Section 16

FINAL SUPPORTING STATEMENT
FOR
CODES AND STANDARDS

10 CFR 50.55a

DESCRIPTION OF THE INFORMATION COLLECTION

The NRC regulations in 10 CFR 50.55a incorporate by reference Division 1 rules of Section III, "Rules for Construction of Nuclear Power Plant Components," and Section XI, "Rules for Inservice Inspection of Nuclear Power Plant Components," of the American Society of Mechanical Engineers Boiler and Pressure Vessel Code (ASME B&PV Code); and the rules of the ASME “Code for Operation and Maintenance of Nuclear Power Plants” (ASME OM Code). These rules of the ASME B&PV and OM Codes set forth the requirements to which nuclear power plant components are constructed, tested, and inspected. The ASME Codes contain information collection requirements that impose a recordkeeping and reporting burden. In general, the records prepared are not collected by the NRC, but are retained by the licensee to be made available to the NRC, if requested, at the time of an NRC audit.

The information collection requirements imposed by 10 CFR 50.55a through incorporation by reference of the ASME Codes apply to activities associated with the construction and operation of nuclear power plants. The actual number of plants affected by the various ASME Code editions and addenda incorporated by this regulation, and thereby affected by the information collection requirements, is dependent on a variety of factors. These factors include whether the application is for construction, operation, the class and type of components involved; the date of the construction permit application; the schedule of the inservice inspection (ISI) and inservice testing (IST) programs; and whether the plant licensee voluntarily elects to implement updated editions and addenda of the ASME Code. Section III of the ASME B&PV Code applies to the construction of new plants, and, through reference by Section XI of the ASME B&PV Code, the repair and replacement activities in operating plants. Section XI of the ASME B&PV Code and the ASME OM Code apply solely to operating plants. At present, there are no nuclear power plants under construction, and 104 that are licensed to operate. The following analysis of information collection requirements determines the ASME B&PV Code, Section XI, and the ASME OM Code burden for 104 operating plants, including the burden associated with repair and replacement activities. In addition, since no new plants are presently scheduled for the future, an evaluation has not been made to estimate what the information collection burden for a single new plant would be as a result of Section III being incorporated by reference in § 50.55a.

Section 50.55a specifies that the ASME Code edition and addenda to be applied to reactor coolant pressure boundary, and Quality Group B and Quality Group C components must be determined by the provisions of paragraph NCA-1140 of Subsection NCA of Section III of the ASME B&PV Code. NCA-1140 specifies that the Owner (or his designee) shall establish the ASME Code edition and addenda to be included in the Design Specifications, but that in no case shall the Code edition and addenda dates established in the Design Specifications be earlier than three years prior to the date that the nuclear power plant construction permit application is docketed. NCA-1140 further states that later ASME Code editions and addenda

may be used by mutual consent of the Owner (or his designee) and Certificate Holder. It is permissible for individual operating plants to implement improved rules in later editions and addenda on a voluntary basis, but unless they make that choice, there is no additional paperwork burden associated with incorporating later Section III editions and addenda than that to which they are committed. New plants would be required to construct the facility in accordance with applicable Section III edition and addenda.

Owners of nuclear power plants are required to establish ISI and IST programs in accordance with the requirements of the latest edition and addenda of the ASME Code that have been incorporated by reference into 10 CFR 50.55a as of 12 months prior to the date of issuance of the operating license. Licensees are required to update their ISI and IST programs in accordance with the latest edition and addenda of ASME Code that have been incorporated by reference as of 12 months prior to the start of the next 120-month inspection interval. Conservatively, the total number of plants that may ultimately be required to implement a particular ASME Code edition and addenda is 104.

Section III, Section XI, and the OM Code specify certain recordkeeping and reporting requirements. These requirements are generally identified in Section III Subsection NCA and Section XI Article IWA-6000 of the ASME B&PV Code, and in Subsection ISTA of the ASME OM Code. In addition, specific technical requirements may result in an additional information collection burden. This analysis of information collection burden evaluates all general information collection activities, any significant additional burden that may be imposed as a result of specific technical requirements, and information collections imposed as a result of licensee requirements specified directly in § 50.55a.

Recordkeeping Requirements

Section III

Section III, Subsection NCA specifies recordkeeping requirements for Class 1 (Subsection NB), Class 2 (Subsection NC), and Class 3 (Subsection ND) components. These provisions require the Owner to:

- Prepare and submit to the ASME necessary forms to obtain an Owner's Certificate of Authorization, and to obtain a written agreement with an Authorized Inspection Agency (AIA), prior to application, to provide inspection and auditing services (NCA-3230). This activity by the Owner occurs after receipt of notification from the NRC that an application for a Construction Permit has been docketed. The information to be supplied by the Owner when making an application is identified in the forms issued by the ASME. It is estimated that completion of these information forms takes 80 p-hours/plant. No construction permits are expected to be docketed during this clearance period. (one-time recordkeeping)

- Prepare and file ASME Form N-3, "Owner's Data Report for Nuclear Power Plant Components" (NCA-3270). Information to be included on this form identifies the Owner and location of the plant, and the nuclear vessels, piping, and pumps and valves installed within the plant. Information required to identify each component

includes certificate holder and serial number, system identification, state number, national board number, and year built (NCA-3270). Form N-3, which is provided by the ASME, expedites the documentation of this information. It is estimated that the time to obtain the necessary information and to document that information on Form N-3 is 400 p-hours/plant. None are anticipated. (one-time recordkeeping)

- Document that a review of the Design Report has been performed to verify that all Design and Service Loadings have been evaluated and meet the acceptance criteria (NCA-3260). It is estimated that review of the Design Report, with documentation of any areas that need to be revised, takes 2000 p-hours/plant. No reviews are expected. (one-time recordkeeping)

- Provide and file the Overpressure Protection Report required for the nuclear protection system (NCA-3220 (m) and (n)). This report includes the overpressure protection requirements for each component or system, including location of the overpressure protection devices, identification of the edition and addenda, system drawings, range of operating conditions, and an analysis of the conditions that give rise to the maximum pressure relieving requirements (NB/NC/ND-7200). It is estimated that the time associated with preparing the Overpressure Protection Report is 2000 p-hrs, which is comprised of 1600 p-hours associated with obtaining and developing the necessary information and 400 p-hrs for collating the information into the necessary report. No reports will be prepared in this clearance period. (one-time recordkeeping)

- Document a Quality Assurance Program, and file copies of the Quality Assurance Manual with the Authorized Inspection Agency (NCA-8140). This documentation includes programs for surveying, qualifying, and auditing suppliers of subcontracted services (e.g., nondestructive examination contractors, material suppliers, and material manufacturers). Although Section III identifies the need for a documented Quality Assurance (QA) program, the primary NRC requirement for an overall QA program is contained in 10 CFR 50, Appendix B, "Quality Assurance Criteria for Nuclear Power Plants and Fuel Reprocessing Plants." (See Section 15 supporting statement.) Therefore, no additional information collection burden is imposed on Owners by the quality assurance provisions of Section III which are incorporated by reference into Section 50.55a.

