

1FINAL SUPPORTING STATEMENT FOR
NRC FORM 361, REACTOR PLANT EVENT NOTIFICATION WORKSHEET,
NRC FORM 361A, FUEL CYCLE AND MATERIALS EVENT NOTIFICATION
WORKSHEET, NRC FORM 361N, NON-POWER REACTOR EVENT NOTIFICATION
WORKSHEET, NRC FORM 361S, PART 53 PLANT EVENT NOTIFICATION WORKSHEET

(3150-0238)
REVISION

Description of the Information Collection

The U.S. Nuclear Regulatory Commission (NRC) licenses and regulates the Nation's civilian use of radioactive materials to provide reasonable assurance of adequate protection of public health and safety, promote the common defense and security, and protect the environment. In order for the NRC to carry out these responsibilities, its regulations require licensees to report significant events so that the NRC can evaluate the events to determine what actions, if any, are warranted to ensure protection of public health and safety. In addition, this information is needed for the NRC to carry out its responsibility to inform Congress of those events constituting "abnormal occurrences."

Holders of operating licenses for commercial nuclear power plants are required to report specified events per 10 CFR 50.72 or 10 CFR 53.1630 and other requirements (10 CFR 20, 10 CFR 21, 10 CFR 26, 10 CFR 73, and 10 CFR 74) to the NRC Operations Center. Holders of NRC non-power reactor licenses are required to report specified events per their respective technical specifications and other requirements (10 CFR 20, 10 CFR 73 and 10 CFR 74) to the NRC Operations Center. Holders of NRC fuel cycle facility and materials licenses are required to report specified events per 10 CFR 30.50, 10 CFR 40.60, 10 CFR 70.50, or 10 CFR 72.75 and other requirements (10 CFR 20, 10 CFR 21, 10 CFR 26, 10 CFR 35, 10 CFR 36, 10 CFR 37, 10 CFR 73, and 10 CFR 74) to the NRC Operations Center.

In order to efficiently process the information received through such reports for reactors, the NRC created Forms 361, 361A, 361N, and 361S to provide a worksheet for licensees to record the information for the report. NRC licensees are not required to fill out or submit the form, but the form describes the order in which data about the event will be requested to enable a licensee to efficiently make the notification. Without the format provided by the NRC Forms 361, 361A, 361N, and 361S, the information exchange between licensees and NRC Headquarters Operations Officers could result in delays in completing the notification as the licensee answers questions from the NRC staff taking the report. NUREG-1022, Rev. 3, "Event Report Guidelines, 10 CFR 50.72 and 50.73" provides guidance to licensees for meeting the requirements of 10 CFR 50.72 "Immediate notification requirements for operating nuclear power reactors" and 10 CFR 50.73 "Licensee event report systems." Specifically, Section 4.2.4 of NUREG-1022 references the Event Notification Worksheet (NRC Form 361) as a tool to facilitate easier

communication between the NRC Headquarters Operations Officers and licensees during event notifications.

While each version of NRC Form 361 contains unique information with respects to the requirements of 10 CFR listed above, the information requested for all four forms includes the time of event, name and location of the facility, facility conditions at the onset of the event, a description of the event, effects to other facilities on site, current status of the affected facilities, and whether notifications have or will be made to State or local governments.

A. JUSTIFICATION

1. Need For and Practical Utility of the Collection of Information

The information supplied by the licensee to meet the various reporting requirements of 10 CFR is needed for the NRC to determine if an emergency or event has potential impact to public health and safety. Reports of significant safety events and theft of radioactive material are used by the NRC in evaluating the protective actions required to mitigate exposures to radiation or releases of radioactive materials that could exceed regulatory limits.

In order to efficiently receive the information provided by licensees through such reports, the NRC developed Forms 361, 361A, 361N, and 361S to provide a worksheet for licensees to record the information for the report. NRC licensees are not required to fill out or submit the form, but the form describes the order in which data about the event will be requested to enable a licensee to efficiently make the notification. Without the format provided by the NRC Forms 361, 361A, 361N, and 361S the information exchange between licensees and NRC Headquarters Operations Officers could result in delays in completing the notification as the licensee answers questions from the NRC staff taking the report.

2. Agency Use of Information

The NRC Headquarters Operations Officers use the NRC Forms 361, 361A, 361N, and 361S to collect information from the licensees about reportable events. This information is then used to prepare an NRC event notification report for distribution to NRC staff and the public via the NRC's public web site. The NRC staff uses the information in the event notification reports for responding to emergencies, monitoring ongoing events, confirming licensing bases, studying potentially generic safety problems, assessing trends and patterns of operational experience, monitoring performance, identifying precursors of more significant events, and providing operational experience to the industry.

