

April 4, 2019

**Supporting Statement for
Paperwork Reduction Act Submissions**

OMB Control Number: 1660 - 0024

Title: Federal Assistance for Offsite Radiological Emergency Preparedness and Planning

Form Number(s): None

General Instructions

A Supporting Statement, including the text of the notice to the public required by 5 CFR 1320.5(a)(i)(iv) and its actual or estimated date of publication in the Federal Register, 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 in Section A below. If an item is not applicable, provide a brief explanation. When Item 17 or the OMB Form 83-I is checked “Yes”, Section B of the Supporting Statement must be completed. 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. Attach a copy of the appropriate section of each statute and regulation mandating or authorizing the collection of information. Provide a detailed description of the nature and source of the information to be collected.

FEMA’s Radiological Emergency Preparedness (REP) Program coordinates the National effort to provide State, Tribal and local governments with relevant and executable planning, training, and exercise guidance and policies necessary to ensure that adequate capabilities exist to prevent, protect against, mitigate the effects of, respond to, and recover from incidents involving commercial nuclear power plants (NPPs). The REP Program assists State, Tribal and local governments in the development and conduct of off-site REP emergency planning and preparedness activities within the emergency planning zones (EPZs) of Nuclear Regulatory Commission (NRC)-licensed commercial nuclear power facilities.

Sec. 109 of the NRC Authorization Act of 1980 (Public Law 96- 295) directed the NRC to establish emergency preparedness as a criterion for licensing commercial NPPs. Specifically, section 109 of Public Law 96- 295 directed the NRC to establish through rulemaking, (a) standards, developed with FEMA, for the evaluation of State and local government radiological emergency planning and preparedness; and (b) a requirement that the NRC will issue operating licenses. Before issuing a license the NRC must determine that there is (i) a State or local emergency response plan compliant with the standards developed with FEMA or (ii) in the absence of such a plan, a State, local, or utility emergency response plan that provides reasonable assurance that public health and safety is not endangered by the NPP's operation. See Public Law 96-295, §109 (b)(1) (A)-(B)). The NRC revised its regulations in Part 50 of Title 10 of the CFR to incorporate additional emergency preparedness requirements, including 16 planning standards for onsite and offsite emergency plans as required by PL 96-295. FEMA mirrors these 16 planning standards in part 350, specifically at 44 CFR 350.5.

In the communities surrounding commercial nuclear power plants, 44 CFR 350.5(b) directs FEMA's REP Program to review offsite radiological emergency plans and preparedness. Approved plans and preparedness "must be determined to adequately protect the public health and safety by providing reasonable assurance that appropriate protective measures can be taken offsite in the event of a radiological emergency."

FEMA defines reasonable assurance as a determination that State, Tribal, local, and utility offsite plans and preparedness are adequate to protect public health and safety in the emergency planning areas of commercial nuclear power plants. FEMA will consider plans, procedures, personnel, training, facilities, equipment, drills, and exercises, which in its professional judgment are important to the effective implementation of protective measures offsite in the event or any incident at a commercial nuclear power plant. FEMA will make its adequacy determination, supported by other Federal agencies, as necessary, by conducting inspections, providing Staff Assistance Visits (SAVs), organizing, conducting and reviewing training, participating in, observing and evaluating drills and exercises, and by being an engaged partner with Federal, State, Tribal, and local government officials and industry stakeholders.

State, Tribal, or local government participation in offsite radiological emergency planning and preparedness is voluntary. However, participation in the REP planning and preparedness process necessitates adherence to the program requirements as set forth in 44 CFR Part 350, the joint NRC/FEMA document NUREG-0645/FEMA-REP-1, Rev. 1, "Criteria for Preparation and Evaluation of Radiological Emergency Response Plans and Preparedness in Support of Nuclear Power Plants" (and supplements), and the REP Program Manual (RPM). The RPM consolidates many of the REP Program's operative guidance and policy documents into one location. The RPM provides guidance that

interprets the planning standards and evaluation criteria contained in NUREG-0654 and 44 CFR Part 350. See 76 FR 72431, November 23, 2011.

