

ATTACHMENT 1

Plan for Accomplishing Performance Goal and Performance Measure

| Action | Lead | Date |
|---|------------------|--------------|
| 1) Initial meeting with FCSS and MSIB contacts to discuss the plan, implementation, issues, schedule and next steps. | IMNS/RGB | 8/01 |
| 2) Coordinate efforts with RES/NRR staff re: their RUB initiatives & Part 20 | IMNS | Ongoing |
| 3) Division review of rule sections and NRC Forms to identify possible areas where reporting/recordkeeping burden could be reduced while still maintaining public health and safety. ¹ | IMNS/FCSS | 8/01 -12/01 |
| 4) Identify final proposed areas where reductions can be made or where safety considerations prevent reductions. ¹ Identify NRC actions to accomplish reductions, e.g., rulemaking, guidance revision, revision of NRC Forms, changes in licensing or inspection procedures, or other initiatives. Also, identify other factors ² which could cause reductions. | IMNS/FCSS | 1/02 |
| 5) Provide to IMNS/RGB results of review and recommended actions. | IMNS/MSIB & FCSS | 2/02 |
| 6) Upon completion of item 5 above, prepare an ANPR and request stakeholder input. | IMNS/RGB | 6/02 |
| 7) Based on results of item 6 above, initiate actions to reduce burden. | TBD | 12/02 - 9/05 |
| 8)Revise burden tables (Attachment 2) to determine anticipated reductions. | IMNS/RGB | Continuing |

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Notes:

¹ The staff should consider the following in making determinations about areas where burden can be reduced:

- a) Initiatives in progress or under consideration. For materials facilities, this includes the guidance consolidation effort. For fuel cycle facilities, this includes current work with users of the NMMSS safeguards system to identify ways to improve nuclear material reporting activities. It also includes development of standard review plans.
- b) Information and recommendations in the "Second Draft of the Working Group on Event Reporting," January 2001.
- c) Alternate risk-informed, performance-based licensing/inspection procedures not requiring specific records or reports.

² Factors which should be considered that could cause reductions in paperwork burden, other than through regulatory initiatives, include, for example, increased use of computerized recordkeeping and reporting.

ATTACHMENT 2

Table 1
Annual Burden Values Applicable to the Nuclear Materials Safety Arena¹

| Rule/Form | Baseline² (hours) | Current³ (hours) | Normalized⁵ (hours) | NOTES |
|--------------------------------|---|--|---|---|
| Part 35 - Medical | 369,916 | 254,059 | 290,287 | Rulemaking (3/01) - when issued will eliminate prescriptive rqmts |
| Part 70 - SNM (5/01) | 77,835 | 82,927 | 82,927 | Rulemaking (10/00) - added rqmts for a safety program considered essential. |
| Part 73 - Phys Prot (8/98) | 61,896 | | | |
| Part 34 - Radiography (7/98) | 60,000 | | | |
| Part 32 - Manu/trans (6/99) | 53,333 | | | |
| Part 30 - Byprod matl (8/99) | 47,032 | | | |
| Part 40 - Source matl (3/00) | 35,068 | | | |
| Part 35 - QM prog ⁴ | 34,743 | 0 | 0 | Rulemaking (3/01) - when issued will be eliminated as part of Part 35 rev |
| Forms 741/741A (2/00) | 27,375 | | | |
| Forms 313/313A&B (6/99) | 18,683 | 18,876 | 18,904 | Rulemaking (3/01) - when issued will increase part of Part 35 rev |
| Part 36 - Irradiators (3/99) | 14,923 | | | |
| Part 39 - Well logging (7/98) | 11,094 | | | |
| Part 74 - MC&A (7/99) | 5,323 | | | |
| Part 75 - Safeguards | 4,848 | | | |

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| Rule/Form | Baseline ² (hours) | Current ³ (hours) | Normalized ⁵ (hours) | NOTES |
|---------------------------------|----------------------------------|---------------------------------|------------------------------------|---|
| Part 31 - GL (8/99) | 4,696 | 12,548 | 12,548 | Rulemaking (8/00) - added rqmts to better track general licensees and devices |
| Form 742 - Inventory | 2,160 | | | |
| Total | 828,925 | 694,899 | 731,155 | |
| ** Net Percent change ** | | -16.2% | -11.8% | |

Table 1 Notes:

¹ Totals reflect burdens contained in requirements for facilities in the Nuclear Materials Safety Arena. The burdens do not include requirements in 10 CFR Part 20 because the requirements in Part 20 are broad in scope and affect nuclear reactor facilities which are outside this arena. If NRR determines that Part 20 will be revised, then those efforts will be coordinated between NRR and NMSS.

² Baseline values are taken from OMB clearance revisions through 7/00.

³ Based on OMB packages for final rule, other initiatives, or updated OMB clearance extensions

⁴ Burden for QM rule has been included into final Part 35 totals

⁵ Normalized to same number of licensees as baseline

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Nuclear Materials Safety Arena Burden Tables

Table 2

Part 30 Estimated Burden

Reporting Requirements

| Section | Responses/yr | Hrs/submittal | Burden hr/yr |
|---|--------------|---------------|-----------------|
| 30.9(b) | 9 | 1 | 9 |
| 30.1120 | 20 | 5 | 100 |
| 30.15(b) (under OMB Clearance 3150-0120) | | | 0 |
| 30.18(d) (under OMB Clearance No. 3150-0120) | | | 0 |
| 30.19(b) (under OMB Clearance No. 3150-0120) | | | 0 |
| 30.20(b) (under OMB Clearance No. 3150-0120) | | | 0 |
| 30.32(a) (under OMB Clearance No. 3150-0120) | | | 0 |
| 30.32(b) (under OMB Clearance No. 3150-0120) | | | 0 |
| 30.32(f) (under OMB Clearance No. 3150-0021) | | | 0 |
| 30.32(g) (under OMB Clearance No. 3150-000) | | | 0 |
| 30.34(e)(4) (Burden covered under individual clearance requests submitted as needed) | | | 0 |
| 30.34(h) | 10 | .5 | 5 |
| 30.35 Certification | 50 | 100 | 5000 |
| 30.35 Funding Plan | 15 | 300 | 4500 |
| 30.36(b)(2)(ii) | 10 | 6 | 60 |
| 30.36(d) | 390 | 1 | 390 |
| 30.36(e)Burden is included in § 30.35. | | | 0 |
| 30.36(g) | 25 | 360 | 9000 |
| 30.36(j) (under OMB Clearance 3150-0028) | | | 0 |
| 30.37(a) (under OMB Clearance No. 3150-0120) | | | 0 |
| 30.38 (under OMB Clearance 3150-0120) | | | 0 |

