulations do not request sensitive information.

12. Estimated Industry Burden and Burden Hour Cost

Respondents

In these estimates, the NRC assumes that a total of 175 respondents are affected by the information collection:

- 104 operating nuclear power plants at 65 sites.
 - o 76 converted and 28 non-converted plants
 - o 45 converted and 20 non-converted sites
- 29 permanently shutdown nuclear power reactors at 28 sites
 - o 15 converted and 14 non-converted permanently shutdown plants
- 31 operating and 11 permanently shutdown RTRs (non-power) are affected by the provisions of the various reporting and recordkeeping requirements that NRC approves as part of the TS submitted pursuant to 10 CFR 50.36 and 10 CFR 50.36a.

Industry Reporting Burden and Cost

The total industry reporting burden for nuclear power plants and RTRs is 152,815 hours and 892 responses, as shown in Table 1. At an hourly rate of \$274, the total cost is \$41,871,310. A detailed description of responses and respondents for each report follows the summary of total industry burden.

Recordkeeping Burden and Cost

The recordkeeping requirements called for under 10 CFR 50.36(c) impact 104 operating power plants, 31 RTRs, 14 non-converted permanently shutdown power plants and 11 permanently shutdown RTRs. The total recordkeeping burden of all licensees is 221,800 hours for a total cost of \$60,773,200. The data is summarized in Table 2.

Total Industry Burden and Cost

Total annual burden for all reporting/recordkeeping requirements for TS is expected to be 374,615 hours (152,815 hours reporting + 221,800 hours recordkeeping). The total annual cost to industry at \$274 per hour is \$102,644,510.

<u>Assumptions Used for Calculating Reporting Burden</u>

Reporting burden is estimated below. The attached tables reflect this burden applied to converted and non-converted plants, to RTRs, and permanently shutdown reactors. While 28 plants have not have totally converted to the iSTS during the clearance period, most plants will have adopted the revised reporting and recordkeeping requirements in the iSTS through line item improvements (e.g. TSTF-369). For ease of burden calculation for the clearance period, the burden has been calculated based on the numbers of converted and non-converted operating power plants and sites listed in the paragraph above.

a. Radioactive Effluent Reports

- 1. The Exceeding Design Objectives Reports include (a) Exceeding Design Objectives Doses, (b) Inoperable Radwaste Equipment, (c) Dose Contribution from Effluents, (d) Unplanned Radioactive Release, (e) Exceeding 10 CFR Part 20 Release Limits and (f) Exceeding Ci Content in Liquid or Gaseous Tank or Ci Release Rate for Offgas System (BWR), which involve approximately 50 hours each for 3 operating nuclear power plants. The total number of reports estimated is 3.
- 2. <u>Annual Effluent Reports</u> for each operating nuclear power plant require 140 hours preparation/report for 104 plants.

These reports for 14 non-converted permanently shutdown nuclear power plant requires 35 hours preparation/report.

Each RTR licensee submits an Annual Operating Report. Part of the report includes information on radioactive effluents. It is estimated that 70 hours are required to prepare each of these 31 reports for operating RTRs and approximately 20 hours for 11 permanently shutdown RTRs.

b. <u>Startup Report</u>

The requirements for Startup Reports have generally been removed from TS and relocated to licensee-controlled documents (e.g., "Technical Requirements Manual"). Also, the reports are not required to be submitted by converted nuclear power plants.

Only non-converted nuclear power plants and operating RTRs are required to submit this report. Of the 28 non-converted plants, approximately 2 are estimated to submit a report each year. The burden is estimated to be 140 hours/report.

RTRs only submit a Startup Report if certain significant changes have occurred, as defined by their TS. For example, if a new core is installed that is different from previous designs. One hundred (100) hours are estimated for preparation time. It is anticipated that one report per year total (not one per plant) will be submitted, based on past experience and known licensing and design changes being performed.

c. Sealed Source Report

Sealed Source Reports are not required to be submitted by nonconverted operating nuclear plants.

Plants with specific TS requirements, RTRs, and permanently shutdown reactors, are required to submit this report. Plants are required to report only those sealed source test results, which exceed the removable contamination limit.

It is estimated that the burden is 16 hours per plant. Of the 28 non-converted plants, none are estimated to submit a report.

The combined RTRs prepare about one Sealed Source Report/year. It is estimated that the burden is 10 hours. The total number of reports is 1.