If State, Tribal, or local governments choose not to participate in REP planning, 44 CFR Part 352 outlines the licensee's obligation to develop offsite plans/procedures to protect the public health and safety in accordance with the requirements in Executive Order 12657, as amended.

The circumstances that make the collection of information necessary, including the legal or administrative requirements that necessitate the collection are listed below:

•**44 CFR 350.7** describes the submittal to FEMA of the application to review State radiological emergency plans. The application is submitted by the Governor (or Governor's designee) to the appropriate FEMA Regional Administrator. The application must include a copy of the State plans/procedures (including coverage of response in the ingestion exposure pathway EPZ) and local radiological emergency plans/procedures for the site's plume exposure pathway emergency planning zone (EPZ) [350 CFR 350.7(a)]. Only a State may request formal review of State or local radiological emergency plans. The State must also certify that the plans/procedures are "adequate to protect the public health and safety of its citizens living within the emergency planning zones...by providing reasonable assurance that State and local governments can and intend to effect appropriate protective measures offsite in a radiological emergency" [44 CFR 350.7(d)].

•**44 CFR 350.5** describes the planning standards and criteria for evaluating State and local radiological plans and preparedness and the request for alternative approaches. As described in § 350.5(a), the joint FEMA/NRC guidance document NUREG-0654/FEMA-REP-1, Rev. 1 provides the Evaluation Criteria for assessing radiological emergency plans and preparedness. As described in the RPM, States may submit a formal written request outlining the proposed alternative approach to the FEMA Regional Office. The request includes: jurisdiction(s) affected/involved; relevant evaluation criteria; explanation regarding how the currently approved approach is not sufficient for the jurisdiction (e.g., statues and regulations prohibit the currently approved approach, terrain/weather conditions prohibit the use of certain equipment, and/or distance from facilities inhibits response times, etc.); the alternative approach; and a description of how the proposed alternative approach differs from the previous approach and how it will be demonstrated.

•**44 CFR 350.14** describes the process by which a State may amend its plan. A State may amend a plan submitted to FEMA for review and approval under § 350.7 at any time during the review process or may amend a plan at any time after FEMA approval has been granted under § 350.12. A State must amend its plan in order to extend the coverage of the plan to any new nuclear power facility which becomes operational after a

FEMA approval or in case of any other significant change. The State plan shall remain in effect as approved while any significant change is under review.

•44 CFR 350.5(a)(16) describes the continued responsibility for plan development and review. FEMA determined that the periodic reporting requirements could be accomplished through the State submitting an Annual Letter of Certification (ALC). The ALC assists FEMA in making reasonable assurance findings and determinations regarding offsite radiological emergency plans/procedures and preparedness. As described in the RPM, each November, the FEMA Regional Office submits a letter to the State requesting the ALC. The ALC submission for a given year is required by January 31 of the following year. The ALC may address more than one site within the State. By the end of February, FEMA Regional personnel review the ALC and mail to the State either an approval letter for each site or a letter requesting additional information for completing the review. FEMA personnel may verify information during SAVs. FEMA Regional personnel will provide FEMA Headquarters with a copy of the State's ALC cover letter and the Region's final approval letter.

•44 CFR 352.4 describes the process when a State government chooses not to participate in REP planning. 44 CFR Part 352 outlines the licensee's obligation to develop offsite plans/procedures to protect the public health and safety. Executive Order 12657, dated November 18, 1988, as amended, charged the FEMA and other Federal agencies with emergency planning response in cases where State and local governments have declined or failed to prepare emergency plans. To implement Executive Order 12657, FEMA worked with NRC and other Federal agencies on the Federal Radiological Preparedness Coordinating Committee to develop Regulation 44 CFR Part 352, "Commercial Nuclear Power Plants: Emergency Preparedness Planning". This regulation establishes policies and procedures for: (i) a licensee submission of a certification of the State's decision to "decline" or "fail" to prepare radiological emergency plans, (ii) FEMA's determination concerning Federal assistance to the licensee, and (iii) also establishes policies and procedures for providing Federal support for offsite planning and preparedness.

