Section 33

DRAFT OMB SUPPORTING STATEMENT FOR
AN APPROACH FOR USING PROBABILISTIC RISK ASSESSMENT IN
RISK-INFORMED DECISIONS ON PLANT-SPECIFIC CHANGES
TO THE CURRENT LICENSING BASIS
(Regulatory Guides RG-1.176, GQA; RG-1.177, TS; RG-1.178, ISI; and RG-1.201, RISC)
(3150-0011)

Description of the Information Collection

In the specific areas of In-Service Inspection (ISI, RG-1.178), In-Service Testing (IST, RG-1.175), Graded Quality Assurance (GQA, RG-1.176), Technical Specifications (TS, RG-1.177), Risk-Informed Safety Classification (RISC, RG-1.201) and in an overall guide generically applicable to all five of these areas (RG-1.174), this series of Regulatory Guides provides a risk-informed method for licensees to use in requesting changes to their current licensing bases (CLB), the requirements for which are stated or referenced in numerous sections of 10 CFR 50 as detailed below in item A.1. No changes or additions have been made to those sections of 10 CFR 50 (nor to any other rules or regulations) in conjunction with the issuance of this series of guides. The risk-informed method is an alternative to the deterministically-based CLB change method (which remains acceptable as an alternative to this risk-informed method).

The risk-informed (RI) alternative method allows licensees to concentrate on plant equipment and operations that are most critically important to plant safety. For example, existing regulations require certain quality assurance activities to be applied to a wide variety of a plant's systems, structures, and components (SSCs). Although the regulations allow these quality assurance activities to be applied in a way that is commensurate with the safety importance of each SSC, historical precedent has resulted in the same quality assurance activities being applied to SSCs that have a wide range of safety significance. This risk-informed alternative encourages quality assurance activities that are compatible with safety significance, thus allowing more effort to be expended on the more important equipment, and correspondingly less effort on the less important equipment. In this way, a savings in total effort can be achieved with an insignificant change in overall safety. This savings, together with the greater operating flexibility that is possible utilizing the risk-informed method, are among the principal incentives for licensees to voluntarily assume the recordkeeping and reporting burdens that come with the risk-informed method.

The guides specify the records, analyses, and documents that licensees are expected to prepare in support of risk-informed changes to their CLB in the specified areas. Within each of the five areas, the applicable Regulatory Guide (supplemented by additional generic guidance from the overall guide, RG-1.174) specifies that the licensee should consider the following four items. The licensee should:

1. identify those aspects of the plant's licensing bases that may be affected by the proposed change, including, but not limited to, rules and regulations, final safety analysis report (FSAR), technical specifications, licensing conditions, and licensing commitments; identify all SSCs, procedures, and activities that are covered by the CLB change under evaluation and consider the original reasons for inclusion of each program requirement; and identify available engineering studies, methods, codes, applicable plant-specific and industry data and

operational experience, Probabilistic Risk Assessment (PRA) findings, and research and analysis results relevant to the proposed CLB change;

2. evaluate the proposed CLB change with regard to the principles that adequate defense-in-depth is maintained, that sufficient safety margins are maintained, and that proposed increases in core damage frequency and risk are small and are consistent with the intent of the Commission's Safety Goal Policy Statement;

3. develop an implementation and monitoring plan to ensure that the engineering evaluation conducted to examine the impact of the proposed changes continues to reflect the actual reliability and availability of SSCs that have been evaluated, and to ensure that the conclusions which have been drawn from the evaluation remain valid; and

4. review the proposed CLB change in order to determine the appropriate form of the change request; assure that information required by the relevant regulations(s) in support of the request is developed; and prepare and submit the request in accordance with relevant procedural requirements (for those applications where submittal is required, as specified later in this document).

Changes in NRC expectations, regarding licensee recordkeeping and reporting in the technical areas due to a licensee's voluntary use of this alternative risk-informed method for requesting CLB changes, are the subject of this supporting statement. 10 CFR 50 supporting statements describing the current bases for OMB's recordkeeping and reporting approval in these technical areas are as follows:

Section 16 of the current 10 CFR 50 OMB clearance covers the recordkeeping and reporting burdens for inservice inspection and inservice testing programs. Not included in Section 16 are the recordkeeping and reporting needed to convert the bases of ISI and/or IST programs to the risk-informed CLB change methodology (a one-time-only effort, as described in items #1, #2, and #4 above), and the recordkeeping and reporting associated with the implementation and monitoring plan that is an integral part of these risk-informed programs (an ongoing effort, as described in item 3 above, to ensure that no unexpected, adverse, safety degradation occurs after the requested changes have been made). However, the burden for CLB changes, including but not limited to CLB changes related to In-Service Inspection (ISI) and In-Service Testing (IST), is covered in Section 1 of the OMB clearance for 10 CFR 50 (license amendments).

