

SUPPORTING STATEMENT FOR REQUESTS FOR APPROVAL UNDER
THE PAPERWORK REDUCTION ACT AND 5 CFR 1320
Survey of Farms in the Vicinity of Nuclear Power Plants
OMB Approval # 3316-0016

Summary:

- This is a request for approval for an information collection for which approval has expired.
- The information collection is planned to be conducted in mid-Spring 2023, 2024 and 2025.
- The information collection is a reinstatement, with change, of a previously approved collection for which approval has expired.
- This information collection does not employ statistical methods.

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.

The Nuclear Regulatory Commission (NRC) requires that all nuclear plants that are operating, or are about to operate, conduct a survey of residents within five (5) miles of the plant. The purpose of the survey is to locate in each of the sixteen compass sectors, for monitoring and modeling purposes, the nearest residents, home gardens and animals producing milk for human consumption. The license conditions also require the consideration of the impacts of the use of irrigation water from streams receiving effluents from the nuclear plants.

This monitoring is a mandated requirement of the NRC and is specified in the plant technical specifications or other supporting documents. TVA currently has three (3) nuclear power plants that are licensed for operation by the NRC. The appropriate section of the supporting documentation outlining the requirements for the surveys for the Browns Ferry, Sequoyah and Watts Bar Nuclear Plants is attached to this information collection request.

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.

In accordance with the licensing requirements, TVA monitors milk and food products on a regular basis. The results of these surveys identify the locations of the nearest residents, gardens, and milk animals to aid in the selection of the sampling locations.

The plant licensing documents prescribe a radiological environmental monitoring program to sample, among other things, soil, milk, vegetation, food crops and water supplies. The primary purpose of this monitoring program is to determine if the operation of the plants has an adverse impact on the environment or on people living near the plants. The data obtained in the land use survey provides guidance regarding

the selection of locations that should be sampled and is used to estimate radiological exposures to people who live or work in the vicinity of the plants.

The survey (see TVA form 9476, Land Use Survey Questionnaire), is required by Control 1.2.3 of the respective ODCMs for Browns Ferry (Appendix A), Sequoyah (Appendix B), and Watts Bar (Appendix C) Nuclear Plants. The questions in the survey are designed to collect the information called for in the radiological environmental monitoring specifications. A summary of the primary purposes of the questions included in the survey is outlined below:

Top of the form: For identification purposes.

Section 1: To determine water sources that could be influenced by plant operations and to identify potential locations for taking samples produced in home gardens.

Section 2: To identify locations producing milk for human consumption and to aid in the identification of milk sampling locations.

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.

The licensing conditions require an annual survey of residents within a 5-mile radius of each plant. Because the respondents are typically farmers and rural residents, the use of computers and other electronic information collection and transmission measures and methods is precluded. Additionally, TVA does not believe it is feasible to conduct the survey by mail or telephone. The person conducting the survey is required to be in the survey area weekly to read radiation monitors. Once each year he incorporates conducting the survey into his monitor reading activities.

For survey purposes, the 5-mile area around each of TVA's nuclear plants is divided into 16 sectors. The residents who were surveyed the year before may not qualify for the current survey because they may not have a home garden, milk animal, etc., that they had the previous year. When a resident cannot be resurveyed, the surveyor must then visually locate a new resident to survey who has one or more of the survey requirements (home garden, milk animal, etc.).

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

The United States Department of Agriculture offices have indicated that they do not collect this type of information nor are they aware of any other organizations or agencies which may collect this type of information.

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

Some agricultural type of businesses in the area own adjacent lands therefore the businesses are requested to complete the questionnaire. The number of survey questions are kept to minimum to ensure a low impact to the businesses.

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

If the collection were not conducted or were conducted less frequently, the licenses for the operation of the nuclear power plants could be revoked by the U.S. Nuclear Regulatory Commission (NRC).

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

- requiring respondents to report information to the agency more often than quarterly;
- requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;
- requiring respondents to submit more than an original and two copies of any document;
- requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records for more than three years;
- 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;
- requiring the use of statistical data classification that has not been reviewed and approved by OMB;
- that includes a pledge of confidentiality that is not supported by authority established in statute or regulation, that is not supported by disclosure and data security policies that are consistent with the pledge, or which unnecessarily impedes sharing of data with other agencies for compatible confidential use; or
- 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 require the collection of information to be conducted in a manner inconsistent with the guidelines of 5 CFR 1320.6.

8. If applicable, provide a copy and identify the date and page number of publication in the Federal Register of the agency's notice, required by 5 CFR 1320.8(d), 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.

