

**Table 1  
10 CFR Part 73 Annual Reporting Burden**

Section	Description of requirement	No. of Respondents	Responses per Respondent	Number of Responses	Burden Hours per Response	Total Annual Burden Hours	Notes
73.5	The Commission may grant exemptions from the requirements of the regulations in Part 73 under specified conditions, upon the application of any interested person or on its own initiative.	4.00	1.00	4.00	25.00	100.00	No change since the 2018 report.
73.26(b)(3)	Prior to each shipment, licensees shall provide information to NRC concerning the identity of the shipper, consignee, carriers, transfer points, modes of shipment, and security arrangements for the shipment.	0.00	0.00	0.00	20.00	0.00	No change since the 2018 report, because no licensees are performing work that fall under this requirement.
73.26(i)(6)	Road Shipments: Calls to the movement control center shall be made at least every half hour to convey the status and position of the shipment. In the event no call is received in accordance with these requirements, the licensee or his agent shall immediately notify the law enforcement authorities	0	0	0.00	1.00	0.00	No change since the 2018 report, because no licensees are performing work that fall under this requirement. Burden hours per response has been added to both road and rail shipments @ 1 hour each.
73.26(k)(4)	Rail Shipments: Calls to the movement control center shall be made at least every half hour to convey the status and position of the shipment. In the event no call is received in accordance with these requirements, the licensee or his agent shall immediately notify the law enforcement authorities	0	0	0.00	1.00	0.00	<b>Put (i)(6) road and (k4) rail into 2 separate line items</b>
73.27(b)	Each licensee who receives a shipment of formula quantities of SSNM shall immediately notify the person who delivered the material to a carrier for transport and the Director DPCP of the arrival of the shipment at its destination. In the event such a shipment fails to arrive at its destination at the estimated time, or in the case of an export shipment, the licensee who exported the shipment, shall immediately notify Director, DPCP and the licensee or other person who delivered the material to a carrier for transport. The licensee who made the physical protection arrangements shall also immediately notify Director, DPCP of the action being taken to trace the shipment.	0.00	0.00	0.00	1.00	0.00	No change since the 2018 report, because no licensees are performing work that fall under this requirement.
73.27(c)	Each licensee who makes arrangements for physical protection of a shipment of formula quantities SSNM as required by §§ 73.25 and 73.26 shall immediately conduct a trace investigation of any shipment that is lost or unaccounted for after the estimated arrival time and file a report with the Commission as specified in § 73.71.	0	0	0.00	8.00	0.00	New entry for 2021 from NSIR SMEs.
73.37(b)(1)(vi)	Preplan and coordinate with the NRC to obtain advance approval of the routes used for road and rail shipments of spent nuclear fuel	4.00	1.00	4.00	25.00	100.00	Decreased based on change in transportation

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73.38(d)	Conduct fingerprints and an FBI investigation and criminal history records check in accordance with Section 73.57. Conduct background investigations before allowing an individual to act as an armed escort or have unescorted access to spent reactor fuel in transit. Requires the licensee to transmit the fingerprints to the NRC.	6.00	1.00	6.00	5.25	31.50	No change since the 2018 report.
73.46(b)(9)	Notify NRC at least 60 days in advance of a scheduled training exercise for the security force which is required to be observed by NRC.	2.00	1.00	2.00	1.00	2.00	There are 2 respondents and MOX has been terminated by DOE.
73.46(b)(12) & 73.46(b)(12)(i)	Develop and submit to the NRC for approval site specific, content-based, physical fitness performance tests	0.00	0.00	0.00	8.00	0.00	This activity is complete for current CAT I licensees.
73.55(l)(7)	Requests for use of MOX fuel assemblies containing greater than 20 weight percent PuO2 be reviewed and approved by the Commission before receipt of MOX fuel assemblies.	0.00	0.00	0.00	8.00	0.00	MOX has been terminated by DOE.
73.55(p)(3)	Suspension of security measures reported	6.00	1.00	6.00	6.00	6	Added this line for explicit reporting requirements that has been missed in the past.
73.55(r)	Submission of alternative measures for protection against radiological sabotage	1.00	1.00	1.00	8.00	8.00	Pilgrim, in decommissioning stage, submitted 1 Alternative Measure in 2021. This is the only alternative measure recognized by the NRC staff submitted in the last 3 years.
73.56(d)	Background Investigation for unescorted access to the protected area or vital area of a nuclear power plant	56.00	25.00	1400.00	0.33	462.00	Decreased respondents because NPPs decreased.
73.57(a), (b)(1), (b)(6), (d), (d)(1), (d)(2), (g)(1), & (g)(2)	Submit a fingerprint card for individuals who have access to Safeguards Information and nuclear power plant licensees shall fingerprint each individual who has or will have access to Safeguards Information or who will require unescorted access to the nuclear power facility or non-power reactor facility.	91.00	427.00	38857.00	0.50	19428.50	No change since the 2018 report. Included NPR in the respondents total because combined the (a) and (d) requirements to one line item.
73.67(e)(3) & 73.71(b)	Notify the NRC Operations Center within 1 hour after the discovery of the theft or attempted theft or unlawful diversion of SSNM	0.00	0.00	0.00	6.00	0.00	No notifications anticipated in the next 3 years.
73.67(e)(7)(i)	Upon request by the NRC, a shipper provide additional information regarding a planned shipment as the Commission considers pertinent to the decision on whether to delay such shipment	1.00	1.00	1.00	2.00	2.00	
73.67(e)(7)(ii)	The receiver, or the shipper if the receiver is not a licensee, notify the NRC by telephone within 24 hours after the arrival of the shipment at its final destination, or after the shipment has left the United States as an export.	6.00	1.66	10.00	1.00	10.00	Increased due to transportation operations.
73.67(g)(3)(iii), 73.71(a), & 73.27(c)	Report of lost SSNM	0.00	0.00	0.00	0.00	0.00	Moved parenthasized from "Section" column: (No notifications anticipated in the next 3 years).
73.70(g)	Information to record prior to and during shipping of SSNM.	0	0	0.00	4.00	0.00	New line item added from SME for 2021. Burden hour per response estimated @ 4.

