

Supporting Statement A
30 CFR Part 250, Subpart S, Safety and Environmental Management Systems (SEMS)
Form BSEE-0131 Performance Measures Data
OMB Control Number: 1014-0017
Expiration Date: November 30, 2018

Terms of Clearance: None

General Instructions

A completed Supporting Statement A must accompany each request for approval of a collection of information. The Supporting Statement must be prepared in the format described below, and must contain the information specified below. If an item is not applicable, provide a brief explanation. When the question, "Does this information collection request (ICR) contain surveys, censuses, or employ statistical methods?" is checked "Yes," then a Supporting Statement B must be completed. The Office of Management and Budget (OMB) reserves the right to require the submission of additional information with respect to any request for approval.

Specific Instructions

A. Justification

1. Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection.

The Outer Continental Shelf (OCS) Lands Act at 43 U.S.C. 1334 authorizes the Secretary of the Interior (Secretary) to prescribe rules and regulations necessary for the administration of the leasing provisions of that Act related to mineral resources on the OCS. Such rules and regulations will apply to all operations conducted under a lease. Operations on the OCS must preserve, protect, and develop oil and natural gas resources in a manner that is consistent with the need to make such resources available to meet the Nation's energy needs as rapidly as possible; to balance orderly energy resource development with protection of human, marine, and coastal environments; to ensure the public a fair and equitable return on the resources of the OCS; and to preserve and maintain free enterprise competition. These responsibilities are among those delegated to the Bureau of Safety and Environmental Enforcement (BSEE).

In addition to the general rulemaking authority of the OCSLA at 43 U.S.C. 1334, section 301(a) of the Federal Oil and Gas Royalty Management Act (FOGRMA), 30 U.S.C. 1751(a), grants authority to the Secretary to prescribe such rules and regulations as are reasonably necessary to carry out FOGRMA's provisions. While the majority of FOGRMA is directed to royalty collection and enforcement, some provisions apply to offshore operations. For example, section 108 of FOGRMA, 30 U.S.C. 1718, grants the Secretary broad authority to inspect lease sites for the purpose of determining whether there is compliance with the mineral leasing laws. Section 109(c)(2) and (d)(1), 30 U.S.C. 1719(c)(2) and (d)(1), impose substantial civil penalties for failure to permit lawful inspections and for knowing or willful preparation or submission of false, inaccurate, or misleading reports, records, or other information. Because the Secretary has delegated some of the authority under FOGRMA to BSEE, 30 U.S.C. 1751 is included as additional authority for these requirements.

Regulations governing Safety and Environmental Management Systems (SEMS) are covered in 30 CFR 250, Subpart S and are the subject of this collection. This request also covers any related Notices to Lessees and Operators (NLTs) that BSEE issues to clarify, supplement, or provide additional guidance on some aspects of our regulations.

2. Indicate how, by whom, and for what purpose the information is to be used. Except for a new collection, indicate the actual use the agency has made of the information received from the current collection. Be specific. If this collection is a form or a questionnaire, every question needs to be justified.

We consider the information to be critical for us to monitor industry's operations record of safety and environmental management on the OCS. The Subpart S regulations hold the operator accountable for the overall safety of the offshore facility, including ensuring that all employees, contractors, and subcontractors have safety policies and procedures in place that support the implementation of the operator's SEMS program and align with the principles of managing safety. An operator's SEMS program must describe management's commitment to safety and the environment, as well as policies and procedures to assure safety and environmental protection while conducting OCS operations (including those operations conducted by all personnel on the facility). BSEE will use the information obtained by submittals and observed via SEMS audits to ensure that operations on the OCS are conducted safely, as they pertain to both human and environmental factors, and in accordance with BSEE regulations, including industry practices incorporated by reference within the regulations. Job Safety Analyses (JSA's) and other recordkeeping required by the SEMS regulation will be reviewed diligently by BSEE during inspections and other oversight activities and by SEMS auditors during regulatory required audits, to ensure that industry is using the documentation required by the SEMS regulation to manage their safety and environmental risks.

