

FINAL SUPPORTING STATEMENT
FOR
VOLUNTARY REPORTING OF PERFORMANCE INDICATORS

3150-0195
REVISION TO EXTENSION REQUEST

Description of the Information Collection.

In mid-1998, the nuclear industry offered to voluntarily send selected performance attributes known as performance indicators (PIs) to the NRC as part of a larger effort to improve the NRC's oversight process. In April 2000, the NRC implemented a new oversight process, which included the use of PI information. The NRC uses PI information, along with the results of audits and inspections, as the basis for NRC conclusions regarding plant performance and necessary regulatory response. Licensees transmit PIs electronically to reduce burden on themselves and the NRC.

The NRC is improving the PI program through a joint effort with public stakeholders, industry representatives, and the Nuclear Energy Institute (NEI)¹. In November 2001, NEI issued a guidance document to licensees for use in collecting and reporting PI data to the NRC "Regulatory Assessment Performance Indicator Guideline", NEI 99-02, Revision 2. In December 2001, the NRC endorsed this guidance in Regulatory Issue Summary 2001-25, "NEI 99-02, Revision 2, Voluntary Submission of Performance Indicator Data." Licensees already collect most of the PIs and report some of them to various industry groups. There is widespread industry support for the revised oversight process (see attached letter from NEI), and all reactor licensees have voluntarily submitted PIs since its implementation.

A. JUSTIFICATION

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

In response to concerns expressed by congressional committees, the nuclear industry, public interest groups, as well as the NRC's own internal reviews, the NRC revised its oversight process for commercial nuclear power plants. The new process, called "the reactor oversight process" (ROP), is more objective, predictable, and understandable. The use of PI information is a basic tenet of the ROP.

The ROP evaluates licensee performance on the basis of PIs and inspection results. PIs objectively measure the performance of plant systems and licensee programs in specific risk-significant areas. The use of PIs allows the ROP to be more objective and allows for a reduction in the amount of time licensees support NRC inspections. For those attributes for which PIs could not be identified or were not sufficiently comprehensive, the NRC developed inspection activities to obtain necessary information.

¹ NEI is a utility group whose mission is to "foster and encourage the continued safe utilization and development of nuclear energy in order to meet the nation's energy, environmental, and economic goals."

A joint industry/NRC working group has been refining the PIs as experience is gained with the ROP. To improve the "unavailability" PI, the working group developed a proposed replacement PI to monitor systems that perform the functions listed in item b below. The replacement PI would monitor two additional systems (essential service water and component cooling water) and it also monitors the reliability of the six systems. Currently, 10 reactor sites have volunteered to test the replacement PI. This effort may result in incremental adjustments to the replacement PI.

Under the ROP, licensees report PIs quarterly and retain records as long as necessary to calculate specific indicators, but in no case longer than 3 years.

The ROP PIs provide the following information:

- a. The number of:
 - unplanned scrams per 7,000 hours of critical operation
 - unplanned scrams with loss of normal heat removal in the preceding 12 quarters
 - unplanned transients per 7,000 hours of critical operation
 - safety system functional failures in the preceding 4 quarters
 - non-conformances with 10 CFR Part 20 requirements for high or very high radiation areas, or unintended personnel exposures in the preceding 4 quarters
 - occurrences of radiological effluent releases that exceed values derived from the Radiological Effluent Technical Specifications (RETS) or provisions in the Offsite Dose Calculation Manual (ODCM), if applicable, in the preceding 4 quarters
 - reportable failures of the security program to screen personnel in the preceding 4 quarters
 - reportable failures of the security program for personnel reliability in the preceding 4 quarters
- b. The unavailability (the percentage of time the system was unavailable for operation in the preceding 12 quarters) of systems that perform the following functions:
 - high-pressure injection
 - high-pressure heat removal
 - residual heat removal
 - emergency AC power
- c. The percentage of:
 - reactor coolant activity (as a percent of the Technical Specification limit)
 - reactor coolant leakage (as a percent of the Technical Specification limit)

- successful (accurate and timely) classifications, notifications, and protective action recommendations (as a percent of all such actions) by the Emergency Response Organization (ERO) during drills, exercises, and actual events in the preceding 8 quarters
- key ERO members who participated in emergency drills, exercises, or actual events in the preceding 8 quarters
- sirens that operated reliably in the preceding 4 quarters
- guard duty required to compensate for the unavailability of protected area security equipment (as a percent of total time) in the preceding 4 quarters

2. Agency Use of Information.

The Office of Nuclear Reactor Regulation (NRR) uses PIs, along with the results of audits and inspections, as the basis for determining whether performance thresholds (as described in the oversight program guidance) have been exceeded. The oversight process relies, in part, on performance insights gained from PI data to assess plant performance and trigger regulatory actions. PIs, along with the results of inspections, are made publically available on the Internet shortly after the end of each quarter.

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. PI data are transmitted electronically to reduce burden on both industry and the NRC.

4. Effort To Identify Duplication and Use Similar Information.

The PIs were selected to maximize usefulness, and consequently, they track specific performance over predetermined periods. Although licensees report similar information for 6 of the 18 indicators, this information is not always reported in sufficient detail to properly characterize issues to meet the requirements of the ROP. The industry expressed a strong preference to report PIs separately from other reporting requirements (even if there is some overlap with required reports) to expedite the development and implementation of the ROP and continues to support this preference.

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 could not implement the ROP as it is currently structured if PI information were limited or not available. The PI information is a critical element of the ROP. The PIs establish an objective basis for assessing licensee performance and allocating NRC inspection resources. The NRC would be forced to rely on inspections to obtain assessment information to the extent that PI information is not available.

7. Circumstances which Justify Variation from OMB Guidelines.

This information collection does not vary from OMB guidelines.