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73.71(a)(1)	Report of lost shipment of SNM or spent fuel.	0.00	0.00	0.00	0.50	0.00	Added line due to the reporting requirement. Real data acquired from the NRC Operations Center HOO, February 2021 for CY 2020.
73.71(b)(1)	Report of safeguards events in accordance with Appendix G	10.00	1.00	10.00	0.50	5.00	Added line due to the reporting requirement. Real data acquired from the NRC Operations Center HOO, February 2021 for CY 2020.
73.71(d)	Provides guidance for the submission of 60-day reports required under the forgoing provisions of Section 73.71.	10.00	1.00	10.00	6.00	60.00	Real data acquired from the NRC Operations Center HOO, February 2021 for CY 2020.
73.72 - Advance Notice Telephonic	Notify NRC Headquarters Operations Center about the shipment status by telephone	6.00	3.33	19.98	0.30	5.99	Changed title to "Advance Notice Telephonic."
73.72(a)(1)	Provide written advance notification to NRC of Cat. I, Cat II and SNF shipments.	14.00	1.00	14.00	1.00	14.00	<b>New line item for 2021.</b>
73.72(a)(4)	Provide 2 hr advance notification to NRC of Cat. I, Cat II and SNF shipments.	14.00	1.00	14.00	1.00	14.00	<b>New line item for 2021.</b>
73.72(a)(5)	Notify NRC of scheduled changes > 6 hrs for Cat. I, Cat II and SNF shipments.	14.00	1.00	14.00	1.00	14.00	<b>New line item for 2021.</b>
73.73 - Advance Notice	Licensees exporting SNM of low strategic significance to provide advance written notification to the NRC at least 10 days prior to shipment, along with shipment details and itinerary, and may notify the NRC by telephone of any changes to the shipment details or itinerary.	6.00	24.00	144.00	2.00	288.00	No change since the 2018 report, because there has been no change in transportation.
73.74	Requires that licensees importing SNM of low strategic significance from a country not a party to the Convention on the Physical Protection of Nuclear Material must provide advance written notification to NRC at least 10 days prior to shipment, along with shipment details and itinerary, and may notify the NRC by telephone of any changes to the shipment details or itinerary.	0.00	0.00	0.00	8.00	0.00	Decreased based on change in transportation. No shipments of this type have been observed or anticipated in the next 3 years.
73.77(a)(1)	1 hour cyber security event notifiator	56.00	0.50	28.00	1.00	28.00	Decreased respondents because NPPs decreased.
73.77(a)(2)	4 hour cyber security event notifiator	56.00	1.00	56.00	0.50	28.00	Decreased respondents because NPPs decreased.
73.77(a)(3)	8 hour cyber security event notifiator	56.00	2.00	112.00	0.50	56.00	Decreased respondents because NPPs decreased.
73.77(d)	Follow-up written report for 73.77(a)(1), (a)(2)(i), and (a)(2)(iii) event notifications	56.00	1.00	56.00	3.00	168.00	Decreased respondents because NPPs decreased.
73.71(b), Appendix G	Provides clarification of the requirements for reporting safeguards events.	120.00	1.00	120.00	15.00	1800.00	Increased based on changing types of licensees - FCF (7) + NPP (66) + NPR (31) + Decom (20) + Irradiated Fuel Shipments (6)
<b>Totals</b>		<b>283.00</b>		<b>40888.98</b>		<b>22630.99</b>	

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Section	Description of requirement	No. of Recordkeepers	Hours per recordkeeper	Total Annual Burden Hours	Retention period	Notes
73.20(c), 73.25(b),(c), &(d); 73.26(d)(3); 73.26(e)(1); 73.26(h)(5); 73.26(i)(5); 73.26(j)(6); 73.26(k)(2); 73.37(a); 73.37(b)(2); 73.40; 73.45; 73.46(d)(3); 73.46(g)(5); 73.46(h)(1)&(3); 73.50(a)(3), 73.50(g)(1); 73.50(h); 73.51(d)(5),(6), & (10); 73.60(e); 73.67(a)&(c); 73.67(d)(11); 73.67(f)(4); 73.67(g)(3)(i); Appendix B Section VI H.1; Appendix C	Establish and maintain NRC-approved physical protection, training & qualification and safeguards contingency plans	130	16.00	2080.0	(L, P+3, S+3)	Increased based on numerous licensed sites - FCFs (11), ISFSIs (80), NPRs (31), In transit (8)
73.22(b)	Condition for access to Safeguards Information	169	4.00	676.0	A+1; A+10	All licensees have chosen to maintain documents at the SGI level instead of SGI-M; Moved all of the
73.24(b)(1)	Maintain written log of the arrival at the final destination of each individual shipment of SSNM	8	1.00	8.0	3.0	Increased because BWXT shipments of CAT II to Belgium and NPR.
73.26(c)(1)(ii)	Retain SSNM records.	0	1.00	0.00	3.0	New line item for 2021 from NSIR SMEs.
73.26(c)(2)	Retain SSNM records.	0	1.00	0.00	3.0	New line item for 2021 from NSIR SMEs.
73.26(d)(3)	Retain a record of current management system.	0	2.00	0.00	3.0	New line item for 2021 from NSIR SMEs.
73.26(d)(4)	Retain a record of training and qualification of escort personnel (initial and requals).	0	4.00	0.00	3.0	<b>New line item for 2021.</b>
73.26(e)(1)	Retain a record of the contingency response plan.	0	4.00	0.00	3.0	<b>New line item for 2021.</b>