Section 15 of the current 10 CFR 50 OMB clearance covers 10 CFR 50 Appendix B, which contains NRC's requirements regarding the features of the quality assurance (QA) programs that each licensee must establish, update, and follow throughout the life of the plant. 10 CFR 50 Appendix B allows QA activities to be applied in a graded manner and, because there is variety in the exact commitment made by individual licensees in their CLB regarding QA programs, licensees can adopt certain aspects of graded QA programs without prior NRC approval. The last paragraph of item A.1 of Section 15 states:

> "Maintenance of a QA program description is a license condition for both the construction and operation phases of a nuclear power plant. Like other license conditions, the description must be maintained current after it has been accepted

by the NRC. It is estimated that a licensee/applicant will make one change to the QA program description per year. The burden for Current Licensing Basis (CLB) changes, including changes to the QA program description, are included in the total license amendment requests in Section 1."

Thus the burden for CLB changes, including but not limited to CLB changes related to QA, is covered in Section 1 of the OMB clearance for 10 CFR Part 50 (license amendments).

Section 1 of the Part 50 clearance covers the recordkeeping and reporting required for technical specifications. Technical specifications are required to be part of a licensee's operating license, and license amendments are issued in response to requests for changes to technical specifications. License amendments for technical specifications changes have been anticipated for the clearance period, and the anticipated recordkeeping and reporting requirements burden has been included within Section 1. Over the past several years, applications for license amendments for technical specification changes have made increasing use of quantitative risk evaluations (i.e., the requests have become more "risk-informed"). Thus, the subject RG-1.177 serves more to codify and standardize existing practice than it does to significantly change that practice. Thus, many of the recordkeeping and reporting expectations associated with conversion to, and later maintenance of, risk-informed technical specification changes are already included within Section 1. This includes the implementation and monitoring plan, since technical specifications are required only for significant, safety-related equipment for which implementation and monitoring activities are currently required by 10 CFR 50.65.

A. JUSTIFICATION

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

In cases where the licensee chooses to convert from the present deterministically-oriented CLB to the alternative risk-informed CLB in any one of (or combination of) the subject technical areas, the licensee and the NRC must have sufficient information to determine that the plant continues to be operated in a manner that ensures the health and safety of the public once the changes have been implemented.

The information expected to be collected for the above-stated purpose in each of the technical areas considered by the subject Regulatory Guides is specified in various sections of 10 CFR 50, as described below. These regulations remain unchanged by issuance of the subject Regulatory Guides. Only the method for compliance has been changed. The current regulations are:

In-Service Inspection (ISI, RG-1.178, and the generically applicable RG-1.174):

10 CFR 50.55a(g) "Inservice inspection requirements," specifies in detail, according to the date of issuance of the plant's construction permit, the editions of Section XI of the ASME Boiler and Pressure Vessel Code and Addenda to which the inservice inspection of the plant's piping and pressure boundary equipment must comply, including the reporting and recordkeeping that is expected as part of the licensee's ISI program.

In order for the licensee to ensure, and the NRC to verify, that the requirements of this regulation (and the referenced codes and addenda) continue to be met following changes to the licensee's ISI program, in those cases where the licensee chooses to use the risk-informed alternative method for requesting such changes, the NRC expects the licensee to document and submit its consideration of the four items described in the above "Description of the Information Collection" section. This documentation is used by the NRC as indicated in item A.2 below.

The NRC expects licensees to maintain sufficient information regarding how the plant meets its CLB to support NRC audit of these bases at any time such audit should become necessary. However, the details regarding the related documentation that must be maintained, and for how long, are not explicitly provided in the regulations (other than that provided by the records-retention aspects of 10 CFR 50.71(c), which are discussed in the next-to-last paragraph under "Technical Specifications" below).

