

SUPPORTING STATEMENT FOR PROPOSED RULE  
10 CFR PART 50  
"RISK-INFORMED CATEGORIZATION AND TREATMENT OF STRUCTURES, SYSTEMS,  
AND COMPONENTS"

(OMB CLEARANCE NOS. 3150-0011, 3150-0035, AND 3150-0104)

DESCRIPTION OF THE INFORMATION COLLECTION

Existing regulations in 10 CFR Part 50 (OMB Clearance No. 3150-0011) specify recordkeeping and reporting requirements associated with structures, systems, and components (SSCs) used in a nuclear power plant. The subject rulemaking would revise certain provisions of these regulations as they pertain to "treatment" requirements, meaning those quality assurance programs, testing, reporting requirements and other activities intended to add confidence that SSCs can perform their intended safety functions when needed. The rulemaking provides, in a new section 50.69, a voluntary alternative set of requirements under which a licensee may obtain relief from some unnecessary regulatory burden for those SSCs that are determined through a risk-informed categorization process to be of low safety-significance. The rule is intended to provide more flexibility to licensees in the application of treatment requirements for low safety-significant SSCs, by replacing some of the prescriptive programmatic requirements with more general performance requirements. In addition, requirements are being included to specify the process for obtaining NRC approval for implementing the alternative requirements and for licensee preparation of ongoing SSC performance evaluations against established standards. The rule provisions would modify the recordkeeping and reporting requirements only for those licensees or applicants who choose to implement the alternative requirements.

To use the alternative provisions of proposed section 50.69, the rule would require that a licensee or applicant evaluate the safety significant functions of SSCs and categorize each SSC into one of four categories (defined as RISC-1, RISC-2, RISC-3, and RISC-4, depending on its safety-significance function). The rule would establish revised treatment and less prescriptive and burdensome information collection requirements for safety and non-safety SSCs categorized as performing low safety-significant functions (RISC-3 and RISC-4), but would also add requirements for on-going evaluations to ensure safety standards are maintained and that records of categorization decisions be kept.

Because the information collection requirements for RISC-3 and RISC-4 SSCs would be handled in the new section 50.69, the information collection burden for these SSCs that was covered by other sections would be reduced. The sections that would have burden reductions for licensees choosing to implement section 50.69 are some sections within Part 50 (OMB clearance number 3150-0011), section 21.21(a) and (d) (OMB clearance number 3150-0035), and section 50.73 (OMB clearance number 3150-0104). No information collection requirements are being changed in these sections (other than the addition of new section 50.69). The current information collection requirements and their burden reductions are discussed under "Justification" for these sections.

The rule provisions may be used by applicants for a license to be issued under Parts 50 or 52, as well as by holders of operating licenses issued under Parts 50 or 54. A licensee or applicant choosing to use the provisions of section 50.69 would be required to obtain NRC approval of its categorization process and supporting probabilistic risk analysis, by either including the information in its application for license, or by submitting a license amendment request with the required information, using the existing processes in section 50.34, section 50.90 or Part 52.

The exact number of facilities affected is uncertain because the information collection is associated with voluntary alternative requirements.

No changes in burden are being included for applications submitted under Part 52 and covered by OMB clearance number 3150-0151. It is unlikely that applicants for design certifications will use these alternative requirements, as licensees opting to use the design would also need to use the alternative requirements. Furthermore, the small change in burden for addressing one minor subset of requirements versus an alternative set is negligible against the overall burden for submittal of a license application.

## A. JUSTIFICATION

### 1. Need for the Collection of Information.

Section 21.21 (a) and (d) requires that each organization subject to the requirements (e.g., power reactor licensees and suppliers of basic components) report defects in components that could create a substantial safety hazard. Part 21 also requires each organization subject to it to maintain such records as may be required to assure compliance. The regulatory requirement is not being changed. Section 50.69(b)(1) would relieve licensees who adopt section 50.69 from the Part 21 requirements for those SSCs that are determined to be of low safety-significance. For those licensees, some small reduction in burden may result for any SSC determined to be RISC-3 for which the licensee may identify a defect (in the future) or in future procurement actions for such SSCs. Therefore, the overall burden for section 21.21 (OMB clearance number 3150-0035) would be slightly reduced. There is no impact on suppliers of components.