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| Section | Responses/yr | Hrs/submittal | Burden hr/yr |
|--|--------------|---------------|-----------------|
| 30.50 | 70 | 4 | 280 |
| 30.55(c) | 2 | 10 | 20 |
| Appendix A Burden is included in § 30.35 | | | 0 |
| Appendix C Burden is included in § 30.35 | | | 0 |
| Total | 1,123 | | 19364 |

Recordkeeping Requirements

| Section | Records/Yr | Hrs/Record | Burden hr/yr |
|----------------|------------|------------|-----------------|
| 30.34(g) | 92 | 17.3 | 1592 |
| 30.35(g) | 560 | 10 | 5600 |
| 30.41(c) & (d) | 294 | 3.5 | 1029 |
| 30.51 | 5529 | 3.5 | 19352 |
| Total | | | 27572 |

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Table 3
Part 31 Estimated Burden

Reporting Requirements

| Section | #Response/ yr | Hrs/ response | Burden hr/yr |
|--|--------------------------|--------------------------|-------------------------|
| 31.2 - (covered under Parts 19,20,21,30) | 0 | | 0 |
| 31.5(c)(5) | 20 | 1 | 20 |
| 31.5(c)(8) | 115 | .5 | 58 |
| 31.5(c)(9) | 29 | .75 | 22 |
| 31.8(c)(2) | 6 | .25 | 2 |
| 31.11(b) - covered under other OMB clearance | 0 | | 0 |
| 31.11(e) - covered under other OMB clearance | 0 | | 0 |
| Total | | | 101 |

Recordkeeping Requirements

| Section | #licensees | Hrs/ licensee | Burden hr/yr |
|------------------------------------|-------------------|--------------------------|-------------------------|
| 31.5(c)(4) (3-yr retention period) | 10,126 | .25 | 2532 |
| Total | | | 2532 |

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Table 4
Part 32 Estimated Burden

Reporting Requirements

| Section | Responses/yr | Hrs/response | Burden hr/yr |
|---|---------------------|---------------------|-------------------------|
| 32.11 (Burden under OMB Clearance 3150-0120) | | | 0 |
| 32.12 | 2 | .5 | 1 |
| 32.14(b) (under OMB Clearance 3150-0120) | | | 0 |
| 32.15(b) (under OMB Clearance No. 3150-0120) | | | 0 |
| 32.16 | 10 | .5 | 5 |
| 32.17(c) | 0 | 0 | 0 |
| 32.18(d) (under OMB Clearance No. 3150-0120) | | | 0 |
| 32.20(b),(c),(d) | 6 | .5 | 3 |
| 32.22(a)(2)-under OMB Clearance No. 3150-0120 | | | 0 |
| 32.23 Burden is included in §32.210 | | | 0 |
| 32.25(c) | 3 | .5 | 2 |
| 32.26(b) (under OMB Clearance No. 3150-0120) | | | 0 |
| 32.27 (Burden is included in §32.210) | | | 0 |
| 32.29(c) | 5 | .5 | 3 |
| 32.51(a)(2)-under OMB Clearance No. 3150-0120 | | | 0 |
| 32.51(b) (under OMB Clearance No. 3150-0120) | | | 0 |
| 32.51(c) (under OMB Clearance No. 3150-0120) | | | 0 |
| 32.51a | 5,000 | .03 | 150 |
| 32.52(a)&(b) | 152 | .2 | 30 |
| 32.53(b) (under OMB Clearance No. 3150-0120) | | | 0 |
| 32.55(c) - Burden is included in §32.210 | | | 0 |
| 32.56 | 1 | 2 | 2 |
| 32.57(b) (under OMB Clearance No. 3150-0120) | | | 0 |

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| Section | Responses/yr | Hrs/response | Burden hr/yr |
|---|---------------------|---------------------|-------------------------|
| 32.61(b) | 0 | 0 | 0 |
| 32.61(d) | 0 | 0 | 0 |
| 32.62(d) | 0 | 0 | 0 |
| 32.72(a) (under OMB Clearance No. 3150-0120) | | | 0 |
| 32.72(b)(5) | 83 | .5 | |
| 32.74(a)(2)-under OMB Clearance No. 3150-0120 | | | 0 |
| 32.74(b) (under OMB Clearance No. 3150-0120) | | | 0 |
| 32.210 | 200 | 21 | 4200 |
| Total | | | 4395 |

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Recordkeeping Requirements

| Section | Records/Yr | Hrs/Record | Burden hr/yr |
|--|------------|------------|-----------------|
| 32.12 - (R+1 Year) | 7 | 1 | 7 |
| 32.15(d) - (P) | 48 | 100 | 4800 |
| 32.16 - (R+1 Year) | 48 | 1 | 48 |
| 32.17(d) - (P) | 0 | 1 | 0 |
| 32.19(c) - (P) | 30 | 4.5 | 135 |
| 32.19(d) Burden is included in §32.19(c) | | | 0 |
| 32.20(a) (R+1 Year) | 30 | 1 | 30 |
| 32.25(b) - (P) | 11 | 30 | 330 |
| 32.25(c) - (R+1 Year) | 11 | 1 | 11 |
| 32.29(b) - (P) | 21 | 270 | 5670 |
| 32.29(c) - (R+1 Year) | 21 | 1 | 21 |
| 32.51(a)(3) - (P) | 38 | 47.5 | 1805 |
| 32.52(c) (5 Years) | 38 | .2 | 8 |
| 32.54(a)&(b) - (P) | 1 | 50 | 50 |
| 32.58 (P) | 1 | 3 | 3 |
| 32.71(c) (P) | 11 | 7.5 | 83 |
| 32.71(d) Burden is included in §32.71(c) | | | 0 |
| 32.71(e) Burden is included in §32.71(c) | | | 0 |
| 32.72(a)(4) - (P) | 92 | 390 | 35880 |
| 32.72(c) - (P) | 10 | 0 | |
| 32.74(a)(2)(viii) (P) | 5 | 2.8 | |
| 32.74(a)(3) - Burden included in 32.74(a)(2)(viii) | | | |
| Total | | | 48880 |

* P = Life of product

R = Until included in report to Commission (up to 5 years)

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Table 5
Part 34 Estimated Burden

