

**TABLE 1: ANNUAL REPORTING BURDEN**

| <b>Requirement</b>                                | <b>Description</b>   | <b>No. of Respondents</b> | <b>Responses per Respondent</b> | <b>Number of Responses</b> | <b>Burden Hours per Response</b> | <b>Total Annual Burden Hours</b> | <b>Cost at \$300/hr</b> |
|---|--|---------------------------|---------------------------------|----------------------------|----------------------------------|----------------------------------|-------------------------|
| 70.9(b)   | significant information not reporting under other requirements   | 10                        | 1.0                             | 10.0                       | 1.0                              | 10                               | \$3,000                 |
| 70.17(a)  | application for exemption  | 10                        | 1.0                             | 10.0                       | 40.0                             | 400                              | \$120,000               |
| 70.20a(d)   | transportation of SNM  | 8                         | 1.0                             | 8.0                        | 40.0                             | 320                              | \$96,000                |
| 70.20b(f)   | notification of shipments  | 12                        | 1.0                             | 12.0                       | 4.0                              | 48                               | \$14,400                |
| 70.20b(g)   | notification of unscheduled stops                                | 2                         | 1.0                             | 2.0                        | 4.0                              | 8                                | \$2,400                 |
| 70.21(a)  | filing an application for a new license                          | 2                         | 1.0                             | 2.0                        | 5,000.0                          | 10,000                           | \$3,000,000             |
| 70.22, 70.32(c)(1), 70.33, 70.34, 70.39(a), 70.73 | filing an application for a licensing action (existing licensee) | 20                        | 2.0                             | 40.0                       | 213.0                            | 8,520                            | \$2,556,000             |
| 70.25 Certification                               | certification of financial assurance in prescribed amounts       | 4                         | 1.0                             | 4.0                        | 100.0                            | 400                              | \$120,000               |
| 70.25 Funding Plan                                | decommissioning funding plan with detailed cost estimate         | 6                         | 1.0                             | 6.0                        | 300.0                            | 1,800                            | \$540,000               |
| 70.32(a)(9)                                       | notification of filing for bankruptcy                            | 1                         | 1.0                             | 1.0                        | 1.0                              | 1                                | \$300                   |
| 70.32(c)(2)                                       | Change to material control and accounting program                | 16                        | 1                               | 16                         | 80.0                             | 1,280                            | \$384,000               |
| 70.32(d)  | change in transportation security plans                          | 1                         | 1                               | 1                          | 16.0                             | 16                               | \$4,800                 |
| 70.32(e)  | change in physical security plan                                 | 16                        | 1                               | 16                         | 80.0                             | 1,280                            | \$384,000               |
| 70.32(g)  | change in safeguards contingency plan                            | 2                         | 1                               | 2                          | 80.0                             | 160                              | \$48,000                |
| 70.32(i)  | Change in emergency plan   | 12                        | 1                               | 12                         | 80.0                             | 960                              | \$288,000               |
| 70.38(d)  | notification of cessation of operations                          | 6                         | 1                               | 6                          | 1.0                              | 6                                | \$1,800                 |
| 70.38(e)  | financial assurance for decommissioning                          | 8                         | 1                               | 8                          | 40.0                             | 320                              | \$96,000                |
| 70.38(f)  | relief to postpone decommissioning                               | 2                         | 1                               | 2                          | 40.0                             | 80                               | \$24,000                |
| 70.38(g)(1)&(4)                                   | decommissioning plan   | 2                         | 1                               | 2                          | 1,000.0                          | 2,000                            | \$600,000               |
| 70.38(g)(2)                                       | alternate schedule for decom. plan                               | 2                         | 1                               | 2                          | 40.0                             | 80                               | \$24,000                |
| 70.38(j)  | final decom steps  | 2                         | 1                               | 2                          | 300.0                            | 600                              | \$180,000               |

