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DRAFT SUPPORTING STATEMENT
FOR 10 CFR PART 50 AND PART 52
MITIGATION OF BEYOND-DESIGN-BASIS EVENTS
PROPOSED RULEMAKING

Description of the Information Collection

The U.S. Nuclear Regulatory Commission (NRC) is proposing to amend its regulations that establish regulatory requirements to mitigate beyond design basis events. As a result of the recommendations of the Fukushima Near Term Task Force (NTTF) report, the NRC is proposing a rule with the following regulatory objectives:

- (1) Make the requirements of Order EA-12-049, *Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events*, and Order EA-12-051, *Order Modifying Licensees with Regard to Reliable Spent Fuel Pool Instrumentation*, generically applicable.
- (2) ~~Establish Create~~ regulatory requirements for Severe Accident Management Guidelines (SAMGs) **as part of an integrated response capability** to promote consistency across industry.
- (3) Incorporate **enhanced onsite emergency response capabilities preparedness-related industry initiatives** into the regulations.

This analysis addresses only those proposed rule requirements that contain an incremental change in burden relative to existing rules, Orders, and industry initiatives. The proposed rule would result in the following incremental information collection requirements:

- Developing and maintaining site-specific SAMGs as part of an integrated response capability;
- Reviewing the FLEX Support Guidelines (FSGs), Extensive Damage Mitigating Guidelines (EDMGs), and SAMGs to confirm integration with the Emergency Operating Procedures (EOPs);
- Revising procedures to document command and control (i.e., verifying the site's organizational structure as well as defining roles, responsibilities, and authorities for directing and performing the activities called for in the SAMGs);
- Developing and updating training materials as well as documenting training on SAMGs;
- Developing and reporting drill and exercise scenarios as well as documenting the results of drills or exercises to demonstrate the capability to transition to and use the strategies and guidelines required under the proposed rule; and
- Developing change control policy and procedures, as well as updating generic and site-specific SAMGs based on operating experience.

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Affected Entities

The proposed rule requirements would impact nuclear power plants at the site level. Therefore, the incremental burdens are expressed in terms of nuclear power plant sites. The burdens affecting individual sites differ depending on various characteristics (e.g., type of design, reactor, and nuclear steam supply system (NSSS)). This analysis includes 60 operating sites (five decommissioning sites – Crystal River, Kewaunee, Oyster Creek, San Onofre, and Vermont Yankee – would be exempt from the SAMGs-related rule requirements). Two of the operating sites (i.e., VC Summer and Vogtle) are constructing new AP1000 reactor units onsite. Because incremental costs are estimated at the site-level, the new reactors are accounted for as part of the operating site on which they are located.

The analysis also considers differences in burden depending on reactor type. There are 22 boiling-water reactor (BWR) sites and 38 pressurized-water reactors (PWR) sites. Development of site-specific SAMGs would be more burdensome for PWR sites relative to BWR sites because the generic SAMGs for PWRs will require PWR sites to make significant changes to existing site-specific SAMGs. In addition to impacts on individual sites, the proposed rule would impact the Pressurized-Water Reactor Owners Group (PWROG) and the Boiling-Water Reactor Owners Group (BWROG), which would incur burdens to update generic SAMGs over time.

Burdens also vary in cases where a site has more than one type of design, reactor, or NSSS. Sites with more than one type of design, reactor, or NSSS would incur additional burden to develop two sets of SAMGs. The analysis classifies these sites as “dual-SAMG” sites (five sites). Sites that would develop only one SAMG are referred to as “single-SAMG” sites (55 sites). The two sites that also have new reactors under construction (i.e., VC Summer and Vogtle) are considered dual-SAMG sites because of the varying reactors types (PWRs and AP1000s).

Due to these differences in site-specific features (i.e., reactor type and whether a site is classified as a “single-SAMG” or “dual-SAMG” site), some activities that would be undertaken to comply with the proposed rule requirements would differ between sites. Therefore, where applicable, the NRC evaluated information collection burdens that differ by site separately, as presented in the tables below.

License applicants are required to comply with the proposed rule. The NRC staff estimate the information collection burden associated with license applicants separately.

