

DRAFT OMB SUPPORTING STATEMENT
FOR
10 CFR PART 54
REQUIREMENTS FOR RENEWAL OF OPERATING LICENSES FOR
NUCLEAR POWER PLANTS
3150-0155

EXTENSION

DESCRIPTION OF THE INFORMATION COLLECTION

Title 10 of the *Code of Federal Regulations* (10 CFR) Part 54 establishes license renewal requirements for operating nuclear power plants. Collection requirements included in 10 CFR Part 54 are related to the license renewal application submittal and recordkeeping.

With respect to license renewal of a commercial nuclear power plant, the U.S. Nuclear Regulatory Commission (NRC) has established the following two basic principles:

The first principle of license renewal is that with the exception of age-related degradation and possibly a few other issues related to safety only during extended operation of nuclear power plants, the existing regulatory process is adequate to ensure that the licensing bases of all currently operating plants provide and maintain an acceptable level of safety so that operation will not be inimical to public health and safety or common defense and security.

The second and equally important principle of license renewal holds that the plant-specific licensing basis must be maintained during the renewal term in the same manner and to the same extent as during the original licensing term. This would be accomplished, in part, through a program of age-related degradation management.

In the license renewal application submittal the applicant: (1) identifies the appropriate systems, structures and components (SSCs) that need to be managed for aging degradation, and (2) proposes additional actions needed to maintain the functionality of the SSCs in the period of extended operation. The current licensing basis (CLB) of a facility is modified to include programs and activities related to the aging management of SSCs through updates to the updated final safety analysis report (UFSAR) and additional requirements added as part of the renewed operating license.

Applicants for renewal must perform an integrated plant assessment in which SSCs within the scope of license renewal are identified and screened to determine which SSCs require actions to manage the detrimental effects of age-related degradation. A license renewal applicant must submit with its application an UFSAR supplement which describes the aging management programs to be implemented and inspection and testing activities to be completed before and during the period of extended operation.

Renewed operating licenses routinely contain a one-time reporting requirement for the licensee to notify NRC in writing when the inspection and testing activities are completed. The only licensees subject to this requirement are those that: (a) have renewed licenses prior to the clearance period or may receive a renewed license during the clearance period, and (b) will complete implementation of the inspection activities and notify NRC accordingly.

A. JUSTIFICATION

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

Part 54 of 10 CFR establishes license renewal requirements for operating nuclear power plants and describes the information that licensees must submit to the NRC when applying for a license renewal. The application must contain technical information regarding how the licensee will manage the detrimental effects of age-related degradation for certain plant SSCs so as to continue the plant's safe operation during the renewal term. The NRC needs this information to determine whether the licensee's actions will be effective in assuring the plant's continued safe operation.

The letter documenting the completion of inspection and testing activities required to be submitted by each renewed license serves as notification to the NRC that the licensee has completed the inspection and program implementation activities described in the UFSAR supplement. The NRC needs this notification so as to verify through inspection the implementation of these activities.

Holders of renewed licenses must retain in an auditable and retrievable form, for the term of the renewed operating license, all information and documentation required to document compliance with 10 CFR Part 54.

Section 54.13 states information completeness and accuracy requirements. Specifically, Paragraph (b) requires each applicant to notify the Commission of information identified by the applicant as having, for the regulated activity, significant implication for public health and safety or the common defense and security. Such notification must be made within two working days of identifying the information. The NRC needs this information so that it may take appropriate actions, as required, to protect the public's health and safety. Applicants will report this information as necessary to comply with the regulation.

Section 54.15 permits the NRC, in accordance with 10 CFR 50.12, to grant exemptions from 10 CFR Part 54 requirements. The Commission, upon application by any interested person or upon its own initiative, may grant the exemptions. The NRC requires the information so that it can determine whether an exemption is warranted.

Section 54.17 states requirements for renewal application filing:

- Paragraph (a) requires the filing to be in accordance with Subpart A of 10 CFR Part 2 and 10 CFR 50.4 and 50.30. This section establishes the procedural aspects for the filing whereas 10 CFR 54.19, 54.21, 54.22 and 54.23 addresses information to be included in the application, as described below.
- Paragraph (g) requires the license renewal applicant to agree in writing that it will not permit any individual access to Restricted Data or classified National Security Information until an investigation has been approved for such access under the provisions of 10 CFR Parts 25 and/or 95. This

information is necessary to assist the Commission in determining that permitting such persons access to Restricted Data or classified National Security Information will not endanger the common defense and security. OMB Clearance Nos. 3150-0046, 3150-0050, 3206-0007, 3150-0026, 3150-0049, 3150-0051 cover information collection for 10 CFR Part 25, and OMB Clearance No. 3150-0047 covers information collection for 10 CFR Part 95. An applicant will report this information once per renewal application submission.