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|--------------------------------|---|---------------------------|---------------------------------|----------------------------|----------------------------------|----------------------------------|-------------------------|
| 70.50(c)(1)                    | initial event report by telephone   | 30                        | 1                               | 30                         | 24.0                             | 720                              | \$216,000               |
| 70.50(c)(2)                    | 30-day written event report   | 30                        | 1                               | 30                         | 120.0                            | 3,600                            | \$1,080,000             |
| 70.51(a)                       | records for license termination   | 30                        | 4                               | 120                        | 2.0                              | 240                              | \$72,000                |
| 70.52(a)&(b)                   | reports of accidental criticality   | 1                         | 1                               | 1                          | 16.0                             | 16                               | \$4,800                 |
| 70.55(b)                       | making records available for inspection                                       | 30                        | 8                               | 60                         | 80.0                             | 4,800                            | \$1,440,000             |
| 70.59                          | effluent monitoring reports   | 10                        | 2                               | 20                         | 40.0                             | 800                              | \$240,000               |
| 70.62(c)(3) (Action completed) | Initial ISA Plan and submittal CY 2004  |                           |                                 |                            |                                  | 0                                | \$0                     |
| 70.65                          | Additional content of applications for licensing actions by certain licensees | 7                         | 1                               | 7                          | 200.0                            | 1,400                            | \$420,000               |
| 70.72(d)(1)                    | changes that require amendment  | 6                         | 1                               | 6                          | 800.0                            | 4,800                            | \$1,440,000             |
| 70.72(d)(2)                    | changes that don't require amendment  | 8                         | 1                               | 8                          | 600.0                            | 4,800                            | \$1,440,000             |
| 70.72(d)(3)                    | ISA annual update   | 8                         | 1                               | 8                          | 300.0                            | 2,400                            | \$720,000               |
| 70.74                          | initial event report by telephone   | 10                        | 2                               | 20                         | 24.0                             | 480                              | \$144,000               |
| 70.74                          | 60-day written event report   | 10                        | 2                               | 20                         | 40.0                             | 800                              | \$240,000               |
| <b>TOTAL</b>                   |   | <b>72</b>                 |                                 | <b>494</b>                 |                                  | <b>53,145</b>                    | \$15,943,500            |

**TABLE 2: ANNUAL RECORDKEEPING BURDEN**

| <b>Requirement</b>      | <b>Description</b>   | <b>Number of Recordkeepers</b> | <b>Burden Per Recordkeeper</b> | <b>Total Annual Burden Hours</b> | <b>Cost at \$300/hr</b> |
|-------------------------|--|--------------------------------|--------------------------------|----------------------------------|-------------------------|
| 70.22(g)-(k)            | physical security plans  | 2                              | 200.0                          | 400                              | \$120,000               |
| 70.24(a)(3)             | emergency procedures for SNM areas   | 30                             | 7.5                            | 225                              | \$67,500                |
| 70.25(g)                | decommissioning records  | 240                            | 3.0                            | 720                              | \$216,000               |
| 70.32(d)                | plan for physical protection of SNM in transit   | 15                             | 0.5                            | 8                                | \$2,400                 |
| 70.32(e)                | physical security plan   | 25                             | 0.25                           | 6                                | \$1,800                 |
| 70.32(g)                | safeguards contingency plan  | 2                              | 0.25                           | 1                                | \$300                   |
| 70.42(c)&(d)            | Verifying authorization before SNM is transferred  | 100                            | 10.0                           | 1,000                            | \$300,000               |
| 70.61, 70.62, and 70.72 | safety program, process safety information, integrated safety analysis, management measures, configuration management system, and facility changes | 8                              | 300.0                          | 2,400                            | \$720,000               |
| 70.64(a)                | baseline design criteria   | 10                             | 87.5                           | 875                              | \$262,500               |
| <b>TOTAL</b>            |  | <b>240</b>                     |                                | <b>5,635</b>                     | <b>\$1,690,500</b>      |

**TABLE 3: ANNUAL THIRD PARTY DISCLOSURE BURDEN**

| <b>Requirement</b>     | <b>Description</b>                                   | <b>No. of Respondents</b> | <b>Responses per Respondent</b> | <b>Number of Responses</b> | <b>Burden Hours per Response</b> | <b>Total Annual Burden Hours</b> | <b>Cost at \$300/hr</b> |
|------------------------|--|---------------------------|---------------------------------|----------------------------|----------------------------------|----------------------------------|-------------------------|
| 70.19(c)(2) & 70.39(b) | calibration & reference sources, labeling of sources | 240                       | 1                               | 300                        | 0.1                              | 30                               | \$9,000                 |
| 70.51(b)               | transferance of records                              | 2                         | 1                               | 2                          | 2.0                              | 4                                | \$1,200                 |
| <b>TOTAL</b>           |  | <b>240</b>                |                                 | <b>302</b>                 |                                  | <b>34</b>                        | <b>\$10,200</b>         |

**TABLE 4: BURDEN TOTALS**

|                        | <b>Responses</b> | <b>Burden</b> | <b>Cost @\$300/hr</b> |
|------------------------|------------------|---------------|-----------------------|
| Reporting              | 494              | 53,145        | \$15,943,500          |
| Recordkeeping          | 240              | 5,635         | \$1,690,500           |
| Third Party Disclosure | 302              | 34            | \$10,200              |
| <b>TOTAL</b>           | <b>1,036</b>     | <b>58,814</b> | <b>\$17,644,200</b>   |

Recordkeeping costs           \$           676

NRC staff costs               \$    7,770,000

**BURDEN HOURS**

|               | Previous total | Current Request | Change   |
|---------------|----------------|-----------------|----------|
| Reporting     | 31556.50       | 53145.00        | 21588.50 |
| Recordkeeping | 5459.30        | 5635.00         | 175.70   |
| Third party   | 34.00          | 34.00           | 0.00     |
| TOTAL         | 37049.80       | 58814.00        | 21764.20 |