Licensee requests for CLB changes to various portions of their inservice inspection programs are voluntary. The availability of the risk-informed alternative for requesting such changes in no way makes the licensee's present inservice inspection program unacceptable. Each licensee will therefore request such a change if and when the licensee decides it is to its advantage (by virtue of concentrating its inspection efforts on the more risk-significant portions of its piping and pressure boundaries, and by the resulting increased operating flexibility) to request such a change. Therefore, the frequency of inservice inspection program change submittals using the risk-informed alternative method is not known with any certainty, although the staff's best estimates are used in item 12 below ("Estimate of Burden").

<u>In-Service Testing (IST, RG-1.175, and the generically applicable RG-1.174)</u>:

10 CFR 50.55a(f), "Inservice testing requirements," specifies in detail, according to the date of issuance of the plant's construction permit, the editions of Section XI of the ASME Boiler and Pressure Vessel Code and Addenda to which the inservice testing of the plant's pumps and valves must comply, including the reporting and recordkeeping that is expected as part of the licensee's IST program.

In order for the licensee to ensure, and the NRC to verify, that the requirements of this regulation (and the referenced codes and addenda) continue to be met following changes to the licensee's IST program, in those cases where the licensee chooses to use the risk-informed alternative method for requesting such changes, the NRC expects the licensee to document and submit its consideration of the four items described in the above "Description of the Information Collection" section. This documentation is used by the NRC as indicated in item A.2 below.

The NRC expects licensees to maintain sufficient information regarding how the plant meets its CLB to support NRC audit of these bases at any time such audit should become necessary. However, the details regarding the related documentation that must be maintained, and for how long, are not explicitly provided in the regulations (other than that provided by the records-retention aspects of 10 CFR 50.71(c), which are discussed in the next-to-last paragraph under "Technical Specifications" below).

Licensee requests for CLB changes to various portions of their inservice testing programs are voluntary. The availability of the risk-informed alternative for requesting such changes in no way makes the licensee's present inservice testing program unacceptable. Each licensee will therefore request such a change if and when the licensee decides it is to its advantage (by virtue of concentrating its testing efforts on the more risk-significant pumps and valves, and by the resulting increased operating flexibility) to request such a change. Therefore, the frequency of inservice testing program change submittals using the risk-informed alternative method is not known with any certainty, although the staff's best estimates are used in item 12 below ("Estimate of Burden").

Graded Quality Assurance (GQA, RG-1.176, and the generically applicable RG-1.174):

10 CFR 50 Appendix B, "Quality Assurance Criteria," describes the requirements of the quality assurance (QA) program that must be documented and applied to all activities affecting the safety-related functions of the plant's equipment, including the reporting and recordkeeping that is expected as part of the licensee's QA program. The overall purpose of the QA program is to establish a set of systematic and planned actions that are necessary to provide adequate confidence that safety-related plant equipment will perform satisfactorily in service.

The requirements delineated in 10 CFR 50 Appendix B allow QA program controls to be applied in a "graded" manner, that is, with greater efforts applied to QA programs related to more safety-significant equipment and activities, and lesser efforts applied to QA programs related to less safety-significant equipment and activities. In the past, engineering judgement provided the general mechanism for evaluating the relative importance to safety of plant equipment and activities, resulting in little advantage being taken of the regulation's provision that graded QA programs could be applied. The risk-informed alternative for making QA program changes (described in the subject RG-1.176) encourages graded QA (GQA) programs by providing a more systematic methodology for categorizing safety-related equipment and activities according to their safety importance, and for applying commensurate QA activities to each category.

In order for licensees to ensure that the requirements of 10 CFR 50 Appendix B continue to be met following changes to the licensee's QA program, in those cases where the licensee chooses to use the risk-informed alternative method for requesting such changes, the NRC expects licensees to document their consideration of the four items described in the above "Description of the Information Collection" section. Because the governing regulation (10 CFR 50 Appendix B) allows QA activities to be applied in a graded manner, and because there is variety in the exact commitment made by individual licensees in their CLB regarding QA programs, certain licensees can adopt certain aspects of graded QA programs without prior NRC approval. However, in those cases, the NRC expects licensees to document their consideration of the above-described four items for NRC's use during later audits of their QA program. This documentation may be used by NRC as indicated in item A.2 below.

The NRC expects licensees to maintain sufficient information regarding how the plant meets its CLB to support NRC audit of these bases at any time such audit should become necessary. However, the details regarding the related documentation that must be maintained, and for how long, are not explicitly provided in the regulations (other than

that provided by the records-retention aspects of 10 CFR 50.71(c), which are discussed in the next-to-last paragraph under "Technical Specifications" below).