8. Consultations Outside the NRC.

The NRC has worked closely with the nuclear-power industry and public stakeholders to improve PIs during development of the reactor oversight process. NRC and industry representatives met frequently, as a working group, more than 10 times in 1998 and biweekly in 1999. The group has met at least monthly since 2000. NRC has held a number of public meetings (a 4-day public workshop on September 28-October 1, 1998, and public Commission briefings on April 2, 1998, November 2, 1998, January 20, 1999, March 26, 1999, July 19, 2001, July 20, 2001, and May 1, 2002) to provide information and to solicit comments on the revised process. The NRC held public workshops on the ROP, including PIs, on April 12-15, 1999, May 17-20, 1999, and July 23-25, 2002. NRC also met with industry at industry-sponsored workshops in June 2001, November 2001, January 2002, and February 2002.

There is broad agreement among the working group members on the usefulness of collecting PI data. The working group meetings typically last 7 hours and discuss PI attributes, including the availability of data, the clarity of each indicator, recordkeeping requirements, the reporting format, the estimated burden, and the data to be reported. As a result of these meetings, NEI issued a guidance document ("Regulatory Assessment Performance Indicator Guideline") for industry reporting of PIs in November 2001, which the NRC subsequently endorsed.

Although attendance at the working group meetings varies because of the frequency of the meetings, industry is typically represented by NEI, Entergy Nuclear Generation Company, Institute of Nuclear Power Operations, Exelon Generation, Nebraska Public Power District, Dominion Nuclear Connecticut, Inc., Public Service Enterprise Group, Southern California Edison Company, Progress Energy, Duke Energy Corporation, Southern Nuclear Operating Company, and Arizona Public Service Company.

On January 22, 1999, the NRC issued a *Federal Register* notice (64 FR 3576) soliciting public comments on the scope and content of the revised oversight process, including PIs. The comments overwhelmingly supported the new oversight process, including the collection of PIs.

Opportunity to comment on the information collection was published in the Federal Register on May 31, 2002 (67 FR 38149). No comments were received.

9. Payment or Gift to Respondents.

Not applicable.

10. Confidentiality of the Information.

No information normally considered confidential is requested. The NRC displays PI information on its Web site for public viewing.

11. Justification for Sensitive Questions.

Not applicable.

12. Estimate of Industry Burden and Burden Hour Cost.

The following table reflects licensee burden to provide PI information and is based on information from industry (see attached letter from NEI). The estimates include only additional hours needed above those already expended by licensees to report indicators to the Institute of Nuclear Power Operations or to comply with other regulatory requirements (e.g., the maintenance rule, 10 CFR 50.73 reporting, etc.).

Overall inspection hours were kept constant during the initial phase of implementing the new ROP. Recent inspection hours have decreased. However, the specific extent of decrease associated with the reporting of PIs under the ROP is difficult to quantify given the actions taken in response to the terrorist attacks on September 11, 2001. This information collection imposes a minimal recordkeeping burden due to efficiencies inherent with electronic storage and transmission of data.

The following table assumes there will be one response per reactor unit on a quarterly basis ($4 \times 103 = 412$ annual responses). The recordkeeping estimate includes time to maintain utility procedures and occasionally refine the PIs and related procedures to incorporate improvements learned from experience.

ANNUAL REPORTING BURDEN

	No. Annual Responses	Burden per Response	Total Annual Burden Hours	Annual Cost at \$150/hr
PI Reporting	412	200	82,400	\$12,360,000

ANNUAL RECORDKEEPING BURDEN

	No. of Utilities	Burden per Utility	Total Annual Burden Hours	Annual Cost at \$150/hr
Recordkeeping	33	40	1,320	\$198,000

Total annual burden is 83,720 (82,400 hours plus 1,320 burden hours) annually.

13. Estimate of Other Additional Costs.

NRC has determined that the storage and equipment costs per foot are approximately \$45. The quantity of records to be maintained is roughly proportional to the recordkeeping burden. Based on the number of pages maintained for a typical clearance, the records storage cost has been determined to be equal to .0004 percent of the recordkeeping burden cost. Therefore, the storage cost for this clearance is insignificant - \$79 (1320 recordkeeping hours X \$150/Hr X .0004).

14. Estimated Annualized Cost to the Federal Government.

The information provided by these indicators was reviewed as a normal part of the previous 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.

The burden has increased significantly because licensees have increased their estimate of the time to accurately collect and report PIs. The burden estimates have been revised to be reported by unit for reporting requirements and by utility for recordkeeping requirements to conform with the burden estimates that NEI provided for the requirements. The increase is due to the experience gained by licensees and the staff using PI data in regulatory decisions and the subsequent improvements to quality control measures needed to ensure sufficient accuracy of the PI data. The PI reporting burden increased from 13,200 hours to 82,400 hours while the recordkeeping burden has increased from 660 to 1320 hours. The recordkeeping burden has increased due to the effort to refine PIs and site-specific procedures to incorporate improvements learned from experience.

Other changes to the PI program are largely offsetting. The burden on 10 plants evaluating a replacement PI for the unavailability PI will slightly increase during the program. A precise estimate of the burden is not possible because the scope of the program has not been defined yet. If the unavailability PI is revised, the burden will increase slightly for all plants. Although the burden of collecting and reporting the replacement PI will be minimal, there will be a one-time burden associated with establishing monitored system parameters and success criteria. The reduction in burden associated with eliminating the containment leakage PI is expected to offset this increase.

16. Publication for Statistical Use.

This information will not be published for statistical use.

17. Reason for Not Displaying the Expiration Date.

The expiration date will be displayed.

18. Exceptions to the Certification Statement.

There are no exceptions.

B. COLLECTIONS OF INFORMATION EMPLOYING STATISTICAL METHODS

Not applicable.