

TABLE 1: ANNUAL REPORTING BURDEN

| Requirement | Description | No. of Respondents | Responses per Respondent | Number of Responses | Burden Hours per Response | Total Annual Burden Hours | Cost at \$265/hr |
|--|--|---------------------------|---------------------------------|----------------------------|----------------------------------|----------------------------------|-------------------------|
| 70.9(b) | new information | 43.0 | 1.0 | 43.0 | 1.0 | 43.0 | \$11,395 |
| 70.17(a) | application for esemption | 1.0 | 1.0 | 1.0 | 40.0 | 40.0 | \$10,600 |
| 70.20a(d) | transportation of SNM | 6.0 | 1.0 | 6.0 | 40.0 | 240.0 | \$63,600 |
| 70.20b(f) | notification of shipments | 10.0 | 1.0 | 10.0 | 4.0 | 40.0 | \$10,600 |
| 70.20b(g) | notification of unscheduled stops | 1.0 | 1.0 | 1.0 | 4.0 | 4.0 | \$1,060 |
| 70.21(a), 70.22(a), 70.32(c)(1), 70.33, 70.34, 70.39(a), 70.73 | filing an application or renewal | 8.0 | 35.0 | 280.0 | 213.0 | 59,640.0 | \$15,804,600 |
| 70.25 Certification | financial assurance | 1.0 | 1.0 | 1.0 | 100.0 | 100.0 | \$26,500 |
| 70.22(a)(9) and 70.25 Funding Plan | decommissioning funding plan | 5.0 | 1.0 | 5.0 | 300.0 | 1,500.0 | \$397,500 |
| 70.25(c)(1)&(2) NRC Licenses | decommissioning funding plan | 1.0 | 1.0 | 1.0 | 4.0 | 4.0 | \$1,060 |
| 70.25(c)(1)&(2) Agreement States | decommissioning funding plan | 4.0 | 1.0 | 4.0 | 4.0 | 16.0 | \$4,240 |
| 70.25(e) NRC Licenses | detailed cost estimate, once every 3 years | 11.0 | 1.0 | 11.0 | 8.0 | 88.0 | \$23,320 |
| 70.25(e) Agreement States | detailed cost estimate, once every 3 years | 35.0 | 1.0 | 35.0 | 8.0 | 280.0 | \$74,200 |
| 70.32(a)(9) | notification of filing for bankruptcy | 1.0 | 1.0 | 1.0 | 1.0 | 1.0 | \$265 |
| 70.32(c)(2) | control&accounting of source matl | 30.0 | 1.0 | 30.0 | 13.3 | 399.0 | \$105,735 |
| 70.32(d) | change in transportation security plans | 1.0 | 1.0 | 1.0 | 16.0 | 16.0 | \$4,240 |
| 70.32(e) | change in security plans | 30.0 | 1.0 | 30.0 | 80.0 | 2,400.0 | \$636,000 |
| 70.32(g) | change insafeguards contingency plan | 5.0 | 1.0 | 5.0 | 80.0 | 400.0 | \$106,000 |
| 70.32(i) | emergency plans | 1.0 | 1.0 | 1.0 | 16.0 | 16.0 | \$4,240 |
| 70.38(d) | notification of cessation of operations | 6.0 | 1.0 | 6.0 | 1.0 | 6.0 | \$1,590 |
| 70.38(e) | financial assurance for decommissioning | 6.0 | 1.0 | 6.0 | 40.0 | 240.0 | \$63,600 |
| 70.38(f) | relief to postpone decommissioning | 2.0 | 1.0 | 2.0 | 40.0 | 80.0 | \$21,200 |
| 70.38(g)(1)&(4) | decommissioning plan | 4.0 | 1.0 | 4.0 | 1,000.0 | 4,000.0 | \$1,060,000 |