Information on Form BSEE-0131, which the SEMS regulation requires to be submitted to BSEE annually, includes company identification, number of company/contractor injuries and/or illnesses suffered, company/contractor hours worked, EPA National Pollutant Discharge Elimination System (NPDES) permit non-compliances, and oil spill volumes for spills less than 1 barrel. Such information is reported on a calendar year basis, with data broken out by calendar quarter. The information is used to develop industry average incident rates that help to describe how well the offshore oil and gas industry is performing. Operators use these incident rates to benchmark against their own performance, and to focus on areas that need improvement. Using the produced data allows BSEE to better focus our regulatory and research programs on areas where the performance measures indicate that operators are having difficulty meeting our expectations. BSEE will be more effective in leveraging resources by redirecting research efforts, promoting appropriate regulatory initiatives, and shifting inspection and Directed Audit program emphasis based on performance results.

3. Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques or other forms of information technology, e.g., permitting electronic submission of responses, and the basis for the decision for adopting this means of collection. Also describe any consideration of using information technology to reduce burden and specifically how this collection meets GPEA requirements].

Most information collection required by the SEMS regulation allows for the information to remain with an operator unless specifically requested by BSEE. However, BSEE Form 0131 is required to be

submitted to BSEE annually. Starting in CY2018, we estimate that more than 90 percent of that information will be collected in electronic format. BSEE developed an online electronic collection system for the BSEE-Form 0131, which was brought online in January 2018. The system was further expanded in August 2018 to allow for electronic submission to BSEE of SEMS audit Plans, Audit Reports and Corrective Action Plans (CAPs), and for exchange of written communications regarding each submission between BSEE personnel and the operator. This new system will reduce form processing time by allowing for electronic form review/acceptance/rejection, and by automatically uploading the accepted form data into a database for processing. The electronic version of Form 0131 collects the exact same information as the OMB-approved paper version. BSEE encourages respondents to use the new electronic collection method; however, we will continue to accept paper and PDF versions of the forms, plans, reports and CAPs from those operators who wish to use old methods.

4. Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purposes described in Item 2 above.

The Department of the Interior and the U.S. Coast Guard have Memoranda of Understanding that define the responsibilities of their agencies with respect to activities on the OCS. These are generally effective in eliminating duplicate reporting and recordkeeping burdens. The requirements pertaining to an operator's SEMS plan do not affect other regulatory requirements outside of BSEE's jurisdiction. Nothing will affect the U.S. Coast Guard's current authority and jurisdiction over vessels and offshore facilities. Pertaining to form BSEE-0131 in this collection, the EPA collects exceedance information in the monthly Discharge Monitoring Reports; however, companies submit these reports on a quarterly and staggered basis and report by facility rather than company. The other information is not collected by any other Federal agency, nor is any similar information available.

5. If the collection of information impacts small businesses or other small entities, describe any methods used to minimize burden.

This collection of information may impact a number of small businesses as defined by the Small Business Administration. However, both small and large businesses on the OCS impacted by this regulation rely on a large contractor workforce (81% of work conducted on the OCS in CY 2016 was undertaken by contractors), and the risk each company faces does not vary based on company size. Because the information required by the SEMS regulation is needed to evaluate the effect of industry's continued improvement of safety and environmental management of the OCS, the hour burden on any small entity subject to these regulations cannot be reduced to accommodate them.

6. Describe the consequence to Federal program or policy activities if the collection is not conducted or is conducted less frequently, as well as any technical or legal obstacles to reducing burden.

The OCS Lands Act mandates that operations in the OCS be conducted in a safe and environmentally sound manner. Until recent years, we have depended on regulatory and inspection programs to ensure that this goal would be met; however, the Deepwater Horizon event highlighted the importance of operators initiating and implementing a comprehensive safety management system. Without this information, BSEE would not be able to evaluate the effect of industry's continuous improvement in safety and environmental management on the OCS, nor would it be able to determine if industry was in compliance with the regulations. For the majority of the collection, the frequency of submission for is occasional. Only Form BSEE-0131 is required to be collected on an annual basis.

