

FINAL SUPPORTING STATEMENT FOR  
10 CFR PART 55, OPERATORS' LICENSES

(OMB CLEARANCE NO. 3150-0018)

EXTENSION REQUEST

DESCRIPTION OF THE INFORMATION COLLECTION

The regulations in 10 CFR 55 establish: (1) procedures and criteria for the issuance of licenses to operators and senior operators of utilization facilities (which are licensed pursuant to the Atomic Energy Act of 1954, as amended, 10 CFR 50, and 10 CFR 52); (2) the terms and conditions upon which the Commission will issue or modify those operators' licenses; and (3) the terms and conditions to maintain and renew those operators' licenses.

The majority of the information collection requirements related to 10 CFR 55 apply to the holders of and applicants for utilization facility operating licenses (as defined in 10 CFR 50). Several of the information collections apply to the holders of or applicants for an individual operator's license (i.e., operators and senior operators as defined in 10 CFR 55). The information collections are necessary to permit the timely examination of applicants, operators, and senior operators as well as the timely issuance and renewal of operators' licenses.

This supporting statement provides a comprehensive overview of the information collection requirements specified in 10 CFR 55. Note that the burden hours associated with NRC Form 396 (OMB Clearance No. 3150-0024), NRC Form 536 (OMB Clearance No. 3150-0131), and NRC Form 398 (OMB Clearance No. 3150-0090) are contained in the supporting statements for the associated OMB Clearances. However, all of those information collection requirements are identified in this Supporting Statement, as summarized in Table 12, for the sake of completeness.

In addition to the rules, three NRC Regulatory Guides and one NUREG staff report provide guidance on acceptable methods of implementing the regulations. These Regulatory Guides and NUREG report are:

1. Regulatory Guide 1.134 - Medical Evaluation of Licensed Personnel for Nuclear Power Plants (Revision 3). This Regulatory Guide was revised in March 1998, but facility licensees may continue to use the earlier version.
2. Regulatory Guide 1.149 - Nuclear Power Plant Simulation Facilities for Use in Operator License Examinations (Revision 3). This Regulatory Guide was revised in October 2001, but facility licensees may continue to use the earlier versions.
3. Regulatory Guide 1.8 - Qualification and Training of Personnel for Nuclear Power Plants (Revision 3). This Regulatory Guide was revised in May 2000, but facility licensees may continue to use the earlier version.
4. NUREG-1021 - Operator Licensing Examination Standards for Power Reactors (Revision 9). This report provides guidance necessary for power reactor facility licensees to voluntarily prepare their operator licensing examinations.

A. JUSTIFICATION

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

- a. Holders of facility operating licenses and applicants for such operating licenses (numbering 70 nuclear power facilities located at 65 sites and 33 non-power reactor facilities) shall:

(1) submit the following items in accordance with the indicated section of 10 CFR 55:

§55.11: Application for exemption from the requirements of the regulations in 10 CFR 55. Facility licensees are expected to comply with the regulations unless they provide sufficient information for the Commission to determine that a specific exemption is authorized by law, will not endanger life or property, and is otherwise in the public interest.

§55.23, 55.31(a)(6), and 55.57(a)(6): NRC Form 396, "Certification of Medical Examination by Facility Licensee" (currently approved under OMB Clearance No. 3150-0024).

§55.25: Notification to the Commission within 30 days of learning of the diagnosis of a licensed operator's permanent physical or mental disability. Submittal of NRC Form 396 is required if a license restriction is requested (currently approved under OMB Clearance No. 3150-0024).

§55.27: Report medical qualifications data to Commission upon request (currently approved under OMB Clearance No. 3150-0024).

§55.31(a): Written request that a written examination and operating test be administered and certification on NRC Form 398, "Personal Qualification Statement - Licensee," that the applicant has completed the facility licensee's requirements for licensing (currently approved under OMB Clearance No. 3150-0090). In practice, per NUREG-1021, power reactor facility licensees must also submit a written request for the NRC to administer the generic fundamentals examination (GFE) in advance of the formal license application.

§55.31(b): Additional information as necessary for the NRC to determine whether to grant or deny the license application or revoke, modify or suspend the license.