- Provide, correlate, and certify Design Specifications (NCA-3250). This requires that the component Design Specification be provided in sufficient detail to form the basis for fabrication in accordance with the rules of Section III. The Design Specifications shall be certified to be correct and complete and to be in compliance with the requirements of NCA-3250 by one or more competent Registered Professional Engineers (NCA-3252). Although this is a requirement of Section III, its incorporation by reference in Section 50.55a does not impose an additional information collection burden on the Owner. Preparation and certification of design specifications for construction of engineered structures is a routine and necessary engineering practice, which occurs with or without the incorporation of this Section III provision into Section 50.55a.

- Designate records to be maintained and provide for their maintenance (NCA-3280). Although Section III identifies the need for specific record retention, the primary NRC requirement for record retention is specified in 10 CFR 50, Appendix B, Criterion XVI (Quality Assurance Records). (See Section 15 supporting statement.) Therefore, no additional information collection burden is imposed on Owners by the record retention provisions of Section III which are incorporated by reference into Section 50.55a.

Section XI

Section XI, Subsection IWA specifies recordkeeping requirements for ISI of Class 1 (Subsection IWB), Class 2 (Subsection IWC), Class 3 (Subsection IWD), Class MC (Subsection IWE), and Class CC (Subsection IWL) components. These recordkeeping requirements require the Owner to:

- Prepare records of the preservice and inservice examinations of Class 1 and Class 2 pressure retaining components and their supports on ASME Form NIS-1, "Owner's Report for Inservice Inspections." Information to be included on Form NIS-1, which expedites documentation of the required information, includes identification of the component (i.e., name of component, name of manufacturer, manufacturer serial number, state number, national board number), examination dates, the applicable Section XI edition and addenda, and abstracts of the examination and tests, including results, and any corrective measures (IWA-6220).

  Section XI examinations are performed on the basis of a 10-year interval (i.e., all components to be examined, are examined within 10 years), with examinations distributed over three 40-month periods. For the purpose of this burden calculation, it has been estimated that it takes 160 p-hours to obtain and document the information required on Form NIS-1 for the examinations during one 40-month examination period at one plant. This averages to approximately 50 p-hrs/year/plant, or a total industry recordkeeping burden of 5,200 p-hrs/year (104 plants X 50 p-hrs/year/plant).

- Document the repairs and replacements in the inservice inspection summary reports on existing Form NIS-2, "Owner's Report for Repair or Replacements." Information to be included on ASME Form NIS-2 includes identification of the component (i.e., name of component, name of manufacturer, manufacturer serial number, national board number, year built) and system, the applicable construction code and Section XI edition and addenda, repair organization, and a description of the work performed (IWA-7520).

  Form NIS-2 expedites documentation of the required information. For the purpose of this burden calculation, it has been estimated that, on the average, 50 components are repaired each year by each plant in accordance with Section XI rules. It is estimated that it takes 2 hours to document the repair of an individual component on Form NIS-2. This results in a recordkeeping burden associated with this documentation of 100 p-hours/year/plant, or a total industry recordkeeping burden of 10,400 p-hrs/year (104 plants X 100 p-hrs/year/plant).

- Prepare plans and schedules for preservice and inservice examination and tests (IWA-6210). It is estimated that the preparation of the plans and schedules for preservice and inservice examination requires 1600 p-hours, and the plans and schedules for preservice and inservice testing requires 400 p-hours. Assuming that, on average, 10% of the plants prepared plans and schedules for examination and testing (plans and schedules are established for 10 year intervals), this would result in an industry recordkeeping burden of 20,800 p-hrs/year [(1600+400) p-hrs/plant x (0.10) (104) plants/year].

- Record the results of preservice and inservice examinations of components performed in accordance with Section XI, IWB/IWC/IWD-2000. Specific requirements for examinations are tabulated in IWB/IWC/IWD-2500-1 for components such as vessels and piping. A record of each examination includes the component identification, date of examination, specific Section XI requirement, type of examination (e.g., volumetric, surface, visual), equipment settings, and record of any indications. The examinations are distributed over a 10-year examination interval (three 40-month periods) with examinations being performed at, on average, 18-month refueling outages (i.e., two per clearance period). Therefore, on average, approximately 1/10 of the components are examined/year. The recordkeeping burden associated with these examinations is estimated at 1 hour/component. Based on an estimate of 4000 components/plant, it takes 400 p-hrs/year/plant (4000 components/10 x 1 p-hour/component) to document the testing of these components for each plant, which results in a total industry recordkeeping burden of 41,600 p-hours/year (400 p-hrs/year/plant x 104 plants).

- The 1996 incorporation by reference of Subsections IWE and IWL into 10 CFR 50.55a requires licensees to develop an inservice inspection (ISI) plan for these subsections, implement that ISI plan, and then develop and implement 10-year updates to that ISI plan. The development of the initial ISI plan is estimated to average 4000 p-hrs for a new licensee. All 104 licensees have completed the development of the ISI plan. (one-time recordkeeping)

  It is estimated that recordkeeping for implementing the ISI plan requires 600 p-hrs/yr for each plant performing ISI of the containment. Assuming that on the average 10 plants per year perform ISI of the containment, this results in an industry burden of 6,000 p-hrs/yr.

  Every 10 years each licensee must update the ISI plan. Update of the plan is estimated to average 180 p-hrs per plant. Assuming that 10 plants per year update their containment ISI plans, this results in an industry burden of 1,800 p-hrs/yr. The total recordkeeping burden is estimated to be 7,800 p-hrs/yr (6,000p-hrs/yr + 1,800 p-hrs/yr).