Section 54.19 states the general information required in the application:

- Paragraph (a) requires license renewal applicants to provide the information specified in 10 CFR 50.33(a) through (e), (h), and (i); the application may incorporate this information by reference. The NRC needs this information to establish the continued validity, during the renewal term, of general information applicable during the original license. An applicant will report this information once per renewal application submission.
- Paragraph (b) requires each renewal application to include conforming changes to the standard indemnity agreement in 10 CFR 140.92, Appendix B. This information is necessary to account for the expiration term of the proposed renewed license. An applicant will report this information once per renewal application submission.

Section 54.21 states requirements for the application's technical information:

- Paragraph (a) requires an integrated plant assessment to identify and list those SSCs subject to an aging management review. The integrated plant assessment must describe and justify the methods used to identify those SSCs. The NRC needs this information to be able to conclude that additional aging management attention is directed to SSCs that require it because they are important and can undergo age-related degradation during the renewal term. The integrated plant assessment must also demonstrate the adequacy of actions taken or to be taken to manage the detrimental effects of aging. The NRC needs this information to be satisfied that the actions will be effective in assuring the continued safe operation of the plant. An applicant will report this information once per renewal application submission.
- Paragraph (b) requires the application to contain CLB changes which occur during NRC review of the application. Each year following submittal of the license renewal application and at least three months before scheduled completion of the NRC review, the applicant must submit an amendment to the renewal application that identifies any change to the facility's CLB that materially affects the contents of the license renewal application, including the UFSAR supplement. The NRC needs this information to determine the acceptability of these changes from the pertinent safety standpoints. An applicant will report this

information as necessary while NRC completes its review of the application.

- Paragraph (c) requires the application to contain an evaluation of time-limited aging analyses (TLAAs) for SSCs. The applicant must list the TLAAs that conform to the definition in 10 CFR 54.3 and demonstrate that the analyses remain valid for the period of extended operation, the analyses have been projected to the end of the period of extended operation, or the effects of aging on the intended function(s) will be adequately managed for the period of extended operation. The NRC needs this information to determine whether those SSCs meet the requirements for license renewal. This section also requires a list of all plant-specific exemptions granted pursuant to 10 CFR 50.12 and in effect that are based on TLAAs as defined in 10 CFR 54.3. The applicant must provide an evaluation that justifies the continuation of these exemptions for the period of extended operation. The NRC needs this information to justify whether to continue these exemptions. An applicant will report this information once per renewal application submission.
- Paragraph (d) requires the application to include an UFSAR supplement for the facility which must contain a summary description of the programs and activities for managing the effects of aging and the evaluation of TLAAs for the period of extended operation as determined by 10 CFR 54.21(a) and (c), respectively. The NRC needs this information to determine whether the licensee's actions for managing the effects of aging provide reasonable assurance that the facility's operations during the period of extended operation can be conducted without endangering public health and safety. An applicant will report this information once per renewal application submission.

Section 54.22 requires the application to include any technical specification changes or additions necessary to manage the effects of aging during the period of extended operation. The justification for these changes or additions must also be contained in the application. The NRC needs this information to determine the acceptability of these changes from pertinent safety standpoints. An applicant will report this information once per renewal application submission.

Section 54.23 states the environmental information required in the application. This information is required to be a supplement to the environmental report that complies with 10 CFR Part 51, "Environmental Protection Regulations for Domestic Licensing and Related Regulatory Functions," Subpart A, "National Environmental Policy Act – Regulations Implementing Section 102(2)." The NRC requires this information to determine the acceptability of the environmental consequences of the facility's continued operation during the renewal term. OMB Clearance No. 3150-0021 covers the burden for this environmental information collection. An applicant will report this information once per renewal application submission.