Recordkeeping

| Section | # licensees | Hrs/ licensee | Burden (hr/yr) |
|-------------------------------------|--------------------|--------------------------|---------------------------|
| 34.20(b)(1) - labels | 158 | 0.4 | 63 |
| 34.25(c) - see 34.65 (3yrs) | 158 | | 0 |
| 34.27(c)(2) - see 34.67 (3yrs) | 158 | | 0 |
| 34.27(e) - see 34.67 (3yrs) | 158 | | 0 |
| 34.29(b) - see 34.69 | 158 | | 0 |
| 34.31(b)& 34.31(c) - see 34.73 | 158 | | 0 |
| 34.33(b) - see 34.75 | 40 | | 0 |
| 34.35(a)- (3yrs) | 158 | 0.8 | 126 |
| 34.35(b)(2) - (3yrs) | 158 | 36 | 5,688 |
| 34.43(b)(1) & 34.43 (c)(1) | 158 | 2.5 | 395 |
| 34.43(f) - see 34.79 | 158 | | 0 |
| 34.45(b) - see 34.81 (RULT) | 158 | | 0 |
| 34.47(b)- see 34.83(a) - (3 yrs) | 158 | | 0 |
| 34.47(c) - see 34.83(a) - (3 yrs) | 158 | | 0 |
| 34.47(d) - see 34.83(d) - (RULT) | 158 | | 0 |
| 34.47(e) - see 34.83(d) - (RULT) | 158 | | 0 |
| 34.47(g)(4) - see 34.83(b) - (3yrs) | 158 | | 0 |
| 34.49(d) - see 34.85 - (3yrs) | 158 | | 0 |
| 34.61 - RULT | 158 | 0.16 | 25 |
| 34.63 - 3yrs | 158 | 1.6 | 253 |
| 34.65 - 3 yrs | 158 | 1.6 | 253 |
| 34.67 - 3 yrs | 158 | 1.2 | 190 |
| 34.69 - 3 yrs | 158 | 2 | 316 |

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| Section | # licensees | Hrs/ licensee | Burden (hr/yr) |
|---|-------------|------------------|-------------------|
| 34.71 - 3 yrs | 158 | 36 | 5,688 |
| 34.73 - 3 yrs | 158 | 27 | 4,266 |
| 34.75 - 3 yrs | 40 | 48.2 | 1,928 |
| 34.79 - 3 yrs | 158 | 5 | 790 |
| 34.81 - RULT | 158 | 0.08 | 13 |
| 34.83(a) - 3 yrs | 158 | 122.5 | 19,355 |
| 34.83(b) - 3 yrs | 158 | 2.5 | 395 |
| 34.83(d) - 3 yrs | 158 | 3.2 | 506 |
| 34.85 - 3 yrs | 158 | 120 | 18,960 |
| 34.89 - RULT | 158 | 5.4 | 853 |
| Appendix A, Part I, item 6 - life of program | 1 | 10 | 10 |
| Appendix A, Part I, item 9 - life of program | 1 | 158 | 158 |
| Appendix A, Part I, item 10- life of program | 1 | 10 | 10 |
| Appendix A, Part I, item 11- life of program | 1 | 10 | 10 |
| Appendix A, Part I, item 13- life of program | 1 | 10 | 10 |
| Appendix A, Part II, item 2 - life of program | 158 | 1 | 158 |
| Appendix A, Part II, item 3 - life of program | 1 | 10 | 10 |
| Appendix A, Part II, item 4 - life of program | 1 | 10 | 10 |
| Appendix A, Part II, item 6 - life of program | 1 | 10 | 10 |
| Appendix A, Part II, item 7 | 200 | 0.5 | 100 |
| Total | | | 60,549 |

Note: RULT - required until license termination

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Reporting

| SECTION | #Responses/ yr | Hrs/ Response | Burden (hr/yr) |
|---|-------------------|------------------|-------------------|
| 34.27(d) | 1 | 4 | 4 |
| 34.101 (a and b) | 5 | 10 | 50 |
| 34.101 (c) | 65 | 0.5 | 33 |
| Appendix A, Part I, Item 12 - life of program | 2 | 10 | 20 |
| TOTAL | 73 | | 107 |

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Table 6
Part 36 Estimated Burden

Reporting Requirements

| Section | Responses/yr | Hrs/ responses | Burden hr/yr |
|---|---------------------|---------------------------|-------------------------|
| 36.11 Burden is covered under Form 313 | 0 | 0 | 0 |
| 36.13 Burden is covered under Form 313 | 0 | 0 | 0 |
| 36.17 (a), (b) Burden is covered under Form 313 | 0 | 0 | 0 |
| 32.19 (a), (b) Burden is covered under Form 313 | 0 | 0 | 0 |
| 36.69 (a), (b) Burden is covered under Form 313 | 0 | 0 | 0 |
| 36.83(a), (b) | 8 | 100 | 800 |
| Total | | | 800 |

Recordkeeping Requirements

| Section | #licensees | Hrs/ licensee | Burden hr/yr |
|---|-------------------|--------------------------|-------------------------|
| 36.21(a)(1) | 32 | .5 | 16 |
| 36.53(a), (b) - (averaged over 10 yr useful life of procedures) | 32 | 60 | 1920 |
| 36.81 (a) | 32 | 2 | 64 |
| 36.81 (b) | 32 | 20 | 640 |
| 36.81 (c) | 32 | 2 | 64 |
| 36.81 (d) | 32 | 40 | 1280 |
| 36.81 (e) - Burden is covered under Part 20 | 32 | 0 | 0 |
| 36.81 (f) | 32 | 20 | 640 |
| 36.81 (g) | 32 | 4 | 128 |
| 36.81 (h) | 32 | 10 | 320 |
| 36.81 (i) | 32 | 200 | 6400 |
| 36.81 (j) | 32 | 20 | 640 |

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| Section | #licensees | Hrs/ licensee | Burden hr/yr |
|--|------------|------------------|-----------------|
| 36.81 (k) - Burden covered under 30.41/51 | 32 | 0 | 0 |
| 36.81 (l) - burden averaged over 10 years | 32 | 80 | 2560 |
| 36.81 (m) - Burden is covered under 30.35(g) | 32 | 0 | 0 |
| Total | | | 14672 |

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Table 7
Part 39 Estimated Burden