The following additional significant recordkeeping requirements result from implementation of specific Section XI technical requirements:

- The 1995 Edition up to and including the 1996 Addenda of Section XI requires examination of essentially 100% of the length of all reactor vessel shell welds during the 2nd, 3rd, and 4th inspection intervals. (Section XI has required examination of essentially 100% of the length of reactor vessel shell welds during

the 1st interval since the 1974 Edition as modified by addenda through the 1975 Addenda.) Although the data from these examinations is generally automatically recorded and processed, it is estimated that about 200 p-hrs is required to assemble, review, and summarize the additional data that is collected once during each 10-year inspection interval. On average, about 10 percent of all operating plants perform the reactor vessel shell weld examinations each year. Therefore, the additional recordkeeping burden per year resulting from the specified reactor vessel examination is estimated to be 2,080 p-hrs/year (200 p-hrs/plant x [.10 x 104] plants/year).

- Section XI, Mandatory Appendix VII, "Qualification of Nondestructive Examination Personnel for Ultrasonic Examination," specifies requirements for the training and qualification of ultrasonic nondestructive examination (NDE) personnel in preparation for employer certification to perform NDE. Appendix VII specifies requirements for qualification records. These records include those for recertification (e.g., name of individual, qualification level, educational background and experience, statement indicating satisfactory completion of prior training, record of annual supplemental training, results of vision examinations, and current qualification examination results). It is estimated that it takes 65 p-hrs/plant/year to prepare and maintain the specified training records. This results in a yearly recordkeeping industry burden of 6,760 p-hrs/year (104 plants x 65 p-hr/plant/year).

- Table IWA-1600-1 (1991 Addenda) references a revised ASME N626 specification which requires that Authorized Inspection Agencies be accredited by ASME. It is estimated that the records associated with this change results in an average of 10 p-hrs per plant per year. The total industry recordkeeping burden is estimated to be 1,040 p-hrs/yr (10 p-hrs/plant-yr x 104 plants). This estimate is based on discussion with an authorized nuclear inspection (ANI) organization, but the impact has been assigned to the owners who ultimately pay for ANI services.

- IWA-2210 (1990 Addenda) improves visual examination requirements and requires calibration records for light meters and test charts. It is estimated that the records associated with this change results in an average of 1 p-hr per plant per year. The industry recordkeeping burden is estimated to be 104 p-hrs/yr (i.e., 1 p-hr/plant-yr x 104 plants).

- IWA-2322 (1991 Addenda) requires that, before the near-distance test chart is used for the first time, an optical comparator or other suitable instrument be used to verify the height of a representative lower case character. It is estimated that the records associated with this change results in an average of 2 p-hrs at each plant once a licensee updates its ISI program to the 1991 Addenda or later edition and addenda. It is estimated that 20 plants will implement this new requirement during the 3-year clearance period. The industry recordkeeping burden is estimated to be 13 p-hrs/year (i.e., 2 p-hrs/plant x 20 plants/3 years).

- IWA-4130 (1989 Addenda) requires more detail to be documented in repair plans. It is estimated that the records associated with this change results in an average of 1 p-hr for each repair operation, and an average of 100 repair plans per plant per year is assumed. Therefore, the industry recordkeeping burden is estimated to be 10,400 p-hrs/yr (100 p-hrs/plant/yr x 104 plants).

- IWA-4340 (1991 Addenda) eliminates a surface examination for certain repair removal cavities. Recordkeeping decreases approximately 16 p-hrs per plant per 10-year ISI interval because of the elimination of a need to submit a relief request. The decrease in industry recordkeeping burden is estimated to be 166 p-hrs/yr (16 p-hrs/10yr x 104 plants).

- Table IWB-2500-1 (1994 Addenda) requires an estimated 2 p-hrs for each plant per 10-year ISI interval for records associated with additional pump and valve internal surface visual examinations. The industry recordkeeping burden is estimated to be 21 p-hrs/yr (2 p-hrs x 104 plants/10 yr).

- IWB-4300 (1989 Addenda) requires an estimated 4 p-hrs for records for each pressurized water reactor (PWR) plant in conjunction with each series of steam generator sleeving operations during any refueling outage. The additional records include the Sleeving Procedure Specification, procedure qualification, performance qualification for personnel, location records, and examination records. If sleeving operations are performed an average of three times each ten-year interval for each PWR plant, the industry recordkeeping burden is estimated to be 83 p-hrs/yr (69 PWR plants x 3 times/10 years x 4 hrs each).

- IWB-1220, IWC-1220, and IWD-1220 (1991 Addenda) each give an exemption for inaccessible integral attachments. Recordkeeping burden is reduced about 16 p-hrs per plant per 10-year ISI interval since it is no longer required to document these inaccessible integral attachments in relief requests. The decrease in recordkeeping burden is estimated to be 166 p-hrs/yr (16 p-hrs/10 yrs x 104 plants).

- IWC-5222(e) (1991 Addenda) exempts open-ended lines from hydrostatic tests. Recordkeeping is decreased about 16 p-hrs per plant per 10-year ISI interval because of the elimination of the need for a relief request. The decrease in industry recordkeeping burden is estimated to be 166 p-hrs/yr (16 p-hrs/10 yrs x 104 plants).

- IWD-2420 (1991 Addenda) adds successive examination requirements for Class 3 components. Recordkeeping increases about 8 p-hrs per plant per year. The industry recordkeeping burden is estimated to be 832 p-hrs/yr (8 p-hrs/plant-yr x 104 plants).

- IWA-5221, Table IWB-2500-1, IWB-5200, Table IWC-2500-1, IWC-5200, and IWD-5240 (1993 Addenda) have all been revised to stipulate a "system leakage test" in lieu of a system hydrostatic test during each 10-year interval. Recordkeeping burden decreases about 16 p-hours per boiling-water reactor (BWR) plant per 10-year interval through the elimination of the need for a relief request. (Note, the decrease applies only to BWR plants which encounter problems with obtaining the Code-required pressure for hydrostatic testing of Class 2 portions of the main steam system.) The industry decrease in recordkeeping burden is estimated to be 56 p-hrs/yr (16 p-hrs/10 yrs x 35 BWR plants).

- IWF-1230 (1990 Addenda) exempts examination of inaccessible supports. Eliminating the need for a relief request is estimated to save 16 p-hours per plant per 10-year interval. The decrease in industry recordkeeping burden is estimated to be 166 p-hrs/yr (16 p-hrs/10 yrs x 104 plants).