§55.35: Certification on NRC Form 398 that the applicant is ready for reexamination and a statement that describes the extent of the applicant's retraining (currently approved under OMB Clearance No. 3150-0090).

§55.40(a) and (d): Information regarding examination content for operators to whom 10 CFR 55 applies. This information is necessary for the NRC to prepare the site-specific written examinations and operating tests that applicants must pass in order to obtain an operator's license.

§55.40(b)(1) and (3): The written examinations required by §55.41 and §55.43 and the operating tests required by §55.45. In lieu of submitting information from which the NRC will prepare the licensing examinations, power reactor facility licensees may prepare the examinations themselves and submit them to the NRC for review and approval.

§55.40(c): Written request for the NRC to prepare, proctor, and grade the required licensing examinations. Preparing a site-specific licensing examination requires significantly more resources than reviewing and approving a facility-prepared examination; therefore, a written request provides the basis to budget and schedule the resources. NRC Form 536 is used for this purpose; that form is currently approved under OMB Clearance No. 3150-0131.

§55.46(b): Power reactor facility licensees that propose to use a simulation facility, other than a plant-referenced simulator, or the plant in the administration of operating tests under §55.45(b)(1) or (3) shall request approval from the Commission. This is necessary to ensure the consistency and validity of the operating tests upon which licensing decisions are based.

§55.47: Request for waiver of examination and test requirements on NRC Form 398 (currently approved under OMB Clearance No. 3150-0090).

§55.57(a): Certification on NRC Form 398 that the renewal applicant has competently and safely discharged the license responsibilities and satisfactorily completed the requalification program during the effective term of the current license (currently approved under OMB Clearance No. 3150-0090).

55.59(a)(2)(iii): Support the preparation and administration of for-cause (NRC) requalification examinations if the NRC determines that the facility licensee's examinations are inadequate.

§55.59(c): Have a requalification program and, upon request, submit to the Commission a copy of comprehensive requalification written examinations or annual operating tests. This improves efficiency by enabling the NRC staff to review these materials before traveling to the site for a licensed operator requalification program inspection.

(2) and keep on file:

§55.27: Retain medical qualifications data (currently approved under OMB Clearance No. 3150-0024).

§55.40(b)(2): Establish and maintain procedures to control examination security and integrity. The Commission takes examination security and integrity very seriously and incorporated this on-going requirement when it amended 10 CFR 55 to allow power reactor facility licensees to prepare their own operator licensing examinations.

§55.46(d)(1): The results of the simulation facility performance tests conducted for four years after completing the test or until superseded by updated test results. The NRC staff will review uncorrected performance deficiencies to ensure that the operating tests administered per §55.45(b) are valid.

§55.53(f): Certification that the qualifications and training of a licensee who has not been actively performing the functions of an operator are current. This certification, which, in practice, is not submitted to the NRC but subject to inspection on-site, ensures that licensed operators who have not maintained their watch-standing proficiency are fully qualified before they are allowed to resume licensed duties.

§55.59(a)(2): In order to facilitate the preparation and administration of requalification examinations, power reactor facility licensees maintain banks of written questions and operating test materials.

§55.59(b): Evidence of successful completion of additional training, if necessary. Licensed operators are required to complete a requalification training and examination program to maintain the knowledge, skills, and abilities needed to safely perform licensed duties. If an operator does not complete the program, the Commission retains the right to prescribe and review additional training to ensure the operator's competence prior to returning to licensed duties.

§55.59(c)(5)(i): Maintain records of operator participation in the requalification program until the operator's license is renewed. This enables the facility licensee to certify, pursuant to §55.57(a)(4), that a license renewal applicant has satisfactorily completed the requalification program during the 6-year term of the license.

- b. Holders of or applicants for an individual operator's license (numbering approximately 4,700 reactor operators and senior operators) shall submit the following items in accordance with the indicated section of 10 CFR 55:

§55.11: Application for exemption from the requirements of the regulations in 10 CFR 55. Applicants and licensees are expected to comply with the regulations unless they provide sufficient information for the Commission to determine that a specific exemption is authorized by law, will not endanger life or property, and is otherwise in the public interest.

