

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.

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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

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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

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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

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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

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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.

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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

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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

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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

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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

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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

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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

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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

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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.