- IWF-2430, IWF-2510, and Table IWF-2500-1 (1990 Addenda) - The exemption for supports of multiple components allowed under previous versions of IWF-2510(b) has been deleted. However, this change does not increase the number of supports required to be examined. In conjunction with the deletion of the IWF-2510 exemption, Table IWF-2500-1 adopts for the first time representative sampling (i.e., grouping) which reduces the number of supports required to be examined by over 100. Even though the adoption of representative sampling is considered an improvement over present procedures in that there is more assurance that defective supports are detected, the ASME added the provisions of IWF-2430(c) and (d) require that if the examinations performed under IWF-2430(a) and (b) result in the detection of a large number of defective supports, additional examinations may be required. The reduction in the number of examinations attained through sampling is estimated to save 12 p-hrs in recordkeeping per plant per year. Records associated with possible additional examinations could add 8 p-hrs per plant per year which gives a net decrease of 4 p-hrs in recordkeeping per plant per year. The estimated recordkeeping burden is estimated to decrease by 416 p-hrs/yr (4 p-hrs/plant-yr x 104 plants).

- Appendix VIII, Article VIII-5000 (1996 Addenda) requires that qualification records be kept. The records are generated when the qualification activities are performed. A conservative estimate is that ten percent of the total initial Appendix VIII qualification costs per plant applies to records. The costs are equivalent to an average per plant total of 260 p-hrs for Appendix VIII records. The recordkeeping burden, estimated to be a one-time total of 27,040 p-hrs or an annualized 9,013 hours (260 p-hrs/plant x 104 plants/3) has been completed. (one-time recordkeeping)

- Subsubarticle IWA-2420 (1999) Addenda added items for which records must be kept. Records associated with inspection plans must include (1) inspection period and interval dates; (2) identification of the components selected for examination and testing, including successive exams for prior periods; (3) identification of drawings showing items which require examination; (4) list of examination procedures; (5) description of alternative examinations and identification of components to be examined using alternative procedures; and (6) identification of calibration blocks used for ultrasonic examination of components. These records should not significantly change after being initially added to the inspection plans; therefore, it is estimated that average increase in recordkeeping is approximately 1 p-hour per plant during the 10-year interval because of the additional recordkeeping requirements. It is estimated that 20 plants will implement this new requirement during the clearance period. This increase in recordkeeping burden is estimated to be 7 p-hours/year (1 p-hour x 20 plants/3yr).

- Subsubarticle IWA-6340 (1999 Addenda) added items for which records must be kept. Records associated with (1) flaw acceptance by analytical evaluation; (2) regions in ferritic Class 1 standards with modified acceptance standards; (3) Class MC bolt torque or tension tests; (4) tendon force and elongation measurements; (5) tendon wire and strand sample test results; (6) free water documentation; and (7) corrosion protection medium analysis results must now be kept, if applicable. The added recordkeeping burden is estimated at 3 p-hours per plant because of the additional recordkeeping requirements. It is estimated that 20 plants will implement this new requirement during the clearance period. This increase in industry recordkeeping burden is estimated to be 20 p-hours/yr (3 p-hours x 20 plants/3 years).

- The 1998 Edition deleted the torque test of bolted connections which was contained in editions and addenda earlier than the 1998 Edition (Table IWE-2500-1, Category E-G, Item E8.20). It is estimated that the recordkeeping burden decreases approximately 2 p-hours per plant because testing has been eliminated. It is estimated that 20 plants will implement this new requirement during the clearance period. The decrease in industry recordkeeping burden is estimated to be 13 p-hours/yr (2 p-hours x 20 plants/3 years).

- Code Case N-513, Evaluation Criteria for Temporary Acceptance of Flaws in Class 3 Piping, permits licensees to voluntarily adopt provisions for temporary acceptance of a flaw in certain piping. Licensees are required to perform a flaw evaluation and a flaw growth analysis to establish the allowable time for temporary operation. Periodic examinations of no more than 90-day intervals shall be conducted to verify the analysis. It is estimated that each licensee applies the provisions of Code Case N-513 twenty times each year. The increase in industry recordkeeping burden is estimated to be 2080 p-hrs/yr (20 occurrences x 1 p-hr/flaw evaluation-flaw growth analysis x 104 plants).

- Code Case N-523-1, Mechanical Clamping Devices for Class 2 and 3 Piping, allows the use of mechanical clamping devices for Class 2 and Class 3 piping. Licensees are required to prepare a plan for monitoring defect growth, and perform periodic examinations of no more than 90-day intervals to verify the analysis. It is estimated that each licensee applies these provisions 20 times each year. The increase in industry recordkeeping burden is estimated to be 2080 p-hrs/yr (20 occurrences x 1 p-hr/flaw evaluation-flaw growth analysis x 104 plants).

- Code Case N-532, Alternative Requirements to Repair and Replacement Documentation Requirements and Inservice Summary Report Preparation and Submission as required by IWA-4000 and IWA-6000, provides a less burdensome recordkeeping alternative. These records must be prepared following activities conducted during a refueling outage (approximately once every 18 months). Assuming 18 month intervals for these reports, each licensee provides two reports in the 3-year period. Therefore, there are 104 plants X 2 reports per period ÷ 3 years = 69 reports annually. It is estimated that the alternative recordkeeping associated with Code Case N-532 reduces burden by 16 p-hours per licensee every 18 months. Thus, the reduction in industry recordkeeping burden associated with the Code Case N-532 is 1104 p-hours/yr (69 reports X 16 p-hours).

- Code Case N-573, Transfer of Procedure Qualification Records Between Owners, provides a less burdensome recordkeeping alternative. It is assumed that the recordkeeping associated with the current ASME Code requirement is that each licensee performs procedure qualifications 6 times in each 3-year clearance period, and that the recordkeeping associated with each procedure qualification is 8 p-hours. Therefore, there are 104 reactors X 6 procedure qualifications ÷ 3 years = 208 procedure qualifications performed each year. The industry recordkeeping burden for the current ASME Code requirement is 208 procedure qualifications/year X 8 p-hours per procedure qualification = 1664 p-hours/year. It is estimated that the alternative recordkeeping associated with Code Case N-573 reduces the number of procedure qualifications performed each year by half. Thus, the industry decrease in recordkeeping burden is 832 p-hrs/yr (1664 p-hours/2).

OM Code

- Record the results of the preservice and inservice pump tests in accordance with OM Code Subsection ISTB, which provides rules for the preservice and inservice testing of pumps to assess the operational readiness of certain centrifugal and positive displacement pumps. The inservice tests, like the inservice examinations, are established for a 10-year interval, but the testing is performed on a quarterly basis. A record of each test includes the pump identification, date of test, reason for test, values of measured parameters, identification of instruments used, comparisons with allowable ranges of test values, and requirements for corrective action. It is estimated that it takes 80 p-hrs to document the testing of the quarterly pump tests for each plant, which results in a yearly burden for each plant of 320 p-hrs. This results in a total industry recordkeeping burden of 33,280 p-hrs (320 p-hrs/yr x 104 plants).