Section 50.49 (j) requires that a licensee keep files in an auditable form of their program for qualification of electrical equipment in its environmental conditions, including performance specifications, conditions, and method of qualification. The proposed rule would make no changes to this paragraph. However, as a result of implementation of section 50.69, a licensee would be relieved of these specific requirements for RISC-3 SSCs (and for any RISC-4 SSCs to which it currently applies). Instead, these licensees would be subject to the more general requirements in section 50.69(d)(2) for these components. There could be some small reduction in recordkeeping burden for any future replacements of an SSC that would not be subject to the section 50.49 requirements. Although the burden decrease for RISC-3 and 4 requirements is estimated at 80% as compared to the section 50.49 requirements, the actual burden reduction is only about 100 hours for each of four licensees, because there are only minimal RISC-3 and 4 requirements associated with SSC replacements.

Section 50.55(e) requires that each entity subject to its requirements (holders of construction permits or other entities supplying components) evaluate deviations, submit reports of defects, and maintain records necessary to accomplish the purposes of the section. The proposed rule would remove the requirements of this section for a construction permit holder (who is now an applicant) for RISC-3 SSCs. No estimate is given for any change in burden because, at the present time, there are no such entities, nor are any expected in the near future. Even were there to be such affected facilities, the burden change would be expected to be small because there are relatively few

defects that would be reportable under these provisions, and the potential impact is only for that subset of SSCs recategorized as of low safety-significance.

Sections 50.55a (f) and (g) incorporate by reference certain requirements of the American Society of Mechanical Engineers Boiler and Pressure Vessel Code. The Code sets forth requirements to which nuclear power plant components are constructed, tested and inspected. The Code contains information collection requirements that impose a recordkeeping and reporting burden. Section 50.69(b)(1) would relieve some of the section 50.55a requirements for licensees who adopt section 50.69 for SSCs that are determined to be of low safety-significance. In particular, requirements for inservice inspection and testing of some components and for repair of other components would be revised. Instead of the specific requirements in the Code, the more general requirements of section 50.69(d)(2)(iii) and (e)(3) would apply. As a result, burden reduction is anticipated for recordkeeping requirements associated with some of the Section XI requirements of the Code, for some fraction of components. While the burden from section 50.55a would be removed, some burden from section 50.69 would be established in its place. The estimate assumes 30% of the (safety-related) components end up being RISC-3, and that the reduction in burden is by one-third (that is, the existing section 50.55a burden would be removed and the section 50.69 burden imposed instead). This is reflected in the table.

Section 50.65(a)(1) through (3) requires that a licensee document performance of SSCs within its scope against goals, including data collection, trending, and analysis; document preventive maintenance programs; and conduct periodic assessments. As a result of implementation of section 50.69, a licensee would be relieved of these specific requirements for RISC-3 SSCs but would instead be subject to the more general requirements in section 50.69(d)(2) and (e)(3). There could be some small reduction in recordkeeping burden with respect to the requirements for RISC-3 SSCs. It is estimated that 30% of safety-related SSCs would end up in RISC-3, and burden is reduced by 1/4 (that is, the section 50.65 burden would be removed, and the section 50.69 burden imposed).

Section 50.69 (b)(1) would allow power reactor licensees and applicants, licensees having a renewed license, and applicants for design certification to voluntarily comply with the requirements in section 50.69 for components categorized as RISC-3 and RISC-4. This would be an alternative to a number of requirements that require information collections, specifically, the reporting requirements in Part 21; section 50.49 qualification requirements, certain section 50.55(e) notifications of defects and failures to comply; section 50.55a in-service inspection and testing requirements (ISI/IST) and quality qualification requirements; section 50.65 maintenance monitoring except for maintenance risk-assessment; section 50.72 and section 50.73 event reporting; and quality assurance requirements in Appendix B.

For licensees choosing to use section 50.69 for SSCs categorized as RISC-3 and RISC-4 in lieu of the regulatory sections cited above, the rule would establish in paragraphs (d) and (e) new requirements that cover the same basic program elements, but with less specificity on how they are to be conducted and documented. Therefore, although some information collections will still be necessary, the burden should be reduced. Much of the burden reduction would arise during future activities, such as when a

replacement component is procured or when operational events or equipment problems arise, with potential reportability. In addition, there may be some reduction during periodic inspections and tests.