Minor enhancements to the event classification options of all four forms were made to improve the clarity of the specific 10 CFR reporting requirements being met. Forms 361 and 361S added references to the specific section of 10 CFR in the event classification

options. 10 CFR 21 was added as an event classification, as power reactor licensees commonly use Form 361 to report events as required by 10 CFR 21. Form 361A added event classifications for the reports required by 10 CFR 37 and 10 CFR 73. Form 361N added references to the specific sections of 10 CFR and the security event classification option was revised to be consistent with Forms 361 and 361A.

3. Reduction of Burden Through Information Technology

The NRC has issued [*Guidance for Electronic Submissions to the NRC*](#) which provides direction for the electronic transmission and submittal of documents to the NRC. Unsecure electronic transmission and submittal of documents can be accomplished via the following avenues: the Electronic Information Exchange (EIE) process, which is available from the NRC's "Electronic Submittals" Web page, by Optical Storage Media (OSM) (e.g. CD-ROM, DVD), by e-mail, by special Web-based interface, or by other means.

It is estimated that approximately 97% of power reactor licensees use the format of NRC Form 361 to prepare their event report notification, and these licensees also typically follow telephonic notifications with electronic confirmation via email or facsimile.

It is estimated that 50% of the fuel cycle facilities use the NRC Form 361A format and approximately 5% of the 31 non-power reactor licensees use the NRC Form 361N format, and these licensees also typically follow telephonic notifications with electronic confirmation via email or facsimile.

4. Effort to Identify Duplication and Use Similar Information

No sources of similar information are available. There is no duplication of requirements.

5. Effort to Reduce Small Business Burden

Efforts have been made to keep the requirements for information to a minimum. However, since the health and safety consequences of the events being reported are likely to be the same for large and small entities, it is not possible to further reduce the burden on small businesses by less frequent or less complete recordkeeping or reporting. The only small businesses with NRC licenses are materials licensees which have not historically used NRC Form 361A. The percentage of respondents that are small businesses is taken to be zero.

6. Consequences to Federal Program or Policy Activities if the Collection Is Not Conducted or Is Conducted Less Frequently

Not collecting the information, or collecting it less frequently, would degrade the NRC's ability to determine in a timely manner what actions, if any, may be needed to resolve potential threats to public health and safety or the environment and inform Congress of those events constituting "abnormal occurrences."

7. Circumstances Which Justify Variation from OMB Guidelines

Not applicable..

8. Consultations Outside the NRC

Opportunity for public comment on the information collection requirements for this clearance package was published in the *Federal Register* on April 21, 2026 (91 FR 21333). Additionally, five potential respondents were contacted by email as part of the consultation process (3 power reactor licensees: Tennessee Valley Authority Browns Ferry Nuclear, South Texas Project, Entergy River Bend Station; 1 non-power reactor, University of Missouri Research Reactor; and 1 materials licensee, Urenco).

Only one comment was received in response to the FRN, from Constellation Energy Generation. The comment addressed the four questions raised in the FRN.
Summary of Comments-

Purpose and Utility:

The feedback emphasizes that timely and accurate event notification is essential for the NRC's oversight responsibilities. NRC Form 361 is seen as a valuable structuring tool for event notifications, promoting completeness and consistency. Its utility is maximized when used flexibly and aligned with NRC information needs but diminished if it introduces unnecessary expectations or duplication.

The NRC agrees with Constellation's response to the first question on the necessity and practical utility of the form. No change was made as a result of this comment.

Burden Assessment:

The estimated burden of 30 minutes per response is considered understated. Real-world event notifications require additional effort, including procedure adherence, cross-functional review, and management approvals. The total reporting burden is significantly higher, ranging from 2 to 4 hours when considering all steps involved.

The NRC disagrees with Constellation's response to the second question on the accuracy of the burden estimate. Constellation's comment "the estimate is understated because the total effort should include more than preparing the response document" fails to recognize that the regulatory requirement for gathering and submitting information

related to event notification for power reactor licensees is already considered under 10 CFR 50.72. The actual burden for completing Form 361 is separate from the information gathering and notification required by 10 CFR 50.72 and should not be included as suggested. No change was made as a result of this comment.

Enhancing Quality and Clarity:

Recommendations include:

- Aligning data elements with regulatory requirements.
- Reducing ambiguous or duplicative fields.
- Reinforcing flexibility by allowing equivalent formats or licensee-developed tools.
- Ensuring consistency with NRC questioning practices to minimize follow-up.

