

Table 3. Annual Reporting Burden						
Section & Description of Requirement	Number of Respondents	Number of Responses Per Respondent	Total Annual Responses	Burden Hrs Per Response	Total Annual Burden (Hrs)	Cost @ \$278/HR
72.7 - Request for exemption	4.0	1.0	4.0	200.0	800.0	\$ 222,400.00
72.11 - Notification of information about significant implication for public health and safety or common defense and security	-	-	-	1.0	-	\$ -
72.16, 72.22, 72.24, 72.26, 72.28, 72.30, 72.32, 72.34, 72.44(b)(4) - Application for specific license	1.0	1.0	1.0	12,732.0	12,732.0	\$ 3,539,496.00
72.30(a)-(g) - Decommissioning funding plan with application, renewal and every 3 years	11.0	1.0	11.0	4.0	44.0	\$ 12,232.00
72.42 - ISFSI license renewal	1.3	1.0	1.3	6,000.0	7,980.0	\$ 2,218,440.00
72.44(b)(3) - Demand for information	-	-	-	500.0	-	\$ -
72.44(b)(6) - Notification of bankrupt filing	-	-	-	1.0	-	\$ -
72.44(d)(3) - Authorization of the receipt, handling, and storage of spent fuel, high-level radioactive waste and/or reactor-related GTCC waste	82.0	3.0	246.0	8.0	1,968.0	\$ 547,104.00
72.44(e) - Application to amend license in order to amend security plan	2.0	1.0	2.0	10.0	20.0	\$ 5,560.00
72.44(f) - Emergency plan changes	2.0	15.0	30.0	10.0	300.0	\$ 83,400.00
72.48(c)(2) - Circumstances that require a license amendment	Included in 72.56 and 72.244					
72.48(d)(2) - Reporting a brief description of any changes, tests, and experiments, including a summary of the evaluation of each as specified in 72.4 (To be done by a licensee and certificate holder)	41.0	1.0	41.0	20.0	820.0	\$ 227,960.00
72.50 (no transfers anticipated) - Transfer of License	-	-	-	100.0	-	\$ -
72.52(b) - (Included in 72.56) - Consent from Commission without an individual application to the creation of any mortgage, pledge, or other lien on spent nuclear material	Included in 72.56					
72.54(d) - Licensee shall notify NRC in writing and submit within 12 months of the notification with a final decommissioning plan per 72.42(b) or by administrative directions in 72.4	-	-	-	1,200.0	-	\$ -
72.54(f) - Commission approval to delay or postpone initiation of the decommissioning process if it isn't detrimental to public health & safety	-	-	-	40.0	-	\$ -
72.54(g) - (Included in 72.54(d)) - Proposed final decommissioning plan requirements	included in 72.54(d)					
72.54(j)(2) - Requirements for decommissioning of the entire site	-	-	-	1,200.0	-	\$ -
72.54(k) - Commission approval for an alternate schedule for the completion of decommissioning	-	-	-	240.0	-	\$ -
72.54(l) - Final radiation surveys and certification of waste disposition	-	-	-	1,200.0	-	\$ -
72.56 - Application for an amendment to a license	4.0	1.0	4.0	120.0	480.0	\$ 133,440.00

Section & Description of Requirement	Number of Respondents	Number of Responses Per Respondent	Total Annual Responses	Burden Hrs Per Response	Total Annual Burden (Hrs)	Cost @ \$278/HR
72.62(d) - (this is a contingency provision) - Commission requirement for a holder of a license to submit information dealing with backfitting or proposed backfitting	-	-	-	80.0	-	\$ -
72.70 - (all sections included) - SAR Periodic Updates	8.0	1.0	8.0	180.0	1,440.0	\$ 400,320.00
72.74 - (this is a contingency provision) - CoC-Only Requirement to Provide Updated SAR to New Certificate Holder or NRC	-	-	-	40.0	-	\$ -
72.75(a) - Reporting requirements: Emergency notifications	-	-	-	1.0	-	\$ -
72.75(b) - Reporting requirements: Non-emergency notifications (4 hr reports)	-	-	-	1.0	-	\$ -
72.75(c) - Reporting requirements: Non-emergency notifications (8 hr reports)	-	-	-	1.0	-	\$ -
72.75(d)(1) - (2) (included in 72.75(a), (b), and (c)) - Reporting requirements: Non-emergency notifications (24 hr reports)	Included in 72.75(a), (b), and ©					
72.75(e)(1)-(3): Reporting requirements: Initial notification	-	-	-	1.0	-	\$ -
72.75(f) - Reporting requirements: Follow-up notification	-	-	-	1.0	-	\$ -
72.75(g)(1)-(7) - Reporting requirements: Preparation and submission of written reports	-	-	-	1.0	-	\$ -
72.75(h) - Reporting requirements: Supplemental information	-	-	-	1.0	-	\$ -
72.80(b) - Other records and reports: Each licensee shall furnish a copy of its annual financial report, including the certified financial statements to the Commission	72.0	1.0	72.0	1.0	72.0	\$ 20,016.00
72.80(e) - Other records: Before license termination shall forward records required by the regs to the appropriate NRC Regional Office	-	-	-	1.0	-	\$ -
72.80(g) - Other records and reports: Each specific licensee shall notify the Commission of its readiness to begin operation at least 90 days prior to the first storage of spent fuel	-	-	-	5.0	-	\$ -
72.90 - (included in 72.16 or 72.56) - Siting Evaluation Factors: General Considerations						
72.92 - (included in 72.16 or 72.56) - Siting Evaluation Factors: Design Basis External Natural Events						
72.94 - (included in 72.16 or 72.56) - Design basis external man-induced events						
72.98 - (included in 72.16 or 72.56): Siting Evaluation Factors: Identifying Regions around an ISFSI or MRS Site						
72.100 - (included in 72.16 or 72.56) - Siting Evaluation Factors: Defining Potential Effects of the ISFSI or MRS on the Region						