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Section	Description of requirement	No. of Recordkeepers	Hours per recordkeeper	Total Annual Burden Hours	Retention period	Notes
73.26(h)(6)	Maintain audit report program records and documented in a report,	0	30.00	0.00	3.0	New line item for 2021.
73.26(d)(4)	Requalification training records for all individuals assigned to act as an escort or other security member organization.	0	40.00	0.0	(E,Q,R+3)	No change since the 2018 report, because there are no licensees performing work that falls under this requirement. No shipments of CAT I have occurred since the 1980's.
73.26(g)(1)	A numbered picture badge identification procedure shall be used to identify all individuals who will have custody of a shipment.	0	200.00	0.0	3.0	No change since the 2018 report, because there are no licensees performing work that falls under this requirement. No shipments of CAT I have occurred since the 1980's.
73.26(h)(6)	Annual transportation security program Review	0	5.00	0.0	3.0	No change since the 2018 report, because there are no licensees performing work that fall under this requirement. No shipments of CAT I have occurred since the 1980's.
73.26(i)(1)	Transportation Route Plan	0	360.00	0.0	S	No change since the 2018 report, because there are no licensees performing work that fall under this requirement. No shipments of CAT I have occurred since the 1980's.
73.37(b)(2)(vi)	Retain a copy of the preplanning and coordination activities, advance notification, and any revision or cancellation notice as a record	4	3.33	13.3	3.0	Decreased based on change in transportation.
73.37(b)(3)(iv)	Maintain a written log for each spent nuclear fuel shipment	4	27.00	108.0	3.0	Decreased based on change in transportation
73.37(b)(3)(v), (vi), & (vii) 73.37(b)(4)(iii), 73.37(g)(iii)	Maintain, revise and implement written transportation physical protection and contingency and response procedures	4	0.25	1.0	3.0	Decreased based on change in transportation
73.37(f)	Investigations of lost unaccounted for after designated no-later-than arrival time.	0	4.00	0.0	3.0	4 hours added to document the number of burden hours for investigation.

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Section	Description of requirement	No. of Recordkeepers	Hours per recordkeeper	Total Annual Burden Hours	Retention period	Notes
73.38(a)(2)	Establish, implement, and maintain its access authorization program	6	0.25	1.5	L	No change since the 2018 report.
73.38(c)(2)(v)	Written confirmation from the agency/employer that granted the Federal security clearance or reviewed the criminal history records check must be provided to the licensee.	6	3.75	22.5	E+3	No change since the 2018 report.
73.38(d)(5)(iv)(A)	Document individual's refusal or unwillingness to provide information for access authorization investigation	6	3.75	22.5	E+5	No change from 2018 report. E+5 was interpreted from (l)(1) records.
73.38(d)(5)(vi)	Make a record of the contents of the telephone call and shall retain that record, and any documents or electronic files obtained electronically, under paragraph (l) of this section	6	0.25	1.5	E+5	Decreased based on change in transportation. Interpreted from (l)(1) records.
73.38(f)(1)-(4)	procedures for protection of the criminal history record and the personal information from unauthorized disclosure	4	40.00	160.0	A	Added new line: Irradiated Fuel Shipments
73.38(f)(5)	Retain all fingerprint and criminal history records received from the FBI, or a copy if the file has been transferred, on an individual (including data indicating no record)	6	1.00	6.0	E+5	Decreased based on change in transportation. Interpreted from (f)(5).

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Section	Description of requirement	No. of Recordkeepers	Hours per recordkeeper	Total Annual Burden Hours	Retention period	Notes
73.38(j)	Develop, implement, and maintain written procedures for conducting background investigations for persons who are applying for unescorted access or access authorization for spent nuclear fuel in transit.	6	40.00	240.0	5.0	No change from 2018 response. 5 years after the procedure is no longer needed, 5 years after the license is terminated. If any portion of the procedure is supersceded, the supersceded material is retained for 5 years. (the retentin period is interpreded from (l)(2)).
73.38(l)	Retain documentation regarding the trustworthiness and reliability of individual employees	6	0.25	1.5	E+5	No change since the 2018 review.
73.46(b)(1)&(3)	Security implementing procedures	2	80.00	160.0	L + 2 years for superceded records	Increased due to personal NRC staff observation at a CAT I site.
73.46(b)(4),(7),(8) & 73.46(b)(11)(i)	Documentation of qualification and requalification of Tactical Response Team members, armed response person, guard, or other members of the security organization	2	33.00	66.0	Q/R+3	MOX doesn't do this yet
73.46(b)(9)	Document the results of all training exercises for the security force.	2	36.00	72.0	3.0	MOX doesn't do this yet. (73.46(b)(9), refers to Section (i)(2)(ii), which is no longer in the regulation. The intent of (b)(9) is to refer to (i)(2). Therefore administrative rule change will be processed in CY2021 to change reference of (i)(2)(ii) in (b)(9) to (i)(2)). Changed Hours per recordkeeper from 1 to 3, due to 3 exercises being documented per year
73.46(b)(10)(iii) & 73.46(b)(11)(iii)	Records of medical examination for Tactical Response Team members, armed response personnel, and guards	2	150.00	300.0	3.0	Increased due to annual requirement for medical certification for approximately 150 security staff.