The combined permanently shutdown power reactors also prepare about one Sealed Source Report/year. It is estimated that the burden is also 10 hours. The total number of reports is 1.

d. Quarterly Operating Reports (Formerly Monthly Operating Reports)

The protocol for electronic Monthly Operating Report reporting using this industry database is a combined (all nuclear plants) quarterly electronic submittal of monthly operating and shutdown history data.

All operating nuclear power plants have adopted TSTF-369. The burden for each operating nuclear power plant is estimated to be 5 hrs/month data compilation (15 hours per quarter), based on industry feedback and engineering judgment.

RTRs and permanently shutdown reactor licensees do not submit Monthly Operating Reports.

e. <u>Non-Routine Environmental Report</u>

Non-Routine Environmental Reports are not required to be submitted by converted operating nuclear power plant sites. The 20 non-converted sites are required to submit this report.

For operational plants, it is estimated that two non-converted plants will submit a report and each report will require up to 50 hours preparation time. For permanently shutdown reactors, none are estimated to submit a report.

The RTRs do not submit Non-Routine Environmental Reports.

f. <u>Annual Radiological Environmental Operating Report</u>

Operating nuclear power plant licensees will submit this report for an estimated 65 sites in response to this requirement. The burden is estimated to be 1,400 hours per report. Permanently shutdown nuclear power plant licensees also submit this report for approximately 14 sites at an estimated burden of 700 hours per report.

The estimated annual radiological environmental operating report is based on discussions with a licensee on the actual number of hours spent gathering data and preparing the report.

Each RTRs licensee submits an Annual Operating Report. Part of the report includes information on radiological environmental monitoring. It is estimated that the preparation time for each operating RTR is 200 hours/report and approximately 100 hours/report for each permanently shutdown RTR.

g. <u>Annual Non-Rad Environmental Operating Report</u>

Licensees for 65 operating sites and 14 permanently shutdown nuclear power plant sites are required to submit this report. Each report could require approximately 60 hours to prepare for each operating plant site and approximately 60 hours to prepare for each permanently shutdown plant site.

The estimate annual non-radiological environmental operating report is based on discussions with a licensee on the actual number of hours spent gathering data and preparing the report.

The RTR licensees do not submit Annual Non-Radiological Environmental Operating Reports, nor is it part of the Annual Operating Reports.

h. Occupational Radiation Exposure Report (ORER)

Each operating and permanently shutdown nuclear power plant licensee that has not eliminated the report from TS is required to prepare one ORER report per year.

The NRC made a model license amendment available to remove the reporting requirement from TS (see 69 FR 35067-35071, dated June 23, 2004, also TSTF-369, "Removal of Monthly Operating Report and Occupational Radiation Exposure Report"). All operating power plant licensees have adopted the change to TS, so no reports are anticipated from these licensees.

Non-converted permanently shutdown plants are required to submit this report, the preparation time is estimated to be 20 hours per report.

The estimated burden for operating RTRs is 10 hours preparation for each facility and for each permanently shutdown RTR the preparation time is estimated at 5 hours.

i. <u>Special Reports</u>

It is estimated that there will be 50 special reports per year for all reactors, operating or shutdown. It is estimated that 300 hours is the required preparation time for each report.

j. Core Operating Limits Report (COLR) & Reactor Coolant System (RCS)

Pressure and Temperature Limits Report (PTLR)

With adoption of the COLR and the PTLR, a nuclear power plant licensee no longer needs to submit license amendment requests for the sole purpose of updating parameter limits. These limits are established and documented in the COLR and the PTLR. The analytical methods used to determine the limits are those previously approved by NRC. The limits and analytical methods would need to be determined and documented by licensees in the normal course of power plant operation.

The RTRs and permanently shutdown reactors do not submit this report.

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 221,800 hours, the storage cost for this clearance is \$24,309

(221,800 hours x 0.0004 x \$274/hour).

14. Estimated Annualized Cost to the Federal Government

Estimated hours of staff effort involved for the review of each report is delineated below and summarized in Table 3. The cost for this effort is fully recovered by fee assessment to NRC licensees pursuant to 10 CFR Parts 170 and/or 10 CFR 171.

a. <u>Radioactive Effluent Report</u>

1. <u>Exceeding Design Objectives Reports</u> - combined, the 104 plants submit 3 reports/year. Forty (40) staff hours are estimated to review each report.