7. Explain any special circumstances that would cause an information collection to be conducted in a manner:

(a) requiring respondents to report information to the agency more often than quarterly;

(b) requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;

(c) requiring respondents to submit more than an original and two copies of any document;

Not applicable in this collection.

(d) requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records, for more than 3 years;

Document and retain all records pertaining to SEMS audits for 6 years (at least 2 audit cycles (audits are at least once every 3 years)) to allow BSEE to have the necessary information when requested, and to allow BSEE to properly evaluate the SEMS program.

(e) in connection with a statistical survey, that is not designed to produce valid and reliable results that can be generalized to the universe of study;

(f) requiring the use of statistical data classification that has not been reviewed and approved by OMB;

(g) that includes a pledge of confidentiality that is not supported by authority established in statute or regulation, that is not supported by disclosure and data security policies that are consistent with the pledge, or which unnecessarily impedes sharing of data with other agencies for compatible confidential use; or

(h) requiring respondents to submit proprietary trade secrets or other confidential information unless the agency can demonstrate that it has instituted procedures to protect the information's confidentiality to the extent permitted by law.

Not applicable in this collection.

8. If applicable, provide a copy and identify the date and page number of publication in the Federal Register of the agency's notice, required by 5 CFR 1320.11), soliciting comments on the information collection prior to submission to OMB. Summarize public comments received in response to that notice and in response to the PRA statement associated with the collection over the past 3 years and describe actions taken by the agency in response to these comments. Specifically address comments received on cost and hour burden.

Describe efforts to consult with persons outside the agency to obtain their views on the availability of data, frequency of collection, the clarity of instructions and recordkeeping, disclosure, or reporting format (if any), and on the data elements to be recorded, disclosed, or reported.

Consultation with representatives of those from whom information is to be obtained or those who must compile records should occur at least once every 3 years – even if the collection of information activity is the same as in prior periods. There may be circumstances that may preclude consultation in a specific situation. These circumstances should be explained.

As required in 5 CFR 1320.8(d), BSEE provided a 60-day notice in the *Federal Register* on March 6, 2018 (83 FR 9541). Also, 30 CFR 250.199 explains that BSEE will accept comments at any time on the information collection aspects of 30 CFR 250. We display the OMB control number and provide the

address for sending comments to BSEE. We received no comments in response to the *Federal Register* notice or unsolicited comments from respondents covered under these regulations.

To prepare this ICR, companies were contacted to determine the estimated burden this subpart places on respondents: The following company representatives that commented were:

Fieldwood Energy, LLC; VP HSE and Regulatory; (985) 773-6095;
2014 W. Pinhook Rd., Suite 800, Lafayette, LA 70508;

Chevron North America; Mgr. Legislative and Regulatory Advocacy;
985-773-6095; 100 Northpark Blvd., Covington, LA 70433;

Arena Offshore; HSE Manager; (281) 210-3141;
4200 Research Forest Drive, Suite 230, The Woodlands, TX 77381;

Eni Petroleum; Safety and Env. Engineer; (713) 393-6314;
1201 Louisiana St., Houston, TX 77002;

DCOR; Senior Safety Advisor; (805) 535-2071;
290 Maple Court, Suite 290, Ventura, CA 93003;

Castex Offshore, Inc., VP Operations; (281) 878-0074;
333 Clay St., Suite 2000, Houston, TX 77002;

PetroQuest Energy, LLC; SEMS Coordinator; (337) 232-7028;
400 E. Kaliste Saloom Road, Suite 6000, Lafayette, LA 70508;

Whitney Oil & Gas, LLC, EH&S Manager; (337) 519-0843;
1233 W. Loop S, Suite 1800, Houston, TX 77027;