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73.46(b)(12)(ii)	Annual medical examination including a determination and written certification by a licensed physician	2	0.00	0.0	3.0	Decreased due to assumptions that licensees exercise 73.46(b)(10)(iii) and 73.46(b)(11)(iii).
73.46(d)(10)	Records of containers that are containers of contaminated wastes must be drum scanned and tamper sealed	2	63.75	127.5	3.0	Same as last renewal period.
73.46(d)(11)	Verify and certify the content of each shipping container through the witnessing of gross weight measurements and nondestructive assay, and through the inspection of tamper seal integrity and associated seal records	2	42.50	85.0	3.0	Same as last renewal period.
73.46(d)(13)	Maintain a log of individuals escorted in the protected area (include name, date, time, purpose of visit and employment affiliation, citizenship, and name of the individual to be visited).	2	51.00	102.0	3.0	Same as last renewal period.
73.46(g)(6)	Annual security program review at Category I fuel cycle facilities	2	40.00	80.0	3.0	Same as last renewal period.
73.46(h)(2)	Establish and document response arrangements that have been made with local law enforcement authorities.	3	0.50	1.5	L+3 years for superseded	No of recordkeepers are only 2 because BWXT and NFS (both CAT I sites).
73.50(a)(4)	Documentation of qualification and requalification of armed response person, guard, or other members of the security organization	0	0.64	0.0	Q/R+3	No licensees performing work that fall under this requirement



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73.50(c)(5)	Maintain a log of individuals escorted in the protected area (include name, date, time, purpose of visit and employment affiliation, citizenship, and name of the individual to be visited).	0	1.60	0.0	3.0	No changes since the 2018 report, because there are no licensees performing work that fall under this requirement.
73.50(g)(2)	Establish and document response arrangements that have been made with local law enforcement authorities.	0	0.02	0.0	L	No changes since the 2018 report, because there are no licensees performing work that fall under this requirement.
73.51(d)(12)	Physical protection program review must include an evaluation of the effectiveness of the physical protection system and a verification of the liaison established with the designated response force or LLEA.	80	8.00	640.0	3.0	Increased to updated number of specific-licensed ISFSIs. The retention requirement is in 73.51(d)(13)
73.54(b)(1); 73.54(e) & (f); 73.55(b)(8); 73.55(c)(6);	Establish and maintain a cyber security plan	56	80.00	4480.0	L+3 years for superceded records	Decreased recordkeepers because NPPs decreased and increased hours per recordkeepers due to the magnitude of the work.
75.55(b)(7); 73.55(c)(1)&(3); 73.55(e)(1)&(2); 73.55(e)(8)(iv); 73.55(k)(5)&(6); 73.55(l)(3); 73.55(n)(1); 73.55(o)	Physical Security Plan	56	80.00	4480.0	L+3 years for superceded records	Decreased recordkeepers because NPPs decreased.
73.55(b)(6); 73.55(c)(4);	Training and Qualification Plan	56	80.00	4480.0	L+3 years for superceded records	Decreased recordkeepers because NPPs decreased.

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73.55(b)(11)& 73.58(b)	Assess and manage the potential for adverse effects on safety and security, including the site emergency plan, before implementing changes to plant configurations, facility conditions, or security	56	96.00	5376.0	3.0	Decreased recordkeepers because NPPs decreased.
73.55(c)(5)	Safeguards Contingency Plan	56	40.00	2240.0	L+3 years for superceded records	Decreased recordkeepers because NPPs decreased.
73.55(c)(7); 73.55(f); 73.55(k)(8); 73.55(l)(3); 73.55(n)(1), 73.56(l); 73.56(m)(4)	Security implementing procedures	56	40.00	2240.0	L+3 years for superceded records	Decreased recordkeepers because NPPs decreased.
73.55(g)(6)(i)(B)	Maintain a record, to include name and affiliation, of all individuals to whom access control devices have been issued	56	48.00	2688.0	Annually	Decreased recordkeepers because NPPs decreased.
73.55(g)(6)(ii)(C)	Maintain a record, to include the name and areas to which unescorted access is granted, of all individuals to whom photo identification badges have been issued	56	48.00	2688.0	3.0	Decreased recordkeepers because NPPs decreased.
73.55(g)(6)(iii)	Access authorization program personnel shall be issued passwords and combinations to perform their assigned duties	56	165.00	9240.0	3.0	Decreased recordkeepers because NPPs decreased.