Licensee requests for CLB changes to various portions of their quality assurance programs are voluntary. The availability of the risk-informed alternative for requesting such changes in no way makes the licensee's present quality assurance program unacceptable. Each licensee will therefore request QA program changes if and when the licensee decides it is to its advantage (by virtue of concentrating its QA efforts on the more risk significant SSCs and activities in its plant, and by the resulting increased operating flexibility) to request such a change. Therefore, the frequency of QA program change submittals using the risk-informed alternative method is not known, although the staff's best estimates are used in item 12 below ("Estimate of Burden").

Technical Specifications (TS, RG-1.177, and the generically applicable RG-1.174):

10 CFR 50.36, "Technical Specifications," requires that technical specifications be included as part of the plant's license specifying certain safety and control limits and settings, limiting conditions for operations, surveillance requirements, design features, administrative controls, and required notifications and reports, and it includes specification of the reporting and recordkeeping that is expected as part of the licensee's TS program. Requests for changes to technical specifications are submitted as applications for amendments to the plant's operating license.

Over the past several years, applications for license amendments for technical specification changes have made increasing use of quantitative risk evaluations (i.e., the requests have become more "risk-informed"). Thus, issuance of the subject RG-1.177 serves more to codify and standardize existing practice than it does to significantly change that practice.

In order for the licensee to ensure, and the NRC to verify, that the requirements of this regulation continue to be met following changes to the licensee's TS program, the NRC expects the licensee to document and submit its consideration of the four items described in the above "Description of the Information Collection" section. This documentation is used by the NRC as indicated in item A.2 below.

10 CFR 50.71(c) states, "Records that are required by the regulations in this part, by license condition, or by technical specifications, must be retained for the period specified by the appropriate regulation, license condition, or technical specification. If a retention period is not otherwise specified, these records must be retained until the Commission terminates the facility license." Thus, the required retention period varies according to the particular regulations, license conditions, or technical specifications that govern the particular aspect of the plant's CLB that is being changed.

Licensee requests for license amendments for technical specification changes are usually voluntary, but are sometimes in response to regulatory changes or regulatory positions that reflect changes in risk perspectives (for example, as caused by the occurrence of a significant operating event), or unplanned maintenance allowed outage time extensions (for example, emergency amendment requests).

Risk-Informed Safety Classification (RISC, RG-1.201, and the generically applicable RG-1.174):

On November 22, 2004, the U.S. Nuclear Regulatory Commission (NRC) adopted 10 CFR 50.69 (69 FR 68008). This regulation permits power reactor licensees and license applicants to implement an alternative regulatory framework with respect to "special treatment," where special treatment refers to those requirements that provide increased assurance beyond normal industrial practices that structures, systems, and components (SSCs) perform their design-basis functions. Under this framework, licensees using a risk-informed process for categorizing SSCs according to their safety significance can remove SSCs of low safety significance from the scope of certain identified special treatment requirements.

In May 2006, the NRC issued for trial use, Regulatory Guide (RG) 1.201, "Guidelines for Categorizing Structures, Systems, and Components in Nuclear Power Plants According to Their Safety Significance," which describes a method that the NRC staff considers acceptable for use in complying with the Commission's requirements in 10 CFR 50.69 with respect to the categorization of SSCs that are considered in risk-informing special treatment requirements. This categorization method endorses, with a number of clarifications, the process that the Nuclear Energy Institute (NEI) describes in Revision 0 of its guidance document NEI 00-04, "10 CFR 50.69 SSC Categorization Guideline," dated July 2005. Specifically, this process determines the safety significance of SSCs and categorizes them into one of four risk-informed safety class (RISC) categories.

This trial regulatory guide provides interim guidance for complying with the NRC's requirements in 10 CFR 50.69, by using the process described in Revision 0 of NEI 00-04 to determine the safety significance of SSCs and placing them into the appropriate RISC categories. The safety significance of SSCs is determined using an integrated decision-making process, which incorporates both risk and traditional engineering insights. The safety functions of SSCs include both the design-basis functions (derived from the safety-related definition) and functions credited for preventing and/or mitigating severe accidents. Treatment requirements are then commensurately applied for the categorized SSCs to maintain their functionality.