Center for Offshore Safety; SEMS Audit, Accreditation and Certification;
(832) 239-5105; 19219 Katy Freeway, Suite 175, Houston, TX 77094

All the different reporting and recordkeeping requirements that are listed in the Subpart S burden table (Section A.12) were thoroughly reviewed by the company representatives listed. These representatives had no concerns regarding the availability of data, frequency of collection, clarity of instructions, and elements being collected at this time. The companies that replied to our request provided the burden estimates that are reflected in Section A.12. One of the companies declined to provide their cost per SEMS audit. They indicated that the cost is a non-zero value, but company policy prohibits them from sharing it. This “zero” cost was not included in the average calculation, so as to not understate the result.

9. Explain any decision to provide any payment or gift to respondents, other than remuneration of contractors or grantees.

BSEE will not provide payment or gifts to respondents in this collection.

10. Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or agency policy.

BSEE will protect any confidential commercial or proprietary information according to the Freedom of Information Act (5 U.S.C. 552) and DOI's implementing regulations (43 CFR 2); section 26 of OCSLA (43 U.S.C. 1352); 30 CFR 250.197, *Data and information to be made available to the public or for limited inspection*; and 30 CFR part 252, *OCS Oil and Gas Information Program*.

11. Provide additional justification for any questions of a sensitive nature, such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private. This justification should include the reasons why the agency considers the questions necessary, the specific uses to be made of the information, the explanation to be given to persons from whom the information is requested, and any steps to be taken to obtain their consent.

This collection does not include questions of a sensitive nature.

12. Provide estimates of the hour burden of the collection of information. The statement should:

(a) Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated. Unless directed to do so, agencies should not conduct special surveys to obtain information on which to base hour burden estimates. Consultation with a sample (fewer than 10) of potential respondents is desirable. If the hour burden on respondents is expected to vary widely because of differences in activity, size, or complexity, show the range of estimated hour burden, and explain the reasons for the variance. Generally, estimates should not include burden hours for customary and usual business practices.

(b) If this request for approval covers more than one form, provide separate hour burden estimates for each form and aggregate the hour burdens.

Potential respondents are Federal OCS oil, gas, or sulphur lessees, operators, and/or third-party personnel or organization. It should be noted that not all of the potential respondents will submit information in any given year and some may submit multiple times. The burden estimates include the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information and are based on informal discussions with the listed respondents in Section A.8. For the majority of the collection, the frequency of submission for is occasional. Most Responses are mandatory. We estimate the total annual paperwork burden on industry to be 1,487,634 hours. This is based on feedback received from the entities listed in Section A.8. Refer to the following table for a breakdown of these burdens.

Burden Table

Citation 30 CFR 250 Subpart S	Reporting and Recordkeeping Requirement	Hour Burden	Average No. of Annual Responses	Annual Burden Hours (rounded)
1900-1933	High Activity Operator: Have a SEMS program, and maintain all documentation and records pertaining to your SEMS program, according to API RP 75, ISO 17011 in their entirety,	11,926	8 operators	95,408