§55.31(a) and (d): NRC Form 398, "Personal Qualification Statement -- Licensee," to apply for a license (currently approved under OMB Clearance No. 3150-0090).

§55.31(b): Additional information as necessary for the NRC to determine whether to grant or deny the license application or revoke, modify or suspend the license.

§55.35: Reapplication on NRC Form 398 (currently approved under OMB Clearance No. 3150-0090).

§55.47: Request for waiver of examination and test requirements on NRC Form 398 (currently approved under OMB Clearance No. 3150-0090).

§55.53(g): Notification of conviction of a felony within 30 days. This is the only direct means by which the NRC can ensure that felony conviction cases, which may have a bearing on the operator's trustworthiness, reliability, judgment, integrity, competence, and fitness-for-duty are evaluated to determine whether the operator poses sufficient risk to public health and safety to warrant suspension or revocation of the operator's license.

§55.57(a): Application for renewal of license on NRC Form 398 (currently approved under OMB Clearance No. 3150-0090).

§55.59(b): Evidence of successful completion of additional training, if necessary. Licensed operators are required to complete a requalification training and examination program to maintain the knowledge, skills, and abilities needed to safely perform licensed duties. If an operator does not complete the program, the Commission retains the right to prescribe and review additional training to ensure the operator's competence prior to returning to licensed duties.

## 2. Agency Use of Information

The NRC will use the reports and records required by 10 CFR 55 for one or more of the following purposes:

- the preparation, review, and approval of the written examinations and operating tests used to determine whether the applicants for operators' licenses have learned to operate the facility competently and safely and, additionally, for senior operators, whether the applicants have learned to safely and competently direct the activities of licensed operators;
- the review and approval of operator license applications (initial and renewal);
- the review and evaluation of the licensed operator requalification programs conducted by facility licensees; and
- the review of facility licensees' plans for and performance testing of simulation facilities.

To the extent possible, the facility licensees and applicants are required to maintain documentation rather than submit reports to the NRC.

## 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 (68FR58791), 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. It is estimated that approximately 25% of the potential responses are filed electronically; however, the majority of the most voluminous responses (i.e., the power reactor licensing examinations and reference materials), which constitute over 75% of the total information collection burden, are filed electronically.

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

No small businesses are affected by these information collection requirements.

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

The information collections under 10 CFR 55 are conducted "one time only" or "as required." No other frequency of collection is assigned. If the information collections were not conducted, the NRC would not be able to fulfill its statutory responsibility to determine the qualifications of applicants for operator licenses, including the preparation and approval of initial operator licensing examinations, or to oversee simulator and requalification training and examination programs.

7. Circumstances Which Justify Variation from OMB Guidelines

Procedures must be retained for the life of the license. Operators licensed for 6 years must retain certifications and other data associated with licensees for inspection to ensure operational safety at nuclear reactor facilities.

8. Consultations Outside the NRC

The staff contacted licensed operator training personnel at three nuclear power reactor facilities and an NRC operator licensing examiner with recent experience preparing examinations under contract to power reactor facilities to obtain estimates of the amount of time required to develop the reports and maintain the records summarized in Table 12. The staff also contacted personnel at four non-power reactor facilities to obtain estimates of the amount of time required to submit the examination content information necessary for the NRC staff to prepare those examinations. Burden estimate changes made as a result of those consultations are summarized in Item 15 below.

The opportunity for public comment on this information collection requirements was published on February 6, 2006, in the Federal Register (71 FR 6098). The staff received one comment related to the information collection in 10 CFR 55.25, which requires facility licensees to notify the Commission within 30 days of learning of the diagnosis of a licensed operator's permanent physical or mental disability. The comment, which was submitted by an alliance of six facilities in the Southwest,

suggested that the information has little practical value and is not necessary for the NRC to properly perform its function; moreover, it opined that the burden estimate in Table 12 for this reporting requirement was far too low. For the record, it should be noted that the subject information collection is actually covered by OMB Clearance Number 3150-0024 for NRC Form 396, "Certification of Medical Examination by Facility Licensee," which was last renewed in November 2005, and is identified in this 10 CFR Part 55 supporting statement only for completeness.

