

DRAFT SUPPORTING STATEMENT  
FOR  
10 CFR 50.70 TEAM INSPECTIONS OF POWER REACTOR LICENSEES

Description of the Information Collection.

Pursuant to the Atomic Energy Act of 1954, as amended, the U.S. Nuclear Regulatory Commission (NRC) has the responsibility and authority to regulate nuclear power plants. The NRC verifies licensees' compliance with NRC rules and regulations by conducting inspections. 10 CFR Part 50.70 requires power-reactor licensees to permit inspection of licensee records, premises, activities, and of licensed material as necessary for the NRC to ensure public health and safety. For three types of inspections, the NRC plans to request licensees to submit relevant information before the inspection to improve efficiency and effectiveness for both the licensee and the NRC. Licensees will be encouraged to transmit this information electronically to reduce burden on themselves and the NRC.

A. JUSTIFICATION

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

The Reactor Oversight Process (ROP) defines the inspection program for power reactors. Within the ROP, three types of inspections require extensive planning due to their scope and depth. Relevant inspection information is needed before these inspections to effectively conduct on-site activities and to prevent inefficient use of licensee and NRC resources. The recordkeeping requirement for licensees to maintain this relevant inspection information is established in 10 CFR Part 50.71 and the burden is included in each relevant section of this clearance. The three inspection procedures (IPs) are listed below along with a description of needed information.

IP 71111.05, "Fire Protection" inspection is performed every three years. Information requested to prepare for this inspection includes a copy of selected system drawings and procedures; selected information related to system design, system risk, and licensing basis information; and a list of recent fire protection tests, recent problems, and corrective actions. This information is needed to assess the licensee's ability to safely shut down the plant after a fire.

IP 71111.21, "Safety System Design and Performance Capability" inspection is performed every two years. Information requested to prepare for this inspection includes a list of recent system performance problems, corrective actions, system modifications, and operability evaluations; selected information related to system design, system risk, and licensing basis information; and a copy of selected system diagrams, operating and testing procedures. This information is needed to assess whether a selected safety system or selected plant components used for optimal mitigation of a risk-significant accident sequence can be relied upon to meet functional requirements that prevent damage to the reactor core.

IP 71152, "Identification and Resolution of Problems" inspection is performed every two years. However, an additional inspection may be performed at a site if warranted by declining plant performance (typically this triggers one additional inspection per year). Information requested to prepare for this inspection includes a list of recent equipment problems, self-assessments, root cause evaluations, and corrective action documents; and a copy of the corrective action program and equipment monitoring program procedures. This information is needed to gain insights regarding the licensee's ability to promptly identify and resolve problems.

2. Agency Use of Information.

The information requested will be reported to and used by the inspectors responsible for evaluating licensee compliance with existing rules and regulations. The requested information will be used to focus on-site inspection on the most significant licensee activities and will help achieve more accurate inspection results during the short time available for on-site inspection. Accurate inspection results are needed to correctly assess licensee performance, to determine the level of agency oversight, and to allocate agency inspection resources efficiently. Inspectors also request information for other inspections, but these information requests involve issues unique to individual facilities and therefore are not subject to the Paperwork Reduction Act requirements. This off-site preparation improves effectiveness and minimizes the impact on licensees and NRC resources.

3. Reduction of Burden Through Information Technology.

There is no legal obstacle or any obstacle to licensees reducing the burden associated with this information collection by use of information technology or otherwise. Licensees will be encouraged to transmit requested inspection information electronically to reduce burden on both industry and the NRC.

4. Effort To Identify Duplication and Use Similar Information.

No sources of current similar information are available, and the time and effort for NRC to update this information is excessive and prone to error. Although requested records are available on-site, the NRC needs them before the inspection, so they can appropriately plan for the inspection. Licensees support this approach (see attached letter). Otherwise, a licensee would have to support a separate and additional NRC on-site activity to plan for the inspection.

Additionally, NRC plans to update the affected inspection procedures to ensure that inspectors seek out available sources of similar information to eliminate duplication and to not burden the licensees with unnecessary information requests. No source of similar information is reported to other federal agencies.

5. Effort to Reduce Small Business Burden.

The information collection does not impact small business as all respondents are nuclear power plant licensees.

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

The NRC and licensee resources would be less effective and less efficiently utilized if relevant inspection information is not available or is available less frequently. That is, the NRC would have to accept less accurate inspection results or keep inspectors on site longer (who would engage supporting licensee resources longer) to achieve the same level of accuracy. This inspection information is needed to properly plan for these detailed and resource intensive inspections.

7. Circumstances which Justify Variation from OMB Guidelines.

Normally, this information collection will not vary from OMB guidelines. However, there may be occasions when the information will be requested less than 30 days to ensure that the information is current.

8. Consultations Outside the NRC.

To develop the reactor oversight program, including reactor inspections, the NRC has worked closely with the nuclear-power industry, public stakeholders, and the Nuclear Energy Institute (NEI), an industry group representing the power reactor industry. NRC and industry representatives have met frequently, as a working group, at least 10 times a year since 1998.

On May 8, 2003, Anthony Pietrangelo of NEI stated in the attached letter to the NRC that the "nuclear utility industry strongly supports the Reactor Oversight Process and has no objection to providing this information to the NRC prior to the on-site portion of the inspections." In addition, the letter reported the estimated burden on licensees to report this information to the NRC. To obtain this estimated burden, NEI surveyed members of its Safety Performance Assessment Task Force (which represents over 70% of the nuclear utility industry and all four NRC regions). NRC's averaged burden estimates are based directly on the information obtained from industry.

9. Payment or Gift to Respondents.

Not applicable.

10. Confidentiality of the Information.

The NRC does not normally request confidential information. If it were to request such information, it would be handled in accordance with 10 CFR 2.790 of the NRC's regulations.

11. Justification for Sensitive Questions.

Not applicable.

12. Estimate of Industry Burden and Burden Hour Cost.

The following table reflects licensee burden to collect and report requested inspection information and is based on information from industry (see attached letter from NEI). There is no recordkeeping burden imposed by this information collection. There are 65 sites subject to the information collection. IP71111.05 inspections are done once every 3 years, and IP71111.21 and 71152 inspections are done every 2 years. The number of annual responses for IP 71152 counts the number of sites based on inspection frequency (half the sites being inspected per year) plus one anticipated additional inspection based on declining performance.

ANNUAL REPORTING BURDEN

	Number of Respondents	Responses per Respondent	Burden per Response	Total Annual Burden Hours	Cost @ \$156/Hr.
71111.05	22	1	164	3,608	\$562,848
71111.21	33	1	148	4,884	\$761,904
71152	34	1	85	2,890	\$450,840
TOTALS	89			11,382	\$1,775,592

13. Estimate of Other Additional Costs.

None.

14. Estimated Annualized Cost to the Federal Government.

These records are reviewed as a normal part of the routine inspection process and, therefore, incur minimal incremental cost to the government. This cost is fully recovered through fee assessments to NRC licensees pursuant to 10 CFR Parts 170 and/or 171.

15. Reasons for Change in Burden or Cost.

This is the initial inclusion of the burden for submitting information to the NRC to be used in the inspection effort.

16. Publication for Statistical Use.

This information will not be published for statistical use.

17. Reason for Not Displaying the Expiration Date.

The requirement is contained in a regulation. Amending the Code of Federal Regulations to display information that, in an annual publication, could become obsolete would be unduly burdensome and too difficult to keep current.

18. Exceptions to the Certification Statement.

There are no exceptions.

B. COLLECTIONS OF INFORMATION EMPLOYING STATISTICAL METHODS

Not applicable.