- Record the results of the preservice and inservice valve tests in accordance with OM Code Subsection ISTC, which provides rules for the preservice and inservice testing of valves to assess the operational readiness of certain valves and pressure relief devices. The inservice tests, like the inservice examinations, are established for a ten-year interval, but the testing is performed on a frequency, depending on the valve, from quarterly to every two years. The types of records to be retained for valve testing are similar to those identified above for pump testing. Because of the greater number of valves tested, it is estimated that it takes 200 p-hrs to document the periodic valve tests for each plant, which results in a yearly burden for each plant of 800 p-hrs. This results in a total industry recordkeeping burden of 83,200 p-hrs (800 p-hrs/yr x 104 plants).

- Table ISTB 4.7.1-1 (1994 Addenda) requires more accurate pressure instruments for the comprehensive and preservice pump tests. Additional records are required for the procurement and periodic calibration of these instruments. The burden is estimated at one p-hr per plant per instrument per year. Assuming three new instruments per plant, it is estimated that the increased industry recordkeeping burden is 312 p-hrs/yr (3 instruments x 1 p-hr/yr x 104 plants).

- ISTB 5.2.2(b) and Table ISTB 4.1-1 (1994 Addenda) have eliminated the requirement for quarterly measurement of vibration and either flowrate or pressure for standby pumps. This results in fewer test records and a decrease in industry recordkeeping burden estimated at 2,080 p-hrs/yr (10 standby pumps x ½ p-hr/test x 4 tests/yr x 104 plants).

- Appendix I, 1.3.7(a) (1994 Addenda) changes the test frequency for containment vacuum breakers from 6 months to 2 years or during a refueling outage, whichever is sooner. Assuming 2 vacuum breakers per PWR, the estimated reduction in industry recordkeeping requirements is 52 p-hrs/yr (1.5 less tests/yr x ½ p-hr/test x 69 PWR plants).

- Appendix I, 4.1.2(a) and 8.1.2(a) (1994 Addenda) allow air or nitrogen to be substituted at the same temperature without the additional alternate test media requirements. This results in fewer records. Assuming two correlation evaluations per plant a year, the estimated decrease in industry recordkeeping burden is 832 p-hrs/yr (2 x 4 p-hrs/yr x 104 plants).

- The requirements in ISTA 1.4, ISTA 1.5, and ISTA 2.1 requiring the use of an Authorized Inspection Agency for inspection services were deleted in the 1997 Addenda. It is estimated that the recordkeeping burden decreases approximately 4 p-hrs per plant a year because of the elimination of the use of an Authorized Inspection Agency. The decrease in industry recordkeeping burden is estimated to be 416 p-hrs/yr (4 p-hrs/yr x 104 plants).

- In ISTB-1200 and ISTC-1200 (1998 Edition), skid mounted pumps and valves were excluded from the requirements of the Code provided they are tested as part of the major component and are justified by the Owner as being adequately tested. It is estimated that recordkeeping decreases approximately 2 p-hours per plant a year because testing has been reduced. The decrease in industry recordkeeping burden is estimated to be 208 p-hours a year (2 p-hrs/yr x 104 plants).

- Code Case OMN-1, Alternative Rules for Preservice and Inservice Testing of Certain Electric Motor-Operated Valve Assemblies in Light Water Reactor Power Plants, requires that the adequacy of the initial test interval for certain electric operated valve assemblies be evaluated between 5 and 6 years after implementation of Code Case OMN-1. The Code Case is a voluntary alternative, and this is a one-time burden. Assuming that half of the plants choose to implement the Code Case, the estimated increase in industry recordkeeping burden is 5,200 p-hrs/yr (1 p-hr/evaluation x 100 motor-operated valves x 52 plants) (one-time recordkeeping starting approximately November 22, 2004).

50.55a

- The recordkeeping burden for Sections 50.55a(b)(2)(viii)(B), (C), (D), and (E), which are modifications to Subsection IWL, and Section 50.55a(b)(2)(ix)(A) which is a modification to Subsection IWE, is estimated to average 12 p-hrs/yr per plant. Assuming that 10 plants per year update their containment ISI plans, results in an industry burden of 120 p-hrs/yr (12 p-hrs/yr x 10 plants).

- Section 50.55a(b)(2)(xxi)(B) reinstates the requirement to examine control rod drive (CRD) bolting whenever the CRD housing is disassembled in accordance with the provisions in Table IWB-2500-1, Category B-G-2, Item B7.80 of the 1995 Edition. It is estimated that recordkeeping increases approximately 1 p-hour a year for 104 units because of the examination of CRD bolting. The increase in industry recordkeeping burden is estimated to be 104 p-hours a year (1 p-hour x 104 units).

- Section 50.55a(b)(3)(iv)(B) requires trending and evaluation of test data to support changes in the check valve test frequency. This one-time evaluation is to be performed at a maximum of 3 years after implementation of Appendix II. Appendix II provides alternative requirements that licensees may implement as an option to OM Code requirements. On average, there are 260 safety-related check valves per plant. The time required for trending and evaluation of test data is estimated at 1 p-hr/valve. Assuming that 12 plants implement the optional appendix, the recordkeeping burden is estimated at an annualized 1,040 p-hrs/yr (260 check valves x 1 p-hr/evaluation x 12 plants/3 years). One-time recordkeeping is complete.

- The reduction in the exercise frequency for manual valves in 10 CFR 50.55a(b)(3)(vi) results in a reduction of recordkeeping. Manual valves are exercised every 2 years in lieu of every 3 months as required by ISTC-3510 of the 1998 Edition. It is estimated that the recordkeeping burden decreases approximately 3 p-hours per plant a year because of the reduction in the exercising frequency for manual valves. This decrease in industry recordkeeping burden is estimated to be 312 p-hours a year (3 p-hrs x 104 plants).

- Section 50.55a(g)(6)(ii)(A) requires all licensees to augment their reactor vessel examination by expediting the essentially 100% examination of reactor vessel shell welds that is specified in the Section XI 1989 Edition of Section XI. This results in some additional recordkeeping requirements. As an expansion to the ongoing examination in the present interval, the additional recordkeeping is estimated to be 160 p-hrs/plant per examination. With the exception of Browns Ferry Unit 1, the augmented reactor vessel examination has been completed at all plants. Browns Ferry Unit 1 is scheduled to perform this examination during this clearance period. This results in a one time recordkeeping burden of 160 hours.