The following summarizes the comment's estimates of burden and the calculated burden for NRC Form 396 from the most recent OMB Clearance review.

Source	Hours per occurrence	Number of Occurrences per Year	Total Burden for 70 Sites
Comment	10 hours	10 - 15 per site	700 - 1050 hours
Previous Estimate for OMB Clearance No. 3150-0024	0.25 hour	75 for all sites	19 hours

It can be seen that this comment estimates a burden that is substantially larger than the recent estimate used for this form's OMB Clearance. The staff intends to further investigate the comment in order to understand what activities were included in this estimate and what actual burden is involved and take appropriate action, if needed.

The comment also stated that most of the reports made under this requirement were unnecessary because they did not affect the license. The staff reviewed the requirements in 10 CFR 55.25 and concluded that this reporting is clearly needed for the NRC to implement its responsibilities regarding individual operating licenses and to ensure that licensed operators' medical condition and general health will not adversely affect their performance of assigned duties or cause operational errors. It is possible that this requirement may be misunderstood and misapplied in practice. The staff will investigate this aspect as well, and will identify appropriate action to improve understanding and implementation of this reporting requirement.

9. Payment or Gift to Respondents

Not applicable.

10. Confidentiality of Information

The NRC provides no pledge of confidentiality for this collection of information other than those records which are covered under NRC 16 - Facility Operator Licensees Record Files (10 CFR Part 55), System of Records.

The NRC will withhold from public disclosure, until after their administration, the operator licensing examinations and tests that power reactor facility licensees submit to the NRC for approval pursuant to 10 CFR 55.40(b).

11. Justification for Sensitive Questions

No sensitive information is requested for this information collection.

12. Estimated Industry Burden and Burden Hour Cost

- a. The annual reporting and recordkeeping burdens are summarized in Table 12. As reflected in Item 1 above, some of the reporting requirements apply to the 103 power and non-power facility licensees as well as the 4,700 individual license holders (a total of 4,803 possible respondents). At the respondents' discretion, these requirements may be satisfied directly by the individual license holders, as a collaborative effort between the individual and facility license holders, or by the facility licensees on their individual license holders' behalf. The estimated burden per response should be approximately the same regardless which respondent completes the required report.
- b. Those burden estimates that have changed since the last supporting statement for this clearance are discussed in Item 15 below.

13. Estimate of Other Additional Costs

The annual cost to reproduce and transmit the material for the initial operator licensing program is estimated to be \$10,125. The estimate includes \$2,625 (35 licensees x 1000 pages per examination x \$.05 per page for reproduction costs plus \$25 per examination for packaging and shipping) for those facility licensees that write their own examinations and \$7,500 (15 licensees x 8,000 pages of reference material per examination x \$.05 per page for reproduction costs plus \$100 to package and ship the reference material) for those facility licensees at which the NRC writes the examinations.

Facility licensees may submit their materials in electronic format, which would significantly reduce the reproduction and transmittal 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 0.04 percent of the recordkeeping burden cost. Therefore, the storage cost for this clearance is \$1,771 (21,596 recordkeeping hours x \$205/hour x .0004).

Total Other Additional Costs are \$11,896 (\$10,125 + \$1771).



14. Estimated Annualized Cost to the Federal Government

The total annual cost to the Federal Government is estimated to be \$3,702,557 as shown in Table 14. This cost is fully recovered by fee assessments to NRC licensees pursuant to 10 CFR 171.

Those cost estimates that have changed since the last supporting statement for this clearance are discussed in Item 15 below.

The burden to the Federal Government includes 280 hours to process the registrations (4 hours per facility response), \$100,040 per year for a contractor to prepare and grade the examinations, and 300 hours for the staff to review the examinations and administer the program (75 hours per GFE x 4 exams per year).