10 CFR 50.69 relies on a robust categorization process, as described in RG 1.201 and NEI 00-04, to provide reasonable confidence that the safety significance of SSCs is correctly determined. To ensure a robust categorization is employed, 10 CFR 50.69 requires the categorization process to be reviewed and approved by the NRC prior to implementation of 10 CFR 50.69. 10 CFR 50.69(b)(2) requires a licensee who voluntarily seeks to implement 10 CFR 50.69 to submit an application for a license amendment pursuant to 10 CFR 50.90 that contains the following information:

> (i) A description of the categorization process that meets the requirements of 10 CFR 50.69(c);
> (ii)A description of the measures taken to assure that the quality and level of detail of the systematic processes that evaluate the plant for internal and external events during normal operation, low power, and shutdown (including the plant-specific PRA, margins-type approaches, or other systematic evaluation techniques used to evaluate severe accident vulnerabilities) are adequate for the categorization of SSCs;

(iii) Results of the PRA review process to be conducted to meet 10 CFR 50.69(c)(1)(i); and,
(iv) A description of, and basis for acceptability of, the evaluations to be conducted to satisfy 10 CFR 50.69(c)(1)(iv). The evaluations shall include the effects of common cause interaction susceptibility, and the potential impacts from known degradation mechanisms for both active and passive functions, and address internally and externally initiated events and plant operating modes (e.g., full power and shutdown conditions).

The validity of the categorization process relies on ensuring that the performance and condition of SSCs continues to be maintained consistent with applicable assumptions. Changes in the level of treatment applied to an SSC might result in changes in the reliability of the SSCs credited in the categorization process. Additionally, plant changes, changes to operational practices, and plant and industry operational experience may impact the categorization process results. Consequently, the regulation contains requirements for updating the categorization and treatment processes when conditions warrant to assure that continued SSC performance is consistent with the categorization process and results.

Specifically, the regulation requires licensees to review in a timely manner, but no longer than once every two refueling outages, the changes to the plant, operational practices, applicable plant and industry operational experience, and, as appropriate, update the PRA and SSC categorization. In addition, licensees are required to obtain sufficient information on SSC performance to verify that the categorization process and its results remain valid. For RISC-1 SSCs, much of this information may be obtained from present programs for inspection, testing, surveillance, and maintenance. However, for RISC-2 SSCs, and for RISC-1 SSCs credited for beyond-design-basis accidents, licensees need to ensure that sufficient information is obtained. For RISC-3 SSCs, there is a relaxation of the requirements for obtaining information when compared to the applicable special treatment requirements. However, sufficient information would still need to be obtained and the regulation requires considering performance data, determining if adverse changes in performance have occurred, and making the necessary adjustments such that desired performance is achieved so that the evaluations conducted to meet 10 CFR 50.69(c)(1)(iv) remain valid. The feedback and adjustment process is crucial to ensuring that the SSC performance is maintained consistent with the categorization process and its results.

Taking timely corrective action is an essential element for maintaining the validity of the categorization and treatment processes used to implement 10 CFR 50.69. For safety significant SSCs, all current requirements continue to apply and, as a consequence, 10 CFR 50 Appendix B corrective action requirements are applied to the design basis aspects of RISC-1 SSCs to ensure that conditions adverse to quality are corrected. For both RISC-1 and RISC-2 SSCs, requirements are included in 10 CFR 50.69(e)(2) for monitoring and for taking action when SSC performance degrades.

When a licensee or applicant determines that a RISC-3 SSC does not meet its established acceptance criteria for performance of design basis functions, the regulation requires that a licensee perform timely corrective action (10 CFR 50.69(d)(2)(ii)). Further, as part of the feedback process, the review of operational data may reveal inappropriate credit for reliability or performance and a licensee would need to re-visit

the findings made in the categorization process or modify the treatment for the applicable SSCs (10 CFR 50.69(e)(3)). These provisions would then restore the facility to the conditions that were considered in the categorization process and would also restore the capability of the SSCs to perform their functions.

In 10 CFR 50.69(f) the regulation requires the licensee or applicant to document the basis for its categorization of SSCs before removing special treatment requirements. The regulation also requires the licensee or applicant to update the final safety analysis report to reflect which systems have been categorized.