Describe efforts to consult with persons outside the agency to obtain their views on the availability of data, frequency of collection, the clarity of instructions and recordkeeping,

disclosure, or reporting format (if any), and on the data elements to be recorded, disclosed, or reported.

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

The 60-day Federal Register notice was published at 88 CFR 10961 (February 22, 2023). The 30-day Federal Register notice was published at 88 CFR 25725 (April 27, 2023).

A copy of the Federal Register Notices are attached. There were no public comments received by TVA.

Since its inception, at the request of the Office of Management and Budget, the questionnaire was reduced from six (6) pages to four (4) pages. In addition, the maximum possible data elements to be completed from information received from the respondents was reduced from 373 to 197. The survey was further reduced to its current two (2) pages. These reductions have reduced the burden on each respondent to approximately 30 minutes.

The respondents are not required to keep any records; and since the information is collected by personal interview, their prior understanding of the questionnaire is not necessary. In addition, the majority of the respondents do not change from one survey to the next. In these cases, the survey only involves updating the information for the location.

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

None.

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

Respondents are assured that the information provided will not be used in making decisions about them individually. Information that is furnished and which is personally identifiable will be considered confidential and will not be disclosed, as guaranteed under the Privacy Act of 1974, unless TVA is required to do so by law.

The information provided is covered by a Privacy Act System of Records Notice. A copy of the notice is attached to this information request.

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

Not applicable. Questions of a sensitive nature are not included in this collection of information.

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

- Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated. Unless directed to do so, agencies should not conduct special surveys to obtain information on which to base hour burden estimates. Consultation with a sample (fewer than 10) of potential respondents is desirable. If the hour burden on respondents is expected to vary widely because of differences in activity, size, or complexity, show the range of estimated hour burden, and explain the reasons for the variance. Generally, estimates should not include burden hours for customary and usual business practices.
- 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.
- Provide estimates of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories. The cost of contracting out or paying outside parties for information collection activities should not be included here. Instead this cost should be included in Item 14.

Approximately 150 respondents are personally interviewed annually. This number is obtained by actual count. The annual burden per respondent is approximately 30 minutes. Consequently, the annual burden is estimated to be 75 hours.

Annualized cost per applicant: The average hourly wage for counties in the 2 states in the TVA service area where this information is conducted is approximately \$21.71, and represents an increase in the average hourly wage from the previous approval. This estimate was calculated using a snapshot of data taken on 3-18-2019 from the U.S. Bureau of Labor Statistics National Compensation Survey on Wages from the following sources:

https://www.bls.gov/regions/southeast/news-release/countyemploymentandwages_alabama.htm

https://www.bls.gov/regions/southeast/news-release/countyemploymentandwages_tennessee.htm

Based on the estimated .5 hour burden, the total annualized time cost for all applicants is \$1629 ($\$21.71 \times 75 \text{ hours} = \1628.25).

13. Provide an estimate of the total annual cost burden to respondents or record keepers resulting from the collection of information. (Do not include the cost of any hour burden shown in Items 12 and 14).

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

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

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

Capital and startup cost do not apply to this questionnaire.

14. Provide estimates of annualized cost to the Federal government. Also, provide a description of the method used to estimate cost, which should include quantification of hours, operational expenses (such as equipment, overhead, printing, and support staff), and any other expense that would not have been incurred without this collection of information. Agencies also may aggregate cost estimates from Items 12, 13, and 14 in a single table.

TVA receives no appropriated funds; therefore, the cost of this information collection is paid from power-generated revenue. TVA estimates that 50 hours is spent annually to conduct the survey at each of the three nuclear power plants, for a total of 150 annual hours. Another 150 hours is spent annually by TVA employees to enter and transmit information, record keeping and reporting. The estimated cost for these activities is:

Salaries (300 hours)	\$36,000
Overhead	9,000
Travel	2,000
Support Staff	1,500
Printing and supplies	500
Total	\$49,000

The total cost to TVA is estimated to be \$49,000.

15. Explain the reasons for any program changes or adjustment reported in Items 13 or 14 of the OMB Form 83-I.

Based on current data the time to complete questionnaires has increased. The previous time projections may have been underestimated.

This survey was previously performed by on seasoned individual. Currently the performance is completed by the individual (3) sites. Union agreements prevent assigning this responsibility to one individual and reduces efficiency. Additionally, each site must provide a vehicle and supplies to complete the survey.

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.

This information will not be published for statistical use.

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

Not applicable.

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

Not applicable.

B. Collections of Information Employing Statistical Methods

Not applicable. This survey does not employ statistical methods.