Reporting Requirements

| Section | Responses/yr | Hrs/ response | Burden hr/yr |
|---|---------------------|--------------------------|-------------------------|
| 39.11 Burden is covered under Form 313 | 0 | 0 | 0 |
| 39.13(b),(c),(e),(f) Burden covered under 39.11 | 0 | 0 | 0 |
| 39.15 (c) | 1 | 5 | 5 |
| 39.17 Burden is covered under 39.11 | 0 | 0 | 0 |
| 39.35(d)(2) | 1 | 4 | 4 |
| 39.61(a)(2)&(b)(2) | 510 | .25 | 128 |
| 39.63 Burden covered under 39.11 | 0 | 0 | 0 |
| 39.77(a) | 1 | 12 | 12 |
| 39.77(b) - under other OMB clearance | 0 | 0 | 0 |
| 39.77(c) | 5 | .5 | 3 |
| 39.77(d) | 5 | 4 | 20 |
| 39.91 - Burden covered under 39.11 | 0 | 0 | 0 |
| Total | | | 171 |

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Recordkeeping Requirements

| Section | # licensees | Hrs/licensee | Burden hr/yr |
|---------------------------|-------------|--------------|--------------|
| 39.13(d) | 255 | .25 | 64 |
| 39.15(a)&(b) | 55 | 2 | 110 |
| 39.31(a) | 510 | .05 | 26 |
| 39.33(d) | 1020 | .08 | 82 |
| 39.35(a) | 510 | .08 | 41 |
| 39.37 | 510 | .08 | 41 |
| 39.39 | 38250 | .03 | 1148 |
| 39.43(a)&(b) | 816 | .48 | 392 |
| 39.61(d) | 510 | .75 | 383 |
| 39.63 - included in 39.11 | 0 | 0 | 0 |
| 39.65(c) | 440 | 1 | 440 |
| 39.67(f) | 38250 | .16 | 6120 |
| 39.73 | 153 | 1 | 153 |
| 39.75 | 38250 | .05 | 1913 |
| Total | | | 10910 |

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Table 8
10 CFR Part 40, Estimated Burden

Reporting Requirements

| Section | Responses/yr | Hrs/ response | Burden hr/yr |
|--|---------------------|--------------------------|-------------------------|
| 40.9(b) | 0 | 1 | 0 |
| 40.23 | 4 | 1 | 4 |
| 40.25(c) (under OMB Clearance 3150-0031) | | | 0 |
| 40.25(d)(3) (under OMB Clearance 3150-0031) | | | 0 |
| 40.25(d)(4) | 2 | .5 | 1 |
| 40.26(c)(2) | 1 | 2 | 2 |
| 40.26(d) (Burden included under Appendix A) | | | 0 |
| 40.27(c)(3) | 2 | 8 | 16 |
| 40.27(c)(5) | 1 | 2 | 2 |
| 40.31(a) (under OMB Clearance 3150-0120) | | | 0 |
| 40.31(b) (under OMB Clearance 3150-0120) | | | 0 |
| 40.31(f) (under OMB Clearance 3150-0021) | | | 0 |
| 40.31(g) (under OMB Clearance 3150-0055 & 56) | | | 0 |
| 40.31(h) (Burden included under Appendix A) | | | 0 |
| 40.31(i) (Burden included under Section 40.36) | | | 0 |
| 40.31(j)(1) | 1 | 160 | 160 |
| 40.31(j)(3)(viii) (Burden included with 40.31(j)(1)) | | | 0 |
| 40.35(b) | 50 | .5 | 25 |
| 40.35(d) (under OMB Clearance 3150-0031) | | | 0 |
| 40.35(e) | 0 | .75 | 0 |
| 40.35(f) | 1 | 80 | 80 |
| 40.36(a) & (b) | 17 | 160 | 2720 |
| 40.36(a) & (b) Certifications | 3 | 40 | 120 |

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| Section | Responses/yr | Hrs/ response | Burden hr/yr |
|--|--------------|------------------|-----------------|
| 40.41(f) | 1 | 1 | 1 |
| 40.42(d) | 16 | 8 | 128 |
| 40.42(e)(2) | 5 | 40 | 200 |
| 40.42(f) | 5 | 40 | 200 |
| 40.42(g)(1) | 15 | 1000 | 15000 |
| 40.42(g)(2) | 5 | 40 | 200 |
| 40.42(j) | 30 | 100 | 3000 |
| 40.43 (under OMB Clearance 3150-0120) | | | 0 |
| 40.44 (under OMB Clearance 3150-0120) | | | 0 |
| 40.60(a) | 3 | 4 | 12 |
| 40.60(b) | 14 | 4 | 56 |
| 40.64(a) (under OMB Clearance 3150-0003) | | | 0 |
| 40.64(b) | 150 | 2 | 300 |
| 40.64(c) | 0 | 2.5 | 0 |
| 40.65 | 58 | 15 | 870 |
| 40.66 (Burden included in 40.23) | | | 0 |
| 40.67 (Burden included in 40.23) | | | 0 |
| Appendix A60 | 60 | 40 | 2400 |
| Criterion 6 & 6A4 | 4 | 140 | 560 |
| Total | | | 26057 |

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Recordkeeping Requirements

| Section | Records/Yr | Hrs/ Record | Burden hr/yr |
|------------------------|------------|----------------|-----------------|
| 40.26(c)(2) | 13505 | .05 | 675 |
| 40.35(e)(3) | 0 | .3 | 0 |
| 40.36(f) | 1280 | 1.5 | 1920 |
| 40.51(c)&(d) | 200 | 3.5 | 700 |
| 40.61(a)&(b) | 8,000 | .1 | 800 |
| 40.61(d) | 125 | 2 | 250 |
| 40.61(e) | 5 | 2 | 10 |
| 40.61(f) | 250 | 4 | 1000 |
| Appendix A | 90 | 40 | 3600 |
| App.A Criterion 6 & 6A | 4 | 16 | 64 |
| Total | | | 9019 |

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Table 9
Part 70 Estimated Burden

Reporting Requirements

| Section | Responses/yr | Hrs/ response | Burden hr/yr |
|---|---------------------|--------------------------|-------------------------|
| 70.9(b) | 43 | 1 | 43 |
| 70.14(a) | 1 | 40 | 40 |
| 70.19(c)(2) - Included in 70.39(b) | | | 0 |
| 70.20a(d) | 6 | 40 | 240 |
| 70.20a(e) - See OMB Clearance No. 3150-0002 | | | 0 |
| 70.20b(f) | 10 | 4 | 40 |
| 70.20b(g) | 1 | 4 | 4 |
| 70.21(a) | 258 | 236 | 60888 |
| 70.21(f) - See OMB Clearance No. 3150-0021 | | | 0 |
| 70.21(g)- See OMB Clearance No. 3150-0056 | | | 0 |
| 70.21(h)- See OMB Clearance No. 3150-0021 | | | 0 |
| 70.22(a)- Included in 70.21(a) thru (m) | | | 0 |
| 70.22(a)(9)- Included in 70.25 | | | 0 |
| 70.25 Certification | 1 | 100 | 100 |
| 70.25 Funding Plan | 5 | 300 | 1500 |
| 70.32(a)(9) | 1 | 1 | 1 |
| 70.32(c)(1) - Included in 70.21(a) | | | 0 |
| 70.32(c)(2) | 30 | 13.3 | 399 |
| 70.32(d) | 1 | 16 | 16 |
| 70.32(e) | 30 | 80 | 2400 |
| 70.32(g) | 5 | 80 | 400 |
| 70.32(i) | 1 | 16 | 16 |
| 70.33(a) - Included in 70.21(a) | | | 0 |
| 70.34 - Included in 70.21(a) | | | 0 |