Citation 30 CFR 250 Subpart S	Reporting and Recordkeeping Requirement	Hour Burden	Average No. of Annual Responses	Annual Burden Hours (rounded)
	the COS-2-01, 03, and 04 documents as listed in § 250.198, and all the requirements as detailed in 30 CFR 250, Subpart S. Make your SEMS available to BSEE upon request.			
1900-1933	Moderate Activity Operator: Have a SEMS program, and maintain all documentation and records pertaining to your SEMS program, according to API RP 75, the three COS documents in their entirety, and all the requirements as detailed in 30 CFR 250, Subpart S. Make your SEMS available to BSEE upon request.	4,195	22 operators	92,290
1900-1933	Low Activity Operator: Have a SEMS program, and maintain all documentation and records pertaining to your SEMS program, according to API RP 75, the three COS documents in their entirety, and all the requirements as detailed in 30 CFR 250, Subpart S. Make your SEMS available to BSEE upon request.	671	34 operators	22,814
1911(b)	Immediate supervisor must conduct a JSA, sign the JSA, and ensure all personnel participating sign the JSA. The individual designated as being in charge of facility approves and signs all JSAs before job starts. NOTE: JSA's are now considered a customary and usual practice, engrained as part of the normal business culture for OCS Oil and Gas operations*	9,431	64 operators	603,584
1914(e); 1928(d), (e); 1929	Submit Form BSEE-0131. Maintain a contractor employee injury/illness log in the operation area, retain for 2 years, and make available to BSEE upon request (this requirement is included in the form burden). Inform contractors of hazards.	1,151	64 operators	73,664
1920(a), (b); 1921	ASP audit for High Activity Operator ASP audit for Moderate Activity Operator ASP audit for Low Activity Operator NOTE: An audit is done once every 3 years.	8 operators x \$400,000 audit = \$3,200,000 / 3 = \$1,066,667 22 operators x \$135,000 audit = \$2,970,000 / 3 = \$990,000 34 operators x \$54,167 audit = \$1,841,678/3 = \$613,893		
1920(b)	Notify BSEE with audit plan/schedule 30 days prior to conducting your audit.	385	64 operators /once every 3 years =21	8,085
1920(c); 1925(a);	Submit to BSEE after completed audit, an audit report of findings and conclusions, including deficiencies and required supporting information/ documentation.	112	21 operators	2,352
1920	Submit to BSEE information it requests during the ASP-conducted SEMS audit	39	21 operators	819
1920(d); 1925(b);	Submit/resubmit a copy of your CAP that will address deficiencies identified in audit within 60 days of audit completion.	137	21 operators	2,877
1920(e)	Submit to BSEE information to verify operator undertook the corrective actions and that they effectively addressed audit findings	131	21 operators	2,751
1922(a)	Labor hours spent by AB meeting ISO 17011 (or equivalent) requirements	420	1 AB	420
1922(b)	Make available to BSEE upon request, AB activity details and	234	1 AB	234

Citation 30 CFR 250 Subpart S	Reporting and Recordkeeping Requirement	Hour Burden	Average No. of Annual Responses	Annual Burden Hours (rounded)
	conflict of interest procedures.			
1924(b)	Make available to BSEE upon request, evaluation documentation and supporting information relating to your SEMS.	941	64 operators	60,224
1924	Make available to BSEE SEMS documentation in response to inspection findings (BSEE or USCG) or an incident.	1,818	64 operators	116,352
1925(a);	Pay for all costs associated with BSEE directed ASP audit, at a frequency of approximately 1 operator per year per category: 1 directed audit for high operator (\$400,000 per audit x 1 audit = \$400,000); 1 directed audit for moderate operator (\$135,000 per audit x 1 audits = \$135,000; and 1 directed audit for low operator (\$54,167 per audit X 1 audit = \$54,167) = 3 required audits per year. (Please note that in FYs 2016-2017, BSEE required only 2 Directed Audits, but the frequency listed here is expected to be a typical frequency going forward).	3 BSEE directed ASP audits per year – for a total of \$589,167.		
1928	(1) Document and keep all SEMS audits for 6 years (at least two full audit cycles) at an onshore location.	300	64 operators	19,200
	(2) JSAs must have documented results in writing and kept onsite for 30 days or until release of the MODU; retain records for 2 years. (3) All MOC records (API RP Sec 4) must be documented, dated, and retained for 2 years. (4) SWA documentation must be kept onsite for 30 days; retain records for 2 years. (5) Documentation of employee participation must be retained for 2 years.	5,903		377,792
1930(c)	Document decision to resume SWA activities.	64	64 operators	4,096
1933(a)	Personnel reports unsafe practices and/or health violations.	Burden covered under 30 CFR 250, Subpart A 1014-0022.		0
1933(c)	Post notice where personnel can view their rights for reporting unsafe practices.	73	64 operators	4,672
TOTAL SUBPART S			686 Responses	1,487,634 Hours
			\$3,259,727 Non-Hour Cost Burden	

*The hour burden reported here for JSA completion and signatures is reported by industry respondents to be the extra paperwork management burden that the SEMS regulation adds onto their customary and usual practice for managing JSAs.