15. Reasons for Change in Burden or Cost

The burden has increased by 1,042 hours from 66,018 hours to 67,060 primarily because of the implementation guidance in NUREG-1021, published in July 2004, which allows facility licensees to develop and submit, upon approval by an authorized representative of the facility licensee, proposed examinations for review and approval by the staff of the U.S. Nuclear Regulatory Commission (10 CFR 55.40). Also, facility licensees who elect to prepare their own examinations shall develop and submit their proposed examinations based on the guidelines and instructions contained therein.

**Burden Increases:**

Per NUREG-1021, power reactor facility licensees under section 55.31(a), must submit a written request for the NRC to administer the generic fundamentals examination (GFE) in advance of the formal license application. It is estimated that 70 licensees will request this examination at 10 hours per request, for a 700 hour burden increase.

Staff previously estimated that the operating test required by 10 CFR 55.45, whose burden is covered by section 55.46(b), would result in no requests to use either the plant or non-plant-referenced simulator. However, 2 requests were submitted, thereby increasing the number of respondents from 0 to 1 annually. This results in a burden increase from 0 to 40 hours.

Based on consultation with one of the facilities that recently submitted a request under section 55.46(b), the estimated burden per response is 40 hours instead of 120 hours as originally estimated.

Based on consultation with licensed operator training personnel regarding the maintenance of simulator performance data pursuant to 10 CFR 55.46(d)(1), the annual recordkeeping burden per respondent was increased from 25 to 30 hours thereby, increasing the total burden from 1,750 hours (70 recordkeepers x 25 hours per recordkeeper) to 2,100 hours (70 recordkeepers x 30 hours per recordkeeper). This results in an increase of 350 hours (1750 hours - 2100 hours = 350).

**Total annual burden Increase: 1,090 hours**

**Burden Decreases:**

During the past three years, 3 non-power reactor facilities ceased operations, thereby, decreasing the number of respondents in that category from 36 to 33. This has reduced the estimated recordkeeping burden associated with 10 CFR 55.59(c)(5)(I) by 36 hours from 432 to 396(12 hours per facility).

The 3 non-power reactor facilities ceasing operations have also contributed to a slight decrease in the estimated annual number of non-power reactor examinations from 25 to 22, resulting in a slight decrease in the non-power reactor burden for 10 CFR 55.40(a) and (d) from 100 to 88 burden hours. This results in a decrease of 12 hours.

**Total annual burden decrease: 48 hours**

**Net Burden Change: 1,042 hours (1,090 hours - 48 hours)**

16. Publication for Statistical Use

This information will not be published for statistical use.

17. Reason for Not Displaying the Expiration Date

The requirements are 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

There are no exceptions.

B. COLLECTIONS OF INFORMATION EMPLOYING STATISTICAL METHODS

Not applicable.

TABLE 12: ANNUAL REPORTING REQUIREMENTS

Section	Number of Respondents	Responses Per Respondent	Total Number of Responses	Burden Per Response	Total Burden Hours	Cost at \$205 / Hour
55.11	4 (out of 4,803)	1	4	40	160	\$ 32,800
55.23	Currently approved under OMB No. 3150-0024					
55.25	Currently approved under OMB No. 3150-0024					
55.27	Currently approved under OMB No. 3150-0024					
55.31(a) & (d)	Currently approved under OMB No. 3150-0090					
55.31(a)	70	1	70	10	700	\$ 143,500
55.31(a)(6)	Currently approved under OMB No. 3150-0024					
55.31(b)	50 (out of 4,803)	1	50	4	200	\$ 41,000
55.35	Currently approved under OMB No. 3150-0090					
55.40(a) and (d)	15 (out of 70)	1	15	Power Reactors: 130	1,950	\$ 399,750
	22 (out of 33)	1	22	Non-power Reactors: 4	88	\$ 18,040
55.40(b)(1) and (3)	35 (out of 70)	1	35	1200	42,000	\$ 8,610,000
55.40(c)	Currently approved under OMB No. 3150-0131					
55.46(b)	1 (out of 70)	1	1	40	40	\$ 8,200
55.47	Currently approved under OMB No. 3150-0090					
55.53(g)	5 (out of 4,803)	1	5	4	20	\$ 4,100

