

DRAFT SUPPORTING STATEMENT
FOR
VOLUNTARY REPORTING OF PLANNED TOPICAL REPORT SUBMISSIONS
(3150-XXXX)
NEW COLLECTION

Description of the Information Collection

The U.S. Nuclear Regulatory Commission (NRC) collects planning information on Topical Report (TR) submissions from nuclear power plant owner groups (OG), organizations, the Electric Power Research Institute, and the Nuclear Energy Institute in accordance with agency guidance to process requests for reviews of topical reports (TRs). A TR is a stand-alone report containing technical information about a nuclear power plant safety topic that can be submitted to the NRC for its review and approval. A TR improves the efficiency of the licensing process by allowing the staff to review a proposed methodology, design, operational requirements, or other safety-related subjects that will be used by multiple licensees following approval by referencing the approved TR. The TR provides the technical basis for a licensing action. Organizations have voluntarily submitted information related to planned submittals of TRs on an annual basis. As part of its ongoing efforts to improve the effectiveness and efficiency of the TR program, the agency requires up-to-date information on planned TR submittals.

A. JUSTIFICATION

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

The purpose of the NRC TR program is to minimize industry and agency burden by providing for a streamlined review and approval of a safety-related subject with subsequent referencing in licensing actions, rather than repeated reviews of the same subject. Under the NRC TR program, industry organizations, such as a organization or an OG may on its own choice or at the request of the NRC staff, submit reports to the NRC on specific safety-related subjects and have them reviewed independently of any operating license review. The use of industry planning information on TRs allows for a more effective allocation of industry and NRC resources needed to support NRC licensing.

2. Agency Use of Information

Using the information gathered by these information requests, the NRC will determine if additional resources are needed and/or how to allocate current resources to support regulatory actions. This may include actions such as proposed methodology, design, operational requirements, or other safety-related subjects.

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. The NRC issued a regulation on October 10, 2003, (68 FR 58791), consistent with the Government Paperwork Elimination Act, which allows its licensees, organizations, 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 95 percent of the potential responses are filed electronically.

4. Effort to Identify Duplication and Use Similar Information

No sources of similar information are available. There is no duplication of requirements. The 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

There is no impact or burden on small business because the recipients of the requests are large corporations.

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

The NRC will not be as effective in managing its review of TRs if the information is not provided. This in turn could delay review times and thus make the availability of products and tools covered in the TRs less timely to utilities wanting to use them in their plants.

7. Circumstances Which Justify Variation from OMB Guidelines

This information collection does not vary from OMB guidelines.

8. Consultations Outside the NRC

Opportunity for public comment on the information collection requirements for this clearance package has been published in the *Federal Register*.

9. Payment or Gift to Respondents

Not applicable.

10. Confidentiality of Information

Confidential and proprietary information is protected in accordance with NRC regulations at Title 10 of the Code of Federal Regulations (10 CFR) 9.17(a) and 10 CFR 2.390(b). Information considered confidential or proprietary is not normally requested.

11. Justification for Sensitive Questions

Not applicable.

12. Estimated Burden and Burden Hour Cost

There are 10 TR organizations expected to annually provide 1 report that outlines planned submissions of TRs. The burden per organization is projected at 100 hours annually (10 reports x 100 hours per report = 1,000 hours) and an annual cost of \$274,000 (1000 hours x \$274 per hour = \$274,000).

13. Estimate of Other Additional Costs

The NRC has determined that the records storage cost is roughly proportional to the recordkeeping burden cost. Based on a typical clearance, the records storage cost has been determined to be equal to 0.0004 percent of the recordkeeping burden cost. Therefore, the records storage cost is estimated to be \$0.00 (0 recordkeeping hours x 0.0004 x \$274/hr = \$0.00).

14. Estimated Annualized Cost to the Federal Government

Based upon staff estimates, the NRC will spend about 25 professional hours annually on the exchange of information with the 10 TR organizations. Using the staff hourly rate of \$274, the annual cost to the NRC is approximately \$6850. This cost is fully recovered through fee assessments to NRC licensees pursuant to 10 CFR 170 and/or 10 CFR 171.

15. Reasons for Change in Burden or Cost

Over the past four years, the NRC has been collecting this information to help with planning and budgeting its reviews of TRs. During this time, the number of organizations submitting TRs was less than 10. However, with the industry seeing the benefit from a single review of a TR instead of multiple reviews at individual plants, and the continued move to digital instrumentation and control (I&C) systems, the number of organizations submitting TRs to NRC has increased to 10 thus requiring an OMB Information Collection Clearance. It is expected that in future years the number will grow as those 10 organizations currently submitting reports provide updates and revisions to their TRs and new organizations submit TRs in growing areas such as digital I&C systems.

16. Publication for Statistical Use

This information will not be published for statistical use.

17. Reason for Not Displaying the Expiration Date

The expiration date will be displayed.

18. Exceptions to the Certification Statement

There are no exceptions.

B. COLLECTIONS OF INFORMATION EMPLOYING STATISTICAL METHODS

Not applicable.