The proposed rule also includes third party burdens related to training on SAMGs. To comply with the training requirements of the proposed rule, sites would prepare training materials that would be disclosed to the individuals receiving the training. As discussed below, “third parties” are the individuals that will be trained on SAMGs, including ultimate decision makers or “non-licensed operators,” which includes on-shift non-licensed operators, maintenance workers, and security personnel assigned operational tasks under SAMGs.

A. JUSTIFICATION

1. Need for and Practical Utility of the Information

The NRC has determined that the proposed information collection requirements are necessary for the following reasons:

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- *Information collection related to developing and maintaining SAMGs:* SAMGs are not currently required by NRC regulations. SAMGs exist as a voluntary industry initiative. This information collection is necessary to ensure that licensees consistently maintain the SAMGs.
- *Information collection related to emergency procedures integration:* This information collection is necessary to support an integrated response capability and ensure that FSGs, SAMGs, and EDMGs would be integrated with EOPs to support their implementation or augment them where their implementation is not successful in preventing significant fuel damage.
- *Information collection related to command and control:* This information collection is necessary because existing requirements do not specify a command and control structure for a multi-unit event that includes the potential need for acquisition of offsite assistance to support onsite event mitigation.
- *Information collection related to training:* The NRC's regulations do not identify the training and qualifications necessary for key personnel to demonstrate that they are capable of effectively performing their roles and responsibilities in implementing the strategies and guidelines required under the proposed rule (i.e., FSGs, EDMGs, and SAMGs). This information collection is necessary to ensure adequate training and qualifications of personnel that perform activities in accordance with these strategies and guidelines.
- *Information collection related to drills and exercises:* Current regulations governing exercises do not require licensees to demonstrate implementation of all the procedures designed to address beyond-design-basis events during drills and exercises. This information collection is necessary to allow demonstration and evaluation of a site's capability to execute the strategies and guidelines in light of the specific plant damage state and operational conditions presented by an initiating event.
- *Information collection relating to change control requirements:* This information collection is necessary to document and evaluate any changes to procedures, strategies, guidance, capabilities, or descriptions made by a licensee. This includes updating generic and site-specific SAMGs based on operating experience.

The specific recordkeeping and reporting requirements associated with the proposed revisions and amendments to Part 50 are identified below.

Section 50.155(b)(3) would require sites to develop, implement, and maintain SAMGs as part of an integrated response capability. SAMGs are strategies and guidelines for use when entry conditions indicate the potential existence of an inadequate cooling condition for the reactor core or spent fuel pool (SFP) which could lead to significant fuel damage. Strategies and guidelines required under this provision must include guidance to support actions intended to: (1) arrest the progression of fuel damage, (2) maximize the duration for which the containment capability is maintained, and (3) minimize radiological releases.

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Sites would incur a one-time recordkeeping burden associated with developing site-specific SAMGs. In addition, sites would incur annual recordkeeping burdens associated with maintaining the site-specific SAMGs, which would include updating the site-specific SAMGs consistent with the generic technical guideline documents applicable to the site or ensuring site-specific SAMGs have been updated to incorporate relevant research and analysis and lessons learned from industry events. The recordkeeping burden associated with maintaining SAMGs is assumed to occur triennially for each site, so these burdens are annualized in this analysis.¹ The incremental one-time recordkeeping and annual recordkeeping burdens associated with the SAMG requirements are included in Table 1 and Table 2, respectively. Burdens vary by site-specific features and are therefore presented separately for each category of affected site.

Section 50.155(b)(4) would require that FSGs, EDMGs, and SAMGs be reviewed to confirm integration with the EOPs. Sites would incur a one-time recordkeeping burden to review these strategies and guidelines to confirm that they are integrated with the EOPs. The incremental one-time recordkeeping burden associated with this requirement is included in Table 1.

Section 50.155(b)(6) would require sites to develop, implement, and maintain an integrated response capability that includes a supporting command and control organizational structure with defined roles, responsibilities, and authorities for directing and performing FSGs, EDMGs, and SAMGs. Sites would incur a one-time recordkeeping burden to revise (as necessary) existing command and control processes to meet the new requirements. The incremental one-time recordkeeping burden is included in Table 1.