<u>Reporting Requirements</u>

Section III

The following reporting requirement is specified in Section III:

- A copy of the Design Specifications shall be made available to the Inspector at the manufacturing site before fabrication begins, and a copy filed with the NRC before components are placed in service (NCA-5242). No significant time is associated with this reporting requirement since it only represents a transfer of documents that have been routinely and previously prepared. It is conservatively estimated that 40 p-hrs are required to prepare the documentation to transfer the Design Specifications to the appropriate authorities. No documentation will be prepared in this clearance period. (one-time recordkeeping)

Section XI

The following reporting requirement is specified in Section XI:

- Prepare and submit Summary Report to NRC within 90 days following the refueling outage in which the ISI program is implemented (IWA-6230/6240). The Summary Report is prepared to document preservice and inservice examinations for Class 1 and Class 2 pressure retaining components and their supports. This includes documentation on ASME Form NIS-1 of examinations and tests performed, and documentation on ASME Form NIS-2 of repairs and replacements performed since the preceding summary report. On the average, there are two ISI programs per inspection period for each plant (there are three inspection periods per 10-year inspection interval).

  Whenever a plant shuts down for refueling, an ISI is performed. Assuming an average refueling schedule of 18 months results in about 69 plants being inspected per year. Each inspection results in a Summary Report. It is estimated that 160 p-hrs/plant are required to prepare the summary report. This results in an industry reporting burden of 11,040 p-hrs/year (69 plants x 160 p-hrs/plant).

The following additional reporting requirements result from implementation of specific Section XI technical requirements:

- The reporting burden for Sections 50.55a(b)(2)(viii)(B), (C), (D), and (E), which are modifications to Subsection IWL, Section 50.55a(b)(2)(ix)(A) which is a modification to Subsection IWE, is estimated to average 12 p-hrs/yr per plant. Assuming that 10 plants per year respond to the reporting requirements related to the containment ISI program, this results in an industry burden of 120 p-hrs/yr.

- With respect to reporting, it is estimated that the alternative reporting burden associated with the implementation of Code Case N-532 is reduced by 8 p-hours per licensee every 18 months. The industry reporting burden for Code Case N-532 is reduced 552 p-hours per year (69 reports X 8 p-hours).

OM Code

- ISTA 3.2.1 (1990 Edition) does not include the existing Section XI requirement for preparing and submitting a summary report for Class 1 and Class 2 pump and valve tests to the NRC. The decrease in industry reporting burden is estimated to be 4,160 p-hrs/yr (40 p-hrs/plant/year x 104 plants).

- ISTB 3.2 and 4.3 (1994 Addenda) require bypass/test loops to accommodate within ±20% of design flow when used for the comprehensive or Group A tests. For the purpose of this analysis, it is assumed that all PWRs have to modify the test loops in the containment spray system or prepare and submit a relief request to the NRC for approval. The estimated burden to prepare a relief request is 16 p-hr per PWR per ten-year inspection interval. This gives an increased industry reporting burden of 110 p-hrs/yr (16 p-hrs/10yrs x 69 plants).

50.55a

- Section 50.55a(a)(3) allows applicants to use alternatives to the requirements of 10 CFR 50.55a paragraphs (c), (d), (e), (f), (g), and (h) when authorized by the NRC. It is estimated that all (104) of the plants will choose to use alternatives to the requirements of the 1998 Edition and 1999 and 2000 Addenda to the ASME Boiler and Pressure Vessel Code or the 1998 Edition and 1999 and 2000 Addenda to the ASME *Code for the Operation and Maintenance of Nuclear Power Plants*. The estimated burden to prepare and submit an alternative to the NRC for authorization is 20 p-hours per alternative. Assuming each plant submits an average of 6 alternatives per year (4 for ASME Section XI and 2 for the OM Code), the estimated increase in industry reporting burden is 12,480 p-hrs/year (6 alternatives/year/plant × 20 p-hrs/alternative × 104 plants).

- Section 50.55a(b)(3)(v) requires that a licensee voluntarily choosing to use Subsection ISTD for the examination of snubbers may do so after processing a one-time plant technical specification change. It is estimated that one-half of the plants will choose to implement Subsection ISTD. The estimated one-time reporting burden to prepare a technical specification change is 1,040 p-hrs/yr. All plants expected to use Subsection ISTD have submitted their technical specification changes. (one-time reporting)

- Sections 50.55a(f)(5) and 50.55a(g)(5) allow applicants to request relief from Code requirements determined to be impractical. It is estimated that all (104) of the plants will need to request relief from some of the requirements of the ASME B&PV Code or the ASME OM Code.

  The 1998 Edition deleted the requirement to perform a visual examination of paint and coatings reapplied to containment surfaces (1995 Edition, IWE-2200(g)), and, therefore, licensees will no longer request relief from this ISI provision. The implementation of the revised ISI provision reduces the number of relief requests.

  Code Case N-605 was incorporated in IWE-2500(c) in the 1998 Edition and, therefore, licensees are no longer be required to request approval for its use. The implementation of the revised ISI provision reduces the number of relief requests.

  The 1998 Edition deleted the requirement to visually examine containment seals and gaskets (1995 Edition Table IWE-2500-1, Category E-D, Items E5.10 and E5.20), and, therefore, licensees will no longer request relief from this ISI provision. The implementation of the revised ISI provision reduces the number of relief requests.

  In ISTB-1200 and ISTC-1200 of the 1998 Edition of the ASME OM Code, skid mounted pumps and valves were excluded from the requirements of the Code provided they are tested as part of the major component and are justified by the Owner as being adequately tested. In the past, licensees have requested relief for skid mounted components from certain Code test requirements (for example, valves on the diesel generator skid). The implementation of the revised IST provision reduces the number of relief requests.

The 1998 Edition of the ASME OM Code, ISTC-5223, added a provision to allow operational testing of two check valves in series as a unit, provided certain conditions are met. Therefore, licensees will no longer request relief from this ISI provision. The implementation of the revised IST provision reduces the number of relief requests.

Section 50.55a(b)(3)(iv) allows the exercise interval for manual valves to be extended from 3 months to 2 years when implementing the 1999 Addenda of the OM Code. Therefore, licensees implementing editions and addenda of the OM Code earlier than the 1999 Addenda will request relief to use the 2 year interval. This increases the number of relief requests.