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| Section | Responses/yr | Hrs/ response | Burden hr/yr |
|--|---------------------|--------------------------|-------------------------|
| 70.38(d) | 6 | 1 | 6 |
| 70.38(e) | 6 | 240 | 1440 |
| 70.38(f) | 2 | 40 | 80 |
| 70.38(g)(1) | 4 | 1,000 | 4000 |
| 70.38(g)(2) | 2 | 40 | 80 |
| 70.38(g)(4)- Included in 70.38(g)(1) | | | 0 |
| 70.38(i) - See OMB Clearance No. 3150-0028 | | | 0 |
| 70.38(j) | 6 | 300 | 1800 |
| 70.39(a) - Included in 70.21(a) | | | 0 |
| 70.39(b) | 600 | .1 | 60 |
| 70.50 | 30 | 4 | 120 |
| 70.52(a) | 1 | 16 | 16 |
| 70.52(b) | 1 | 16 | 16 |
| 70.53(a) - (See OMB Clearance 3150-0004 & 58) | | | 0 |
| 70.53(b) - (See OMB Clearance 3150-0004 & 139) | | | 0 |
| 70.54 - (See OMB Clearance No. 3150-0003) | | | 0 |
| 70.57(c) | 0 | 0 | 0 |
| 70.59 | 72 | 5.14 | 370 |
| DG-3008 - Included in 70.21(a) | | | 0 |
| Total | | | 74075 |

ATTACHMENT 2

Recordkeeping Requirements

| Section | Records/Yr | Hrs/ Record | Burden hr/yr |
|--|------------|----------------|-----------------|
| 70.22(g)-(k) (Varies - 3 yrs to duration of license) | 2 | 400 | 800 |
| 70.24(a)(3) (Varies - 3 yrs to duration of license) | 100 | 7.6 | 760 |
| 70.25(g) - Duration of license | 210 | 3 | 630 |
| 70.32(c)(2) - Included in 70.58 (3 yrs) | | | 0 |
| 70.32(d) Duration of possession of matl | 2 | .5 | 1 |
| 70.32(e) (3 yrs) | 55 | .2 | 11 |
| 70.32(g) Duration of license | 5 | .2 | 1 |
| 70.42(c) & (d) (3 yrs) | 100 | 10 | 1000 |
| 70.51(b) - Included in 70.58 (Varies - 3 yrs to duration of license) | | | 0 |
| 70.51(b)(6) - No retention after transfer | 125 | 2 | 250 |
| 70.51(b)(7) - No retention after transfer | 5 | 2 | 10 |
| 70.51(c) - Included in 70.58 (Duration of license 3 yrs for changes) | | | 0 |
| 70.51(d)- Duration of possession of matl plus 3 yrs | 200 | 8 | 1600 |
| 70.51(e) - Included in 70.58 (3 yrs) | | | 0 |
| 70.51(f) - Included in 70.58 (3 yrs) | | | 0 |
| 70.57(b) Varies - 3 yrs to duration of license | 1 | 16 | 16 |
| 70.58 Varies - 3 yrs to duration of license | 1 | 120 | 120 |
| DG-3008 (4 yrs) | 8 | 20 | 160 |
| Total | | | 5359 |

ATTACHMENT 2

Table 10
Part 73 Estimated Burden

Reporting Requirements

| Section | Responses/yr | Hrs/ response | Burden hr/yr |
|---|---------------------|--------------------------|-------------------------|
| 73.5 | 1 | 8 | 8 |
| 73.2(c) | 0 | | 0 |
| 73.26(b)(3) | 0 | 5 | 0 |
| 73.26(i)(6) and (k)(4) | 0 | 1 | 0 |
| 73.27(a)(1) | 0 | 0.1 | 0 |
| 73.27(a)(2) | 0 | 0.5 | 0 |
| 73.27(a)(3) | 0 | 0.5 | 0 |
| 73.27(b) | 0 | 0.5 | 0 |
| 73.27(c) (Included in 73.71(a)(4)) | | | 0 |
| 73.37(a) | 0 | 0.1 | 0 |
| 73.37(b)(1) (Included in 73.72) | | | 0 |
| 73.37(b)(11) | 40 | .3 | 12 |
| 73.37(f) | 42 | 8 | 336 |
| 73.46(b)(9) | 2 | 1 | 2 |
| 73.46(h)(4) | 0 | .1 | 0 |
| 73.46(h)(5)(1-time-only requirement, completed) | | | 0 |
| 73.46(i)(1) (1-time-only requirement, completed) | | | 0 |
| 73.50(g)(3) (Emergency notification - never used) | 0 | 0.1 | 0 |
| 73.50(g)(4) (1-time-only requirement, completed) | | | 0 |
| 73.50(h) (1-time-only requirement, completed) | | | 0 |
| 73.55 (1-time-only requirement, completed) | | | 0 |
| 73.55(b)(4)(ii) | 75 | 16 | 1200 |