Section 50.155(e) would require sites to provide for the training and qualification of personnel that perform activities in accordance with FSGs, EDMGs, and SAMGs. Sites would incur a one-time recordkeeping burden to develop new training materials and an annual recordkeeping burden to document training and update training materials based on these new requirements. In addition, sites would incur an annual third-party burden to disclose training materials. The incremental one-time and annual recordkeeping burdens are included in Table 1 and Table 2, respectively. The incremental third-party disclosure burden is included in Table 4. Burdens vary by site-specific features and are therefore presented separately for each category of affected site.

Section 50.155(f) would require sites to conduct drills, exercises, or both that collectively demonstrate a capability to use the FSGs, EDMGs, and SAMGs, including transitions from other procedures and guidelines as applicable, and the use of communications equipment required in 10 CFR Part 50, Appendix E, Section VII. Sites must not exceed eight years between any consecutive drills or exercises.

These drill and exercise requirements would result in a one-time recordkeeping burden associated with developing drill or exercise scenarios and a one-time reporting burden associated with reporting scenarios to the NRC. In addition, sites would incur an annual recordkeeping burden to document drill and exercise performance. The incremental one-time

¹ These costs are annualized by assuming that one third of the affected sites will incur these costs in any given year.

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recordkeeping and annual recordkeeping burdens are included in Table 1 and Table 2, respectively. The incremental one-time reporting burden is included in Table 3. Burdens vary by site-specific features and are therefore presented separately for each category of affected site.

Section 50.155(g) would establish a change control process for the FSGs, EDMGs, and SAMGs. Prior to implementing a proposed change, Section 50.155(g)(1) would require sites to perform an evaluation to ensure that the provisions of Section 50.155 and 10 CFR Part 50, Appendix E, Section VII would continue to be met. Section 50.155(g)(2) would require sites to maintain documentation of all changes, including evaluations made per Section 50.155(g)(1).

Sites would incur a one-time recordkeeping burden to develop change control policy and procedures consistent with these requirements. In addition, the PWROG and the BWROG would each incur an annual recordkeeping burden to update their respective generic SAMG based on operating experience. Each site also would incur an annual recordkeeping burden to update site-specific SAMGs based on changes made to the generic owners groups' SAMGs. The incremental one-time and annual recordkeeping burdens are included in Table 1 and Table 2, respectively. Burdens vary by site-specific features and are therefore presented separately for each category of affected site and for the owner groups.

2. Agency Use of the Information

The information included in the records is reviewed by the NRC staff to ensure that licensees consistently develop, maintain, and implement their strategies and guidelines; ensure that FSGs, EDMGs, and SAMGs are integrated with EOPs; ensure that licensees revise procedures to document command and control structures for directing and performing strategies and guidelines required under the proposed rule; ensure the training and qualification of key personnel; allow for demonstration and evaluation of a site's capability to execute strategies and guidelines in light of the specific plant damage state and operational conditions presented by the initiating event; and document any licensee changes to procedures, strategies, guidance, capabilities, or descriptions.

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, 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.

4. Effort to Identify Duplication and Use Similar Information

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

The NRC has determined that the affected entities are not small entities or businesses as those

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terms are used in the Regulatory Flexibility Act.

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

If the information were not collected, or collected less frequently, the NRC would be unaware for extended periods of time whether licensees are: (1) developing and maintaining site-specific SAMGs; (2) reviewing FSGs, EDMGs, and SAMGs to confirm integration with EOPs; (3) revising procedures to document command and control structures; (4) developing and updating training materials as well as documenting training on SAMGs to support the rule; (5) developing and reporting drill and exercise scenarios as well as documenting the results of drills and exercises in accordance with the rule; or (6) developing change control policy and procedures as well as updating generic and site-specific SAMGs.

7. Circumstances which Justify Variations from OMB Guidelines

This section identifies incremental recordkeeping and reporting burdens as a result of the proposed rule that vary from OMB guidelines established in 5 CFR 1320.5(d)(2).