- 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. Provide a detailed description of: how the information will be shared, if applicable, and for what programmatic purpose.**

The information collected is utilized by FEMA to maintain and ensure that offsite radiological plans and preparedness can "adequately protect the public health and safety by providing reasonable assurance that appropriate protective measures can be taken

offsite in the event of a radiological emergency.” See 44 CFR 350.5(b). In addition, information collected will be utilized to furnish assessments, findings and determinations as to whether offsite emergency plans and preparedness are adequate and continue to be capable of implementation (e.g., adequacy and maintenance of procedures, training, resources, staffing levels and qualification and equipment adequacy). These findings and determinations will be used by NRC under its own rules in connection with its licensing and regulatory requirements and FEMA will support its findings in the NRC licensing process and related court proceedings. See 44 CFR 350.3(e) and (f).

The following provides the instances of how the collection provides necessary information for REP Program considerations:

Submittal of State offsite radiological emergency plans. As described in 44 CFR 350.7(a), the Governor (or Governor’s designee) submits to the appropriate FEMA Regional Administrator a copy of the State plans/procedures (including coverage of response in the ingestion exposure pathway EPZ) and local radiological emergency plans/procedures for the site’s plume exposure pathway EPZ. Pursuant to § 350.7(a) only a State may request formal review of State or local radiological emergency plans. As provided for in 44 CFR 350.5(b), the review and approval of offsite radiological emergency plans and preparedness assist FEMA in ensuring that the plans and preparedness “adequately protect the public health and safety by providing reasonable assurance that appropriate protective measures can be taken offsite in the event of a radiological emergency.”

Request for Alternative Approaches. As described in 44 CFR 350.5, the Evaluation Criteria in NUREG-0654/FEMA-REP-1 provide approved approaches to meet the regulatory requirements of the REP Program. However, FEMA recognizes that other approaches may be appropriate and therefore presents a process for review and approval of alternative approaches. As described in the RPM, States submit a formal written request outlining the proposed alternative approach to the FEMA Regional Office. The request includes: jurisdiction(s) affected/involved; relevant evaluation criteria; an explanation regarding how the currently approved approach is not sufficient for the jurisdiction (e.g., statues and regulations prohibit the currently approved approach, terrain/weather conditions prohibit the use of certain equipment, and/or distance from facilities inhibits response times, etc.); the alternative approach; and a description of how the proposed alternative approach differs from the previous approach and how it will be demonstrated. As provided for in 44 CFR 350.5(b), the review and approval of offsite radiological emergency plans and preparedness, including the requests for alternative approaches, assists FEMA in ensuring that the plans and preparedness “adequately protect the public health and safety by providing reasonable assurance that appropriate protective measures can be taken offsite in the event of a radiological emergency.”

Submittal of Annual Letter of Certification (ALC). 44 CFR 350.5(a)(16) describes the continued responsibility for plan development and review. FEMA determined that the periodic reporting requirements could be accomplished through an Annual Letter of Certification (ALC). To facilitate monitoring of REP planning and preparedness requirements as prescribed in NUREG-0654/FEMA-REP-1 and 44 CFR Part 350, each State that has a REP program submits an ALC to the appropriate FEMA Regional Administrator. The ALC assists FEMA in making reasonable assurance findings and determinations regarding offsite radiological emergency plans/procedures and preparedness.

Request to Amend State Plan. 44 CFR 350.14 describes the State plan amendment process. The State may amend a plan submitted to FEMA for review and approval under § 350.7 at any time during the review process or may amend a plan at any time after FEMA approval has been granted under § 350.12. A State must amend its plan in order to extend the coverage of the plan to any new nuclear power facility which becomes operational after a FEMA approval or in case of any other significant change. The State plan shall remain in effect as approved while any significant change is under review.