TABLE 12: ANNUAL REPORTING REQUIREMENTS

Section	Number of Respondents	Responses Per Respondent	Total Number of Responses	Burden Per Response	Total Burden Hours	Cost at \$205 / Hour
55.57(a)	Currently approved under OMB No. 3150-0090					
55.59(a)(2)(iii)	1 (out of 70)	1	1	Power reactors: 100	100	\$ 20,500
	1 (out of 33)	1	1	Non-power reactors: 22	22	\$ 4,510
55.59(b)	20 (out of 4,803)	1	20	6	120	\$ 24,600
55.59(c)	16 (out of 70)	1	16	Power reactors: 4	64	\$ 13,120
	0 (out of 33)	0	0	Non-power reactors: 0.5	0	\$ 0
TOTAL REPORTING	240		240		45,464	\$9,320,120

TABLE 12: ANNUAL RECORDKEEPING REQUIREMENTS				
Section	Number of Recordkeepers	Burden Hours Per Recordkeeper	Total Burden Hours	Cost at \$205 / Hour
55.27	Currently approved under OMB No. 3150-0024			
55.40(b)(2) (establish security procedures)	1 (out of 70)	100	100	\$ 20,500
55.40(b)(2) (maintain security procedures)	33 (out of 70)	20	660	\$ 135,300
55.53(f)	70	2	140	\$ 28,700
55.59(a)(2)	70	100	7,000	\$ 1,435,000
55.46(d)(1)	70	30	2,100	\$ 430,500
55.59(c)(5)(i)	70	160 for power reactors	11,200	\$ 2,296,000
	33	12 for non-power reactors	396	\$ 81,180
TOTAL FOR PART 55 RECORDKEEPING	103		21,596	\$ 4,427,180
TOTAL BURDEN/COST FOR 10 CFR PART 55			67,060	\$ 13,747,300

TOTAL BURDEN HOURS: 67,060 hours (45,464 hrs. reporting + 21,596 hrs. recordkeeping)

TOTAL BURDEN HOUR COST: 13,747,300 (67,060 hrs x \$205/hrs)

TOTAL RESPONSES: 343 (240 responses plus 103 recordkeepers)

TOTAL RESPONDENTS: 240

TABLE 14: ESTIMATE OF ANNUAL COST TO THE FEDERAL GOVERNMENT

Report / Record	Subsection	Hours Per Response	Number of Responses	Burden Hours	Cost at \$205 / Hour
Review specific exemption applications	55.11	40	4	160	\$ 32,800
Process generic fundamentals exam registrations; prepare and grade exams	55.31(a)	4	70	280	\$ 57,400
	55.41(b) - staff	75	4	300	\$ 61,500
	55.41(b) - contract	122	4	488	\$ 100,040
Review additional information	55.31(b)	0.25	50	12.5	\$ 2,563
Prepare initial operator licensing written examinations and operating tests	55.40(a) and (c) (power reactors)	400	15	6,000	\$ 1,230,000
	55.40(d) (non-power reactors)	200	25	5,000	\$ 1,025,000
Review and approve initial operator licensing examinations prepared by power reactor facility licensees (including review of examination security / integrity procedures)	55.40(b)(1) and (4)	130	35	4,550	\$ 932,750
Review requests to use other than a plant reference simulator	55.46(b)	40	1	40	\$ 8,200
Review/audit simulation facility performance	55.46(d)	12	35	420	\$ 86,100

TABLE 14: ESTIMATE OF ANNUAL COST TO THE FEDERAL GOVERNMENT

Report / Record	Subsection	Hours Per Response	Number of Responses	Burden Hours	Cost at \$205 / Hour
Review training and qualification certifications for license reactivation	55.53(f)	0.5	35	17.5	\$ 3,588
Review notification of felony	55.53(g)	0.25	5	1.25	\$ 256
Conduct requalification examinations	55.59(a)(2)(iii)	Power reactors: 160	1	160	\$ 32,800
		Non-power reactors: 120	1	120	\$ 24,600
Review requalification examinations	55.59(c)	Power reactors: 32	16	512	\$ 104,960
		Non-power reactors: 16	0	0	\$ 0
TOTAL GOVERNMENT BURDEN			301	18,061	\$ 3,702,557