Operating reactors would be required to comply with the information collections until the Commission terminates the license, which is initially issued for 40 years and subsequently renewed for an additional 20 years. Decommissioning reactors must comply with the information collection requirements until the SFPs are empty of all irradiated fuel (or until an exemption is granted by the NRC). These requirements vary from the OMB guidelines in 5 CFR 1320.5(d)(2)(i) and (iv) by requiring licensees and other entities to report information to the NRC more often than quarterly and to retain records for more than 3 years, respectively. The specific provisions of the proposed rule that vary from OMB guidelines are Sections 50.155(a)(1) through (a)(3).

Per proposed Section 50.155(a)(1) and (2), the proposed requirements in Section 50.155 apply throughout the life of each site's operating license, until the licensee informs the NRC that it has permanently ceased to operate the reactor and permanently removed all fuel from the reactor vessel.

Section 50.155(a)(3) would establish a phased compliance requirement for licensees of decommissioning power reactors. This section would allow licensees to end compliance with the portions of this proposed rule that would apply to the reactor source term and associated fission product barriers when all fuel has been permanently removed from the reactor vessel and placed in the SFP. This section would maintain secondary containment requirements for reactor designs that employ this feature as a fission product barrier for the SFP source term.

These variations from the OMB guidelines are justified because the information collections are needed to ensure that the sites have the strategies and guidelines available to assist with the mitigation of beyond-design-basis events.

8. Consultations Outside the NRC

This proposed rulemaking consolidates two previous rulemaking efforts: the Station Blackout Mitigation Strategies rulemaking and the Onsite Emergency Response Capabilities rulemaking. Both regulatory efforts offered extensive external stakeholder involvement opportunities,

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including public meetings, Advanced Notices of Proposed Rulemaking (ANPRs) issued for public comment, and draft regulatory basis documents issued for public comment. The following were the major opportunities for stakeholder involvement:

- Station Blackout ANPR (77 FR 16175; March 20, 2012);
- Onsite Emergency Response Capabilities ANPR (77 FR 23161; April 18, 2012);
- Station Blackout Mitigation Strategies draft regulatory basis and draft rule concepts (78 FR 21275; April 10, 2013). The final regulatory basis was subsequently issued on July 23, 2013 (78 FR 44035); and
- Onsite Emergency Response Capabilities draft regulatory basis (78 FR 1154; January 8, 2013). The final Onsite Emergency Response Capabilities regulatory basis, with preliminary proposed rule language, was subsequently issued on October 25, 2013 (78 FR 63901).
- Preliminary proposed rule language for Onsite Emergency Response Capabilities (78 FR 68774; November 15, 2013);

The public has had additional opportunities to engage in these regulatory efforts for the consolidated rulemaking. Most noteworthy were the following:

- Consolidated rulemaking proof of concept language published on February 21, 2014 (ML14052A057);
- Preliminary proposed rule language for consolidated rulemaking published August 15, 2014 (ML14218A253); and
- Preliminary proposed rule language for consolidated rulemaking published November 13, 2014 (ML14316A297), and December 8, 2014 (ML14336A641), to support public discussion with the ACRS.

In addition, the NRC will publish this information collection requirement in the *Federal Register* to provide the public with the opportunity to comment. The NRC will respond to the public comments received.

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).

11. Justification for Sensitive Questions

There are no sensitive questions included in these information collections.

12. Estimate of Industry Burden and Cost

The burden associated with the information collections is given in Table 1 for one-time recordkeeping burden, Table 2 for annual recordkeeping burden, Table 3 for one-time reporting burden, and Table 4 for annual third-party burden. All one-time costs are annualized in this

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analysis by dividing by the number of years covered by the clearance (three years). Based on the NRC staff's best estimate, the incremental industry burden to generate, maintain, retain, disclose, and provide information related to onsite emergency response procedures and severe accident procedures covered by this proposed rule is estimated to total 119,309 hours (103,485 hours one-time recordkeeping from Table 1, plus 15,386 hours annual recordkeeping from Table 2, plus 190 hours one-time reporting from Table 3, and 248 hours annual third-party burden from Table 4) with an annual cost estimate to the industry of \$33,287,211 (119,309 hours x \$279 per hour).