Licensee Request for Assistance. Pursuant to 44 CFR 352.4, a licensee which seeks Federal assistance shall submit a certification to the FEMA regional Administrator that a decline or fail situation exists. The certification shall be in the form of a letter from the chief executive officer of the licensee. The contents of the letter shall address the following provisions:

- The licensee's certification shall delineate why such assistance is needed based on the criteria of the decline or fail for the relevant State.
- The licensee certification shall document request to and responses from the Governor or responsible local official(s) with respect to the efforts taken by the licensee to secure their participation, cooperation, commitment of resources or timely correction of planning and preparedness failures.
- This information will be forwarded to the FEMA Deputy Administrator for National Preparedness for his/her consideration in making a determination on the need for, and commitment of, Federal facilities and resources.

And finally, as provided in 44 CFR 351.20(i), FEMA is to develop and manage a radiological emergency response training program to meet State, Tribal, and local needs using technical expertise and resources of other involved agencies. Information is submitted to the Center for Domestic Preparedness (CDP), which maintains information about the individuals who register for all FEMA training programs, and the organization employing or sponsoring these individuals, as well as information used to grant access to IT systems that support these programs. The type and amount of PII that the REP

Program collects from individuals to facilitate their voluntarily participation during REP training does not vary among events.

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.

Pursuant to the FEMA regulations in Parts 350 and 352, written submissions are required for the information subject to this information collection; however, FEMA permits respondents to use electronic submission via email to submit information with the expectation that hard copy written submissions will be forthcoming. Allowing electronic submission of information is accomplished in consideration of reducing the burden on respondents who submit information to FEMA.

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.

This information is not collected in any form, and therefore is not duplicated elsewhere.

5. If the collection of information impacts small businesses or other small entities (Item 5 of OMB Form 83-I), describe any methods used to minimize.

This collection of information does not impact small businesses or other small entities.

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

If the information collection is not conducted, FEMA will not meet its regulatory requirements outlined in 44 CFR Parts 350 and 352.

With respect to Part 350, if this collection of information is not conducted when needed, FEMA will not be able to conclude that offsite plans and preparedness “adequately protect the public health and safety by providing reasonable assurance that appropriate protective measures can be taken offsite in the event of a radiological emergency.” See 44 CFR 350.5(b).

With respect to Part 352, information collected under this regulation will only be solicited on a specific situation, as needed basis. If this information was unavailable to FEMA or other Federal agencies, then FEMA will be unable to perform its role in both certifying

utility requests and determining what appropriate facilities and resources are necessary pursuant to the Executive Order 12657, as amended.

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.**
- (d) Requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records for more than three years.**
- (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 a 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.**
- (h) Requiring respondents to submit proprietary trade secret, 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.**

There are no special circumstances that would cause this Information Collection to be conducted in the manner described above.

8. Federal Register Notice:

- a. Provide a copy and identify the date and page number of publication in the Federal Register of the agency's notice soliciting comments on the information collection prior to submission to OMB. Summarize public comments received in response to that notice and describe actions taken by the agency in response to these comments. Specifically address comments received on cost and hour burden.**

A 60-day Federal Register Notice inviting public comments was published on 24 April 2019, Volume 84 FR 17182. **No comments were received.**

A 30-day Federal Register Notice inviting public comments was published on [date, Volume FR pp (example 74 FR 15228)]. **[Select one---No comments were received OR x number of comments related to (state topic of comments) were received].**

b. 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.

FEMA routinely consults with the Nuclear Regulatory Commission (NRC), other Federal agencies and external stakeholders in administering REP Program activities See 44 CFR 351.20(b) and (c) and 44 CFR 354.5(b)(19).

For example, as described in 44 CFR 350.9, consultations can take place in the form of public meetings held after each nuclear power plant exercise on a biennial basis. These meetings involve FEMA REP Program employees, licensees, and State, Tribal, and local exercise participants. In addition, the REP Program routinely coordinates REP Program issues with constituent organizations such as the National Emergency Management Association, Conference of Radiation Control Program Directors, and the Nuclear Energy Institute. See 44 CFR 354.5(b)(20).