Section 54.33 states license renewal conditions. Specifically, Paragraph (c) requires each renewal application to include those conditions to protect the environment that were imposed pursuant to 10 CFR 50.36(b) and that are part of

the facility's CLB at the time the NRC issues the renewed license. The NRC requires this information to protect the environment during the term of the renewed license. OMB Clearance No. 3150-0011 covers information collection for 10 CFR 50.36(b), and OMB Clearance No. 3150-0021 covers the burden for this environmental information collection as it relates to license renewal.

Section 54.37 states additional records and record keeping requirements:

- Paragraph (a) requires holders of renewed licenses to retain in an auditable and retrievable form, for the term of the renewed operating license, all information and documentation required to document compliance with 10 CFR Part 54. The NRC needs access to this information for continuing effective regulatory oversight.
- Paragraph (b) requires licensees, after the NRC issues the renewed license, to include in the UFSAR update required by 10 CFR 50.71(e), any newly identified SSCs that would have been subject to an aging management review or evaluation of time limited aging analyses (TLAAs) in accordance with 10 CFR 54.21. This UFSAR update must describe how the effects of aging will be managed such that the intended function(s) will be effectively maintained during the period of extended operation. The UFSAR update contains information on all of the changes made by the licensee to the plant since submission of the original UFSAR or, as appropriate, since submission of the last UFSAR. The NRC needs access to this information for continuing effective regulatory oversight. Renewed license holders will report this information as necessary to comply with the regulation.

2. Agency Use of the Information

The NRC will use the information submitted with the license renewal application to determine whether continued operation of nuclear power plants during their renewal terms will provide reasonable assurance of the adequate protection of public health and safety and the common defense and security. License renewal applicants and holders of renewed nuclear power plant operating licenses will use the information as a basis for establishing and maintaining aging management programs. Retained records will be used by the licensee and the NRC during inspections to provide the technical bases for continued safe operation of the plant.

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 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. 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

The 10 CFR Part 54 requirements are applicable to licensees who are seeking to extend their current operating licenses for nuclear power plants. These licensees are large entities, such as electric utilities, who do not meet the definition of a small business.

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

The records generated as part of this information collection would be partly provided at the time of application for renewal and made partly available on a continual basis during the period of extended operation. An applicant is only required to report the information if it seeks to apply for license renewal. If the NRC grants a renewed operating license, the recordkeeping requirements are necessary. If the information collection is not conducted in accordance with the recordkeeping requirements, the risk of insufficient aging management programs that are not current to assure maintenance of the licensing basis during the period of extended operation would increase.

7. Circumstances That Justify Variation from OMB Guidelines

There are two 10 CFR Part 54 information collection requirements which vary from OMB guidelines:

- (1) Per 10 CFR 54.13(b), within two working days licensees must report to the NRC information having a significant implication for public health and safety or the common defense and security. This reporting period is necessary so that NRC is promptly informed on such matters. However, after renewing the license of 73 units at 42 sites, the NRC has not received a response to this information collection requirement and, therefore, estimates that future responses, if any, will be reported infrequently.
- (2) Per 10 CFR 54.37, a licensee must keep records throughout the term of a renewed license. This retention period is necessary to make sure data are available for establishing equipment aging trends for managing the detrimental effects of aging on the functionality of certain SSCs, and to maintain an acceptable level of public health and safety.

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 of 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).

11. Justification for Sensitive Questions

Not applicable.

12. Estimated Industry Burden and Burden Hour Cost

During the present submission's clearance period, respondents will incur burdens for submitting one-time reports and for keeping records. NRC estimates that the paperwork burden may vary widely among nuclear power plant licensees. All nuclear plants are somewhat different and the programs employed by individual plants, while similar, are not identical. NRC's assumptions, methodology, and results for estimating the paperwork burdens follow.

One-Time Reporting Burden

There are two one-time reporting burdens:

- (1) The first one-time reporting burden covers all licensee efforts associated with preparing a license renewal application and submitting amendments to the application during the review process. This burden begins when the licensee collects information to prepare the application and ends when the NRC makes a final decision as to granting the renewed license(s). To calculate the annualized one-time reporting burden, NRC considered the total burden for a single license renewal application, the duration over which an applicant would accrue this burden, and the total number of applications expected to incur portions of their total burden during the clearance period.

First, NRC estimates that each one-time response as a license renewal application will incur approximately 84,150 hours of total burden. This figure is partly based on information received from NRC's consultations with four licensees.