The RTRs do not submit a report under Exceeding Design Objectives but would include such under special reports.

2. Annual Effluent Reports - each operating and non-converted permanently shutdown nuclear power plant will submit one report per year. For operating plants, the Annual Radiological Effluent Release Report is reviewed during execution of Inspection Procedure 71122.01, Radioactive Gaseous and Liquid Effluent Treatment and Monitoring Systems. The procedure calls for the Regional inspector to review this report as an in-office inspection. Eight (8) hours are estimated to review each report for operating plant. For shutdown plants, Inspection Procedure 84750, Radioactive Waste Treatment, and Effluent and Environmental Monitoring, is used, and, according to Manual Chapter 2561, Decommissioning Power Reactor Inspection Program, 2 hours per year are allocated per year for review of the effluent reports section of 84750.

Each operating and permanently shutdown RTR submits an Annual Operating Report. Part of the report discusses effluents. The effluent report is reviewed during execution of routine inspection procedures, including Inspection Procedure 69004, Class I Research and Test Reactor Effluent and Environmental Monitoring. About one (1) hour staff time is required to review the effluent portion of this report for operating RTRs, and about one-half (0.5) hour is required for each permanently shutdown RTRs.

b. Startup Reports

Startup Reports are not required to be submitted by converted nuclear power plants. Only non-converted nuclear power plants and RTRs are required to submit this report. Of the 28 non-converted plants, approximately 2 are estimated to submit this report. The Federal staff review burden is estimated to be 8 hours/report.

Annually, the NRC anticipates that just one Startup Report for a RTR will be submitted (*i.e.* not one for each reactor; just one). Eight (8) staff hours are required to review each report.

c. <u>Sealed Source Reports</u>

Sealed Source Reports are not required to be submitted by converted nuclear power plants. Non-converted nuclear power plants are required to submit this report. RTRs submit about one report/year, as do permanently shutdown reactors.

Based on past experience, no reports from power reactors are anticipated each year.

Combined, the RTRs submit about one report/year. The average staff review time is 1 hour.

Combined, the permanently shutdown reactors also submit about one report/year. The average staff review time is 1 hour.

d. Quarterly Operating Reports (Formerly Monthly Operating Reports)

The protocol for electronic Quarterly Operating Report reporting using this industry database is a combined (all nuclear plants) quarterly electronic submittal of monthly operating and shutdown history data. Although the responses for these reports are calculated for each plant when calculating industry burden (104 plants x 4 reports annually = 416 responses), staff hours are based on review time of 4 reports, because the NRC staff assess one report for the entire industry each quarter. The staff assesses each of these reports in 8 hours.

The operating RTRs and permanently shutdown reactors do not submit Monthly Operating Reports.

e. <u>Non-routine Environmental Report</u>

Non-routine Environmental Reports are not required to be submitted by converted nuclear power plant sites. Only non-converted nuclear power sites are required to submit this report.

Of the non-converted sites, two reports with reportable events are anticipated. The staff's effort to assess these reports is estimated to be about 2 hours each.

No reports from permanently shutdown reactors are anticipated.

RTRs do not submit Non-Routine Environmental Reports. These facilities submit environmental reports under Annual Radiological

Environmental Operating Reports or special reports.

f. <u>Annual Radiological Environmental Operating Report</u>

This report will be submitted for 65 operating nuclear power plant sites and for 14 sites with non-converted permanently shutdown power plants. The Annual Radiological Environmental Monitoring Report is reviewed during execution of in Inspection Procedure 71122.03, Radiological Environmental Monitoring Program (REMP) and Radioactive Material Control Program. The procedure calls for the Regional inspector to review this report as an in-office inspection. It is estimated that approximately eight (8) hours will be needed to review this report for each of 65 sites. For shutdown plants, Inspection Procedure 84750, Radioactive Waste Treatment, and Effluent and Environmental Monitoring, is used, and, according to Manual Chapter 2561, Decommissioning Power Reactor Inspection Program, 2 hours per year are allocated for review of the licensee's Annual Environmental Monitoring Report and related topics.