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73.55(g)(7)(i)(C)	Maintain a visitor control register in which all visitors shall register their name, date, time, purpose of visit, employment affiliation, citizenship, and name of the individual to be visited before being escorted into any protected or vital area	56	90.00	5040.0	3.0	Decreased recordkeepers because NPPs decreased.
73.55(i)(4)(ii)(H)	Maintain a record of all alarm annunciations, the cause of each alarm, and the disposition of each alarm	56	48.00	2688.0	3.0	Decreased recordkeepers because NPPs decreased.
73.55(k)(9)	Document and maintain current agreements with applicable law enforcement agencies to include estimated response times and capabilities.	56	10.00	560.0	3.0	Decreased recordkeepers because NPPs decreased.
73.55(b)(10); 73.55(m); 73.55(q)(4)	Security program reviews.	56	1380.00	77280.0	3.0	Decreased recordkeepers because NPPs decreased.
73.55(p)(1)&(3)	The suspension of security measures must be reported and documented in accordance with the provisions of § 73.71	6	1.00	6.0	3.0	Decreased recordkeepers because NPPs decreased.
73.55(q)(3)	If a contracted security force is used to implement the onsite physical protection program, the licensee's written agreement with the contractor must be retained by the licensee as a record for the duration of the contract	56	0.25	14.0	L	Decreased recordkeepers because NPPs decreased.

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10 CFR Part 73 Annual Recordkeeping Burden**

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 "A" = Annual // "E" = Term of Employment // "L" = Life of License // "P" = Physical Protection Plan (PPP) // "PER" = Period Requiring Record // "Q" = Qualification // "R" = Requalification // "S" = Safeguards Contingency Plan (SCP) // "+" = The added number of years for retention after the record is made (e.g., P+3 years, S+3 years, A+1 year)

Section	Description of requirement	No. of Recordkeepers	Hours per recordkeeper	Total Annual Burden Hours	Retention period	Notes
73.56(a)(4)	Licensees and applicants shall certify individuals' unescorted access authorization and are responsible to maintain, deny, terminate, or withdraw unescorted access authorization	0	8.00	0.0	A	This is the initial requirement which has been completed by all current licensees.
73.56(d)	Background investigation - multiple parts	56	1837.50	102900.0	A+5	Decreased recordkeepers because NPPs decreased.
73.56(e)	Psychological assessment to assist in verifying trustworthiness and reliability	56	245.00	13720.0	A+5	Decreased recordkeepers because NPPs decreased.
73.56(f)	Behavioral observation training and testing	56	24.00	1344.0	3.0	Decreased recordkeepers because NPPs decreased.
73.56(i)	Annual Supervisory Review to assist in verifying trustworthiness and reliability	56	1455.00	81480.0	A	Decreased recordkeepers because NPPs decreased.
73.56(j)	List of individuals who are authorized to have unescorted access to specific nuclear power plant vital areas during non-emergency conditions	56	24.00	1344.0	A	Decreased recordkeepers because NPPs decreased.
73.56(k)	Trustworthiness and reliability of background screeners and access authorization program personnel	56	40.00	2240.0	L	Decreased recordkeepers because NPPs decreased.
73.56(m)	Establish and maintain a system of files and procedures to ensure personal information is not disclosed to unauthorized persons	56	24.00	1344.0	L	Decreased recordkeepers because NPPs decreased.
73.56(m)(1)	Signed consent from the subject individual that authorizes the disclosure of any information collected	56	3.00	168.0	3.0	Decreased recordkeepers because NPPs decreased.

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Section	Description of requirement	No. of Recordkeepers	Hours per recordkeeper	Total Annual Burden Hours	Retention period	Notes
73.56(n)(1),(2), &(6)	Access Authorization Program Audits	56	88.50	4956.0	3.0	Decreased recordkeepers because NPPs decreased.
73.57(e)(1)	Prior to any final adverse determination, the licensee shall make available to the individual the contents of records obtained from the FBI for the purpose of assuring correct and complete information. Confirmation of receipt by the individual of this notification must be <u>maintained</u> .	5	0.25	1.3	E+1	
73.57(f)	Procedures for protection of the criminal history record and the personal information from unauthorized disclosure	114	40.00	4560.0	A	Overall decrease because hours changed to match maintenance of procedures of other requirements. Initial development is complete for all current licensees so removed that burden. Recordkeepers updated - NPPs sites (56), NPRs (31), FCFs (7); Decom (20)
73.67(e)(3)(iv)	Establish and maintain written response procedures for dealing with threats of thefts or thefts of this material.	6	40.00	240.0	L+3 and superceded +3	Added Roman numeral (iv) in the section number. Changed P+3 to L+3 and superceded +3
73.70(a)	Record of currently designated authorized individuals	65	7.00	455.0	L+3 and superceded +3	Changed from P+3 to L+3 and superceded+3 Decreased due to updated numbers of licensees that fall into this category (this is assuming that the numbers that add up are greater than 67) - NPP sites (56) and FCFs (7)
73.70(b)	Names, addresses, and badge numbers of all individuals authorized to have access to vital equipment or special nuclear material, and the vital areas and material access areas to which authorization is granted	65	7.00	455.0	PER+3 and superceded+3	Increased due to updated numbers of licensees that fall into this category (this is assuming that the numbers that add up are greater than 67) - NPP sites (56) and FCFs (7)

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Section	Description of requirement	No. of Recordkeepers	Hours per recordkeeper	Total Annual Burden Hours	Retention period	Notes
73.70(d)	Log indicating name, badge number, time of entry, and time of exit of all individuals granted access to a vital area except those individuals entering or exiting the reactor control room	63	50.00	3150.0	PER+3	Decreased due to updated numbers of licensees that fall into this category - NPPs (56) and FCFs (7)
73.70(e)	Documentation of all routine security tours and inspections, and of all tests, inspections, and maintenance performed on physical barriers, intrusion alarms, communications equipment, and other security related equipment used pursuant to the requirements of this part	63	60.00	3780.0	PER+3	Decreased due to updated numbers of licensees that fall into this category - NPPs (56) and FCFs (7)
73.70(f)	A record at each onsite alarm annunciation location of each alarm, false alarm, alarm check, and tamper indication that identifies the type of alarm, location, alarm circuit, date, and time.	63	700.00	44100.0	PER+3	Increased due to updated numbers of licensees that fall into this category - NPPs (56) and FCFs (7)