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

In addition to the consultations described in above in paragraph (b), FEMA routinely consults with representatives of those from whom information is to be obtained. For example, FEMA make its adequacy determinations, supported by other Federal agencies, as necessary, by conducting inspections, providing Staff Assistance Visits (SAVs), organizing, conducting and reviewing training, participating in, observing and evaluating drills and exercises, and by being an engaged partner with Federal, State, Tribal, and local government officials and industry stakeholders. Moreover, consultations can take place in the form of public meetings held after each nuclear power plant exercise on a biennial basis as described in 44 CFR 350.9. These meetings involve FEMA REP Program employees, licensees, and State, Tribal, and local exercise participants.

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

FEMA does not provide payments or gifts to respondents in exchange for a benefit sought.

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

A Privacy Threshold Analysis (PTA) was approved by DHS/FEMA OCC and Privacy Officer on October 10, 2018.

This collection is covered by an existing PIA: DHS/FEMA/PIA-016, "Application and Registration Records for Training and Exercise Programs" (ARRTEP)

This collection is covered by an existing SORN: DHS/FEMA-011, "Training and Exercise Programs"

11. Provide additional justification for any question 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.

There are no questions of a sensitive nature involved with this information collection.

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 for each collection instrument (separately list each instrument and describe information as requested). 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 desired. 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.

- a. State application [44 CFR § 350.7(a)]. State governments submit to FEMA application to review offsite radiological emergency plans. It is estimated that 38 States will submit to FEMA offsite radiological emergency plans 1 time annually.

Each submittal is estimated to take 40 hours. The burden hours per request are estimated to be 38 submittals x 40 hours = 1,520 total annual burden hours.

- b. Alternative Approaches [44 CFR 350.5]. State governments may request alternative approaches to NUREG-0654 evaluation criteria. It is estimated that 38 States will request alternative approaches 1 time annually. Each request is estimated to take 20 hours. The burden hours per request are estimate to be 38 requests x 20 hours = 760 total annual burden hours.
- c. Annual Letter of Certification (ALC) [44 CFR 350.5(b)(16)]. State governments may submit to FEMA an Annual Letter of Certification (ALC). It is estimated that 38 States will submit 1 time annually. Each submittal is estimated to take 40 hours. The burden hours per submittal are estimated to be 38 requests x 40 hours = 1,520 total annual burden hours.
- d. Amend State Plan [44 CFR 350.14]. State governments may amend its offsite radiological emergency plan and submit to FEMA for review and approval. It is estimated that 38 States will submit to FEMA information 1 time annually. Each submittal is estimated to take 40 hours. The burden hours per request are estimated to be 38 submittals x 40 hours = 1,520 total annual burden hours.
- e. Licensee Request for Assistance [44 CFR 352.7]. Licensees may submit information to FEMA requesting assistance. It is estimated that 1 licensee will submit information to FEMA 1 time annually. Each submittal is estimated to take 40 hours. The burden hours per request are estimate to be 1 submittal x 40 hours = 40 total annual burden hours.

b. If this request for approval covers more than one form, provide separate hour burden estimates for each form and aggregate the hour burdens in Item 13 of OMB Form 83-I.

This Collection of Information does not require any forms.

c. Provide an estimate of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories. NOTE: The wage-rate category for each respondent must be multiplied by 1.46 and this total should be entered in the cell for “Avg. Hourly Wage Rate”. The cost to the respondents of contracting out or paying outside parties for information collection activities should not be included here. Instead this cost should be included in Item 13.