(c) Provide estimates of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories. The cost of contracting out or paying outside parties for information collection activities should not be included here. Instead, this cost should be included under “annual Cost to the Federal Government.”

The average respondent cost is \$122/hour. This cost is broken out in the following table using the Society of Petroleum Engineers (SPE) data dated November 2017. See SPE document/website: <http://www.spe.org/industry/docs/2017-Salary-Survey-Highlight-Report.pdf>

Position	Hourly Pay rate (\$/hour estimate)	Hourly rate including benefits (1.4* x \$/hour)	Percent of time spent on collection	Weighted Average (\$/hour/rounded)
HSE Engineer	\$92.86	\$130.00	35%	\$45.50
Production Engineer	\$90.33	\$126.46	17%	\$21.50
Computer or Information Tech	\$86.52	\$121.13	24%	\$29.07
Non-Engineering Technical	\$76.69	\$107.36	24%	\$25.77
Weighted Average (\$/hour)				\$122

*A multiplier of 1.4 (as implied by BLS news release USDL-18-0944, June 8, 2018 (see <http://www.bls.gov/news.release/ecec.nr0.htm>)) was added for benefits.

Based on a cost factor of \$209 per hour, we estimate the hour burden as a dollar equivalent to industry is \$181,491,348 (\$122 x 1,487,634 hours = \$181,491,348).

13. Provide an estimate of the total annual non-hour cost burden to respondents or recordkeepers resulting from the collection of information. (Do not include the cost of any hour burden shown in Item 12).

(a) The cost estimate should be split into two components: (1) a total capital and start-up cost component (annualized over its expected useful life) and (2) a total operation and maintenance and purchase of services component. The estimates should take into account costs associated with generating, maintaining, and disclosing or providing the information (including filing fees paid for form processing). Include descriptions of methods used to estimate major cost factors including system and technology acquisition, expected useful life of capital equipment, the discount rate(s), and the time period over which costs will be incurred. Capital and start-up costs include, among other items, preparations for collecting information such as purchasing computers and software; monitoring, sampling, drilling and testing equipment; and record storage facilities.

(b) If cost estimates are expected to vary widely, agencies should present ranges of cost burden and explain the reasons for the variance. The cost of purchasing or contracting out information collection services should be a part of this cost burden estimate. In developing cost burden estimates, agencies may consult with a sample of respondents (fewer than 10), utilize the 60-day pre-OMB submission public comment process and use existing economic or regulatory impact analysis associated with the rulemaking containing the information collection, as appropriate.

(c) Generally, estimates should not include purchases of equipment or services, or portions thereof, made: (1) prior to October 1, 1995, (2) to achieve regulatory compliance with requirements not associated with the information collection, (3) for reasons other than to provide information or keep records for the government, or (4) as part of customary and usual business or private practices.

We have identified two categories of non-hour cost burdens:

§ 250.1925(a) – Pay for all costs associated with a BSEE directed audit due to deficiencies.

§ 250.1920(a) - ASP audits conducted once every 3 years for each High, Moderate, and Low Activity Operator.

We estimate a total reporting non-hour cost burden to industry of \$3,259,727 for this collection of

information. Refer to the chart in Section A.12 for a breakdown of the burden.

14. Provide estimates of annualized cost to the Federal Government. Also, provide a description of the method used to estimate cost, which should include quantification of hours, operational expenses (such as equipment, overhead, printing, and support staff), and any other expense that would not have been incurred without this collection of information.