Section 50.69 (b)(2) through (b)(4) would specify that a licensee choosing to implement section 50.69 must submit an application for a license amendment that includes a description of (1) the categorization process for RISC-1 through RISC-4 SSCs, (2) the measures taken to assure quality of the evaluation methods, including results of a peer review, and (3) the basis for acceptability for evaluations to be conducted to show that the potential increase in risk would be small considering the changes to treatment permitted by implementation of section 50.69. An applicant for a license would include this information as part of their application for a license. The categorization process is the fundamental basis supporting the revised rule requirements. The Probabilistic Risk Assessment (PRA) used in the process provides important input to the process, because results can be influenced by the completeness and technical adequacy of the PRA. Therefore, NRC needs to review the PRA and other categorization process information to confirm its acceptability. There is a one-time burden for licensees to prepare and submit this application, with resulting burden reductions expected later in reporting and recordkeeping requirements for RISC-3 and RISC-4 SSCs. The NRC estimates that one or two licensees per year may apply and that the burden for the application is 480 hours per application. For applicants for a license, this requirement adds a negligible incremental burden for information to be submitted beyond what would already be necessary to comply with Part 50 or Part 52.

Section 50.69 (c) would specify how the categorization process is to be conducted. After approval of the application, the licensee or applicant would then have to perform evaluations of the significance of SSC functions, considering both internal and external events, and both active and passive functions in an integrated, systematic process, using an integrated decisionmaking panel to make the determination. To meet the requirements, a licensee (or applicant) would need to gather information to support preparation of the models (such as the PRA), gather information about the components within the systems, and prepare information about safety-significance. The majority of the estimated burden for this rulemaking is associated with the categorization process preparation and implementation. The NRC expects that implementation would occur over a period of years. Once the process has been approved, a licensee can begin to categorize on a system-by-system basis and take advantage of the reductions in treatment requirements for components in those systems. As stated in section 50.69(f), records of categorization determinations are required to be prepared and maintained.

Section 50.69(d)(1) would establish requirements for a licensee to evaluate treatment being applied to RISC-1 and RISC-2 SSCs to ensure that it is consistent with categorization process assumptions. This is a one-time requirement associated with developing the basis for the categorization process. No explicit recordkeeping requirement is included.

Section 50.69(d)(2) would require that a licensee or applicant develop and implement processes to control the design; procurement; inspection, maintenance, test, and surveillance; and corrective action for RISC-3 SSCs to provide reasonable confidence in their capability to perform functions under design basis conditions. These requirements

include certain elements presently covered by Appendix B to Part 50 (such as design control, procurement specification and corrective action) and by section 50.55a (f) and (g) and section 50.49. Subparagraph (i) of section 50.69 would require that design functional requirements and bases be maintained and controlled and that RISC-3 SSCs must be capable of performing their functions under specific conditions (environmental and seismic). Subparagraph (ii) would require that procured SSCs satisfy their design requirements. Subparagraph (d)(2)(iii) rule would require periodic inspections and tests be conducted and evaluated using prescribed acceptance criteria including data collection. Subparagraph (iv) would require the licensee to identify and correct in a timely manner conditions that could prevent an SSC from performing its required functions. The existing more detailed requirements for such programs are being removed as requirements for RISC-3 (and RISC-4) SSCs by this rulemaking. Again, these rule requirements would result in a reduction in level of detail from existing requirements, providing more flexibility to the licensee. While specific records are not identified for retention, licensees will keep some records so that they could show how they comply with this requirement if inspected. Further, it is anticipated that most licensees would need to review their existing processes to determine whether they comply with the specific requirements and make changes to procedures, data bases, or other activities as a result. Thus, there will be one-time implementation costs, with some reduction in annual costs for recordkeeping, following implementation.

Section 50.69 (e)(1) would require the licensee (or applicant) to review changes to the plant, operational practices, and operating experience to update the PRA and SSC categorization no longer than every 36 months. This requirement would likely result in a need for a licensee to retain information to be able to perform the required review.

Section 50.69 (e)(2) would establish requirements for a licensee to monitor performance of RISC-1 and RISC-2 SSCs and make adjustments to either categorization or treatment processes as necessary to maintain the validity of the categorization process and results. This requirement will necessitate the collection of information about performance of SSCs so that the licensee could determine if results are such that changes to its processes are needed. This requirement is an enhancement of existing requirements for documentation of performance goals, data collection and analysis, and periodic assessments as required by section 50.65. The net effect of the enhancement for RISC-1/2 and the reduced requirements for RISC-3 (see paragraph discussing section 50.65) is estimated as a small decrease in burden.

Section 50.69 (e)(3) would require consideration of data being collected to meet the maintenance, inspection, test and surveillance requirements of section 50.69(d)(2)(iii) for RISC-3 SSCs to determine whether there are any adverse changes in performance and to make adjustments as necessary to either categorization or treatment processes such that categorization process results remain valid. This is a reduction in information collection requirements relative to the maintenance rule (section 50.65(a)(1), which would no longer be required for these SSCs).