Estimated Annualized Burden Hours and Costs

Type of Respondent	Form Name / Form No.	No. of Respondents	No. of Responses per Respondent	Total No. of Responses	Avg. Burden per Response (in hours)	Total Annual Burden (in hours)	Avg. Hourly Wage Rate	Total Annual Respondent Cost
State, Local or Tribal Government	State Application [44 CFR 350.7 (a)]	38	1	38	40	1,520	\$57.96	\$88,099
State, Local or Tribal Government	Alternative Approaches [44 CFR 350.5]	38	1	38	20	760	\$57.96	\$44,050
State, Local or Tribal Government	Annual Letter of Certification [44 CFR 350.5 (b)(16)]	38	1	38	40	1,520	\$57.96	\$88,099
State, Local or Tribal Government	Amend State Plan [44 CFR 350.14]	38	1	38	40	1,520	\$57.96	\$88,099
Business, or other for profits	Licensee Request for Assistance [44 CFR 352.4]	1	1	1	40	40	\$77.76	\$3,110
Total		153		153		5,360		\$311,458

Note: The “Avg. Hourly Wage Rate” for each respondent includes a 1.46 multiplier to reflect a fully-loaded wage rate. “Type of Respondent” should be entered exactly as chosen in Question 3 of the OMB Form 83-I.

Instruction for Wage-rate category multiplier: Take each non-loaded “Avg. Hourly Wage Rate” from the BLS website table and multiply that number by 1.46. For example, a non-loaded BLS table wage rate of \$42.51 would be multiplied by 1.46, and the entry for the “Avg. Hourly Wage Rate” would be \$62.06.

FEMA expects that the documents which are associated with State, Local, and Tribal governments will be filled out by the Emergency Management Director for the respective government filling out the form. According to the U.S. Department of Labor, Bureau of Labor Statistics website (BLS) the estimated wage rate for category Emergency Management Director is \$39.70¹ per hour × 1.46^{2 3} wage rate multiplier = \$57.96 per

¹ May 2018 National Occupational Employment and Wage Rates, National File (xls), Emergency Management Director (OCC Code: 11-9160, Average, Column Title: H_Mean). Accessed and downloaded April 4, 2019. <https://www.bls.gov/oes/tables.htm> .

² Bureau of Labor Statistics, Employer Costs for Employee Compensation, Table 1. Employer costs per hour worked for employee compensation and costs as a percent of total compensation: Civilian workers, by major occupational and industry group, March 19, 2019. Accessed and downloaded April 4, 2019. https://www.bls.gov/news.release/archives/ecec_03192019.htm.

hour. FEMA expects that governments will give a total of 152 responses⁴ annually which will take an estimated 5,320 hours⁵ to complete. Therefore, the estimated burden hour cost to respondents for State, Local, and Tribal Governments is estimated to be \$308,347 annually.⁶

FEMA expects that a Nuclear Engineer will fill out the document which is associated with businesses or other for-profit organizations. According to BLS, the estimated wage rate for category Nuclear Engineer is \$53.26⁷ per hour × 1.46 wage rate multiplier = \$77.76 per hour. FEMA expects a total of 1 response annually, which will take an estimated 40 hours to complete. Therefore, the estimated burden hour cost to respondents that are businesses or for-profit organizations is estimated to be \$3,110 annually.

In total, FEMA estimates that the total burden cost for respondents resulting from this information collection will be 5,360 total hours and \$311,458⁸. Of those totals, 5,320 hours and \$308,347 is attributable State, Local, and Tribal Governments and 40 hours and \$3,110 is attributable to businesses and for-profit organizations.

13. Provide an estimate of the total annual cost burden to respondents or recordkeepers resulting from the collection of information. The cost of purchasing or contracting out information collection services should be a part of this cost burden estimate. (Do not include the cost of any hour burden shown in Items 12 and 14.)

The cost estimates should be split into two components:

- a. Operation and Maintenance and purchase of services component. These estimates should take into account cost associated with generating, maintaining, and disclosing or providing information. Include descriptions of methods used to estimate major cost factors including**

³ The per hour benefits multiplier is calculated by dividing total compensation for all workers (\$36.32, March 19, 2019) by wages and salaries for all workers (\$24.91, March 19, 2019), which yields a per hour benefits multiplier. As of March 19, 2019, the multiplier is 1.46. ($\$36.32 \div \$24.91 = 1.4580$, rounded to 1.46). Fully-loaded wage rates are calculated by multiplying the per hour benefits multiplier by the applicable wage rate from the applicable National Occupational Employment and Wage Rates report. (1.46 per hour benefits multiplier × hourly wage rate = fully-loaded hourly wage)

⁴ The calculation for total responses is 38 total responses per form × 4 forms = 152 responses.