The NRC agrees, in part, with Constellation's response to the third question, regarding enhancing the utility and clarity of the Form. In response to the comment on "clearer alignment with regulatory basis," for notifications made per 10 CFR 50.72 the Form provides a comprehensive listing of the regulatory requirements. Notifications made to satisfy other parts of 10 CFR have varied reporting requirements, too many to list on the Form, and the licensee can readily identify the specific requirement. In response to the comments on "reduction of ambiguous or duplicative fields" and "consistency with NRC questioning practices", the NRC ensures that the Operations Center processes for information collection remained aligned with the Form, and that duplication of information requests is avoided. The plant-specific data requested by the Form is the minimum needed to ascertain the change in plant status due to the event. The NRC disagrees with the comment to "engage with NRC resident inspectors" as a source of information. NRC regulations clearly state that it is the sole responsibility of the licensee to make the notification and provide the needed information. The NRC agrees with the comment regarding "reinforcement of flexibility." The Form is not referenced in any part of 10 CFR and so use by licensees is voluntary. Licensees likewise are free to use any format to convey information about an event in addition to the telephonic notification to the Operations Center. No change was made as a result of this comment.

Minimizing Burden:

The current form is not reliably editable or savable directly from the NRC website, causing procedural complications. The feedback suggests making Form 361 fully electronic, fillable, and compatible with common industry tools (like Microsoft Word and Adobe PDF). This would reduce administrative burden and improve data quality and usability for both NRC and licensees.

The NRC disagrees with Constellation's response to the fourth question on minimizing burden and use of technology. Form 361 is provided as a PDF form to allow rapid input of information using freely available PDF tools with no restrictions on how the completed form is saved or distributed. Use of the NRC-provided form is voluntary, so licensees

can copy information from Form 361 and create their own equivalents as desired. No change was made as a result of this comment.

9. Payment or Gift to Respondents

Not applicable.

10. Confidentiality of Information

Confidential and proprietary information is protected in accordance with NRC regulations at 10 CFR 9.17(a) and 10 CFR 2.390(b). However, no information normally considered confidential or proprietary is requested.

11. Justification for Sensitive Questions

Not applicable.

12. Estimated Burden and Burden Hour Cost

Table 1 reflects the estimated annual burden to different types of licensees to provide a written event report, whereas Table 2 summarizes the total burden to NRC licensees. The estimates include only additional time needed to complete NRC Form 361, 361A, 361N, or 361S separate from the time already expended by licensees to comply with regulatory reporting requirements. The burden to satisfy the reporting requirements is addressed by separate OMB clearances.

Operating reactor licensees have submitted (on average) approximately 500 telephonic reactor event report notifications per year (initial event reports, updated event reports, and retractions) over the past three years. The licensees operating the 94 power reactors are expected to continue to submit a maximum of about 500 telephonic event reports per year. The hourly additional licensee burden associated with these event reports is estimated at 0.5 hour per report. The burden estimate of 0.5 hours per each event report is valid since the reporting requirements for power reactors have not changed. Therefore, the estimated annual reporting burden is 250 hours (500 event reports x 0.5 hours per event report) at a cost of \$38,500 (250 hours x \$154 per hour).

Fuel cycle facility licensees have submitted (on average) approximately 35 telephonic reactor event report notifications per year (initial event reports, updated event reports, and retractions) over the past three years. The licensees are expected to continue to submit a maximum of about 35 telephonic event reports per year for the foreseeable future. The hourly additional licensee burden associated with these event reports is estimated at 0.5 hour per report. The burden estimate of 0.5 hours per event report is valid since the reporting requirements for fuel cycle facilities, other than those of 10 CFR 73, have not changed. Therefore, the estimated annual reporting burden is

17.5 hours (35 event reports x 0.5 hours per event report) at a cost of \$2,695 (17.5 hours x \$154 per hour).

Non-power reactor licensees have submitted (on average) approximately 18 telephonic reactor event report notifications per year (initial event reports, updated event reports, and retractions) over the past three years. The licensees are expected to continue to submit a maximum of about 18 telephonic event reports per year for the foreseeable future. The hourly additional licensee burden associated with these event reports is estimated at 0.5 hour per report. The burden estimate of 0.5 hours per event report is valid since the reporting requirements of non-power reactor licensees, other than those of 10 CFR 73, have not changed. Therefore, the estimated annual reporting burden is 9 hours (18 event reports x 0.5 hours per event report) at a cost of \$1,386 (9 hours x \$154 per hour).

