

Date: January 30, 2002

SUMMARY OF INFORMATION COLLECTION REQUEST

Title: 10 CFR 73, Physical Protection of Plants and Materials

Current Burden/Responses: 401,194 hours/68,608 responses

Proposed Burden/Responses: 364,805 hours/77,734 responses

Frequency of Response: On occasion

Number of Respondents: 103

Reasons for Changes in Burden/Responses: The estimated burden has decreased from 401,194 hours (43,134 reporting and 358,060 recordkeeping) to 364,805 hours (45,835 reporting and 318,970 recordkeeping). The recordkeeping burden decreased by 39,090. However, the reporting burden increased by 2,701 hours from 43,134 hours to 45,835 hours. The estimated number of responses also increased by 9,274 from 68,357 to 77,631 because the requirements for Sections 73.26(f)(2), 73.46(h)(5), 73.57(b)(3) and 73.71(d) which were previously omitted from the last clearance package.

The major reporting burden changes are as follows:

Increases for Sections 73.26(f)(2) (4 hrs); 73.46(h)(5) (200 hrs); 73.55(h)(4) (2 hrs); 73.57(b)(3) (16,000 hrs) and 73.71(d) (240 hrs), totaling 16,446 hours which were previously omitted from the package;

the burden for the number of licensee employees requiring fingerprinting under Sections 73.57(a), (d) and (e) was reduced by 11,450 hours, from 30,000 to 18,550 hours, based on the actual number of fingerprints cards submitted to the NRC during the past 3 years with a corresponding reduction in the number of responses from 60,000 to 37,100.

the burden for Section 73.55(c)(9), totaling 1,340 hours was eliminated because the requirement has been met.

Also, in the previous clearance package, there was an error in calculating the reporting burden. It should have been 42,567 hours instead of 43,134, a difference of 567 hours. The number of responses was also mis-calculated and should have been 68,357 instead of 68,608, resulting in a decrease of 251 responses.

The major recordkeeping burden changes are as follows:

Increases for Sections 73.26(g)(1) (20 hrs); 73.26(h)(6) (5 hrs); 73.51(d)(6) (4 hrs); and 73.67(c)(1) (80 hrs), totaling 109 which were previously omitted from the package;

the burden for licensees to establish and maintain contingency plan records for Section 73.20(c) was reduced from 200 to 20 hours, based on discussions with the 2 licensees that maintain these records that it takes 10 hours instead of 100 hours to review and maintain these records.

the burden for Sections 73.55(c)(8) (16,967 hours), 73.55(c)(9)(iv) (8,400 hours), and 73.55(c)(10) (6,060), totaling 31,427 hours was eliminated because the requirement has been met.

Also, in the previous clearance package, there was an error in calculating the recordkeeping burden. It should have been 350,468 instead of 358,060, a difference of 7,592 hours.

The number of recordkeepers was reduced from 7,300 to 103. This reduction was due to an error in capturing the universe of respondents instead of only those required to keep records in accordance with specific sections of Part 73.

There is a change in cost because the hourly rate increased from \$125/hr. to \$144/hr.

Licensees contacted: BWX Technologies Inc., Carolina Power and Light, Edlow International, Nuclear Fuel Services, University of Missouri, Braidwood Nuclear Power Plant, Exelon/Bryon Nuclear Power Plant, Exelon/Dresden Nuclear Power Plant, LaSalle-Edison Nuclear Power Plant, and Massachusetts Institute of Technology. See attached list.

Level of Concurrence: Chief
Licensing and International Safeguards Branch
Division of Fuel Cycle Safety and Safeguards
Office of Nuclear Material Safety and Safeguards

Recordkeeping Requirements in Accordance with the Retention Periods for Records Rule: Yes

Search of the Information Requirements Control Automated System (IRCAS):
IRCAS was searched, no duplication was found.

Abstract: 10 CFR 73 prescribes requirements for establishment and maintenance of a physical protection system with capabilities for protection of special nuclear material at fixed sites and in transit and of plants in which special nuclear material is used. The information in the reports and records is used by the NRC staff to ensure that the health and safety of the public is protected and that license possession and use of special nuclear material is in compliance with license and regulatory requirements.

cc: B. St. Mary