⁵ The calculation for total hours is 1,520 hours + 760 hours + 1,520 + 1,520 hours = 5,320 total hours.

⁶ The calculation for total respondent cost for State, Local, and Tribal Governments is $\$57.96 \times 5,320$ hours = \$308,347.20, rounded to \$308,347.

⁷ May 2017 National Occupational Employment and Wage Rates, National File (xls), Nuclear Engineer (OCC Code: 17-2160, Average, Column Title: H_Mean). Accessed and downloaded March 26, 2019. <https://www.bls.gov/oes/tables.htm>.

⁸ The calculation for total annual respondent cost is $\$88,099.20 + \$44,049.60 + \$88,099.20 + \$88,099.20 + \$3,110.40 = \$311,457.60$, rounded to the nearest dollar is \$311,458.

system and technology acquisition, expected useful life of capital equipment, the discount rate(s), and the time period over which costs will be incurred.

Respondents should send the forms electronically to: FEMA-THD-REPP-Records@FEMA.DHS.GOV. Therefore, the respondents do not incur costs for operations, maintenance, or purchasing services related to this information collection.

- b. Capital and Start-up-Cost should include, among other items, preparations for collecting information such as purchasing computers and software, monitoring sampling, drilling and testing equipment, and record storage facilities.**

There are no capital or startup costs associated with this information collection.

Annual Cost Burden to Respondents or Record Keepers				
Data Collection Activity/Instrument	*Annual Capital Start-Up Cost (investments in overhead, equipment, and other one-time expenditures)	*Annual Operations and Maintenance Cost (such as recordkeeping, technical/professional services, etc.)	Annual Non-Labor Cost (expenditures on training, travel and other resources)	Total Annual Cost to Respondents
				\$0.00
				\$0.00
				\$0.00
				\$0.00
				\$0.00
				\$0.00
				\$0.00
Total	\$0.00	\$0.00	\$0.00	\$0.00

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 have been incurred without this collection of information. You may also aggregate cost estimates for Items 12, 13, and 14 in a single table.

Annual Cost to the Federal Government	
Item	Cost (\$)
Contract Costs	\$0
Staff Salaries* Two (2) GS-12, step 4 employees in each of the nine(9) FEMA Regions were the REP Program exists spend approximately 25% of time annually reviewing information for this data collection. (2 employees in 9 FEMA Regions = 18 employees) The annual salaries, as adjusted for location and applying a 1.46 wage rate multiplier at 25% of annual time equals \$555,758.	\$566,163

Region 1: \$90,955 salary x 0.25 time x 2 employees x 1.46 multiplier = \$66,426	
Region 2: \$94,393 x 0.25 time x 2 employees x 1.46 multiplier = \$68,907	
Region 3: \$88,888 x 0.25 time x 2 employees x 1.46 multiplier = \$64,888	
Region 4: \$86,291 x 0.25 time x 2 employees x 1.46 multiplier = \$62,992	
Region 5: \$90,839 x 0.25 time x 2 employees x 1.46 multiplier = \$66,312	
Region 6: \$70,940 x 0.25 time x 2 employees x 1.46 multiplier = \$51,786	
Region 7: \$82,716 x 0.25 time x 2 employees x 1.46 multiplier = \$60,383	
Region 8: N/A. No regional REP Program	
Region 9: \$99,564 x 0.25 time x 2 employees x 1.46 multiplier = \$72,682	
Region 10: \$70,940 x 0.25 time x 2 employees x 1.46 multiplier = \$51,786	
Facilities [cost for renting, overhead, etc. for data collection activity]	\$0
Computer Hardware and Software [cost of equipment annual lifecycle]	\$0
Equipment Maintenance [cost of annual maintenance/service agreements for equipment]	\$0
Travel	\$0
Total	\$566,163
*Note: "Staff Salaries" includes a 1.46 multiplier to reflect a fully-loaded wage rate.	