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Section	Description of requirement	No. of Recordkeepers	Hours per recordkeeper	Total Annual Burden Hours	Retention period	Notes
73.70(g)	Shipments of special nuclear material subject to the requirements of this part, including names of carriers, major roads to be used, flight numbers in the case of air shipments, dates and expected times of departure and arrival of shipments, verification of communication equipment on board the transfer vehicle, names of individuals who are to communicate with the transport vehicle, container seal descriptions and identification, and any other information to confirm the means utilized to comply with §§ 73.25, 73.26, and 73.27.	0	4.00	0.0	3.0	No licensees performing work that fall under this requirement.
73.70(h)	Procedures for controlling access to protected areas and for controlling access to keys for locks used to protect special nuclear material.	63	40.00	2520.0	L and superceded +3	Decreased due to updated numbers of licensees that fall into this category - NPPs (56) and FCFs (7)
73.71(c)	Maintain a current log and record the safeguards events described in paragraphs II(a) and (b) of appendix G	94	450.00	42300.0	3.0	Decreased recordkeepers due to updated numbers of licensees that fall into this category - NPPs (56), NPRs (31), FCFs (7); Decreased hours based on discussion with previous security officers: 7-10 hours per week is a conservative average for how much time is spent maintaing the log for 73.71(c) Safeguards Events. The average comes out to about 450.

Table 2 10 CFR Part 73 Annual Recordkeeping Burden					Retention Period Column Key: "A" = Annual // "E" = Term of Employment // "L" = Life of License // "P" = Physical Protection Plan (PPP) // "PER" = Period Requiring Record // "Q" = Qualification // "R" = Requalification // "S" = Safeguards Contingency Plan (SCP) // "+" = The added number of years for retention after the record is made (e.g., P+3 years, S+3 years, A+1 year)	
Section	Description of requirement	No. of Recordkeepers	Hours per recordkeeper	Total Annual Burden Hours	Retention period	Notes
73.77(b)	24 hour cyber security recordable event	56	4.50	252.0		Number of recordkeepers decreased due to decrease in NPPs.
73.77(d)(12)	Maintain a copy of the written security follow-up report of a cyber security event notification	56	4.50	252.0	PER+3 or L	Decreased recordkeepers because NPPs decreased.
Appendix B Section VI B.4.a.1.	Obtain and retain a written certification from the licensed physician that no medical conditions were disclosed by the medical examination that would preclude the individual's ability to participate in the physical fitness tests	56	8.00	448.0	PER	Decreased recordkeepers because NPPs decreased.
Appendix B Section VI B.4.b.4.	Physical fitness qualification of each armed member of the security organization must be documented by a qualified training instructor and attested to by a security supervisor	56	40.00	2240.0	3.0	Decreased recordkeepers because NPPs decreased. Retention is in VI. H.3.
Appendix B Section VI C.2.(b).	On-the-job training must be documented by a qualified training instructor and attested to by a security supervisor (Hours per recordkeeper is based on a min of 40 hours of OJT)	56	13.33	746.5	3.0	Decreased recordkeepers because NPPs decreased. Increased hours per per recordkeepers. Calculations for Hours per recordkeeper are calculated considering 6 new hires every 3 years @ 6.67 hours per documentation (6*6.67=40)3=13.33
Appendix B Section VI C.3.g; Appendix B, Section VI.C.3.h; Appendix B, Section VI.C.3.i; Appendix B, Section VI.C.3.m:	Performance Evaluation Program Documentation	56	40.00	2240.0	3.0	Decreased recordkeepers because NPPs decreased.



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Section	Description of requirement	No. of Recordkeepers	Hours per recordkeeper	Total Annual Burden Hours	Retention period	Notes
Appendix B Section VI E.1.(b).	Each armed member of the security organization shall be trained and qualified by a certified firearms instructor for the use and maintenance of each assigned weapon	56	12.50	700.0	3.0	Decreased recordkeepers because NPPs decreased.
Appendix B Section VI F.1.b; Appendix B Section VI F.5.a	Results of weapons qualification and requalification must be documented and retained as a record	56	96.00	5376.0	3.0	
<b>Totals</b>		<b>210</b>		<b>451787.6</b>		