Table	Burden Area	Annualized Burden Hours	Cost
1	One-Time Recordkeeping (Annualized)	103,485	\$28,872,315
2	Annual Recordkeeping	15,386	\$4,292,694
3	One-Time Reporting	190	\$53,010
4	Annual Third-Party Disclosure	248	\$69,192
Total		119,309	\$33,287,211

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 0.0004 x the recordkeeping burden cost. Therefore, the annual records storage cost in Tables 1 and 2 is estimated to be \$13,266 (0.0004 x 118,871 hours x \$279/hour).

14. Estimated Annualized Cost to the Federal Government

Table 5 describes the estimated annual cost to the NRC for administration of the reporting and recordkeeping requirements, including: (1) reviewing owners groups' generic SAMGs, (2) overseeing site-specific SAMGs, (3) reviewing drill and exercise scenarios, and (4) overseeing the SAMG change control process. The cost is fully recovered through fee assessments to NRC licensees pursuant to 10 CFR Parts 170 and/or 171. The total estimated annual cost to the government is estimated as \$213,993 (767 hours x \$279/hour).

15. Reasons for Changes in Burden or Cost

The estimated incremental burden of the proposed rule is 119,309 hours. This estimate is composed of one-time and annual requirements of the proposed rule.

The proposed rule contains new provisions that include recordkeeping and reporting burdens that were not part of previous estimates, including: (1) developing and maintaining site-specific SAMGs, (2) reviewing FSGs, EDMGs, and SAMGs to confirm integration with EOPs, (3) revising procedures to document command and control structures, (4) developing and updating training materials as well as documenting training on SAMGs, (5) developing and reporting drill and exercise scenarios as well as documenting the results of drills and exercises, and (6) developing change control policy and procedures as well as updating generic and site-specific SAMGs.

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16. Publication for Statistical Use

This information will not be published for statistical use.

17. Reason for Not Displaying the Expiration Date

These proposed requirements would be contained in a regulation. Amending the *Code of Federal Regulations* to display information that could become obsolete in an annual publication 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
Estimated One-Time Recordkeeping Burden**

Section	Number of Recordkeepers	Burden Hours per Recordkeeper (Annualized)	Total Burden Hours (Annualized)	Total Cost (Annualized)
50.155(b)(3): Develop site-specific SAMGs (single-SAMG BWR sites)	21	600	12,600	\$3,515,400
50.155(b)(3): Develop site-specific SAMGs (dual-SAMG BWR sites)	1	1,200	1,200	\$334,800
50.155(b)(3): Develop site-specific SAMGs (single-SAMG PWR sites)	34	733	24,922	\$6,953,238
50.155(b)(3): Develop site-specific SAMGs (dual-SAMG PWR sites)	4	1,467	5,868	\$1,637,172
50.155(b)(4): Review the FSGs, EDMGs, and SAMGs to confirm integration with EOPs	60	67	4,020	\$1,121,580
50.155(b)(6): Revise procedures to document command and control	60	10	600	\$167,400
50.155(e): Develop new training materials (single-SAMG operating sites)	55	717	39,435	\$11,002,365
50.155(e): Develop new training materials (dual-SAMG operating sites)	5	1,434	7,170	\$2,000,430

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**Table 1
Estimated One-Time Recordkeeping Burden**

Section	Number of Recordkeepers	Burden Hours per Recordkeeper (Annualized)	Total Burden Hours (Annualized)	Total Cost (Annualized)
50.155(f): Develop drill and exercise scenarios (single-SAMG operating sites)	55	71	3,905	\$1,089,495
50.155(f): Develop drill and exercise scenarios (dual-SAMG operating sites)	5	141	705	\$196,695
50.155(g): Develop change control policy and procedures (operating sites)	60	51	3,060	\$853,740
Table 1 Total	60	Varies	103,485	\$28,872,315