The average government cost is \$76/hour. This cost is broken out in the below table using the current Office of Personnel Management salary data for the REST OF THE UNITED STATES (<https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/>).

Position	Grade	Hourly Pay rate (\$/hour estimate)	Hourly rate including benefits (1.6* x \$/hour)	Percent of time spent on collection	Weighted Average (\$/hour)
Regulatory/Program Analyst	GS-12/5	\$39.85	\$63.76	25%	\$15.94
Petroleum Engineer/Geologist/Geophysicist	GS-13/5	\$47.38	\$75.81	50%	\$37.91
Supv. Petroleum Engineer/Geologist/Geophysicist	GS-14/5	\$55.99	\$89.58	25%	\$22.40
Weighted Average (\$/hour)					\$76

* **A multiplier of 1.6 (as implied by BLS news release USDL-18-0944, June 8, 2018 (see <http://www.bls.gov/news.release/ecec.nr0.htm>)) was added for benefits.

Please note that out of the 1,487,634 industry burden hours, only a portion of their hours are associated with submittals or making information available to BSEE upon request.

Citation	Requirement	Industry's Burden Hour	Government's Burden Hour
§§ 250.1900-1933	High, Moderate, and Low Activity Operator – Maintain SEMS, make available to BSEE upon request.	210, 512	5, 000
§§ 250.1900(b); 1914(d); 1928(d), (e); 1929	Submit Form BSEE-0131.	73, 664	130
§ 250.1920	Notification of audit schedule.	8, 085	450
§§ 250.1920(c); 1925(a), (c);	Submit audit reports.	2, 352	500
§§ 250.1920(d), 1920(e), 1925(b)	Submit/resubmit/verify CAP.	5, 628	900
§ 250.1922	Submit documentation and relevant info about ASP.	420	6
§ 250.1922	Make available to BSEE upon request, conflict of interest procedures.	234	1
§ 250.1924(b)	Upon request make available evaluation documentation and supporting info about SEMS.	60, 224	125
§ 250.1924	Provide SEMS information per BSEE requests in response to INCs or an incident.	116, 352	1000
§ 250.1928	Documentation/recordkeeping	396, 992	3, 500
Total		874,463 hours	11,612 hours

To analyze and review the information submitted, we estimate the Government will spend an average of 11,612 hours per year. Based on a cost factor of \$76 per hour, the total estimated annualized cost to the Government is \$882,512 (11,612 Government hours x \$76 per hour = \$882,512).

15. Explain the reasons for any program changes or adjustments in hour or cost burden.

(a) The current OMB inventory for this collection includes 2,238,164 burden hours. In this submission, we are requesting a total of 1,487,634 hours. This represents an adjustment decrease of 750,530 hours. This adjustment decrease is a result of industry, specifically the respondents listed in A.8, supplying us with information that shows a reduced regulatory burden in terms of burden hours. For example as the BSEE SEMS requirements become well known, they become engrained in standard business practices that companies tell us have become customary and usual; reducing the regulator-imposed burden of SEMS.

(b) The current OMB non-hour cost burden inventory is \$5,220,000. In this submission, we are requesting a total of \$3,259,727. This represents an adjustment decrease of \$1,960,273. The decrease is due to two factors: a reduction in the number of companies subject to the SEMS regulation and therefore SEMS auditing, and the market for outside audit services remaining competitive keeping the per audit cost near their historic rates.

16. For collections of information whose results will be published, outline plans for tabulation and publication. Address any complex analytical techniques that will be used. Provide the time schedule for the entire project, including beginning and ending dates of the collection of information, completion of report, publication dates, and other actions.

BSEE will not tabulate or publish the data.

17. If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons that display would be inappropriate.

BSEE will display the OMB control number and approved expiration date.

18. Explain each exception to the topics of the certification statement identified in, "Certification for Paperwork Reduction Act Submission".

Not applicable. To the extent that the topics apply to this collection of information, BSEE is not making any exceptions to the Certification for Paperwork Reduction Act Submissions.