License renewal projects are resource intensive and applicants can prepare applications over several years. Due to these factors, the accrual of burden over time is an important consideration in estimating the total annualized burden for the clearance period. During any given clearance

period, some respondents may begin or finish accruing the burden. However, because of the total duration no respondent will accrue the entire burden during a single three-year clearance period.

NRC estimates that an applicant will accrue this one-time reporting burden over a 54-month period. The bulk of the reporting burden will be associated with the preparation and submission of the application to the NRC for review. NRC estimates a smaller amount of time (less than 5 percent of the total burden hours) to submit required amendments during the review process. Applicants submit these amendments, required under 10 CFR 54.21(b), to identify any changes to the facility's current licensing basis each year during the review process, and at least three months before the scheduled completion of NRC's review.

To show the total burden accrual on a monthly basis, NRC estimated that preparation of the application takes 32 months, whereas the review process takes approximately 22 months. The direct basis for the first duration is on information from NRC's outside consultations; the basis for the second duration is based on the NRC's history of application reviews to date. NRC publicly communicates this schedule in a fact sheet, "Backgrounder on Reactor License Renewal." This document describes the license renewal process and states, "License renewal is expected to take about 30 months, including the time to conduct an adjudicatory hearing, if necessary, or 22 months without a hearing. In some cases the process is completed on a plant-specific schedule agreed upon with the applicant." The circumstances concerning each license renewal application review are unique, especially with regard to whether the application is subject to the NRC's hearing process under Part 2, "Rules of Practice for Domestic Licensing Proceedings and Issuance of Orders," of 10 CFR. When NRC prepared this supporting statement, it had approved the license renewal of 73 nuclear power plants, which covers approximately 70 percent of the nation's current fleet of operating commercial nuclear power reactors. Of these submitted applications, eight have been subject to hearings. Further, Part 2 of 10 CFR does not impose information collection burden upon licensees. On this basis, NRC considers the standard 22 month application review schedule an appropriate duration for the second phase. As such, the NRC used this period in estimating the reporting burden for the clearance period. The referenced fact sheet is accessible by Accession No. ML050680253 in NRC's Agencywide Documents Access and Management System (ADAMS), on the NRC's Web site at <http://www.nrc.gov/reading-rm/adams.html>.

NRC approximated how a respondent will accrue the entire one-time burden for each license renewal application response: 81,150 hours to prepare and submit the application over 32 months, or approximately 2,536 hours/month. In addition, licensees will submit, on average, two amendments during the 22-month review period, each requiring an average of 1,500 hours to complete (3,000 hours total burden to submit

amendments).¹ This is a total of 84,150 hours/application (81,150 + 3000).

To calculate the annualized one-time reporting burden, NRC determined which license renewal application responses would incur portions of their burden during the clearance period. NRC bases license renewal planning on the receipt of two new applications per fiscal year during the clearance period (December 2014 through December 2017). Two new applications will likely mean that the licensee will submit two amendments per application, which may result in four responses total per application. This planning assumption has been valid beginning with the previous clearance.

The burden was calculated by taking into consideration each response as a one-time burden expenditure, which NRC did in previous submissions, resulting in the burden of 168,300 hours/year (2 applications/year x 84,150 hours/application). Therefore, in this submission, using the estimate that NRC will receive two new license renewal applications per year, the annualized burden is accurately calculated by counting each response as a one-time burden expenditure. Using this method Table 1 at the end of this section summarizes the results for this one-time reporting burden.

The total burden during the entire clearance period (December 2014 through December 2017) is 504,900 hours (168,300 hours/year x 3 years) which results in an annualized one-time reporting burden of 168,300 hours/year.

- (2) Depending on the wording of the license conditions contained in the renewed operating license, the NRC may also require licensees to prepare and submit inspection and testing completion review letters as required by each renewed license. These respondents are different from those preparing and submitting license renewal applications because NRC has already granted their renewed licenses. In certain situations, NRC allows licensees to submit one application for renewing the operating licenses of several reactor units. However, NRC issues a separate renewed operating license to each reactor unit and each such license contains the requirement to submit a letter documenting the completion of inspection and testing activities. To estimate the number of these letters that it will receive during the clearance period, NRC estimates that a licensee will submit the required letter within one year of entering a unit's period of extended operation. The NRC determined that 12 plants will enter the period of extended operation during the clearance period of December 2014 through December 2017. This excludes Crystal

¹ These time estimates do not include licensee time to respond to NRC requests for additional information. These requests are necessary so that the NRC can obtain all relevant information needed to make a decision on a licensing action request that is fully informed, technically correct, and legally defensible. NRC requests additional information when the applicant does not include the necessary information in its initial submission, or if the necessary information is not in any other docketed correspondence or cannot reasonably be inferred from the information available to the staff. NRC requests for additional information are exempt from the Paperwork Reduction Act because they are nonstandardized follow-up questions designed to clarify responses to a previously approved collection.