The requirements in ISTA 1.4, ISTA 1.5, and ISTA 2.1 requiring the use of an Authorized Inspection Agency for inspection services were deleted in the 1997 Addenda. Therefore, licensees implementing editions and addenda of the OM Code earlier than the 1997 Addenda will request relief to use this new provision. This increases the number of relief requests.

The estimated burden to prepare and submit a request for relief from Code requirements is 20 p-hours per relief request. Assuming each plant submits an average of 4 relief requests per year (3 for ASME Section XI and 1 for the OM Code), the estimated industry reporting burden is 8,320 p-hrs/year (4 relief requests/year/plant × 20 p-hrs/relief request × 104 plants).

A. JUSTIFICATION

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

The ASME B&PV and OM Code provides listings of information required and specific forms to assist in documenting required information. In general, Section III records are needed to provide documentation that construction procedures have been properly implemented. ASME B&PV Code, Section XI, and ASME OM Code records are needed to document the plans for and results of ISI and IST programs. The information is generally not collected, but is retained by the licensee to be made available to the NRC in the event of an NRC inspection or audit. ASME B&PV and OM Code requirements are incorporated in 10 CFR 50 to avoid the need for writing equivalent NRC requirements.

2. Agency Use of Information

The records are generally historical in nature and provide data on which future activities can be based. The practical utility of the information collection for NRC is that appropriate records are available for auditing by NRC personnel to determine if ASME B&PV and OM Code provisions for construction, inservice inspection, and inservice testing are being properly implemented in accordance with 10 CFR 50.55a of the NRC regulations, or whether specific enforcement actions are necessary.

3. Reduction of Burden Through Information Technology

No responses are submitted electronically. The information being collected represents the documentation for the various plant-specific construction, inservice inspection, and inservice testing programs. The NRC has no objection to the use of new information technologies and generally encourages their use.

4. Effort to Identify Duplication and Use Similar Information

ASME B&PV and OM Code requirements are incorporated by reference into the NRC regulations to avoid the need for writing equivalent NRC requirements. The provisions of this regulation do not duplicate the information collection requirements contained in any other regulatory requirement.

5. Effort to Reduce Small Business Burden

The provisions of 10 CFR 50.55a affect only the construction and operation of nuclear power plants and, therefore, do not affect small businesses.

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

The information generally is not collected but is retained by the licensee to be made available to the NRC in the event of an NRC audit.

7. Circumstances Which Justify Variation from OMB Guidelines

ASME B&PV Code, Section XI, and ASME OM Code requirements for ISI and IST programs, and 10 CFR 50.55a specify that records and reports must be maintained for the service lifetime of the component or system. Such lifetime retention of the records is necessary to ensure adequate historical information of the design, examination, and testing of components and systems to provide a basis for evaluating degradation of these components and systems at any time during their service lifetime.

8. Consultations Outside the NRC

In connection with rulemakings to incorporate by reference later editions and addenda of Section III, Division 1, and Section XI, Division 1, of the ASME B&PV Code and the OM Code, the NRC staff consults with personnel from manufacturers, utilities, DOE laboratories, and other users of the Code as the need for specific information arises.

A final rule was published in the *Federal Register* on September 26, 2002 (66 FR 60520), that incorporated by reference the 1997 Addenda, 1998 Edition, 1999 Addenda, and 2000 Addenda of the ASME B&PV Code and the ASME OM Code. The recordkeeping and reporting provisions in the rule have been incorporated into this clearance renewal.

A proposed rule was published in the *Federal Register* on March 19, 2002 (67 FR 12488), for comment to approve the use of ASME Code Cases. The recordkeeping and reporting provisions in the rule have been incorporated into this clearance renewal.

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 Information

NRC provides no pledge of confidentiality for this collection of information. However, a confidential or proprietary submittal is handled in accordance with 10 CFR 2.790.

11. Justification for Sensitive Questions

No sensitive questions are involved.

12. Estimated Industry Burden and Burden Hour Cost

a. Number and Type of Respondents

In general, the information collection requirements incurred by 10 CFR 50.55a through incorporation by reference of the ASME B&PV and OM Code could apply to the 104 nuclear power plants presently in operation.

b. Estimated Hours Required to Respond to the Collection

Tables 1 and 2, below, tabulate the estimated hours necessary to respond to the Section III, Section XI, OM Code, and 50.55a information collection requirements discussed above. The total continuing industry information collection burden is 254,099 p-hrs/year (226,711 p-hrs/yr for recordkeeping + 27,388 p-hrs/yr for reporting).

c. Estimated Cost Required to Respond to the Collection

Based upon an annual burden of 254,099 p-hrs and a rate of $156/hr, it estimated that the cost to the industry for responding to the information collection is a total of $39,639,444/year (254,099 p-hrs x $156/hour).

13. Estimate of Other Additional Costs

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 estimated to be $14,147 (226,711 hours X $156 X .0004).

Table 1

Annual Recordkeeping Burden

Recordkeeping Requirement	Number of Plants	Burden to Individual Plant (p-hrs/yr)	Total Annual Burden	Retention Period
III/NCA-3230: Owner's Certificate; AIA Agreement*	0	80	0*	Life
III/NCA-3270: Owner's Data Report*	0	400	0*	Life
III/NCA-3260: Design Report*	0	2,000	0*	Life
III/NB/NC/ND-3220: Overpressure Protection Report*	0	2,000	0*	Life
XI/IWA-6220: Records of Exams: NIS-1 Forms	104	50	5,200	Life
XI/IWA-7520: Records of Repairs: NIS-2 Forms	104	100	10,400	Life
XI/IWA-6210: ISI and IST Plans and Schedules	10.4	2,000	20,800	Life
XI/IWB/IWC/IWD-2000: Records of Component Tests	104	400	41,600	Life
XI/Subsections IWE & IWL - develop ISI plan*	0	4000	0*	Life
XI/Subsections IWE & IWL - implement ISI plan	10	780	7,800	Life
XI/IWB-2500: Reactor Vessel Exam	10.4	200	2,080	Life
XI/Appendix VII: Qualification of NDE personnel	104	65	6,760	Life
XI/Table IWA-1600-1: ASME N626 Specification	104	10	1,040	Life
XI/IWA-2210: Visual Examinations	104	1	104	Life
XI/IWA-2322: Near-distance Test Chart*	6.5	2	13	Life
XI/IWA-4130: Repair Plans	104	100	10,400	Life
XI/IWA-4340: Surface Examinations for Repair	104	-1.6	-166	Life
XI/Table IWB-2500-1: Pump and Valve Surface Exams.	10.4	2	21	Life
XI/IWB-4300: PWR Steam Generator Sleeving	20.7	4	83	Life
XI/IWB/C/D-1220: Inaccessible Integral Attachments	104	-1.6	-166	Life
XI/IWC-5222(e): Open-ended line hydrostatic tests	104	-1.6	-166	Life
XI/IWD-2420: Class 3 examinations	104	8	832	Life

