

DRAFT SUPPORTING STATEMENT
FOR
REACTOR OVERSIGHT PROCESS EXTERNAL SURVEY
(3150-XXXX)
NEW

Description of the Information Collection

The Nuclear Regulatory Commission (NRC) seeks to achieve continuous improvement of the Reactor Oversight Process (ROP) through the ROP self-assessment process. The CY 2013 and 2015 ROP self-assessments will rely, in part, on direct feedback from external stakeholders. The information collected through the voluntary surveys will support this purpose, and a summary of the survey results will be included in the annual ROP self-assessment reports to the Commission.

A. JUSTIFICATION

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

The mission of the NRC is to regulate the nation's civilian use of byproduct, source, and special nuclear materials to ensure adequate protection of public health and safety, to promote the common defense and security, and to protect the environment. One way the NRC supports this mission is through the implementation of the ROP, which is the agency's program to inspect, measure, and assess the safety performance of commercial nuclear power plants and to respond to any decline in performance.

On February 24, 2000, the NRC staff issued SECY-00-0049, "Results of the Revised Reactor Oversight Process Pilot Program". The resulting staff requirements memorandum (SRM), issued on March 28, 2000, approved initial implementation of the ROP as recommended by the NRC staff. The initial implementation of the ROP began on April 2, 2000. In a follow-up SRM issued on May 17, 2000, the Commission directed the NRC staff to report on the ROP results after the first year of implementation. The NRC staff did so and documented the results in SECY-01-0114, "Results of the Initial Implementation of the New Reactor Oversight Process", issued June 25, 2001. SECY-01-0114 also noted the NRC staff's intention to continue to perform an annual self-assessment of the ROP. Accordingly, the NRC staff has issued an ROP self-assessment Commission paper each year before the Agency Action Review Meeting (AARM) and has briefed the Commission on the self-assessment results following the AARM.

The objectives and details of the ROP self-assessment program are contained in Inspection Manual Chapter (IMC) 0307, "Reactor Oversight Process Self-Assessment Program." One of the objectives of the self-assessment is to establish a process for objectively evaluating the effectiveness of the ROP in achieving the goals of being objective, risk-informed, understandable, and predictable as well as the applicable agency performance goals. IMC 0307 also establishes a process for

collecting information and data to support the ROP self-assessment program. One such process is an external survey. An external survey will be conducted in the odd years (i.e. CY 2013 and 2015) and an internal survey will be conducted on the even years (i.e. CY 2012 and 2014).

2. Agency Use of Information

The NRC will use the information collected through the voluntary survey to improve the ROP, and a summary of the survey results will be included in the annual ROP self-assessment report to the Commission. The NRC staff also will prepare a consolidated response to the CY 2013 and 2015 external surveys to specifically address comments provided during the surveys. The consolidated response will be placed on the ROP webpage.

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. It is estimated that approximately 80% 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. 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.

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

The information collected through the voluntary survey will support continuous improvement of the ROP through the ROP self-assessment process. The voluntary survey results constitute data for several ROP self-assessment metrics. Without the survey, an opportunity for external stakeholders to participate in the ROP self-assessment process would be lost. The information gained by external stakeholders aids the NRC staff in evaluating the ROP by gaining insights that would otherwise be unavailable.

Also, the NRC staff's intention to perform an annual self-assessment of the ROP is documented in SECY-01-0114, which is informed in part by the information collected in the external survey. Without the feedback from the external survey, many of the

metrics used in reporting the annual self-assessment to the Commission would not be adequately informed.

Conducting the external survey less frequently would limit the opportunity for external stakeholders to provide timely feedback. Through the ROP self-assessment process, the ROP continues to evolve and change. If the external survey were conducted less frequently, external stakeholders may lose an opportunity to provide timely feedback on a recent change that directly affects them.

7. Circumstances Which Justify Variation from OMB Guidelines

Not applicable.

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 10 CFR 9.17(a) and 10 CFR 2.390(b). However, no information normally considered confidential or proprietary is requested.

11. Justification for Sensitive Questions

Not applicable.

12. Estimated Burden and Burden Hour Cost

The ROP External Survey will be conducted once in CY2013 and once in CY2015. The survey will be announced to the stakeholders in a Federal Register Notice. In addition, stakeholders will be made aware of the survey through announcements and mailings to maximize awareness of the survey's availability. The survey will be available online. The NRC will also accept paper copies via the mail. The survey will be available online for approximately eight weeks.

The survey consists of 20 simple statement questions, with a free-form response area in which the respondent may provide recommendations for improvements in specific program areas. The NRC estimates that the burden to complete this voluntary survey is one hour per response.

In 2011, the NRC conducted an ROP External Survey (cleared as a Customer Satisfaction Survey under the NRC's generic clearance, 3150-0197) and received 15 responses. As a result, the NRC conservatively estimates that it will receive 20 responses each time the survey is conducted during the clearance period. The survey will be conducted twice during the clearance period (once in 2013 and once 2015); therefore, the NRC will receive an average of 13.3 responses per year (20 responses in year 1 + 0 responses in year 2 + 20 responses in year 3 = 40 responses, or an average of 13.3 responses per year).

The total public burden is estimated to be 13.3 hours annually (13.3 annual responses x 1 hour/response) at a cost of \$3,644 (13.3 hours x \$274/hr).

13. Estimate of Other Additional Costs

There are no additional costs.

14. Estimated Annualized Cost to the Federal Government

The NRC estimates that it will take professional staff approximately 400 hours to prepare, conduct, and analyze the survey each time it is conducted. Because the survey will be conducted twice during the clearance period, this averages to 266.7 hours of professional effort annually (400 hours in year one, 0 hours in year two, and 400 hours in year three = 800 hours, or an average of 266.7 hours annually.) At \$274/hr, this is estimated to cost \$73,076.

The NRC estimates that 10 hours of clerical effort will be required each time the survey is conducted, averaging to 6.7 hours annually (10 hours in year one, 0 hours in year two, and 10 hours in year three = 20 hours, or an average of 6.7 hours annually.) At \$47/hr for clerical effort, this is estimated to cost \$315.

The total cost to the Federal government is estimated to be \$73,391.

	Costs to the NRC	
	Hours	Cost at \$274/hr
Professional staff	266.7	\$73,076
Clerical staff	6.7	\$315
TOTAL	273.4	\$73,391

15. Reasons for Change in Burden or Cost

This collection is a new collection, which will increase the burden on licensees by 13.3 hours annually.

16. Publication for Statistical Use

A summary of the survey results will be included in the annual ROP self-assessment report to the Commission, which will be made publicly available in ADAMS and on the website. The annual Commission paper will be issued in April.

The NRC staff will also prepare consolidated responses to the CY 2013 and 2015 external surveys to more specifically address the comments provided during the surveys. The consolidated responses will be placed on the ROP webpage. The consolidated responses to the external surveys will be available shortly after the Commission paper is issued.

State and local governments, the public, and representatives from industry (e.g., licensees, licensee employees) may participate in the surveys. The surveys are voluntary and no statistical sampling will be used.

17. Reason for Not Displaying the Expiration Date

Not applicable.

18. Exceptions to the Certification Statement

None.

B. COLLECTIONS OF INFORMATION EMPLOYING STATISTICAL METHODS

Not applicable.