Section 50.69(f)(1) would require that records of the categorization of SSCs be prepared. In accordance with section 50.71(c), they must be retained until the license is terminated. This burden is included with the estimates for section 50.69(c).

Section 50.69 (f)(2) would require that a licensee update its FSAR, consistent with provisions of section 50.71(e) to reflect which systems have been categorized using section 50.69. Existing requirements in Part 50 specify that the FSAR is to be updated such that the FSAR contain complete and accurate information. As a result of implementation of section 50.69, licensees may need to revise their FSAR to the extent that it describes treatment requirements for SSCs (and submit the updated pages to NRC under existing section 50.71(e)). What would be required by section 50.69 is a status of which systems fall under section 50.69 requirements. This requirement is seen as having only a negligible impact on the existing update requirements.

Section 50.69 (g) would add a requirement, if not otherwise reportable, to submit a licensee event report under section 50.73(b) for any event or condition that would have prevented RISC-1 and RISC-2 SSCs from performing a safety-significant function. A small number of events would now be reportable that were not previously (e.g., some events affecting RISC-1 or RISC-2 SSCs). The staff estimates that this would result in a small increase in reporting burden.

Sections 50.72 and 50.73 require reports of events or conditions at a nuclear power plant (by telephone under section 50.72 and written reports under section 50.73). These requirements would be removed from RISC-3 SSCs for licensees who implement section 50.69. It is estimated that there would be only a small reduction in burden as a result because the majority of currently-reportable events and conditions would still be reportable. A negligible change in burden for section 50.72 is expected, so this is not shown in the tables.

Appendix B to Part 50 contains requirements for a quality assurance program for a nuclear power reactor covering several program elements such as design control, procurement control, corrective action, and records. The rule requires that sufficient records be maintained to furnish evidence of activities affecting quality and lists specific types of records that must be retained. As a result of implementation of section 50.69, licensees would be relieved of complying with Appendix B for RISC-3 SSCs, but would instead be subject to the more general requirements in section 50.69(d)(2). Because of the reduction in specificity of types of records to be retained, it is estimated that there would be some reduction in recordkeeping burden from Appendix B. This reduction would apply to the safety-related components recategorized as RISC-3, and while the Appendix B requirements would be removed, section 50.69 would still result in some records being kept. The estimate is that 30% of safety-related SSCs would now be categorized as RISC-3, and that the burden for RISC-3 SSCs would be reduced by one-half from the existing Appendix B burden.

The records being required by section 50.69 are needed to enable the NRC to assure that the licensee is properly exercising the authority granted by this section. The records to be retained contain vital information establishing the basis upon which requirements for treatment (the categorization results) as appropriate are founded. Without these records, NRC's ability to protect the health and safety of the public would be reduced. These records would be used by NRC inspectors to provide the background information needed by the NRC inspector during his or her visit to a licensed facility. The inspector would use these records to confirm the appropriateness of treatment being applied to plant SSC by confirming that they were properly

categorized. These records are being required in place of recordkeeping that would otherwise be imposed through other regulations, such as sections 50.49 and 50.65.

2. Agency Use of Information

The information to be submitted as part of an application to adopt the alternative requirements in section 50.69, in lieu of other requirements, will be used by NRC to confirm that the categorization process to be used, as well as the PRA which will provide results used in the decision process, are adequate to meet the rule requirements to appropriately categorize the SSCs. Thus, before the licensee or applicant would be permitted to revise any existing requirements, NRC would have the opportunity to confirm that the process is satisfactory.

The agency uses reports filed either under Part 21 or under section 50.73 to determine if reported defects or events involve potential generic safety problems that might require action to resolve. The agency would use the new reports involving safety-significant functions of RISC-1 and RISC-2 SSCs required by section 50.69(g) for a similar purpose as above. The reports no longer being required for RISC-3 SSCs are no longer considered necessary because of the new categorization of these SSCs as of low safety-significance.

3. Reduction of Burden Through Information Technology

There is no legal obstacle to the use of information technology. Moreover, NRC encourages its use. The NRC is implementing initiatives for electronic submission of information from licensees or applicants, which would be available for implementation of section 50.69.

4. Efforts to Identify Duplication and Use Similar Information

The information is not required by any other Federal regulation. The Information Requirements Control Automated System (INCAS) was searched, and no duplication was found. This information can only be obtained from licensees of (or applicants for) power reactors.