River which is currently undergoing decommissioning. Therefore the NRC will receive 12 one-time responses as completion letters during the clearance period. There are 3 plants entering the period of extended operation during the first year. There are 7 plants entering the period of extended operation during the second year. There are 2 plants entering the period of extended operation during the third year. Annualizing these responses over the clearance period results in approximately 4 responses per year ($12 \text{ responses} \div 3 \text{ years} = 4 \text{ responses/year}$). NRC estimates that each letter will incur a one-time burden of 10 hours (40 hours/year).

Finally, NRC estimates that respondents will incur both of these one-time reporting burdens by professional staff at the rate of \$272/hour. A complete summary of the calculations for one-time reporting burden and cost is provided in Table 1.

Recordkeeping Burden

The annual recordkeeping burden covers all licensee efforts associated with retaining, as required by 10 CFR 54.37, information to document compliance with 10 CFR Part 54. This burden begins when the NRC grants a renewed license and continues throughout the period of extended operation until the renewed license expires. During the clearance period, the total number of recordkeepers per year will increase as NRC receives more applications and issues more renewed licenses. To estimate the number of recordkeepers, the NRC considered each reactor site with renewed operating license(s). Licensees typically submit combined license renewal applications for multi-unit sites so the NRC issues the renewed license for each unit at the same time. Also, the NRC estimates that the recordkeeping burden for a multi-unit site is approximately equivalent to the burden for a single unit site.

Next, the NRC considered the issuance dates for those sites that have already received renewed licenses, the projected issuance dates for license renewals currently under review, and the renewal applications expected to be submitted based on licensee intent letters. Through this analysis, NRC estimates that there are currently 42 recordkeepers. During the clearance period, the NRC could potentially grant 11 licenses which will add 11 recordkeepers. Also during the clearance period the NRC expects 6 applications. There is potential to grant 4 of the 6 applications which would add another 4 recordkeepers. The total number of recordkeepers prior to entering the clearance period is 42. The total number of recordkeepers at the end of the clearance period is 57 ($42 + 11 + 4$). The average increase in recordkeepers per year is 5 recordkeepers/year. Therefore, during the clearance period, an average of 52 recordkeepers per year will keep records.

Licensees from the outside consultations generally agreed with NRC's recordkeeping burden estimate of 1,000 hours per year which results in 52,000 hours ($52 \text{ recordkeepers/year} \times 1000 \text{ hours}$). In addition, NRC estimates that this burden will be completed exclusively by professional staff at the rate of \$272/hour. The NRC used the above figures to determine the total burden and cost for recordkeeping. A summary is in Table 2.

13. Estimate of Other Additional Costs

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 0.0004 times the recordkeeping burden cost. Therefore, the storage cost for this clearance is estimated to be \$5,657 (52,000 hours x \$272/hour x 0.0004).

14. Estimated Annualized Cost to the Federal Government

The estimated annualized cost to the NRC for 10 CFR Part 54 information collections covers the review of information in each submitted license renewal application. Based on NRC's budget, each application review will cost the Federal government a total of approximately 17,613 hours. Of this amount, 15,979 hours are for professional staff activities like oversight, project management, technical reviews, audits, and legal counsel, and the remaining 1,634 hours are for clerical support.

The NRC will incur professional staff costs at the rate of \$272/hour and clerical staff costs at the rate of \$47/hour. Therefore, the resulting labor cost is \$4,423,086 per application = [(15,979 hours x \$272/hour) \$4,346,288 + (1,634 hours x \$47/hour) \$76,798].

Additionally, each application will cost the Federal government \$785,000 for contractor support and \$46,757 in travel expenses. Therefore, the total cost for review of a single license renewal application is \$5,254,843 (\$4,423,086 + \$785,000 + \$46,757).

