

| Table 1. 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 @ \$300/HR |
| 72.7 - Request for exemption | 4.0 | 1.0 | 4.0 | 200.0 | 800.0 | \$ 240,000.00 |
| 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 | \$ 3,819,600.00 |
| 72.30(a)-(g) - Decommissioning funding plan with application, renewal and every 3 years | 11.0 | 1.0 | 11.0 | 4.0 | 44.0 | \$ 13,200.00 |
| 72.42 - ISFSI license renewal | 1.3 | 1.0 | 1.3 | 6,000.0 | 7,980.0 | \$ 2,394,000.00 |
| 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 | 85.0 | 3.0 | 255.0 | 8.0 | 2,040.0 | \$ 612,000.00 |
| 72.44(e)- Application to amend license in order to amend security plan | 2.0 | 1.0 | 2.0 | 10.0 | 20.0 | \$ 6,000.00 |
| 72.44(f) - Emergency plan changes | 2.0 | 15.0 | 30.0 | 10.0 | 300.0 | \$ 90,000.00 |
| 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) | 43.0 | 1.0 | 43.0 | 20.0 | 860.0 | \$ 258,800.00 |
| 72.48(d)(5) – Transfer records to new certificate holder or the Commission upon ending operations | - | - | - | 20.0 | - | \$ - |
| 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) | | | | | |

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| 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 | \$ 144,000.00 |

| Section & Description of Requirement | Number of Respondents | Number of Responses Per Respondent | Total Annual Responses | Burden Hrs Per Response | Total Annual Burden (Hrs) | Cost @ \$300/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 | \$ 432,000.00 |
| 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 | \$ 21,600.00 |
| 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 | - | \$ - |

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| 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 maninduced 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 @ \$300/HR |
|---|-----------------------|------------------------------------|------------------------------|-------------------------|---------------------------|-----------------|
| 72.102 - (included in 72.16 or 72.56) - Geological and Seismological Characteristics (Applications Before 10/16/2003 and for Wet Storage) | | | Included in 72.16 (or 72.56) | | | |
| 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 | | | | | | |
| 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 | | | |

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| 72.186(b) - Copy of changes to physical security plan to the Regional Administrator | 2.0 | 1.0 | 2.0 | 10.0 | 20.0 | \$ 6,000.00 |
| 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 | \$ 300.00 |
| 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 | \$ 1,200.00 |
| 72.212(b)(2) - Register use of each cask w/in 30 days | 24.00 | 3.00 | 72.0 | 1.2 | 86.4 | \$ 25,920.00 |
| 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 | \$ 1,800.00 |
| 72.212(b)(4) - Register use/application of amended CoC to loaded cask | 6.00 | 1.00 | 6.0 | 1.0 | 6.0 | \$ 1,800.00 |
| 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 @ \$300/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 | \$ 288,000.00 |
| 72.232(d) - Notify NRC 45 days before starting cask fabrication | 4.0 | 0.5 | 2.0 | 2.0 | 4.0 | \$ 1,200.00 |
| 72.234 - Transfer records to the Commission upon ending operations using instructions in 72.4. | - | - | - | 20.0 | - | \$ - |
| 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 | \$ 1,260,000.00 |
| 72.240(c)- Renewal application includes SAR w/ updated design bases information, TLAA, AMP | 4.0 | 1.75 | 7.0 | 40.0 | 280.0 | \$ 84,000.00 |
| 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 | \$ 36,000.00 |
| 72.244 - Application for an amendment to a Certificate of Compliance | 4.0 | 2.5 | 10.0 | 110.0 | 1,100.0 | \$ 330,000.00 |
| 72.248 - Safety Analysis Report (SAR) Updating | 4.0 | 1.5 | 6.0 | 40.0 | 240.0 | \$ 72,000.00 |
| TOTAL REQUESTED REPORTING | 89.0 | | 615.1 | | 33,615.4 | \$ 10,084,620.00 |

