Section 15

FINAL SUPPORTING STATEMENT
FOR
QUALITY ASSURANCE RECORDS

10 CFR 50.55a*, 50.54(a), 50.55(f), APPENDIX A (CRITERION 1), AND APPENDIX B

DESCRIPTION OF THE INFORMATION COLLECTION

Quality Assurance (QA) records associated with the activities listed below are used by the licensee, the National Board of Boiler and Pressure Vessel Inspectors, insurance companies and the NRC in the review and confirmation of quality related activities. Most States and all nuclear insurers require that the ASME Boiler and Pressure Vessel (B&PV) Code (Section III) be used in the design, construction, testing and inspection of nuclear power reactors.

Appropriate records of the design, fabrication, erection and testing of structures, systems and components important to safety shall be maintained by the licensee throughout the life of the plant.

1. Management: QA manual, procedures, and instructions
2. Qualification and training of personnel
3. Design
4. Procurement, items identification/control, acceptance status
5. Manufacture, installation/testing
6. Handling, storage and shipping
7. Inspection, testing and qualifying, including inspection status
8. Calibration
9. Special processes
10. Operation
11. Maintenance
12. Modification and repair
13. Audits
14. Non-conformance, corrective actions
15. Early Site Preparation

1. JUSTIFICATION

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

Licensee burden hours will be spent on QA records development and maintenance, which pertain to Items 1 through 15 listed above. Appendix B requires that records be maintained for plant equipment that the licensee has

* See Draft Supporting Statement, Section 16, for information collection requirements specified in 10 CFR 50.55a.

designated to be "safety-related." Licensees must also generate records as required by Appendix A for plant equipment that they have determined to be "important-to-safety." The burden hours are estimated to be inclusive of both Appendix A and B records.

Regulatory Guide 1.28 (Rev. 3), "Quality Assurance Program Requirements (Design and Construction)" describes an acceptable method for complying with QA record requirements in accordance with 10 CFR Part 50. Except for a few regulatory positions in the Regulatory Guide, it endorses the common industry standard ANSI/ASME NQA-1-1983, "Quality Assurance Program Requirements for Nuclear Facilities." Maintenance of records as specified above is necessary so that evidence can be furnished to show that activities affecting quality have been accomplished in accordance with NRC regulations.

The type of records identified specifically in Criterion XVII of Appendix B to 10 CFR Part 50 are of particular importance to provide adequate evidence that licensee activities affecting quality have been accomplished in accordance with NRC regulatory requirements. Records pertaining to items which are important to safety are expected to be available for inspection and audit by the NRC in accordance with Criterion 1 of Appendix A, and Criterion XVII of Appendix B to 10 CFR Part 50.

Reporting of changes to the QA program pursuant to 10 CFR Part 50.54(a) and 50.55(f) has been a requirement since March 1983. The licensee's QA Program Plan, after acceptance by the NRC, is a license condition. Any changes to this plan must be reported to the NRC like other license conditions of a similar nature. It is estimated that each licensee/applicant will initiate one such change per year. Such changes are included in the total license amendment requests reflected in the Section 1 Supporting Statement. In 2004-2007, it is expected that applicants will prepare and submit documents to support the issuance of Early Site Permits to build three new nuclear power plants.

2. Agency Use of Information

Records required to be maintained for a specific activity are specified in the license application, license condition or Early Site Permit, or NRC-approved documents. These records, some of which will be kept for the life of the facility, are available for inspection by the NRC, and are reviewed and examined to ascertain whether the activities affecting quality have been accomplished in accordance with NRC requirements. Also, in case of malfunction or failure of an item affecting safety, availability of plant records is necessary to aid in the determination of the cause of the failure. In addition, records maintenance is necessary for other important specific functions such as providing baseline data for in service inspection and providing data for trend analyses.

3. Reduction of Burden Through Information Technology

There is no legal obstacle to the use of information technology. Moreover, NRC encourages its use; however, at the current time, no responses are submitted electronically.