**Table 3  
10 CFR Part 73, Annual Third Party Disclosure Burden**

Section	Description of requirement	No. of Respondents	Responses per respondent	Responses	Burden per response	Total burden hours
73.22(d) and (f)	Marking Safeguards Information and Preparing document for external transmission	169	5	845.0	1	845.0
73.23(d) and (f)	Marking SGI-M and Preparing document for external transmission	31	0	0.0	0	0.0
73.26(e)(2)	Inform local law enforcement agencies of abnormal presence or activity of persons or vehicles	0	0	0.0	0.25	0.0
73.26(f)(2)	the personnel in the remote location shall request assistance from the law enforcement authorities, notify the shipment movement control center and initiate the appropriate contingency plans.	0	1	0.0	4	0.0
73.26(i)(6) and (k)(4) - (No notifications anticipated in the next 3 years)	In the event that no communication is received from the shipment or escort personnel at a designated call-in time, the licensee must notify law enforcement authorities immediately and initiate appropriate contingency plans. Applies to both road and rail shipments.	0.00	0.00	0.00	1.00	0.00
73.27(a)(1)	notify the consignee of the time of departure of the shipment	0	0	0.0	1	0.0
73.27(a)(2)	written certification from the licensee who is to take delivery of the shipment	0	0	0.0	1	0.0
73.27(a)(3)	notify the consignee of the arrival of the shipment	0	0	0.0	0.5	0.0
73.27(b)	notify the person who delivered the material to a carrier for transport of the arrival of the shipment	0	0	0.0	0.5	0.0
73.37(b)(1)(ii)&(vi)	Preplan and coordinate shipment itineraries with the receiver. Must obtain approval from the NRC for the routes to be used.	4	20	80.0	1	80.0
73.37(b)(1)(v)	Arrange with local law enforcement for response for route used.	4	20	80.0	1	80.0
73.37(b)(1)(iv)	Preplan and coordinate shipment information no later than 2 weeks prior to the shipment or prior to the first shipment of a series of shipments with the governor of a State	4	6	24.0	3	72
73.37(b)(2)(i-iii)	Advanced notification of shipment. Notify the NRC and State(s) prior to the shipment of SNF within or through a State. notify the Tribal official or Tribal official's designee of each participating Tribe referenced in 10 CFR 71.97(c)(3) prior to the transport of spent fuel within or across the Tribal reservation.	4	6	24.0	1	24
73.37(b)(2)(iv)	Revision notice. Licensee shall notify by telephone a responsible individual in the office of the governor of any schedule change that differs by more than 6 hour	4	15	60.0	0.25	15
73.37(b)(2)(v)	Each licensee who cancels a shipment for which advance notification has been sent shall send a cancellation notice to: the governor or to the governor's designee of each State previously notified, each Tribal official or the Tribal official's designee previously notified and the NRC	4	5	20.0	0.33	6.6
73.37(f)	Investigations of lost unaccounted for after designated no-later-than arrival time.	0	0.00	0.0	4.0	0.0

0  
0  
0

This reports to 3rd party and NRC... should it be in both? Does one take precedence? Does it even matter since the amount is 0?

0  
0  
0  
0  
0  
80  
80

Notes
Decreased due to changing types of licensees. Most licensees have chosen to maintain documents at the SGI level instead of SGI-M; Moved majority of the SGI-M numbers to SGI.
No licensees performing work that fall under this requirement.
No licensees performing work that fall under this requirement.
No licensees performing work that fall under this requirement.
No licensees performing work that fall under this requirement.
No licensees performing work that fall under this requirement.
No licensees performing work that fall under this requirement.
No licensees performing work that fall under this requirement.
Decreased based on change in transportation.
Added line because the line immediately above this had a description of requirement that included the required coordination with local law enforcement.
Decreased based on change in" transportation.
Decreased based on change in transportation.
Decreased based on change in transportation.
Removed "and", added a ":", and added "and the NRC to the description of requirement for clarity.
Added line that was deleted from last review. Estimated burden hours to 4.

**Table 3  
10 CFR Part 73, Annual Third Party Disclosure Burden**

Section	Description of requirement	No. of Respondents	Responses per respondent	Responses	Burden per response	Total burden hours
73.38(d)(1)	Licenses shall not initiate any element of a background investigation without the informed and signed consent of the subject individual.	4	1	4.0	0.5	2.0
73.38(d)(2)	Any individual who is required to have a background investigation under this section shall disclose the personal history information that is required by the licensee's access authorization program for the reviewing official to make a determination of the individual's trustworthiness and reliability.	4	1	4.0	0.5	2.0
73.38(i)	Any individual who has applied for or is maintaining access authorization shall promptly report any legal action(s) taken by a law enforcement authority or court of law that could result in incarceration or a court order or that requires a court appearance. The licensee shall inform the individual of this obligation, in writing, prior to granting unescorted access or certifying access authorization	4	0	0.0	0.5	0.0
73.46(h)(4)(iii)(B) (Emergency notification - never used)	Upon detection of abnormal presence or activity of persons or vehicles within an isolation zone, a protected area, a material access area, or a vital area, licensee shall inform local law enforcement agencies of the threat and request assistance	2	0	0.0	0.25	0.0
73.50(g)(3)(iii)(B) (Emergency notification - never used)	Upon detection of abnormal presence or activity of persons or vehicles within an isolation zone, a protected area, a material access area, or a vital area, licensee shall inform local law enforcement agencies of the threat and request assistance	0	0	0.0	0.25	0.0
73.55(g)(7)(i)(C)	Maintain a visitor control register before being escorted into any protected or vital area	56	1320.3	73,937.0	0.1	7,393.7
73.55(k)(8)(iii)	Upon receipt of an alarm or other indication of a threat, the licensee shall notify law enforcement agencies.	56	1	56.0	0.25	14.0
73.55(p)(1)	The suspension of security measures must be reported and documented in accordance with the provisions of § 73.71	5	2	10.0	0.5	5.0
73.56(d)	Licenses, applicants, and contractors or vendors shall not initiate any element of a background investigation without the informed and signed consent of the subject individual.	56	16.2	907.0	6.75	6,122.3
73.56(e)	ensure that a psychological assessment has been completed before the individual is granted unescorted access or certified unescorted access authorization.	56	2.5	140.0	2.25	315.0
73.56(f)	each person subject to the behavior observation program to report any concerns arising from behavioral observation.	56	10	560.0	0.1	56.0