15. Explain the reasons for any program changes or adjustments reported in Items 13 or 14 of the OMB Form 83-I in a narrative form. Present the itemized changes in hour burden and cost burden according to program changes or adjustments in Table 5. Denote a program increase as a positive number, and a program decrease as a negative number.

A "**Program increase**" is an additional burden resulting from a federal government regulatory action or directive. (e.g., an increase in sample size or coverage, amount of information, reporting frequency, or expanded use of an existing form). This also includes previously in-use and unapproved information collections discovered during the ICB process, or during the fiscal year, which will be in use during the next fiscal year.

A "**Program decrease**", is a reduction in burden because of: (1) the discontinuation of an information collection; or (2) a change in an existing information collection by a Federal agency (e.g., the use of sampling (or smaller samples), a decrease in the amount of information requested (fewer questions), or a decrease in reporting frequency).

"**Adjustment**" denotes a change in burden hours due to factors over which the government has no control, such as population growth, or in factors which do not affect what information the government collects or changes in the methods used to estimate burden or correction of errors in burden estimates.

Itemized Changes in Annual Burden Hours

Data Collection Activity/Instrument	Program Change (hours currently on OMB Inventory)	Program Change (New)	Difference	Adjustment (hours currently on OMB Inventory)	Adjustment (New)	Difference
State Application [44CFR350.7(a)]	1,520	0	0			

Alternative Approaches [44CFR350.5]	760	0	0			
Annual Letter of Certification [44CFR350.5(b)(16)]	1,520	0	0			
Ammend State Plan [44CFR350.14]	1,520	0	0			
Licensee Request for Assistance [44CFR352.7]	40	0	0			
Total	5,360	0	0			

Explain: The intent and the reason for the program increase are to adjust the hourly wage rates for Respondents and FEMA Staff to account for increases in wages and the Federal General Schedule, as well as to reflect current REP Program practice that GS-12, Step 4 employees review Respondent submissions under this collection.

Itemized Changes in Annual Cost Burden

Data Collection Activity/Instrument	Program Change (cost currently on OMB Inventory)	Program Change (New)	Difference	Adjustment (cost currently on OMB Inventory)	Adjustment (New)	Difference
State Application [44CFR350.7(a)]	\$61,758	\$88,099	\$26,341			\$0
Alternative Approaches [44CFR350.5]	\$30,879	\$44,050	\$13,171			\$0
Annual Letter of Certification [44CFR350.5(b)(16)]	\$61,758	\$88,099	\$26,341			\$0
Ammend State Plan [44CFR350.14]	\$61,758	\$88,099	\$26,341			\$0
Licensee Request for Assistance [44CFR352.7]	\$2,735	\$3,110	\$375			\$0
Total	\$218,888	\$311,458	\$92,570	\$0	\$0	\$0
<small>Note: The total for "Program Change (New)" is rounded up to the nearest dollar at \$311,458. The calculation for total annual respondent cost is \$88,099.20 + \$44,049.60 + \$88,099.20 + \$88,099.20 + \$3,110.40 = \$311,457.60, rounded to the nearest dollar is \$311,458. The total for "Difference" is rounded up to the nearest dollar at \$92,570. The calculation for total difference is \$26,341.20 + \$13,170.60 + \$26,341.20 + \$26,341.20 + \$375.40 = \$92,569.60, rounded to \$92,570.</small>						

Explain: The intent and the reason for the program increase is an additional burden resulting from federal government regulatory action or directive (increase in salary increases and multiplier).

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.

There are no plans to tabulate or publish data for this information collection.

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

FEMA does not seek approval to not display the expiration date for OMB approval of this information collection.

18. Explain each exception to the certification statement identified in Item 19 “Certification for Paperwork Reduction Act Submissions,” of OMB Form 83-I.

FEMA does not request an exception to the certification of this information collection.