For operating and permanently shutdown RTRs, each of the 31 operating and 11 permanently shutdown facilities submit a report. The environmental report is reviewed during execution of routine inspection procedures, including Inspection Procedure 69004, Class I Research and Test Reactor Effluent and Environmental Monitoring. About 4 hours of staff review time is required to review each operating and about 1 hour of staff review is required to review each of the 11 reports.

g. <u>Annual Non-Rad. Environmental Operating Report</u>

The report, in general, contains non-radiological environmental effects of low safety significance and low impact (e.g., cooling tower blowdown) and therefore, the NRC staff does not expend a significant effort to review this report. It is estimated that about 1 hour of staff review is required to review all the reports combined.

RTRs do not submit Annual Environmental Operating Reports.

h. <u>Occupation Radiation Exposure Report</u>

The NRC made a model license amendment available to remove the reporting requirement from TS (see 69 FR 35067-35071, dated June 23, 2004, also TSTF-369, "Removal of Monthly Operating Report and Occupational Radiation Exposure Report"). All operating nuclear power plant licensees have adopted TSTF-369, so no reports are anticipated. It is estimated that the staff will expend 0 hours assessing each ORER for each operating nuclear power plant licensee; all licensees have eliminated the report.

For permanently shutdown reactors, Inspection Procedure 83750

Occupational Radiation Exposure, includes review of required records and reports, and Manual Chapter 2561, Decommissioning Power Reactor Inspection Program, plans for no more than 10 hours of staff review per year in internal and external exposure control, including reports.

For operating and permanently shutdown RTRs, about 1 hour per operating facility and one-half hour per shutdown facility are required to assess this report.

i. <u>Special Reports</u>

It is estimated that approximately 50 reports for all licensees will be submitted annually by operating power plants based on previous data.

The staff burden for special reports is estimated at 4 hours per report.

j. Core Operating Limits Report (COLR) & Reactor Coolant System (RCS)

Pressure and Temperature Limits Report (PTLR)

With adoption of the COLR and the PTLR, a nuclear power plant licensee no longer needs to submit license amendment requests for the sole purpose of updating parameter limits. These limits are established and documented in the COLR and the PTLR. The analytical methods used to determine the limits are those previously approved by NRC. Only specific numbers of the updated parameter limits are included in the COLR or PTLR report. Therefore, the NRC does not expend any significant review time for the COLR and PTLR report.

Total Federal Burden and Cost for Nuclear Power Plants and RTRs

Thus, as reflected above and in Table 3, the total annual Federal burden for operating and permanently shutdown nuclear power plants and RTRs is 2,139 hours. At an hourly rate of \$274, the total cost to the Federal government is \$586,086.

15. Reasons for Changes in Burden or Cost

The overall licensee burden has changed from 374,975 hours to 374,615 hours, a reduction of 360 hours. This change is due to the reduced number of plants required to submit reports. The number of RTRs submitting reports decreased from 32 to 31, the number of shutdown power reactors and RTRs submitting reports remained the same.

The number of responses has increased from 483 reporting responses to 892 reporting responses, an increase of 409 responses. The reason for this increase is a correction in the method used to calculate the number of responses for quarterly reports. In the previous submission, the quarterly reports were counted as four total responses for industry, since the electronic Quarterly Operating Report reporting is done using an industry database and comes to the NRC as a combined (all nuclear

plants) quarterly electronic submittal of monthly operating and shutdown history data (one report for the entire industry). However, because each power reactor contributes data to this quarterly report, the NRC staff determined that it was more accurate to count the responses for each reactor, each quarter (104 reactors \times 4 quarterly reports = 416 responses). This resulted in an increase of 412 responses (416 responses – 4 responses = 412 responses). However, due to an overall decrease in the number of respondents, the net increase in responses is 409.

The overall licensee cost has changed from \$96,368,575 to \$102,644,510 due to the hourly rate increase from \$257 to \$274.

16. Publication for Statistical Use

The collected information is not published for statistical purposes.

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. <u>COLLECTIONS OF INFORMATION EMPLOYING STATISTICAL METHODS</u>

Not applicable.