Section & Description of Requirement	Number of Respondents	Number of Responses Per Respondent	Total Annual Responses	Burden Hrs Per Response	Total Annual Burden (Hrs)	Cost @ \$278/HR
72.102 - (included in 72.16 or 72.56) - Geological and Seismological Characteristics (Applications Before 10/16/2003 and for Wet Storage)						
72.103 - (included in 72.16 or 72.56) - Geological and Seismological Characteristics (Applications On/After 10/16/2003)						
72.104 - (included in 72.16 or 72.56) - Dose Criteria			Included in 72.16 (or 72.56)			
72.108 - (included in 72.16 or 72.56) - Transportation of spent nuclear fuel						
72.120 - (included in 72.16 or 72.56) - General Design Criteria: General Considerations						
72.126(d) - (included in 72.16 or 72.56) - ISFSI Designed for ALARA Effluents; Analyses to Demonstrate Compliance with 72.104 and 72.106 (72.104 & 72.106)						
72.140 thru 72.176 - (included in 72.16 or 72.56) - Quality Assurance						
72.180 - (included in 72.16) - Physical protection plan						
72.182 - (included in 72.16) - Design for physical protection						
72.184(a) - (included in 72.16) - Licensee's safeguards contingency plan for responding to threats and radiological sabotage						
72.184(b) - (included in 72.16) - Licensee's safeguards contingency plan procedures effecting the actions and decisions contained in the Responsibility Matrix						
72.186(a) - (included in 72.56) - Commission approval to change safeguards contingency plan (Background, Generic Planning Base, Licensee Planning Base, and Responsibility Matrix)			Included in 72.56			
72.186(b) - Copy of changes to physical security plan to the Regional Administrator	2.0	1.0	2.0	10.0	20.0	\$ 5,560.00
72.192 - (included in 72.16) - Operator training and certification program	-	-	-	-	-	\$ -
72.206 - Provision of MRS Information to State Governments and Indian Tribes: Representation	1.00	1.00	1.0	1.0	1.0	\$ 278.00
72.212(b)(1) - Notify NRC 90 days before storing fuel under a general license	4.00	1.00	4.0	1.0	4.0	\$ 1,112.00
72.212(b)(2) - Register use of each cask w/in 30 days	32.00	3.00	96.0	1.2	115.2	\$ 32,025.60
72.212(b)(3) - Ensure that each cask used by the general licensee conforms to § 72.214.	6.00	1.00	6.0	1.0	6.0	\$ 1,668.00
72.212(b)(4) - Register use/application of amended CoC to loaded cask	6.00	1.00	6.0	1.0	6.0	\$ 1,668.00
72.218(c) - Provide copies of 72.218(a) and (b) submittals to Regional office	-	-	-	8.0	-	\$ -

Section & Description of Requirement	Number of Respondents	Number of Responses Per Respondent	Total Annual Responses	Burden Hrs Per Response	Total Annual Burden (Hrs)	Cost @ \$278/HR
72.230(a) and (b) - Spent fuel storage application & casks that is certified under transportation must follow 72.4	4.0	0.2	0.8	1,200.0	960.0	\$ 266,880.00
72.232(d) - Notify NRC 45 days before starting cask fabrication	4.0	0.5	2.0	2.0	4.0	\$ 1,112.00
72.240(a) & (b) - Cask renewal - 40 yrs; CoC holder or cask user may apply; Submit renewal application 30 days before CoC expiration	4.0	1.75	7.0	600.0	4,200.0	\$ 1,167,600.00
72.240(c)- Renewal application includes SAR w/ updated design bases information, TLAA, AMP	4.0	1.75	7.0	40.0	280.0	\$ 77,840.00
72.242(d) - (this is a contingency provision) - Report design or fabrication deficiency within 30 days of discovery	15.0	4.0	60.0	2.0	120.0	\$ 33,360.00
72.244 - Application for an amendment to a Certificate of Compliance	4.0	2.5	10.0	110.0	1,100.0	\$ 305,800.00
72.248 - Safety Analysis Report (SAR) Updating	4.0	1.5	6.0	40.0	240.0	\$ 66,720.00
TOTAL REQUESTED REPORTING	86.0		628.1		33,712.2	\$ 9,371,991.60