5. Effort to Reduce Small Business Burden

This information collection only affects licensees of power reactors (or applicants for licenses) who are not small business entities.

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

These regulations do not require that application for implementation be filed at a certain time. The NRC would not be able to ensure the public health and safety with respect to having a sufficient basis to allow revisions to treatment of SSCs if the categorization information is not submitted for review.

7. Circumstances Which Justify Variation from OMB Guidelines

These information collections do not vary from OMB guidelines.

8. Consultations Outside the NRC

Opportunity for public comment on the revised reporting and recordkeeping requirements associated with section 50.69 will be published in the Federal Register. Some public comment about the specific reporting and recordkeeping requirements was obtained during an early round of comment on draft rule language and was considered by NRC in preparation of the proposed rule.

9. Payment or Gift to Respondents

Not applicable.

10. Confidentiality of Information

No confidential information is generally received. However, proprietary or confidential information is handled in accordance with section 2.790 of the NRC regulations.

11. Justification for Sensitive Questions

This information collection does not require sensitive information.

12. Estimated Industry Burden and Burden Hour Cost

The burden from recordkeeping and reporting requirements arising from this rulemaking is estimated as shown in the attached Tables. For purposes of this estimate, NRC has used the assumptions used in its most recent information collection request to the Office of Management and Budget for existing regulations, except for those aspects specifically impacted by the rulemaking. The burden estimate, including an estimate of one-time costs, is shown in the attached Tables. As noted, the NRC concludes that the effect of the changes on recordkeeping and reporting requirements will be a small increase in the current burden, because of the one-time implementation burden, with burden reductions expected in subsequent years. There is considerable uncertainty in these estimates for a number of reasons: voluntary nature (which affects number of applicants); extent of SSCs that are RISC-3 or RISC-4 (which depends upon plant design); and burden impact (which depends upon events, need for replacement equipment, etc.). Costs for development of PRA and revisions to procedures would also vary depending upon the current state of the licensee's processes. Costs for applicants would be expected to be less since they would not yet have developed the programs and could factor the proposed rule requirements into their process.

While one-time costs will be incurred by the licensee/applicant for development of PRA and procedures, conducting the categorization, and NRC review, NRC expects cost savings to result from the added flexibility being provided for licensees to apply less prescriptive requirements to some SSCs in using section 50.69. Some of the savings will be with respect to records and reports, but the vast majority of the savings is

expected to result from procurement of equipment at reduced costs and savings in licensee staff hours to implement the lesser treatment requirements for some SSCs. These non-information collection burden reductions are discussed in the regulatory analysis.

13. Estimate of Other Additional Costs

None.

14. Estimated Annualized Cost to the Federal Government

The estimated annualized burden and cost to the government of 400 hours (100 hours per submittal x \$156/hour) for a total of \$62,400 is for review of the implementation submittal. This cost is fully recovered through fee assessments to NRC licensees pursuant to 10 CFR Parts 170 and 171.

15. Reasons for Change in Burden or Cost

The rule would decrease the burden slightly for existing sections where the information collection requirements would be moved to the new section 50.69 for those licensees choosing to implement the rule provisions (for a subset of SSCs). Overall, the rule is estimated to result in a net increase in the information collection burden by an estimated 4,126 hours. This burden is associated with the one-time cost to obtain the NRC approval to implement section 50.69 and to conduct the categorization. Upon implementation of section 50.69, a small net savings in information collection burden is expected.

16. Publication for Statistical Use

The collected information is not published for statistical use.

17. Reason for not Displaying the Expiration Date

The requirements are contained in regulations. 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

None.

B. COLLECTIONS OF INFORMATION EMPLOYING STATISTICAL METHODS

Not applicable.

## CHANGE IN ANNUAL REPORTING BURDEN (Decreases in parentheses)

SECTION (3150-0011)	NO. OF RESPONDENTS	ANNUAL RESPONSES PER RESPONDENT	TOTAL RESPONSES	BURDEN HOURS PER RESPONSE	TOTAL BURDEN HRS	COST @\$156/HR
50.69(g)	4	0.5	2	50	100	\$15,600
TOTAL REPORTING BURDEN					100	\$15,600

Note: Change in burden for section 50.72 is negligible and is not shown above.