ATTACHMENT 2

| Section | Responses/yr | Hrs/ response | Burden hr/yr |
|--|--------------|------------------|-----------------|
| 73.55(c)(8)(i)&(ii) (Burden included in 73.55(c)(9)) | | | 0 |
| 73.55 (c)(9) | 40 | 20 | 800 |
| 73.55 (c)(9) | 20 | 20 | 400 |
| 73.55 (c)(9) | 20 | 7 | 140 |
| 73.55(d) (1-time-only requirement, completed) | | | 0 |
| 73.55(h)(4) | 75 | .25 | 19 |
| 73.55(h)(5) | 6930 | 1 | 6930 |
| 73.56(a)(1) (1-time-only requirement, completed) | | | 0 |
| 73.56(a)(2),(3) (None until advanced reactors start application process) | | | 0 |
| 73.56(b)(1),(2) (Included in 73.56(a)(1), (2), & (3)) | | | 0 |
| 73.56(c) (Included in 73.56(a)(1), (2), & (3)) | | | 0 |
| 73.56(d)(None anticipated during clearance per. | 0 | 89 | 0 |
| 73.56(e) (Included in 73.56(a)(1), (2), & (3)) | | | 0 |
| 73.57(a)-(e) | 60,000 | .5 | 30000 |
| 73.67(c)(1) (1-time-only requirement, completed) | | | 0 |
| 73.67(e)(1) | 370 | 2 | 740 |
| 73.67(e)(3)(v) | 370 | .5 | 185 |
| 73.67(e)(3)(vii) (Included in 73.71(a)) | | | 0 |
| 73.67(e)(6)(ii) | 0 | .5 | 0 |
| 73.67(e)(7)(i) | 0 | 2 | 0 |
| 73.67(e)(7)(ii) | 22 | 10 | 220 |
| 73.67(g)(1),(2) | 70 | 4 | 280 |
| 73.67(g)(3)(ii) | 70 | 1 | 70 |
| 73.67(e)(1) | 370 | 2 | 740 |
| 73.67(e)(3)(v) | 370 | .5 | 185 |

ATTACHMENT 2

| Section | Responses/yr | Hrs/ response | Burden hr/yr |
|--|---------------------|--------------------------|-------------------------|
| 73.67(e)(3)(vii) (Included in 73.71(a)) | | | 0 |
| 73.67(e)(6)(ii) | 0 | .5 | 0 |
| 73.67(e)(7)(i) | 0 | 2 | 0 |
| 73.67(e)(7)(ii) | 22 | 10 | 220 |
| 73.67(g)(1),(2) | 70 | 4 | 280 |
| 73.67(g)(3)(ii) | 70 | 1 | 70 |
| 73.67(g)(3)(iii) (Included in 73.71(a)) | | | 0 |
| 73.67(g)(5)(ii) | 35 | 1 | 35 |
| 73.71(a)(1) | 0 | 1.5 | 0 |
| 73.71(a)(4) & (5) | 0 | 40 | 0 |
| 73.71(b) | 40 | 6 | 240 |
| 73.71(d) (Included in 73.71(b)) | | | 0 |
| 73.72 | 30 | .2 | 6 |
| 73.73 | 90 | 8 | 720 |
| 73.74 | 28 | 8 | 224 |
| Appendix B - Included in previous sections | | | 0 |
| Appendix C - Included in previous sections | | | 0 |
| Appendix G - Included in previous sections | | | 0 |
| Total | | | 44062 |

ATTACHMENT 2

Recordkeeping Requirements

| Section | Records/Yr | Hrs/ Record | Burden hr/yr |
|--|------------|----------------|-----------------|
| 73.20(c) - (L) ¹ | 2 | 100 | 200 |
| 73.24(b)(1) - (3) | 270 | .2 | 54 |
| 73.25(b),(c),(d) - Included in 73.26 (P+3) | | | 0 |
| 73.26(b)(4) - (S+3) | 0 | 1 | 0 |
| 73.26(c) - (P+3) | 0 | 8 | 0 |
| 73.26(d)(3) - (P+3) | 0 | 1.5 | 0 |
| 73.26(d)(4) - (E,Q,R+3) | 0 | 40 | 0 |
| 73.26(e)(1) - (P+3) | 0 | 100 | 0 |
| 73.26(h)(6) - (3) | 0 | 5 | 0 |
| 73.26(i)(1) - (S) | 0 | 18 | 0 |
| 73.37(b)(2) - (P+3) | 40 | .3 | 12 |
| 73.37(b)(3) - (P+3) | 40 | .2 | 8 |
| 73.37(b)(5) - (S+3) | 40 | .2 | 8 |
| 73.37(b)(7) - (Included in 73.72) | | | 0 |
| 73.45 - (Included in 73.20) - (P) | | | 0 |
| 73.46(b)(1) - (1-time-only reqmt, completed) - (L) | | | 0 |
| 73.46(b)(3) - (L) | 2 | 160 | 320 |
| 73.46(b)(4),(7),(8) - (Q/R+3) | 2 | 32.8 | 66 |
| 73.46(b)(9) - (3) | 2 | 1 | 2 |
| 73.46(b)(10)(iii) - (3) | 2 | 8 | 16 |

¹ Notes on maintenance period for records:

P = Duration of Possession of Material

L = Duration of License

E = Duration of Employment

S = Duration of Shipment

C = Duration of Contract

Q = Qualification

R = Requalification

A = Duration of Access Auth.

ATTACHMENT 2

| Section | Records/Yr | Hrs/ Record | Burden hr/yr |
|--|------------|----------------|-----------------|
| 73.46(b)(11)(i) - (Included in 73.46(b)(4)) | | | 0 |
| 73.46(b)(11)(iii) - (3) | 2 | 8 | 16 |
| 73.46(b)(12) & (b)(12)(i) - (Included in 73.46(i)) | | | 0 |
| 73.46(b)(12)(ii) - (3) | 2 | 8 | 16 |
| 73.46(d)(3) - (Included in 73.20) - (L) | | | 0 |
| 73.46(d)(10)255 - (3) | 255 | .5 | 128 |
| 73.46(d)(11)170 - (3) | 170 | .5 | 85 |
| 73.46(d)(13) - (3) | 1020 | .1 | 102 |
| 73.46(g)(5) (Included in 73.20) - (P) | | | 0 |
| 73.46(g)(6) - (3) | 2 | 8 | 16 |
| 73.46(h)(1) - (L) | 15 | 10 | 150 |
| 73.46(h)(2) - (L) | 2 | .5 | 1 |
| 73.46(h)(3) (Included in 73.20) - (L) | | | 0 |
| 73.50(a)(3) - (L) | 3 | 100 | 300 |
| 73.50(a)(4) - (Q/R+3) | 3 | 16 | 48 |
| 73.50(c)(5) - (3) | 600 | .2 | 120 |
| 73.50(g)(1) - (L) | 3 | 100 | 300 |
| 73.50(g)(2) - (L) | 3 | .5 | 2 |
| 73.55(b)(1) - (C) | 75 | 10 | 750 |
| 73.55(b)(3) - (L/3) | 75 | 1 | 75 |
| 73.55(b)(4)(i) - (Q/R/3) | 6,000 | .5 | 3000 |
| 73.55(b)(4)(ii) - (L/3) | 75 | 1 | 75 |
| 73.55(c)(7) - (Included in 73.55(c)(8)) | | | 0 |
| 73.55(c)(8) - (3) | 40 | 340 | 13600 |
| 73.55(c)(8) - (3) | 20 | 380 | 7600 |
| 73.55(c)(8) - (3) | 7 | 480 | 3360 |
| 73.55(c)(9)(iv) - (3) | 40 | 20 | 800 |