As described in Item 12 above, NRC expects to begin review of three license renewal applications per year during the clearance period. Therefore, the resultant estimated annualized cost to the Federal government is \$10,509,686 per year (\$5,254,843/application x 2 applications/year). NRC will incur these costs over 22-month review periods which directly align with those periods when applicants incur costs to support NRC's review. Due to the direct alignment with the applicant burdens during this period, the total annualized cost to the Federal government is also accurately calculated by counting each license renewal application review as a one-time cost. These costs are fully recovered through fee assessments to NRC licensees pursuant to 10 CFR Parts 170 and 171.

15. Reasons for Changes in Burden or Cost

The overall burden estimate decreased by 85,150 hours from 305,490 hours (252,450 hours reporting plus 40 hours to prepare and submit completion review letters as required by each renewed license plus 53,000 hours recordkeeping) to 220,340 hours [168,300 hours/year (2 applications/year x 84,150 hours/application) plus 40 hours/year to prepare and submit completion review letters as required by each renewed license plus 52,000 hours recordkeeping per year)].

Reporting Burden

The reporting burden decreased due to one reason: the effort required per application per year is unchanged at 84,150 hours reporting. However, the number of expected new applications decreased. Presently, the agency has approved the license renewal of 73 nuclear power plants, which covers approximately 70 percent of the nation's current fleet of operating commercial nuclear power reactors. Given the remaining number of licensees expected to submit license renewal applications, the agency has reduced the number of new applications expected per fiscal year during the applicable clearance period from three ($3 \times 84,150 = 252,450$ hours + plus 40 hours to prepare and submit completion review letters) to two ($2 \times 84,150 = 168,300$ hours + 40 hours to prepare and submit completion review letters), resulting in a reduction of 84,150 hours reporting.

Recordkeeping Burden

Although the recordkeeping burden (1,000 hours per application) estimate did not change in this submission, the number of recordkeepers decreased from 53 recordkeepers to 52 recordkeepers.

This is a decrease by 1 recordkeeper for this clearance period. The recordkeeping burden decreased by 1,000 hours. This is a decrease from 53,000 hours in the previous submission to 52,000 hours for this clearance period. This decrease is due to the fact that during the last clearance period, the license renewal application review for Crystal River was underway. Crystal River was accounted for as a recordkeeper. However the plant has since transitioned to decommissioning and therefore decreased the number of recordkeepers by 1.

Finally, the total cost increased as a result of the increases in burden hours and as a result of the increase in the fee rate from \$259/hour to \$272/hour.

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 in regulations published in the *Code of Federal Regulations*. Amending this annual publication to display information that could become obsolete would be unduly burdensome and too difficult to keep current.

18. Exceptions to the Certification Statement

There are no exceptions.

B. COLLECTION OF INFORMATION EMPLOYING STATISTICAL METHODS

Statistical methods are not used in this collection of information.

TABLE 1
ANNUAL REPORTING BURDEN

Section	Number of Respondents	Responses per Respondent	Total Responses	Burden per Response (Hours)	Total Annual Burden (Hours)	Cost at \$272/ hour (\$)
License Renewal Application (54.13, 54.15, 54.17, 54.19, 54.21, 54.22)	2	1	2	84,150	168,300	45,777,600
Environmental Information for License Renewal (54.23, 54.33) †	0	0	0	0	0	0
Completion Letter	4	1	4	10	40	10,880
Total	6	--	6	--	168,340	45,788,480

† OMB Clearance No. 3150-0021 covers license renewal environmental information collection burdens.

TABLE 2
ANNUAL RECORDKEEPING REQUIREMENTS

Section	Number of Recordkeepers	Burden per Recordkeeper (Hours)	Total Annual Burden (Hours)	Cost at \$272/hour (\$)
Retention of Records in an Auditable and Retrievable Form and UFSAR Updates (54.37)	52	1000	52,000	14,144,000

TOTAL ANNUAL BURDEN / COST: 220,340 hours (168,340 hours reporting plus 52,000 hours recordkeeping) / \$59,932,480

TOTAL ANNUAL RESPONDENTS: 58 (6 responses + 52 recordkeepers)

TOTAL ANNUAL RESPONSES: 6 (2 license renewal applications for 10 CFR Part 54+ 4 completion letters)