Recordkeeping Requirement	Number of Plants	Burden to Individual Plant (p-hrs/yr)	Total Annual Burden	Retention Period
XI/IWA-5221: System Leakage Test	35	-1.6	-56	Life
XI/IWF-1230: Inaccessible supports	104	-1.6	-166	Life
XI/IWF-2430: Supports of multiple components	104	-4	-416	Life
XI/App. VIII: Qualification records*	0	260	0*	Life
XI/IWA-2420: Inspection Plans	7	1	7	Life
XI/IWA-6340: Miscellaneous Records	6.7	3	20	Life
XI/IWE-2500-1: Torque Test	6.7	-2	-13	Life
Code Case N-513: Flaws in Class 3 Piping	104	20	2,080	Life
Code Case N-523-1: Mechanical Clamping Devices	104	20	2,080	Life
XI/Code Case N-532: Alternative Recordkeeping	104	-69	-1104	Life
XI/Code Case N-573: Transfer of Procedure Qualification	104	-8	-832	Life
OM/Subsection ISTB: Records of Pump Tests	104	320	33,280	Life
OM/Code Subsection ISTC: Records of Valve Tests	104	800	83,200	Life
OM/Table ISTB 4.7.1-1: Pump Pressure Instruments	104	3	312	Life
OM/ISTB 5.2.2(b): Standby Pump Vibrations	104	-20	-2,080	Life
OM/App. I: Containment Vacuum Breakers	69	-0.75	-52	Life
OM/App. I: Air or Nitrogen Alternate Test	104	-8	-832	Life
OM/ISTA 1.4: Authorized Inspection Agency	104	-4	-416	Life
OM/ISTB-1200 and ISTC-1200: Skid Mounted Pumps	104	-2	-208	Life
Code Case OMN-1: Alternative Rules for Testing Valves**	52	100	5,200**	Life
§ 50.55a(b)(2)(viii) and (ix): Subsections IWE/IWL	10	12	120	Life
§ 50.55a(b)(2)(xxi)(B): Control rod drive housing	104	1	104	Life
§ 50.55a(b)(3)(iv)(B): Appendix II Check Valve*	0	88	0	Life

Recordkeeping Requirement	Number of Plants	Burden to Individual Plant (p-hrs/yr)	Total Annual Burden	Retention Period
§ 50.55a(b)(3)(vi): Manual Valve Exercise Frequency	104	-3	-312	Life
§ 50.55a(g)(6)(ii)(A): Augmented RV Exam***	1	160	160***	Life
TOTAL			226,711	

* One-time recordkeeping requirements (previous OMB clearance periods)

** One-time recordkeeping requirements (current OMB clearance period)

*** 103 plants completed this one-time reporting requirement in previous OMB clearance periods, 1 plant will complete this one-time reporting requirement in current OMB clearance period.

Table 2

Reporting Burden

Reporting Requirement	Number of Plants (Responses)	Burden to Individual Plant (p-hrs/yr)	Burden to Industry (p-hrs/yr)
III/NCA-5242: Providing Construction Documents to Inspector*	0	40	0*
XI/IWA-6000: ISI Summary Reports	69	160	11,040
XI/Subsections IWE & IWL	10	12	120
XI/Code Case N-532: Alternative Recordkeeping	69	-8	-552
OM/ISTA 3.2.1: Class 1&2 Tests	104	-40	-4,160
OM/ISTB 3.2 and 4.3: Bypass Loops	69	1.6	110
§ 50.55a(a)(3): Alternatives	104	120	12,480
§ 50.55a(b)(3)(v): Snubbers*	0	20	0*
§ 50.55a(f)(5) and (g)(5): Relief Requests	104	80	8,320
TOTAL	529		27,588

* One-time reporting burden (previous OMB clearance periods)

14. Estimated Annualized Cost to the Federal Government

NRC inspection personnel who routinely audit plant construction, ISI, and IST programs would include, in the audit, verification that the identified records have been properly prepared and maintained. Since NRC inspectors would generally verify these records as part of the normal NRC audit process, the annual cost to the Federal government is considered to be very small.

In addition to records which are prepared but are maintained at the plant site, the licensee submits summary reports of the inservice inspection program directly to the NRC. These summary reports are over viewed by the staff for the purpose of identifying generic issues. A licensee submits a summary report about twice during each inspection period. On the average, this results in about 70 summary report submittals to the NRC each year. A summary report is reviewed on the average in about 2 hours, resulting in a burden to the NRC of 140 p-hrs/year for all plants. This results in an annual cost to the Federal government of $21,840 (140 hours x $156/hour).

The frequency for containment inservice inspection is once every 3⅓ years (corresponding to the ASME Code Section XI inspection interval for components addressed by Section XI). NRC inspection personnel who audit plant quality assurance records include in their audit verification that the above records are being properly prepared and maintained. The time associated with NRC inspectors verifying these records is very small when the activity is performed as part of a normal quality assurance audit. Additional staff time is required only for cases where containment degradation was reported by licensees. It is estimated that 80 hours of staff time is spent reviewing licensee documents in such cases. The costs for such reviews is $12,480 (80 hours x $156). The number of incidences reported on an annual basis where containment degradation has exceeded ASME Code limits is expected to be 4. Therefore, annual government burden is estimated to be 320 p-hrs/year (4 reports x 80 hours x $156), or $49,920.

Based on the above, the total estimated annual Federal burden is 460 hours at a cost of $71,760. This cost is fully recovered through fee assessments to NRC licensees pursuant to 10 CFR 170 and/or 171.

15. Reasons for Change in Burden

The reduction in burden results from the issuance of a rule to incorporate by reference the 1997 Addenda, 1998 Edition, 1999 Addenda, and 2000 Addenda of the ASME B&PV Code and ASME OM Code with certain limitations and modifications and because certain one-time recordkeeping requirements have been completed. With the addition of XI/Code Case N-532: Alternative Recordkeeping there, was an overall increase of 113 in the responses although the burden for this code case is reduced by 8 hours per licensee every 18 months.

16. Publication for Statistical Use

The information will not be 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.