The regulation also requires, in 10 CFR 50.69(g), reporting of events or conditions that would have prevented RISC-1 and RISC-2 SSCs from being able to perform their safety significant functions. Because the categorization process has determined that RISC-2 SSCs are of safety significance, NRC is interested in reports about circumstances where the safety significant function would have been prevented because of events or conditions. This reporting will enable NRC to be aware of situations impacting those functions found to be significant under 10 CFR 50.69, such that NRC can take any actions deemed appropriate.

Properly implemented, these requirements ensure that the validity of the categorization process and results are maintained throughout the operational life of the plant.

The NRC will review and update, as appropriate, the current inspection procedures under the NRC Reactor Oversight Process to incorporate inspection guidance for monitoring the implementation of 10 CFR 50.69 at nuclear power plants. The NRC intends to conduct sample inspections of plants implementing 10 CFR 50.69 in a manner that is sensitive to conditions that could significantly increase risk. The sample inspections will focus on the implementation of the categorization process approved as part of the NRC review of the 10 CFR 50.69 license amendment request. The sample inspections will also evaluate the treatment processes established under 10 CFR 50.69 with primary attention directed to programmatic and common-cause issues; including those associated with known degradation mechanisms. The inspections may provide operating experience information on RISC-3 SSCs that can also be provided to other licensees.

2. Agency Use of Information

In-Service Inspection (RG-1.178, and the generically applicable RG-1.174):

The information expected as described in item A.1 will be used by responsible NRC personnel to make the finding that the requirements of the plant's CLB in areas related to inservice inspection will continue to be satisfied once the requested changes are made, thus insuring the continuing validity of the plant's operating license.

In-Service Testing (RG-1.175, and the generically applicable RG-1.174):

The information expected as described in item A.1 will be used by responsible NRC personnel to make the finding that the requirements of the plant's CLB in areas related to inservice testing will continue to be satisfied once the requested changes are made, thus insuring the continuing validity of the plant's operating license.

Quality Assurance (RG-1.176, and the generically applicable RG-1.174):

For licensees whose license requires NRC approval prior to implementation of the specific type of QA change being requested (see discussion in item A.1), the submitted information (also described in item A.1) is used by the responsible NRC personnel to make the finding that the QA requirements will continue to be met once the requested QA changes are made. For licensees whose license does not require prior approval (see discussion in item A.1), the same information should be used by the licensee to determine that the QA requirements will continue to be met once the requested changes are made, and also should be retained on-site for possible NRC inspection to confirm that the plant continues to conform to its CLB in areas related to quality assurance.

Technical Specifications (RG-1.177, and the generically applicable RG-1.174):

The information expected as described in item A.1 is used by responsible NRC personnel in the review and approval of the requested license amendment, thus ensuring the continuing validity of the plant's operating license once the requested technical specification changes are made.

Risk-Informed Safety Classification (RISC, RG-1.201, and the generically applicable RG-1.174):

The information expected as described in item A.1 is used by responsible NRC personnel in the review and approval of the requested license amendment, thus ensuring the continuing validity of the plant's operating license once the requested changes are made.

3. Reduction of Burden Through Information Technology

There are no legal obstacles to reducing the burden associated with this information collection. The NRC encourages respondents to use information technology when it would be beneficial to them. NRC issued a regulation on October 10, 2003 (68 FR 58791), consistent with the Government Paperwork Elimination Act, which allows its licensees, vendors, applicants, and members of the public the option to make submissions electronically via CD-ROM, e-mail, special Web-based interface or other means. However, because of the types of information and the infrequency of submission, the reports do not readily lend themselves to the use of information technology collection techniques for submission.

4. Effort to Identify Duplication and Use Similar Information

There is no duplication of requirements. NRC has in place an ongoing program to examine all information collections with the goal of eliminating all duplication and/or unnecessary information collections.

5. Effort to Reduce Small Business Burden

Not applicable. These submittals are prepared by licensees of nuclear power plants, which are not small businesses.

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

These voluntary collections are not required on a specified frequency (or at all). The only effect on Federal Programs of not receiving information, or receiving it less frequently, would be that of not allowing licensees the possible savings in resources and the increased operating flexibility that would otherwise result from such submittals.

7. Circumstances which Justify Variation from OMB Guidelines

These records and reports become part of the licensing basis of the plant (or the license itself, as noted in the sections that discuss technical specifications). The NRC expects licensees to maintain sufficient information regarding how the plant meets its CLB to support NRC audit of these bases at any time such audit should become necessary. However, the details regarding how much related documentation must be maintained, and for how long, are not explicitly provided in the regulations (other than that provided by the records-retention aspects of 10 CFR 50.71(c), which are discussed in the next-to-last paragraph under "Technical Specifications" above).