4. Effort to Identify Duplication and Use Similar Information

This information is only available from nuclear licensees. These records are not a duplication of any other records maintained by the licensee or Federal government. The Information Requirements Control Automated System (IRCAS) was searched for agency duplication, and none was found.

5. Effort to Reduce Small Business Burden

The subject provisions do not affect small businesses.

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

QA records are collected as they are generated during design, construction, operation, and decommissioning of the plants. Less frequent collection is not an alternative.

7. Circumstances which Justify Variation from OMB Guidelines

The records must be retained throughout the life of the plant in order to support the review and confirmation of quality related activities.

8. Consultations Outside the NRC

The opportunity for public comment was published in the Federal Register on August 29, 2003 (68 FR 52063). No comments were received.

9. Payment or Gift to Respondents

Not applicable.

10. Confidentiality of the Information

This information is usually not confidential. If it were, the information would be handled in accordance with 10 CFR 2.790 of the NRC regulations.

11. Justification for Sensitive Questions

These regulations do not require sensitive information.

12. Estimated Industry Burden and Burden Hour Cost

a. Estimated Annual Reporting Burden

104 licensees expend 160 burden hrs each per report reporting changes to the QA Programs (104 x 160)	16,640 hrs/yr
Licensee burden for each of the 3 Early Site Permits is estimated to be 1,000 hours (3 x 1,000)	3,000 hrs/yr
Total Reporting Hours:	19,640 hrs/yr

b. Estimated Recordkeeping Burden

Licensee burden for each of 104 operating reactors is 10,000 hours (104 x 10,000)	= 1,040,000 hrs/yr
20 permanently shutdown reactors is 2,500 hours (20 x 2,500) =	50,000 hrs/yr
Total Recordkeeping Hours:	1,090,000 hrs/yr

c. Total Burden and Cost

1,109,640 hrs/yr (19,640 + 1,090,000 hours) @ $156/hr = $173,103,840

13. Estimate of other Additional Costs

As discussed in Section 1 above, Regulatory Guide 1.28 describes an acceptable method for complying with QA record requirements. Licensees preserve the records in storage facilities that provide protection from hazards such as winds, floods, fires, and environmental conditions such as adverse humidity conditions.

The precise costs associated with the records storage facilities are not known by the NRC; however, we have developed an estimate based on the recordkeeping cost. Based on the number of pages maintained for a typical clearance, the records storage cost has been determined to be .0004 times the recordkeeping burden cost. Therefore, the storage cost for this clearance is estimated to be $68,016 (1,090,000 hours x $156 x .0004).

14. Estimated Annualized Cost to the Federal Government

QA records are generated and maintained by licensees. The incremental cost of NRC audits and inspection of QA records is a small part of the total NRC inspection program consisting of the resident inspectors, regional inspections, and special inspections. Based on NRC staff experience, it is estimated that 333

hours/operating reactor and 83 hours/permanently shutdown reactor of the inspection effort is associated with records review. The total staff hours spent on records review is estimated to be 36,292 hours (333 hrs x 104 operating reactors and 83 hrs x 20 permanently shutdown reactors). The annual NRC staff burden to review licensee QA plan changes is approximately 3,120 hours (30 hrs x 104 operating reactors). The annual NRC staff burden to review licensee ESP QA plans is approximately 2,070 hours (690 x 3 reactor sites).

Therefore, the estimated Federal cost is expected to be $6,471,192 ($156 x 41,482 hours).

This cost is fully recovered by fee assessments to NRC licensees pursuant to 10 CFR Parts 170 and/or 171.

15. Reasons for Changes in Burden or Cost

The burden increase reflects three Early Site Applications to build new nuclear power plants. It also moved 1,090,000 hours from reporting to recordkeeping which accurately reflects the correct recordkeeping hours and reduced the number of responses by 120. Additionally, reflects an increase in the base burden cost from $141 to $156 per hour.

16. Publication for Statistical Use

The collected information is not published for statistical purposes.

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

None.

B. COLLECTIONS OF INFORMATION EMPLOYING STATISTICAL METHODS

Not applicable.