**Table 2
Estimated Annual Recordkeeping Burden**

Section	Number of Recordkeepers	Burden Hours per Recordkeeper	Total Annual Burden Hours	Total Annual Cost
50.155(b)(3): Maintain site-specific SAMGs (single-SAMG operating sites)	18	66	1,188	\$331,452
50.155(b)(3): Maintain site-specific SAMGs (dual-SAMG operating sites)	2	132	264	\$73,656
50.155(e): Document training and update materials (single-SAMG operating sites)	28	234	6,552	\$1,828,008
50.155(e): Document training and update materials (dual-SAMG operating sites)	3	468	1,404	\$391,716
50.155(f): Document drill performance (single-SAMG operating sites)	6	40	240	\$66,960
50.155(f): Document drill performance (dual-SAMG operating sites)	1	72	72	\$20,088

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**Table 2
Estimated Annual Recordkeeping Burden**

Section	Number of Recordkeepers	Burden Hours per Recordkeeper	Total Annual Burden Hours	Total Annual Cost
50.155(f): Document exercise performance (single-SAMG operating sites)	1	40	40	\$11,160
50.155(f): Document exercise performance (dual-SAMG operating sites)	1	72	72	\$20,088
50.155(g): Update generic BWROG SAMG (owner group)	1	51	51	\$14,229
50.155(g): Update generic PWROG SAMG (owner group)	1	53	53	\$14,787
50.155(g): Update site-specific SAMGs (single-SAMG BWR sites)	21	69	1,449	\$404,271
50.155(g): Update site-specific SAMGs (dual-SAMG BWR sites)	1	139	139	\$38,781
50.155(g): Update site-specific SAMGs (single-SAMG PWR sites)	34	91	3,094	\$863,226
50.155(g): Update site-specific SAMGs (dual-SAMG PWR sites)	4	192	768	\$214,272
Table 2 Total	62	Varies	15,386	\$4,292,694

**Table 3
Estimated One-Time Reporting Burden**

Section	Number of Respondents	Responses per Respondent	Total Responses	Burden Hours per Response (Annualized)	Total Burden Hours (Annualized)	Total Cost (Annualized)
50.155(f): Report drills/exercise scenarios to NRC (single-SAMG operating sites)	55	1	55	3	165	\$46,035
50.155(f): Report drills/exercise scenarios to NRC (dual-SAMG operating sites)	5	1	5	5	25	\$6,975
Table 3 Total			60	Varies	190	\$53,010

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**Table 4
Estimated Annual Third-Party Burden**

Section	Number of Responses	Burden Hours per Response	Total Annual Burden Hours	Total Annual Cost
50.155(e):Disclose training materials to ultimate decision makers or "non-licensed operators" (single-SAMG operating sites)	28	8	224	\$62,496
50.155(e):Disclose training materials to ultimate decision makers or "non-licensed operators" (dual-SAMG operating sites)	3	8	24	\$6,696
Table 4 Total	31	Varies	248	\$69,192

TOTAL BURDEN: 119,309 hours (103,485 hours one-time recordkeeping (annualized) + 15,386 hours annual recordkeeping + 190 hours one-time reporting (annualized) + 248 hours annual third-party) for a total cost of \$33,287,211

TOTAL RESPONSES: 91 (60 total reporting responses + 31 third-party responses)

NUMBER OF RESPONDENTS: 62 (60 recordkeepers + 2 owners groups)

THIRD-PARTY DISCLOSURE BURDEN: 248 hours

**Table 5
Annualized NRC Burden**

NRC Action	Rule Text Provision	No. Actions/Year	Burden Hours/Action¹	Total Hours	Total Costs
Become familiar with the owners groups' generic SAMGs	50.155(b)(3)	1	67	67	\$18,693
Oversee site-specific SAMGs	50.155(b)(3)	60	2	120	\$33,480
Review new drill and exercise scenarios	50.155(f)	60	1	60	\$16,740
Oversee SAMG change control process for single-SAMG sites	50.155(g)	55	8	440	\$122,760
Oversee SAMG change control process for dual-SAMG sites	50.155(g)	5	16	80	\$22,320
Total				767	\$213,993

¹ The burden hours per action are based on the estimates used in the regulatory analysis for the

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proposed rule. The NRC burden hours in this supporting statement reflect the hours required for recordkeeping activities only, while the regulatory analysis includes hours for additional activities.

PRE-DECISIONAL

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