0  
0  
7,394  
14  
5  
6,122  
315  
56

Notes
Decreased based on change in transportation.
Decreased based on change in transportation.
Total burden hours remains the same as the 2018 review.
Total burden hours remains the same as the 2018 review.
No licensee falls under this information.
Decreased due to fewer NPPs than in 2018. Decreased respondents because NPPs decreased. Changed No. of respondents from 60 to 56.
Decreased due to fewer NPPs than in 2018. Decreased respondents because NPPs decreased. Changed No. of respondents from 60 to 56.
This is a weather influenced suspension.
Decreased respondents because NPPs decreased.
Decreased respondents because NPPs decreased.
Decreased respondents because NPPs decreased.

**Table 3  
10 CFR Part 73, Annual Third Party Disclosure Burden**

Section	Description of requirement	No. of Respondents	Responses per respondent	Responses	Burden per response	Total burden hours
73.56(g)	Any individual who has applied for or is maintaining unescorted access shall promptly report any legal action(s) taken by a law enforcement authority or court of law that could result in incarceration or a court order or that requires a court appearance. The licensee shall inform the individual of this obligation, in writing, prior to granting unescorted access or certifying access authorization	56	17.8	997.0	0.1	99.7
73.56(m)(2)	All information pertaining to a denial or unfavorable termination of the individual's unescorted access or unescorted access authorization shall be promptly provided, upon receipt of a written request by the subject individual or his or her designated representative as designated in writing.	56	1	56.0	0.5	28.0
73.57(b)(3)	licensee shall notify each affected individual that the fingerprints will be used to secure a review of his/her criminal history record, and inform the individual of proper procedures for revising the record or including explanation in the record	120	50	6,000.0	0.5	3,000.0
73.57(e)	licensee shall make available to the individual the contents of records obtained from the FBI for the purpose of assuring correct and complete information	120	50	6,000.0	0.5	3,000.0
73.58(d)	Where potential conflicts are identified, the licensee shall communicate them to appropriate licensee personnel and take compensatory and/or mitigative actions to maintain safety and security under applicable Commission regulations.	56	12	672.0	1	672.0
73.67(e)(1)(i)	Provide advance notification to the receiver of any planned shipments specifying the mode of transport, estimated time of arrival, location of the nuclear material transfer point, name of carrier and transport identification	10	18.5	185.0	2	370.0
73.67(e)(6)(ii)	Notify the exporter who delivered the material to a carrier for transport of the arrival of such material	0	0	0.0	0.5	0.0
73.67(g)(1) and(2)	Provide advance notification to the receiver of any planned shipments specifying the mode of transport, estimated time of arrival, location of the nuclear material transfer point, name of carrier and transport identification; Notify the shipper of receipt of the material	6	3.5	21.0	4	84.0

100

28

3,000

3,000

672

370

0

84

Notes
Decreased respondents because NPPs decreased.
Decreased respondents because NPPs decreased.
Increased due to updated numbers of licensees that fall into this category - NPPs (56), NPRs (31), FCFs (7); Decom (20); Irradiated Fuel Shipments (6)
Increased due to updated numbers of licensees that fall into this category - NPPs (56), NPRs (31), FCFs (7); Decom (20); Irradiated Fuel Shipments (6)
Decreased respondents because NPPs decreased.
No change since 2018.
No import of CAT II licensees.
Decreased based on change in transportation.

**Table 3  
10 CFR Part 73, Annual Third Party Disclosure Burden**

Section	Description of requirement	No. of Respondents	Responses per respondent	Responses	Burden per response	Total burden hours
73.67(g)(3)(ii)	Make arrangements to be notified immediately of the arrival of the shipment at its destination, or of any such shipment that is lost or unaccounted for after the estimated time of arrival at its destination	6	3.5	21.0	1	21.0
73.67(g)(5)(ii)	Notify the person who delivered the material to a carrier for transport of the arrival of such material	6	1.75	11.0	1	11.0
<b>TOTAL</b>				<b>89,869.0</b>		<b>21,473.3</b>

21

21,341

\$5,954,139.00

Notes
Decreased based on change in transportation.
Decreased based on change in transportation.

	2021 BURDEN TOTALS		
	Responses	Hours	Cost at \$263/hr
<b>Reporting</b>	40,889.0	22,631.0	\$ 5,951,951
<b>Recordkeeping</b>	210.0	451,787.6	\$ 118,820,126
<b>Third Party Disclosure</b>	89,869.0	21,473.3	\$ 5,647,465
<b>Total</b>	130,968.0	495,891.8	\$ 130,419,542

<b>Recordkeeping costs</b>	\$ 50,419
<b>Fingerprint submission</b>	\$ 502,550
<b>Total other costs</b>	\$ 552,969
 <b>Costs to the government</b>	 \$ 1,183,500

	BURDEN CHANGE					
	Current burden in ROCIS		2021 estimates		Change	
	Hours	Responses	Hours	Responses	Hours	Responses
<b>Reporting</b>	22,591	40,819	22,631	40,889	40	70
<b>Recordkeeping</b>	475,852	210	451,788	210	(24,064)	-
<b>Third Party Disclosure</b>	42,963	136,957	21,473	89,869	(21,490)	(47,088)
<b>Total</b>	541,406	177,986	495,892	130,968	(45,514)	(47,018)