8. Consultations Outside NRC

The opportunity for public comment on this information collection has been published in the Federal Register.

9. Payment of Gift to Respondents

Not applicable.

10. Confidentiality of the Information

Confidential or proprietary information is protected in accordance with NRC regulations at 10 CFR 9.17(a) and 10 CFR 2.390(b).

11. Justification for Sensitive Questions

No sensitive information is requested.

12. Estimate of Burden and Burden Hour Cost

ISI and IST burdens are included in Section 16 of the OMB clearance for 10 CFR 50. However, the burden for CLB changes, including but not limited to CLB changes related to ISI and IST, is covered in Section 1 of the OMB clearance for 10 CFR 50 (license amendments). The number of licensing submittals listed in the tables below for ISI and IST are the additional annual submittals that are anticipated as a result of the risk-informed alternative method. These submittals were not anticipated under the present methodology, and thus are not covered by Section 16 and Section 1 of the present OMB clearance.

Plant licenses require that the sections of the licensees' Final Safety Analysis Reports (FSARs) that describe its ISI program be updated when the ISI programs are changed,

e.g., when a risk-informed ISI program is adopted. This is a relatively minor effort since the necessary information will already have been collected in support of the submittal that requests the change. Therefore, the "FSAR update" burden is included in the line items provided in the table below.

QA burdens are included in Section 15 of the OMB clearance for 10 CFR 50. However, the burden for CLB changes, including but not limited to CLB changes related to QA, is covered in Section 1 of the OMB clearance for 10 CFR 50 (license amendments). The single submittal listed in the tables below for GQA is the single additional annual submittal that is anticipated as a result of the risk-informed alternative method. This submittal was not anticipated under the present methodology, and thus is not covered by Section 15 and Section 1 of the present OMB clearance.

Burdens for all types of TS changes are included in Section 1 (license amendments) of the OMB clearance package for 10 CFR 50. Section 1 includes, but is not limited to, the relatively small sub-set of all TSs that are related to allowed outage times (AOTs) and surveillance test intervals (STIs), which are the only types of TSs that can be changed utilizing the risk-informed alternative method presented by the subject regulatory guides. Because the burden is accounted for in Section 1, no additional burden is included in this Section.

ANNUAL REPORTING REQUIREMENTS
FOR SUBMITTALS REQUESTING RI PROGRAM APPROVALS

Section/ Reg. Guide	Number of Lic. Submittals	Hours per Submittal	Total Annual Burden (Hrs.)	Cost @ $217/Hr.
10CFR50.55a(g) RG-1.178, ISI	3[(a)]	530	1,590	$345,030
10CFR50.55a(f) RG-1.175, IST [(b)]	0	550	0	0
10CFR50 App B RG-1.176,GQA [(b)]	0	550	0	0
10CFR50.36 RG-1.177, (TS)	7	400	2,800	607,600
10CFR50.36 RG-1.177, Emer./Exigent	15	100	1,500	325,500
10CFR50.69 RG 1.201, (RISC)	1	600	600	130,200
TOTALS	26		6,490	$1,408,330

(a) Excludes 10-year ASME update

(b) RG 1.175 (IST) submittals have ceased due to equivalent relief from ASME Code Case OMN-3, and RG 1.176 (GQA) submittals have ceased due to issuance of 10 CFR 50.69 (RG 1.201, RISC, Risk-Informed Safety Classification).

ANNUAL RECORDKEEPING REQUIREMENTS
TO SUPPORT SUBMITTALS REQUESTING RI PROGRAM APPROVALS

Section/ (Reg. Guide)	Number of Lic. Program Changes	Hours per Program Change	Total Annual Burden (Hrs.)	Cost @ $217/Hr.
10CFR50.55a(g) RG-1.178, ISI	3[a]	3,750	11,250	$2,441,250
10CFR50.55a(f) RG-1.175, IST [b]	0	2,250	0	0
10CFR50 App B RG-1.176, GQA[b]	1	2,250	2,250	488,250
10CFR50.36 RG-1.177, (TS)	7	1,000	7,000	1,519,000
10CFR50.36 RG-1.177, Emer./Exigent	15	100	1,500	325,500
10CFR50.69 RG 1.201, (RISC)	1	1,500	1,500	325,500
TOTALS	27		23,500	$5,099,500