Table 5. Annual Third-Party Disclosure Burden

Section & Description of Requirement	Number of Respondents	Number of Responses Per Respondent	Total Annual Responses	Burden Hrs Per Response	Total Annual Burden (Hrs)	Cost @ \$278/Hr
72.80(f) - Licensee transfer the records to new licensee	82	1	82	10	820.0	\$227,960
72.234(d)(3) - Certificate holder supplies the licensees using the spent fuel storage cask with the original record of CoC number	4	16	64	8	512.0	\$142,336
72.234(f) - Certificate holder provides copy of procedures and tests to licensee using the spent fuel storage cask	4	2	8	190	1,520.0	\$422,560
TOTAL REQUESTED 3RD PARTY DISCLOSURE	86		154		2,852.0	\$792,856

Table 4. Annual Recordkeeping Burden

Section & Description of Requirement	Record retention period	Number of Recordkeepers	Hours Per Recordkeeper	Total Annual Burden Hours	Cost @ \$278/Hr
72.30(f) - Records of information important to the decommissioning of a facility	L	82	10.0	820.0	\$227,960
72.48(d)(1) - Records of changes in the facility or spent fuel storage cask design, of changes in procedures, and of tests and experiments	2 yrs	82	10.0	820.0	\$227,960
72.72(a) - Records showing the receipt, inventory (including location), disposal, acquisition, and SNM and source material	5 yrs	82	42.0	3,444.0	\$957,432
72.72(b) and (d) - Copy of the current inventory of all spent fuel, high-level radioactive waste, and reactor-related GTCC waste containing special nuclear material, including a duplicate record in a separate location	12 mos. - 72.72(b) 5 years - 72.72(d)	82	78.0	6,396.0	\$1,778,088
72.72(c) - Written material control and accounting procedures	L	78	40.0	3,120.0	\$867,360
72.80(a)&(c) - (included in other specific reqmts) - GENERAL (no additional burden). Each licensee shall maintain any records and make any reports that may be required by the conditions of the license or by the rules, regulations, and orders of the Commission, unless specified, retain Part 72 records until license termination.	L	Included in other specific requirements			
72.80(e) - Other records: Record Retention Periods	L	78	6.0	468.0	\$130,104
72.140(d) & 72.174 - Quality Assurance Programs; Quality Assurance programs for previously approved programs	L	78	50.0	3,900.0	\$1,084,200
72.180 - Physical Protection Plans	3 yrs	17	10.0	170.0	\$47,260
72.184(b) - Licensee's safeguards contingency plan procedures effecting the actions and decisions contained in the Responsibility Matrix	3 yrs	17	5.0	85.0	\$23,630
72.212(b)(5),(6), &(8) - Record of written evaluations before cask use	L	65	6.0	390.0	\$108,420
72.212(b)(7) - Evaluate changes to 72.212 evaluations and conditions not bound by FSAR, per 72.48; maintain records until SNF not stored under GL	L	8	1.0	8.0	\$2,224
72.212(b)(11) - Maintain a copy of CoC and referenced/supporting documents	L	65	8.0	520.0	\$144,560
72.212(b)(12) - Maintain cask records	L	65	60.0	3,900.0	\$1,084,200
72.212(b)(13) - Written procedures for ISFSI activities	L	65	120.0	7,800.0	\$2,168,400

Section & Description of Requirement	Record retention period	Number of Recordkeepers	Hours Per Recordkeeper	Total Annual Burden Hours	Cost @ \$278/Hr
72.234(d) - Establish and maintain cask records; provide records to users; send composite records to NRC if cease production of casks	L	65	120.0	7,800.0	\$2,168,400
72.234(f) - CoC holder establishes written procedures and tests and provides copy to users before cask use	L	4	24.0	96.0	\$26,688
72.236(k) - Mark cask with a model number, unique identification number, empty weight	L	65	60.0	3,900.0	\$1,084,200
72.242 (a)-(c) - Maintain records; Record retention periods; Original record or clear reproduced copy	L	4	5.0	20.0	\$5,560
TOTAL REQUESTED RECORDKEEPING		86		43,657.0	\$12,136,646

Table 1. Annual Burden Estimates for 10 CFR Part 72

	Responses	Burden	Cost at \$278/hr
Reporting	628.1	33,712.2	\$9,371,992
Recordkeeping	86.0	43,657.0	\$12,136,646
Third-Party Disclosure	154.0	2,852.0	\$792,856
TOTAL	868.1	80,221.2	\$22,301,494

Recordkeeping costs		\$ 4,855
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