

DRAFT SUPPORTING STATEMENT
FOR
VOLUNTARY REPORTING OF PERFORMANCE INDICATORS

3150-0195
REVISION TO EXTENSION REQUEST

Description of the Information Collection.

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

The NRC is improving the PI program through a joint effort with public stakeholders, industry representatives, and the Nuclear Energy Institute (NEI)¹. In April 2005, NEI issued an updated guidance document to licensees for use in collecting and reporting PI data to the NRC "Regulatory Assessment Performance Indicator Guideline", NEI 99-02, Revision 3. Licensees already collect most of the PIs and report some of them to various industry groups. There is widespread industry support for the revised oversight process and all reactor licensees have voluntarily submitted PIs since its implementation.

A. JUSTIFICATION

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

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

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

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

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

Public information related to the three security PIs is limited due to the events of September 11, 2001. The ROP PIs provide the following information:

- a. The number of:
 - unplanned scrams per 7,000 hours of critical operation
 - unplanned scrams with loss of normal heat removal in the preceding 12 quarters
 - unplanned transients per 7,000 hours of critical operation
 - safety system functional failures in the preceding 4 quarters
 - non-conformance with 10 CFR Part 20 requirements for high or very high radiation areas, or unintended personnel exposures in the preceding 4 quarters
 - occurrences of radiological effluent releases that exceed values derived from the Radiological Effluent Technical Specifications (RETS) or provisions in the Offsite Dose Calculation Manual (ODCM), if applicable, in the preceding 4 quarters
 - three Security PIs

- b. The unavailability (the percentage of time the system was unavailable for operation in the preceding 12 quarters) of systems that perform the following functions:
 - high-pressure injection
 - high-pressure heat removal
 - residual heat removal
 - emergency AC power

- c. The percentage of:
 - reactor coolant activity (as a percent of the Technical Specification limit)
 - reactor coolant leakage (as a percent of the Technical Specification limit)
 - successful (accurate and timely) classifications, notifications, and protective action recommendations (as a percent of all such actions) by the Emergency Response Organization (ERO) during drills, exercises, and actual events in the preceding 8 quarters
 - key ERO members who participated in emergency drills, exercises, or actual events in the preceding 8 quarters
 - sirens that operated reliably in the preceding 4 quarters

2. Agency Use of Information.

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

3. Reduction of Burden Through Information Technology.

There is no legal obstacle or any obstacle to licensees reducing the burden associated with this information collection by use of information technology or otherwise. PI data are transmitted electronically to reduce burden on both industry and the NRC.

4. Effort To Identify Duplication and Use Similar Information.

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

5. Effort to Reduce Small Business Burden.

Not applicable.

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

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

7. Circumstances which Justify Variation from OMB Guidelines.

This information collection does not vary from OMB guidelines.

8. Consultations Outside the NRC.

The NRC has worked closely with the nuclear-power industry and public stakeholders to improve PIs during development and implementation of the reactor oversight process. The NRC, industry representatives, and public stakeholders have met at least monthly since 1999.

There is broad agreement among the working group members on the usefulness of collecting PI data. The working group meetings typically last 7 hours and discuss PI attributes, including the availability of data, the clarity of each indicator, recordkeeping requirements, the reporting format, the estimated burden, and the data to be reported. As a result of these meetings, NEI issued a revision to the guidance document ("Regulatory Assessment Performance Indicator Guideline") for industry reporting of PIs in April 2005.

On August 3, 2004, Brookhaven National Laboratory (BNL) published the results of an independent survey of licensee managers that BNL conducted for the NRC that indicated strong support with the PI process.

Opportunity to comment on the information collection has been published in the Federal Register.

9. Payment or Gift to Respondents.

Not applicable.

10. Confidentiality of the Information.

No confidential information is required, except for proprietary information which would be handled in accordance with 10 CFR 2.390 of NRC's regulations. The NRC displays PI information (except the three security PIs) on its Web site for public viewing.

11. Justification for Sensitive Questions.

Not applicable.

12. Estimate of Industry Burden and Burden Hour Cost.

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

The following table assumes there will be one response per reactor unit on a quarterly basis (4 X 104 = 416 annual responses). The recordkeeping estimate includes time to maintain utility procedures and occasionally refine the PIs and related procedures to incorporate improvements learned from experience.

ANNUAL REPORTING BURDEN						
	Number of Respondents	Responses per Respondent	Total Responses	Burden per Response	Total Annual Burden Hours	Cost @ \$157/Hr.
PI Reporting	104	4	416	200	83,200	\$13,062,400

ANNUAL RECORDKEEPING BURDEN				
	Number of Recordkeepers	Hours per Recordkeeper	Total Annual Burden Hours	Cost at \$157/hour
PI Recordkeeping	33	40	1,320	\$207,240

Total Annual Burden:	84,520 (83,200 hours plus 1,320 burden hours) annually.
Total Burden Hour Cost:	\$13,269,640 (83,200 hrs. + 1,320 hrs x \$157 hrs.)
Total Respondents:	449 (416 responses + 33 recordkeepers)

13. Estimate of Other Additional Costs.

NRC has determined that the storage and equipment costs per foot are approximately \$45. The quantity of records to be maintained is roughly proportional to the recordkeeping burden. Based on the number of pages maintained for a typical clearance, the records storage cost has been determined to be equal to .0004 percent of the recordkeeping burden cost. Therefore, the storage cost for this clearance is insignificant - \$83 (1320 recordkeeping hours X \$157/Hr X .0004).

14. Estimated Annualized Cost to the Federal Government.

The information provided by these indicators was reviewed as a routine part of the previous inspection process and, therefore, incur minimal incremental cost to the government. This cost is fully recovered through fee assessments to NRC licensees pursuant to 10 CFR Parts 170 and/or 171.

15. Reasons for Change in Burden or Cost.

The burden has increased from 83,720 hours/445 responses (412 responses plus 33 recordkeepers) to 84,520 hours/449 responses (416 responses plus 33 recordkeepers). The previous package was based on 103 operating reactors. This package is based on 104 operating reactors as it is anticipated that Browns Ferry Unit 1 will restart during this clearance period.

16. Publication for Statistical Use.

None.

17. Reason for Not Displaying the Expiration Date.

The expiration date will be displayed.

18. Exceptions to the Certification Statement.

Not applicable.

B. COLLECTIONS OF INFORMATION EMPLOYING STATISTICAL METHODS

Not applicable.