

Date: July 17, 2002

## SUMMARY OF INFORMATION COLLECTION REQUEST

Title: 10 CFR Part 72, Geological and Seismological Characteristics for the Siting and Design of Dry Cask Independent Spent Fuel Storage Installations and DOE Monitored Retrievable Storage Installations, Proposed Rule

Current Burden/Responses: 41,283 hours/201 responses

Proposed Burden/Responses: 36,948 hours/192 responses

Burden Attributable to Third-Party Collections: None

Frequency of Response: Occasional, every 20 or 40 years

Reasons for Changes in Burden/Responses: The overall burden estimate for Part 72 has decreased from 41,283 hours (27,777 reporting and 13,506 recordkeeping) to 36,948 hours (16,502 reporting and 20,446 recordkeeping) for a net decrease of 4,335 hours (-11,275 hours for reporting and +6,940 hours for recordkeeping); and the responses decreased by 8.5 from 201 to 192 responses for the following reasons:

- the reporting burden associated with Section 72.7 would be reduced by 1,040 hours from 2,200 to 1,160 hours, with a reduction of 1 respondent from 11 to 10 respondents annually. This reduction is based on eliminating the need for ISFSI and MRS license applicants to seek exemptions from the requirements of Section 72.102(f)(1) under Section 72.7;
- the reporting burden associated with Section 72.16 would be reduced by 10,235 hours from 19,098 to 8,863 hours. This burden will include the burden associated with new proposed Section 72.103. While the proposed Section 72.103 would result in a burden increase because of the use of a more complex hazard analysis methodology (PSHA or suitable sensitivity analyses) in order to better characterize the seismic hazard, it reduces the burden for analysis and design of ISFSI or MRS systems, structures, and components, with the net result being a burden reduction of 3,869 hours. Further, the burden is reduced by 6,366 hours, reflecting up-to-date information on the estimated annual number of respondents, which NRC estimates to be 1 respondent, instead of 1.5 respondents, for a reduction of .5 respondent annually; and
- the recordkeeping burden associated with Section 72.212(b)(2) would be increased by 6,940 hours from 60 to 7,000 hours. The revised burden estimate is higher than previously reported by NRC and was re-estimated to include the burden associated with conducting the static and dynamic analysis to accurately characterize the seismic hazard of the facility. Although the number of recordkeepers has decreased by 7 from 10 to 3, the analytical burden and the burden to prepare the written evaluation have increased that are associated with the analytical effort necessary to evaluate and protect against seismic hazards.

Level of Concurrence: Director, Spent Fuel Project Office  
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 72 establishes requirements, procedures, and criteria for the issuance of licenses to receive, transfer, and possess power reactor spent fuel and other radioactive materials associated with spent fuel in an Independent Spent Fuel Storage Installation.

cc: B. St. Mary