ANNUAL RECORDKEEPING REQUIREMENTS
TO SUPPORT IMPLEMENTATION AND MONITORING PLAN

Section/ (Reg. Guide)	Number[1] of Lic. Program Changes	Hours per Program Change	Total Annual Burden (Hrs.)	Cost @ $217/Hr.
10CFR50.55a(g) RG-1.178, ISI	90[(a)]	200	18,000	$3,906,000
10CFR50.55a(f) RG-1.175, IST[(b)]	3	200	600	130,200
10CFR50 App B RG-1.176, GQA[(b)]	1	200	200	43,400
10CFR50.36 RG-1.177, (TS)	100	50	5,000	1,085,000
10CFR50.36 RG-1.177, Emer./Exigent	0	0	0	0
10CFR50.69 RG 1.201, (RISC)	1	2,000	2,000	434,000
TOTAL	195		25,800	$5,598,600

Total reporting burden = 6,490 hours
Total recordkeeping burden = 49,300 hours (23,500 + 25,800 hours)
Total burden = 55,790 hours

[1]Recordkeeping for the implementation and monitoring plan is a continuing effort. After making a risk-informed change in the CLB, each licensee would be expected to expend this effort every year on a continuing basis.

13. Estimate of Other Additional Costs

The quantity of records to be maintained is roughly proportional to the recordkeeping burden and therefore can be used to calculate approximate records storage costs. Based on the number of pages maintained for a typical clearance, the records storage cost has been determined to be equal to .0004 times the recordkeeping burden cost. Therefore, the storage cost for this clearance is estimated to be $4,279 (49,300 hours x $217 x .0004).

14. Estimated Annualized Cost to the Government

The following tables and text present this information.

ANNUAL GOVERNMENT REVIEW OF
REQUESTS FOR RI PROGRAM APPROVAL

Section/ (Reg. Guide)	Number of Reviews	Hours per Review	Total Annual Review (Hrs.)	Gov. Cost @ $217/Hr.
10CFR50.55a(g) RG-1.178, ISI	3[(a)]	400	1,200	$260,400
10CFR50.55a(f) RG-1.175, IST[(b)]	0	1,000	0	0
10CFR50 App B RG-1.176, GQA[(b)]	0	750	0	0
10CFR50.36 RG-1.177, (TS)	7	400	2,800	607,600
10CFR50.36 RG-1.177, Emer./Exigent	15	100	1,500	325,500
10CFR50.69 RG 1.201, (RISC)	1	400	400	86,800
TOTAL	26		5,900	$1,280,300

ANNUAL GOVERNMENT REVIEWS/AUDITS OF RECORDS
SUPPORTING IMPLEMENTATION AND MONITORING PLAN

Section/ (Reg. Guide)	Number[2] of Reviews/Audits	Hours per Review/Audit	Total Annual Rev./Aud. (Hrs.)	Cost @ $217/Hr.
10CFR50.55a(g) RG-1.178, ISI	90	50	4,500	$976,500
10CFR50.55a(f) RG-1.175, IST	3	40	120	26,040
10CFR50 App B RG-1.176, GQA	1	45	45	9,765
10CFR50.36 RG-1.177, (TS)	100	50	5,000	1,085,000
10CFR50.36 RG-1.177, Emer./Exigent	0	0	0	0
10CFR50.69 RG 1.201 (RISC)	1	100	100	21,700
TOTAL	195		9,765	$2,119,005

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

15. Reason for Change in Burden or Cost

The estimated burden has been revised based on the actual reporting and ongoing recordkeeping related to plants that have made licensing changes. Also, there has been a change to the base burden cost from $156 to $217 per hour.

16. Publication for Statistical Use

The information will not be published for statistical use.

17. Reason for Not Displaying the Expiration Date

The information collections contained in these regulatory guides are contained in a regulation. Revising the guides merely to update the expiration date unnecessarily expends agency resources.

[2]See footnote #1 (under previous table related to recordkeeping for implementation and monitoring plan)

18. Exceptions to the Certification Statement

There are no exceptions.

B. COLLECTIONS OF INFORMATION EMPLOYING STATISTICAL METHODS

Statistical methods are not used in this collection of information.