

FINAL SUPPORTING STATEMENT
FOR
10 CFR 50.70 TEAM INSPECTIONS OF POWER REACTOR LICENSEES

Description of the Information Collection

Pursuant to the Atomic Energy Act of 1954, as amended, the U.S. Nuclear Regulatory Commission (NRC) has the responsibility and authority to regulate nuclear power plants. The NRC verifies licensees' compliance with NRC rules and regulations by conducting inspections. 10 CFR 50.70 requires power-reactor licensees to permit inspection of licensee records, premises, activities, and licensed material as necessary for the NRC to ensure public health and safety. For three types of inspections, the NRC requests licensees to submit relevant information before the inspection to improve efficiency and effectiveness for both the licensee and the NRC. Licensees are encouraged to transmit this information electronically to reduce burden on themselves and the NRC.

A. JUSTIFICATION

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

The Reactor Oversight Process (ROP) defines the inspection program for power reactors in Inspection Manual Chapter 2515. Within the ROP, three types of inspections require extensive planning and preparation due to their scope and depth. In order to prevent inefficient use of licensee and NRC resources during these inspections certain relevant inspection information is need prior conducting on-site inspections. The recordkeeping requirement for licensees to maintain this relevant inspection information is established in 10 *Code of Federal Regulations* (CFR) 50.71 and the burden is included in each relevant section of this clearance. The three inspection procedures (IPs) are listed below along with a description of needed information.

IP 71111.05, "Fire Protection [Triennial]" inspection is performed every three years. Information requested to prepare for this inspection includes a copy of selected system drawings and procedures; selected information related to system design, system risk, and licensing basis information; and a list of recent fire protection tests, recent problems, and corrective actions. There are two versions of this inspection depending on the fire protection licensing basis of the plant. This information is needed to assess the licensee=s ability to safely shut down the plant after a fire.

IP 71111.21, "Component Design Bases Inspection" is performed every three years. Information requested to prepare for this inspection includes a list of recent system performance problems, corrective actions, system modifications, and operability evaluations; selected information related to component design (design calculations, design basis), component and operator action risk, and licensing basis information; and a copy of selected system diagrams, operating and surveillance testing procedures. This information is needed to assess whether a selected components or operator actions used to mitigate risk-significant accident sequences can be relied upon to meet functional requirements that would prevent damage to the reactor core during design basis events.

IP 71152, "Identification and Resolution of Problems" inspection is performed every two years. However, an additional inspection may be performed at a site if warranted by either declining plant performance (typically this triggers one additional inspection per year) or the need to follow-up on an independent safety culture assessment. Information requested to prepare for this inspection includes a list of recent equipment problems, self-assessments, licensee audits, root cause evaluations, and corrective action documents; and a copy of the corrective action program and equipment monitoring program procedures. This information is needed to gain insights regarding the licensee's ability to promptly identify and resolve problems.

2. Agency Use of Information

The information requested is used by the inspectors responsible for evaluating licensee compliance with existing rules and regulations. The requested information is used to focus on-site inspection on the most significant licensee activities and help achieve more accurate inspection results during the short time available for on-site inspection. Accurate inspection results are needed to correctly assess licensee performance, to determine the level of agency oversight, and to allocate agency inspection resources efficiently. Inspectors also request information for other inspections, but these information requests involve issues unique to individual facilities and therefore are not subject to the Paperwork Reduction Act requirements. This off-site preparation improves effectiveness and minimizes the impact on licensees and NRC resources.

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 Federal Register (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 90 percent 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

These information collections do not affect small business.

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

The licensee and NRC resources would be less effective and less efficiently utilized if relevant inspection information is not available or is available less frequently. That is, the NRC would have to accept less accurate inspection results or keep inspectors on site longer (who would engage supporting licensee resources longer) to achieve the same level of accuracy. This inspection information is needed to select the most risk significant inspection samples for these detailed and resource intensive inspections.

7. Circumstances which Justify Variation from Office of Management and Budget (OMB) Guidelines

Normally, this information collection will not vary from OMB guidelines. However, there may be occasions when the information will be requested in less than 30 days to ensure that the information is current.

8. Consultations Outside the NRC

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

9. Payment or Gift to Respondents

Not applicable.

10. Confidentiality of the 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

Not applicable.

12. Estimate of Industry Burden and Burden Hour Cost

The following table reflects licensee burden to collect and report requested inspection information and is based on information from industry. There is no recordkeeping burden imposed by this information collection. There are 65 sites subject to the information collection. IP 71111.05 and IP 71111.21 inspections are done once every 3 years, and IP 71152 inspections are done every 2 years at each site. The number of annual responses for IP 71152 counts the number of sites based on inspection frequency (half the sites being inspected per year) plus one anticipated additional inspection based on declining performance.

ANNUAL REPORTING BURDEN

IP	Number of Respondents	Responses per Respondent	Burden Hours per Response*	Total Annual Burden Hours	Cost @ \$274/Hr.
71111.05	22	1	164	3,608	\$988,592
71111.21	22	1	178	3,916	\$1,072,984
71152	34	1	85	2,890	\$791,860
TOTALS	78		427	0	\$2,853,436

*Based on numbers supplied by the Nuclear Energy Institute in 2006. These numbers are still valid since the scope of the information requested has not changed.

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 0 hours, the storage cost for this clearance is \$0.00 (0 hours x 0.0004 x \$274/hour).

14. Estimated Annualized Cost to the Federal Government

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

15. Reasons for Change in Burden or Cost

There is no change in the overall burden. However, cost estimates have changed since the last clearance renewal resulting in an increase in the fee rate from \$257 to \$274 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 CFR 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. COLLECTIONS OF INFORMATION EMPLOYING STATISTICAL METHODS

Not applicable.