Table 1 Industry Reporting Burden for Technical Specifications Contained in Licenses to Operate Nuclear Power Plants and Research and Test Reactors

Report	Respondent Type	Number of Respondents	Responses Per Respondent	Total Responses	Hours Per Response	Total Burden Hours	Cost @ \$274/hr
Exceed Design	Operating Power	3	1	3	50	150	\$41,100
Annual Effluent	Operating Power	104	1	104	140	14,560	\$3,989,440
	Shutdown						
	Power	14	1	14	35	490	\$134,260
	Operating RTRs	31	1	31	70	2,170	\$594,580
	Shutdown RTRs	11	1	11	20	220	\$60,280
Start up	Non-converted	2	1	2	140	280	\$76,720
Start up	Operating RTRs	1	1	1	100	100	\$27,400
Sealed Source	Non-converted	28	0	0	16	-	\$-
	Operating RTRs	1	1	1	10	10	\$2,740
	Shutdown						
	Power	1	1	1	10	10	\$2,740
	Shutdown RTRs	*	*	*	*	*	\$ -
Quarterly (formerly Monthly)	Operating Power	104	4	416	15	6,240	\$1,709,760
Non-Routine Environmental	Non-converted	2	1	2	50	100	\$27,400
Annual Radiologial	Operating Power	65	1	65	1,400	91,000	\$24,934,000
	Shutdown Power	14	1	14	700	9,800	\$2,685,200
	Operating RTRs	31	1	31	200	6,200	\$1,698,800
	Shutdown RTRs	11	1	11	100	1,100	\$301,400
Annual Non-rad Environmental Operating	Operating Power	65	1	65	60	3,900	\$1,068,600
	Shutdown Power	14	1	14	60	840	\$230,160
ORER	Shutdown Power	14	1	14	20	280	\$76,720
	Operating RTRs	31	1	31	10	310	\$84,940
	Shutdown RTRs	11	1	11	5	55	\$15,070
Special Report	Operating Power	50	1	50	300	15,000	\$4,110,000
Total Burden				892		152,815	\$41,871,310

^{*} Included under Research and Test Reactors
** Includes all reactors' special reports and any insignificant burden associated with the COLR & PTLR

Table 2
Industry Recordkeeping Burden for Technical Specifications Contained in Licenses to Operate
Nuclear Power Plants and Research and Test Reactors

Recordkeepers	Number of Recordkeepers	Hours per Recordkeeper	Total Burden	Total Cost @ \$274/hr
Operating Power	104	2,080	216,320	\$59,271,680
Operating RTRs	31	80	2,480	\$679,520
Shutdown Power	14	208	2,912	\$797,888
Shutdown RTRs	11	8	88	\$24,112
Total Burden	160		221,800	\$60,773,200

Reporting Burden: 152,815 hours Recordkeeping Burden: 221,800 hours Total Burden: 374,615 hours

Responses: 892 Recordkeepers: 160

Table 3 Federal Burden for Nuclear Power Plants and Research & Test Reactors

Report	Respondent Type	Reports received	Hours per Report	Total NRC Hours	Cost @ \$274/hr
Exceed Design	Operating Power	3	40	120	\$32,880
	Operating Power	104	8	832	\$227,968
Annual Effluent	Shutdown Power	14	2	28	\$7,672
Alliuai Liliuelli	Operating RTRs	31	1	31	\$8,494
	Shutdown RTRs	11	0.5	5.5	\$1,507
Start up	Non-converted	2	8	16	\$4,384
Start up	Operating RTRs	1	8	8	\$2,192
	Non-converted	0	16	-	\$-
Sealed Source	Operating RTRs	1	1	1	\$274
Sealed Source	Shutdown Power	1	1	1	\$274
	Shutdown RTRs	*	*	*	\$ -
Quarterly (formerly Monthly)	Operating Power	4	8	32	\$8,768
Non-Routine Environmental	Non-converted	2	2	4	\$1,096
	Operating Power	65	8	520	\$142,480
Annual	Shutdown Power	14	2	28	\$7,672
Radiologial	Operating RTRs	31	4	124	\$33,976
	Shutdown RTRs	11	1	11	\$3,014
Annual Non-rad Environmental	Operating Power	65	-	0.5	\$137
Operating	Shutdown Power	14	-	0.5	\$137
	Shutdown Power	14	10	140	\$38,360
ORER	Operating RTRs	31	1	31	\$8,494
	Shutdown RTRs	11	0.5	5.5	\$1,507
Special Report	Operating Power	50	4	200	\$54,800
Total Burden		494		2,139	\$586,086

^{*} Included under Research & Test Reactors

** Includes all reactors' special reports and any insignificant burden associated with the COLR & PTLR