SECTION (3150-0035)	NO. OF RESPONDENTS	ANNUAL RESPONSES PER RESPONDENT	TOTAL RESPONSES	BURDEN HOURS PER RESPONSE	TOTAL ANNUAL BURDEN HRS	COST @\$156/HR
21.21	4	(0.5)	(2)	95	(190)	(\$29,640)
TOTAL REPORTING BURDEN					(190)	(\$29,640)

Note: Actual changes are dependent upon many factors, such as number of SSCs that are RISC-3, operating experience, and future equipment purchases.

SECTION (3150-0104)	NO. OF RESPONDENTS	ANNUAL RESPONSES PER RESPONDENT	TOTAL RESPONSES	BURDEN HOURS PER RESPONSE	TOTAL ANNUAL BURDEN HRS	COST @\$156/HR
50.73	4	(1)	(4)	50	(200)	(\$31,200)
TOTAL REPORTING BURDEN					(200)	(\$31,200)

## CHANGE IN ANNUAL RECORDKEEPING BURDEN

SECTION (3150-0011)	NO. OF RECORDKEEPERS	BURDEN HOURS PER RECORD-KEEPER	TOTAL ANNUAL BURDEN HRS	COST @\$156/HR
50.49 (removed from RISC-3 and RISC-4)	4	(100)	(400)	(\$62,400)
50.55a (f) and (g) (removed from RISC-3)	4	(546)	(2184)	(\$340,704)
50.65 (removed from RISC-3)	4	(500)	(2000)	(\$312,000)
50.69(d)(2)	4	535	2140	\$333,840
50.69(e)	4	615	2460	\$383,760
Appendix B (removed from RISC-3)	4	( 300)	(1200)	(\$187,200)
TOTAL RECORD- KEEPING BURDEN			(1184)	(\$184,704)

Note: Estimates assume one third of current safety-related SSCs are RISC-3 and that burden of substitute requirements is in range of 1/3 to 3/4 of existing burden for data collections, depending upon the requirement. Estimates also include PRA update requirements and enhanced requirements for RISC-2 SSCs.

**ANNUALIZED ONE-TIME REPORTING BURDEN (3150-0011)**

SECTION	NO. OF RESPONDENTS	ANNUAL RESPONSES PER RESPONDENT	TOTAL ANNUAL RESPONSES	BURDEN HOURS PER RESPONSE	TOTAL ANNUAL BURDEN HRS	COST @\$156/HR
50.69(b)(2)	4	1	4	480	1920	\$299,520
TOTAL ONE-TIME REPORTING BURDEN					1920	\$299,520

This reflects burden of preparing the submittal to NRC about the categorization process and PRA information including peer review results and evaluations on small change in risk (and basis).

**ANNUALIZED ONE-TIME RECORDKEEPING BURDEN (3150-0011)**

SECTION	NO. OF RESPONDENTS	BURDEN HOURS PER RECORDKEEPER	TOTAL ANNUAL BURDEN HRS	COST @\$156/HR
50.69(d)(1)	4	20	80	\$12,480
50.69(c)	4	800	3200	\$499,200
50.69(d)(2) and (e)	4	100	400	\$62,400
TOTAL ONE-TIME RECORDKEEPING BURDEN			3680	\$574,080

Estimated cost for review and revision of licensee procedures for treatment practices to meet section 50.69(d) and (e). Annualized cost for categorization and documentation of basis for decisions under section 50.69(c) assumes implementation occurs over 3 years, but the licensee has the option to use a different period.

**TOTAL CHANGE IN INDUSTRY BURDEN** (reductions shown in parentheses) - Assumes 4 licensees/applicants (respondents) who decide to implement

3150-0011 (PART 50)	Hours	Dollars (\$156/hr)
RECURRING ANNUAL REPORTING BURDEN	100	\$15,600
RECURRING ANNUAL RECORDKEEPING BURDEN	(1184)	(\$184,704)
ANNUALIZED ONE-TIME REPORTING BURDEN	1920	\$299,520
ANNUALIZED ONE-TIME RECORDKEEPING BURDEN	3680	\$574,080
<b>TOTAL BURDEN</b>	<b>4516</b>	<b>\$704,496</b>

3150-0035 (Part 21)	Hours	Dollars (\$156/hr)
ANNUAL REPORTING BURDEN	(190)	(\$29,640)
<b>TOTAL BURDEN</b>	<b>(190)</b>	<b>(\$29,640)</b>

3150-0104 ( Section 50.73)	Hours	Dollars (\$156/hr)
ANNUAL REPORTING BURDEN	(200)	(\$31,200)
<b>TOTAL BURDEN</b>	<b>(200)</b>	<b>(\$31,200)</b>