Materials licensees have submitted (on average) approximately 375 telephonic materials event report notifications per year (initial event reports, updated event reports, and retractions) over the past three years. The licensees are expected to continue to report a maximum of about 375 events per year for the foreseeable future. However, only a small number of the reports (approximately 10) are estimated to have NRC Form 361A follow the telephonic reports. The hourly additional licensee burden associated with these event reports is estimated at 0.5 hour per report. The burden estimate of 0.5 hours per event report is valid since the reporting requirements for materials licensees have not changed. Therefore, the estimated annual reporting burden is 5 hours (10 event reports x 0.5 hours per event report) at a cost of \$770 (5 hours x \$154 per hour).

The 10 CFR 53 rule became effective on April 29, 2026. Event report notifications pursuant to 10 CFR 53.1630 are not expected within the next three years, so no licensee burden is anticipated for Form 361S in this renewal. The NRC Form 361S was approved under temporary clearance number 3150-0278. Upon approval of the current submission, which incorporates the 361S into the present clearance, the temporary clearance number will be discontinued.

The total burden associated with this clearance is 281.5 hours and 563 responses (see table 1), at a cost of \$43,351 (583 responses x 0.5 hours per response x \$154 per hour)

The NRC's average labor rate of \$154 per hour for FY 2026 was used to calculate burden costs to the public because it aligns with 2024 Bureau of Labor Statistics data showing comparable hourly mean wages across five key occupational groups (executives, management, technical staff, licensing staff, and physicists) within the nuclear industry.

13. Estimate of Other Additional Costs

There are no additional costs.

14. Estimated Annualized Cost to the Federal Government

The staff has developed estimates of annualized costs to the Federal Government related to the conduct of this collection of information. These estimates are based on staff experience and subject matter expertise and include the burden needed to review, analyze, and process the collected information and any relevant operational expenses.

Operating reactor licensees represent the bulk of required event reports processed by the NRC. These licensees have submitted (on average) approximately 500 telephonic reactor event report notifications per year (initial event reports, updated event reports, and retractions) over the past three years.

The licensees operating the 94 power reactors are expected to continue to submit a maximum of about 500 telephonic event reports per year for the foreseeable future. NRC Headquarters Operations Officers spend approximately 0.5 hours processing time per report for a total of 250 hours at a cost of \$38,500 (250 hours x \$154 per hour = \$38,500).

Note that the burden associated with processing each event report by the NRC Headquarters Operations Officers is reduced by the licensee voluntary use of the NRC Form 361 format to provide event descriptions via telephonic notification. It is estimated that the use of the NRC Forms 361 saves the NRC Headquarters Operations Officers approximately 0.5 hours of processing time per report, requiring 0.5 hours to process rather than 1 hour per report.

15. Reasons for Change in Burden or Cost

The previous burden for this collection was 278 hours and 556 responses. Based on data from the last three years, the burden is expected to slightly increase to 281.5 hours and 563 responses (an increase of 3.5 hours and 7 responses). The hourly rate used to calculate burden costs has decreased since the previous clearance from \$288/hr to \$154/hr.

This submission corrects an error in the 2023 renewal in which 2,930 respondents were reported, which represents the total number of potential respondents, rather than the number of respondents submitting the form annually. The current submission includes only those respondents anticipated to submit NRC Forms 361, 361A, 361N, or 361S.

This submission is marked as a revision due to the addition of NRC Form 361S, "Part 53 Plant Event Notification Worksheet," which was previously approved under temporary clearance number 3150-0278 and is now incorporated into the present clearance. Temporary clearance 3150-0278 will be discontinued upon approval of this renewal.

16. Publication for Statistical Use

Not applicable.

17. Reason for Not Displaying the Expiration Date

Not applicable.

18. Exceptions to the Certification Statement

Not applicable.

TABLE 1: ANNUAL REPORTING BURDEN

Description	No. of Respondents	Responses per Respondent	Number of Responses	Burden Hours per Response	Total Annual Burden Hours	Cost at \$154/hr
Power reactors (operating)	94	5.3	500	0.5	250.0	\$38,500
Non-power reactors	29	0.6	18	0.5	9.0	\$1,386
Materials licensees	10	1	10	0.5	5.0	\$770
Fuel cycle facility licensees	10	3.5	35	0.5	17.5	\$2,695
TOTAL	143		563.0		281.5	\$43,351

TABLE 2: BURDEN TOTALS

	Responses	Burden	Cost @ \$154/hr
Reporting	563	281.5	\$43,351
Recordkeeping	0	0	\$0
Third Party Disclosure	0	0	\$0
TOTAL	563.0	281.5	\$43,351