ATTACHMENT 2

| Section | Records/Yr | Hrs/ Record | Burden hr/yr |
|---|------------|----------------|-----------------|
| 73.55(c)(9)(iv) - (3) | 20 | 380 | 7600 |
| 73.55(c)(9)(iv) - (3) | 7 | 20 | 140 |
| 73.55(c)(10) | 40 | 80 | 3200 |
| 73.55(c)(10) | 20 | 80 | 1600 |
| 73.55(c)(10) | 7 | 180 | 1260 |
| 73.55(d)(6) - (3) | 25,000 | .5 | 12500 |
| 73.55(d)(7) - (L) | 924 | 4 | 3696 |
| 73.55(g)(1)&(4) - (L) | 27,104 | 4 | 108416 |
| 73.55(g)(4) - (5) | 75 | 8 | 600 |
| 73.55(h)(1) - (L) | 75 | 10 | 750 |
| 73.55(h)(2) - (L) | 75 | 1 | 75 |
| 73.56(b)(1) - (L) | 75 | 5 | 375 |
| 73.56(f)(1),(2) - (Included in 73.56(h)(1) - (A+5)) | | | 0 |
| 73.56(g)(1),(2) - (Included in 73.50) - (3) | | | 0 |
| 73.56(h)(1) Credit checks - (A+5) | 146,000 | .22 | 32120 |
| 73.56(h)(1) Military checks - (A+5) | 14,640 | .56 | 8198 |
| 73.56(h)(1) Education records check - (A+5) | 61,000 | .56 | 34160 |
| 73.56(h)(1) Psychological evaluation - (A+5) | 61,000 | .22 | 13420 |
| 73.56(h)(1) Transfers - (A+5) | 3,660 | 3 | 10980 |
| 73.56(h)(1) Appeal reviews - (5) | 366 | 49 | 17934 |
| 73.56(h)(2) - (Included in 73.50) - (3) | | | 0 |
| 73.57(e),(f) - (A) | 60,000 | .25 | 15000 |
| 73.60(e) - (Included in Appendix C) - (L) | | | 0 |
| 73.67(c)(1) - (P+3) | 0 | 20 | 0 |
| 73.67(d)(110) - (P+3) | 0 | 20 | 0 |
| 73.67(e)(3)(iv) - (P+3) | 50 | 1 | 50 |

ATTACHMENT 2

| Section | Records/Yr | Hrs/ Record | Burden hr/yr |
|---|------------|----------------|-----------------|
| 73.67(e)(4) - (P+3) | 296 | 1.5 | 444 |
| 73.67(e)(5) - (P+3) | 185 | 2 | 370 |
| 73.67(e)(6)(i) - (P+3) | 70 | 4 | 280 |
| 73.67(f)(4) -(1-time only rqmt completed) - (P+3) | | | 0 |
| 73.67(g)(3)(i) - (P+3) | 70 | 2 | 140 |
| 73.67(g)(4) - (P+3) | 56 | 1.5 | 84 |
| 73.67(g)(5)(i) - (P+3) | 35 | 1 | 35 |
| 73.70(a) - (P+3) | 280 | .5 | 140 |
| 73.70(b) - (P+3) | 400 | .5 | 200 |
| 73.70(c) - (3) | 1,500 | .2 | 300 |
| 73.70(d) - (3) | 56,700 | .03 | 1701 |
| 73.70(e) - (3) | 2520 | .5 | 1260 |
| 73.70(f) - (3) | 766,500 | .02 | 15330 |
| 73.70(g) - (3) | 40 | 2 | 80 |
| 73.70(h) - (L/3) | 84 | 24 | 2016 |
| 73.71(a)(4),(5) - (3) | 0 | 1 | 0 |
| 73.71(c) - (3) | 33,989 | 1 | 33989 |
| 73.71(e) - Included in 73.46(g)(4)&(g)(6) | | | 0 |
| Appendix B - Included in above rqmts - (3/L) | | | 0 |
| Appendix C - (L/3) | 76 | 100 | 7600 |
| Total | | | 367272 |

ATTACHMENT 2

Table 11

Part 74 (and NUREGs 1065 and 1280, Rev 1, and NUREG/CR 5734) Estimated Burden

Reporting Requirements

| Section | Responses/yr | Hrs/ response | Burden hr/yr |
|--|---------------------|--------------------------|-------------------------|
| 74.115 | 5 | 15 | 75 |
| 74.13(a) - (covered under other OMB clearance) | 0 | 0 | 0 |
| 74.13(b) | 1 | 100 | |
| 74.15(a) - (covered under other OMB clearance) | 0 | 0 | 0 |
| 74.17 - (covered under other OMB clearance) | 1 | 4 | 4 |
| 74.31(a),(b),(c) - (1 time rqmt - completed) | 0 | 865 | 0 |
| 74.33(a),(b),(c) - (1 time rqmt - completed) | 0 | 1088 | 0 |
| 74.51(c) - (1 time rqmt - completed) | 0 | 900 | 0 |
| 74.57(c) | 4 | 8 | 32 |
| 74.57(f)(2) | 2 | 4 | 8 |
| 74.59(f) | 2 | 4 | 8 |
| Total | | | 127 |

Recordkeeping Requirements

| Section | # licen- sees | Records / licensee | Hrs/ record | Burden hr/yr |
|---|------------------------------|-----------------------------------|------------------------|-------------------------|
| 74.31(d) - (140-640 records/licensee) | 5 | 400 | .5 | 1000 |
| 74.33(d) - (500-1160 records/licensee) | 3 | 865 | .5 | 1298 |
| 74.51(a) - (2000-3500 records/licensee) | 2 | 2800 | .5 | 2800 |
| Total | | | | 5098 |