Table 3. 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 @ \$300/Hr |
|---|------------------------------|---|-------------------------------|--------------------------------|----------------------------------|------------------------|
| 72.80(f) - Licensee transfer the records to new licensee | 85 | 1 | 85 | 10 | 850.0 | \$255,000 |
| 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 | \$153,600 |
| 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 | \$456,000 |
| TOTAL REQUESTED 3RD PARTY DISCLOSURE | 86 | | 154 | | 2,882.0 | \$864,600 |

Table 2. Annual Recordkeeping Burden

| Section & Description of Requirement | Record retention period | Number of Recordkeepers | Hours Per Recordkeeper | Total Annual Burden Hours | Cost @ \$300/Hr |
|--|--|---|-------------------------------|----------------------------------|------------------------|
| 72.30(f) - Records of information important to the decommissioning of a facility | L | 85 | 10.0 | 850.0 | \$255,000 |
| 72.44(e) – Maintain record of changes to physical security plan | 3 yrs | 85 | 10.0 | 850.0 | \$255,000 |
| 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 | L | 85 | 10.0 | 850.0 | \$255,000 |
| 72.72(a) - Records showing the receipt, inventory (including location), disposal, acquisition, and SNM and source material | 5 yrs | 85 | 42.0 | 3,570.0 | \$1,071,000 |
| 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) | 85 | 78.0 | 6,630.0 | \$1,989,000 |
| 72.72(c) - Written material control and accounting procedures | L | 78 | 40.0 | 3,120.0 | \$936,000 |
| 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 | \$140,400 |
| 72.140(d) & 72.174 - Quality Assurance Programs; Quality Assurance programs for previously approved programs | L | 78 | 50.0 | 3,900.0 | \$1,170,000 |
| 72.180 - Physical Protection Plans | 3 yrs | 17 | 10.0 | 170.0 | \$51,000 |
| 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 | \$25,500 |
| 72.212(b)(5),(6), &(8) - Record of written evaluations before cask use | L | 68 | 6.0 | 408.0 | \$122,400 |

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|---|---|----|-------|---------|-------------|
| 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 | \$2,400 |
| 72.212(b)(11) - Maintain a copy of CoC and referenced/supporting documents | L | 68 | 8.0 | 544.0 | \$163,200 |
| 72.212(b)(12) - Maintain cask records | L | 68 | 60.0 | 4,080.0 | \$1,224,000 |
| 72.212(b)(13) - Written procedures for ISFSI activities | L | 68 | 120.0 | 8,160.0 | \$2,448,000 |

| Section & Description of Requirement | Record retention period | Number of Recordkeepers | Hours Per Recordkeeper | Total Annual Burden Hours | Cost @ \$300/Hr |
|---|-------------------------|-------------------------|------------------------|---------------------------|-----------------------|
| 72.234(d) - Establish and maintain cask records; provide records to users; send composite records to NRC if cease production of casks | L | 68 | 60.0 | 4,080.0 | \$1,224,000 |
| 72.234(f) - CoC holder establishes written procedures and tests and provides copy to users before cask use | L | 4 | 24.0 | 96.0 | \$28,800 |
| 72.236(k) - Mark cask with a model number, unique identification number, empty weight | L | 68 | 60.0 | 4,080.0 | \$1,224,000 |
| 72.242 (a)-(c) - Maintain records; Record retention periods; Original record or clear reproduced copy | L | 4 | 5.0 | 20.0 | \$6,000 |
| TOTAL REQUESTED RECORDKEEPING | | 86 | | 41,969.0 | \$12,590,700.0 |

Table 4. Annual Burden Estimates for 10 CFR Part 72

| | Responses | Burden | Cost at \$300/hr |
|-------------------------------|------------------|-----------------|-------------------------|
| Reporting | 628.1 | 33,615.4 | \$10,138,620 |
| Recordkeeping | 89.0 | 41,969 | \$10,142,700 |
| Third-Party Disclosure | 154.0 | 2,882.0 | \$864,600 |
| TOTAL | 871.1 | 78,466.4 | 21,145,920.0 |
| Recordkeeping costs | | \$5,036 | |