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| 70.38(g)(2) | alternate schedule for decom. plan | 2.0 | 1.0 | 2.0 | 40.0 | 80.0 | \$21,200 |
| 70.38(j) | final decom steps | 6.0 | 1.0 | 6.0 | 300.0 | 1,800.0 | \$477,000 |
| 70.50(a)&(b) | immediate &24-hour reporting | 30.0 | 1.0 | 30.0 | 4.0 | 120.0 | \$31,800 |
| 70.50(c)(1)&(2) | contents of reports | 13.0 | 1.0 | 13.0 | 4.0 | 52.0 | \$13,780 |
| 70.51(a) | records for license termination | 30.0 | 4.0 | 120.0 | 2.0 | 240.0 | \$63,600 |
| 70.52(a)&(b) | reports of accidental criticality | 1.0 | 1.0 | 1.0 | 16.0 | 16.0 | \$4,240 |
| 70.59 | effluent monitoring reports | 72.0 | 1.0 | 72.0 | 5.0 | 360.0 | \$95,400 |
| 70.62(c)(3)i (Action completed) | ISA Schedule CY 2004 | | | | | | \$0 |
| 70.62(c)(3)(ii) | submittal of ISA | 3.0 | 1.0 | 3.0 | 800.0 | 2,400.0 | \$636,000 |
| 70.65(a)&(b) | description of safety program, contents of an ISA | 1.0 | 1.0 | 1.0 | 200.0 | 200.0 | \$53,000 |
| 70.72(d)(1) | changes that require ammendment | 4.0 | 1.0 | 4.0 | 800.0 | 3,200.0 | \$848,000 |
| 70.72(d)(2) | changes that don't require ammendment | 4.0 | 1.0 | 4.0 | 600.0 | 2,400.0 | \$636,000 |
| 70.72(d)(3) | ISA annual update | 4.0 | 1.0 | 4.0 | 40.0 | 160.0 | \$42,400 |
| 70.74(a)&(b) and Appendix A | reports to Ops center, written reports, reportable safety events | 30.0 | 1.0 | 30.0 | 40.0 | 1,200.0 | \$318,000 |
| TOTAL | | 72.0 | | 774.0 | | 81,781.0 | \$ 21,671,965.0 |

TABLE 2: ANNUAL RECORDKEEPING BURDEN

| Requirement | Description | Number of Recordkeepers | Burden Per Recordkeeper | Total Annual Burden Hours | Cost at \$265/hr |
|---|--|--------------------------------|--------------------------------|----------------------------------|-------------------------|
| 70.22(g)-(k) | security plans | 2.0 | 200.0 | 400.0 | \$106,000 |
| 70.24(a)(3) | em. procedures for SNM areas | 114.0 | 7.5 | 855.0 | \$226,575 |
| 70.25(g) | decommissioning records | 240.0 | 3.0 | 720.0 | \$190,800 |
| 70.32(d) | changes physical protection plan | 2.0 | 0.5 | 1.0 | \$279 |
| 70.32(e) | change in security plan | 55.0 | 0.25 | 13.75 | \$3,836 |
| 70.32(g) | change insafeguards contingency plan | 5.0 | 0.25 | 1.25 | \$349 |
| 70.42(c)&(d) | SNM tranference | 100.0 | 10.0 | 1,000.0 | \$279,000 |
| 70.61(a)&(f), 70.62(d), 70.72(a),(e),&(f) | performance req compliance, controlled area, management measures, confirmation management, documentation updates, records of bases determination | 8.0 | 300.0 | 2,400.0 | \$669,600 |
| 70.62(a) & 70.64(a) | safety program, baseline design criteria | 8.0 | 87.5 | 700.0 | \$195,300 |
| 70.62(b) | process safety info | 8.0 | 160.0 | 1,280.0 | \$357,120 |
| TOTAL | | 240.0 | | 7,371.0 | \$2,056,509 |

TABLE 3: ANNUAL THIRD PARTY DISCLOSURE BURDEN

| Requirement | Description | No. of Respondents | Responses per Respondent | Number of Responses | Burden Hours per Response | Total Annual Burden Hours | Cost at \$279/hr |
|------------------------|--|---------------------------|---------------------------------|----------------------------|----------------------------------|----------------------------------|-------------------------|
| 70.19(c)(2) & 70.39(b) | calibration & reference sources, labeling of sources | 601.0 | 1.0 | 601.0 | 0.1 | 60.1 | \$15,927 |
| 70.51(b) | transference of records | 5.0 | 1.0 | 5.0 | 2.0 | 10.0 | \$2,650 |
| TOTAL | | 606.0 | | 606.0 | | 70.1 | \$18,577 |

TABLE 4: BURDEN TOTALS

| | Responses | Burden | Cost @\$265/hr |
|------------------------|------------------|-----------------|-----------------------|
| Reporting | 774.0 | 81,781.0 | \$21,671,965 |
| Recordkeeping | 240.0 | 7,371.0 | \$1,953,315 |
| Third Party Disclosure | 606.0 | 70.1 | \$18,577 |
| TOTAL | 1,620.0 | 89,222.1 | \$23,643,857 |

Recordkeeping costs \$ 781

NRC staff costs \$ 9,275,000

| | BURDEN HOURS | | |
|---------------|---------------------|-----------------|--------|
| | Previous total | Current Request | Change |
| Reporting | 81791.10 | 81781.00 | -10.10 |
| Recordkeeping | 7379.30 | 7371.00 | -8.30 |
| Third party | 70.10 | 70.10 | 0.00 |
| TOTAL | 89240.50 | 89222.10 | -18.40 |