ATTACHMENT 2

Table 12
Part 75 Estimated Burden

Reporting Requirements

| Section | # Licen- sees | Response/ yr | Hrs/ response | Burden hr/yr |
|---|------------------------------|-------------------------|--------------------------|-------------------------|
| 75.3(a) | 1 | 1 | 12 | 12 |
| 75.7 | 1 | 1 | .2 | 0 |
| 75.11(a) - (under OMB clearance 3150-0056) | | | | |
| 75.11(c)- Included in 75.11(a) | | | | 0 |
| 75.11(d)- Included in 75.11(a) | | | | 0 |
| 75.11(e)- Included in 75.11(a) | | | | 0 |
| 75.12(b) | 1 | 1 | 12 | 12 |
| 75.12(d) - Included in 75.12(b) | 0 | | | 0 |
| 75.14(a) - (under OMB clearance 3150-0056) | 0 | | | 0 |
| 75.31- Included in 75.32 and 75.36 | 0 | | | 0 |
| 75.32 -(under OMB clearance 3150-0004) | 0 | | | 0 |
| 75.33 -(under OMB clearance 3150-0003 & 4) | 0 | | | 0 |
| 75.34 - (under OMB clearance 3150-0003) | 0 | | | 0 |
| 75.35-(under OMB clearance 3150-0004,58,57) | 0 | | | 0 |
| 75.36 | 1 | 1 | 12 | 12 |
| 75.43(a) - Included in 75.43(b) and 75.43(c)(2) | 0 | | | 0 |
| 75.43(b) | 1 | 1 | 4 | 4 |
| 75.43(c)(1) - Included in 75.43(c)(2) | 0 | | | 0 |
| 75.43(c)(2) | 1 | 1 | 4 | 4 |
| 75.43(d) | 1 | 1 | 4 | 4 |
| 75.44(c) - Included in 75.43(b) and 75.43(c)(2) | 0 | | | 0 |
| 75.45 - Included in 75.43(b) and 75.43(c)(2) | 0 | | | 0 |
| Total | | | | 48 |

ATTACHMENT 2

Recordkeeping Requirements

| Section | # licensees | Hrs/ licensee | Burden hr/yr |
|---------------------------|----------------|------------------|-----------------|
| 75.12(b)(4) | 6 | 400 | 2400 |
| 75.21 | 6 | 400 | 2400 |
| 75.22 - Included in 75.21 | 0 | | 0 |
| 75.23 - Included in 75.21 | 0 | | 0 |
| 75.24 - Included in 75.21 | 0 | | 0 |
| Total | | | 4800 |

ATTACHMENT 2

Table 13
Form 241 and 244 Estimated Burden

Reporting Requirements

| Section | # Reports/yr | Hrs/ submittal | Burden hrs/yr |
|--|---------------------|-----------------------|----------------------|
| Form 241 - (200 initial submissions) | 200 | .5 | 100 |
| Form 241 - (1100 revisions) | 1,100 | .25 | 275 |
| Form 241 - (3,300 clarifications of information) | 3,300 | .25 | 825 |
| Form 244 | 20 | 1 | 20 |
| Total | | | 1220 |

Table 14
Form 313, Form 313A, and Form 313B Estimated Burden

Reporting Requirements

| Section | # Reports | Hrs/ submittal | Burden hr/yr |
|---------------------------------------|------------------|-----------------------|---------------------|
| Form 313 - (218 new applications) | 218 | 7.5 | 1635 |
| Form 313 - (1856 amendments) | 1,856 | 7.5 | 13920 |
| Form 313 - (448 renewal applications) | 448 | 7.5 | 3360 |
| Total | | | 18915 |

ATTACHMENT 2

Table 15
Form 740 and 741 Estimated Burden

Reporting Requirements

| Section | No. of licensees | Resp/ lic/yr | Hrs/ response | Burden (hr/yr) |
|---|------------------|--------------|---------------|----------------|
| Form 740 | 38 | 30 | .75 | 855 |
| Form 741 and 741A (not submit form) | 800 | 0 | .75 | 0 |
| Form 741 and 741A (between 1-50 forms) | 370 | 25 | .75 | 6938 |
| Form 741 and 741A (between 301-1000 forms) | 18 | 500 | .75 | 6750 |
| Form 741 and 741A (between 1001-5000 forms) | 2 | 2500 | .75 | 3750 |
| Form 741 and 741A (over 5000 forms) | 3 | 5000 | .75 | 11250 |
| Total | | | | 29543 |

ATTACHMENT 3

Issues Affecting Completion of Plan

Issue 1 - The differences between unnecessary and necessary recordkeeping/reporting burden?

The performance goal in the strategic plan notes that NRC will strive to reduce unnecessary regulatory burden and associated costs, if possible, while achieving the other performance goals of maintaining safety and protection of the environment and increasing public confidence.

Thus, the performance goal focuses on reducing unnecessary burden whereas many of the rule parts listed in the attached Tables contain elements which are essential to assuring protection of public health and safety and, therefore, necessary (and not be amenable to reduction in reporting and recordkeeping requirements).

An outline of considerations related to this issue is illustrated below:

| | Reduction | Remarks |
|------------------------|----------------------|---|
| Necessary burden (N) | $\Delta N = 0\%$ | Shouldn't reduce because of importance to safety |
| Unnecessary burden (U) | $\Delta U = - 100\%$ | a) Appropriate to reduce b) Ideally would reduce by 100% |

Issue 2 - Whether reduction in unnecessary recordkeeping/reporting burden can be achieved, in a risk-informed, defensible manner while maintaining public health, safety, & confidence realizing resources needed to complete this effort are limited.

a) Any reductions in requirements must be made in a risk-informed, defensible manner

The Strategic Plan suggests elimination of reports that are not necessary to NRC's goal of protecting public health and safety. Requests from the reactor licensee community (including those made at a public workshop on May 31, 2001) suggest that there are certain reports that NRC doesn't need and/or use and which should be eliminated.

However, any removal or relaxation of reporting/recordkeeping requirements needs to consider the potential impact to public confidence if it is perceived that NRC is relaxing needed safety requirements. Therefore, any NMSS revision of regulations to ease the reporting and recordkeeping burden must be supported by a risk-informed and defensible justification.

b) NRC staff resources needed to complete this effort are limited

Resources for development and implementation of the plan are limited. The Commission budget mark (SRM 8/2/00) indicated that resources for this activity should be reallocated to higher priority needs, specifically license renewal. Resources for review of existing regulations by licensing branches to identify paperwork burdens considered appropriate for revision or elimination (and for IMNS/RGB to carry out any rulemaking initiatives resulting from the review) will have to come from within existing budgets.

ATTACHMENT 3

Issue 3 - Normalizing burden

The Strategic Plan measure proposes reducing paperwork imposed by NRC on its licensees by 25% over 5 years. Over that time, the number of NRC licensees will likely decrease, either because of license terminations or shifting to Agreement States. It may not be appropriate to include the reduction caused by a decrease in the number of licensees as part of achieving the metric.

Table 1 of Attachment 2 contains two columns which lists both the actual updated burden estimates and a normalized burden estimate. The normalized value allows for adjusting future burden estimates to the number of licensees used in the baseline estimate.