

FINAL SUPPORTING STATEMENT
FOR
VOLUNTARY REPORTING OF PERFORMANCE INDICATORS
3150-0195
EXTENSION

Description of the Information Collection

The U.S. Nuclear Regulatory Commission (NRC) collects performance indicator (PI) information from commercial nuclear power plant licensees in accordance with the NRC's Reactor Oversight Process (ROP). Licensees voluntarily submit information related to selected performance attributes (PIs) to the NRC on a quarterly basis. Licensees submit PI information electronically to reduce burden on themselves and the NRC. The NRC meets monthly with public stakeholders, industry representatives, and the Nuclear Energy Institute (NEI)¹ to improve the PI program. NEI issues updated guidance to licensees for use in collecting and reporting PI information to the NRC based on the results of these meetings.

A. JUSTIFICATION

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

In 1998, the nuclear power industry offered to voluntarily send PI information to the NRC to improve the NRC's regulatory oversight process for nuclear reactors. Power reactor licensees were already collecting and reporting PI information to various industry groups. In April 2000, the NRC began implementing the ROP, which provides for risk-informed, objective, predictable, and understandable oversight of commercial nuclear power plants. The ROP uses PIs and inspection results to provide objective indications of licensee performance and to inform the NRC's regulatory response. PIs measure the performance of plant systems and licensee programs in a risk-informed manner, where applicable. The use of PIs allows for a more effective allocation of industry and NRC resources needed to support NRC oversight.

Licensees retain PI records as long as necessary to calculate specific indicators, but do not have to retain these records for more than three years.

Licensees report PIs to the NRC that provide the number of unplanned scrams and power changes per 7,000 hours of critical operation, unplanned scrams with complications over the previous four quarters, safety system functional failures over the previous four quarters,

¹ NEI is a nuclear industry group that develops policy on legislative and regulatory issues affecting the industry.

non-conformances with 10 CFR Part 20 requirements for (very) high radiation areas or unintended personnel exposures over the previous four quarters, and occurrences of radiological effluent releases that exceeded values derived from radiological effluent technical specifications or offsite dose calculation manuals over the previous four quarters.

Licensees report PIs to the NRC that provide the unavailability and unreliability of high pressure injection, heat removal, residual heat removal, emergency power, and cooling water support systems. Licensees also report PIs to the NRC that provide the percentages of reactor coolant activity and leakage with respect to technical specification limits; successful, accurate, and timely classifications, notifications, and protective action recommendations by the licensee's emergency response organization (ERO) during drills, exercises, and actual events over the previous eight quarters; key ERO members that participated in emergency drills, exercises, or actual events over the previous eight quarters; sirens that operated reliably in the preceding four quarters; and availability of security equipment.

2. Agency Use of Information

The NRC uses PIs to assess licensee performance and determine the appropriate level of regulatory response.

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 has issued [Guidance for Electronic Submissions to the NRC](#) which provides direction for the electronic transmission and submittal of documents to the NRC. Electronic transmission and submittal of documents can be accomplished via the following avenues: the Electronic Information Exchange (EIE) process, which is available from the NRC's "Electronic Submittals" Web page, by Optical Storage Media (OSM) (e.g., CD-ROM, DVD), by facsimile or by e-mail. It is estimated that approximately 100% of the responses are filed electronically.

4. Effort to Identify Duplication and Use Similar Information

Licensees may report information similar to some PIs to meet other NRC requirements; however, this information may not be reported in a manner that would allow for timely and adequate implementation of the ROP. The industry prefers to report PIs separately from other reporting requirements to expedite the implementation of the ROP.

5. Effort to Reduce Small Business Burden

None of the respondents are small businesses.

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

The reporting of PIs provides an efficient and effective mechanism for the NRC to obtain

information that is essential to an effective oversight program. Less frequent collection of this information would result in increased licensee burden as the NRC would be required to increase the number of inspections at licensee facilities to obtain the information currently provided by the reporting of PIs.

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 was published in the *Federal Register* on August 8, 2017 (82 FR 37132). Additionally, we contacted via email reactor owner/operator licensees from Exelon Corporation, Duke Energy, Pacific Gas & Electric, STP Nuclear Operating Company, TXU Electric, AMEREN UE, and nuclear industry stakeholder Nuclear Energy Institute. Two comments received agreed with NRC estimates. In addition, the NRC received one comment from a member of the public and the comment was not related to the information collection request.

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, the NRC does not request information normally considered confidential or proprietary for PI reporting purposes.

11. Justification for Sensitive Questions

Not applicable.

12. Estimated Burden and Burden Hour Cost

Table 1 reflects licensee burden to provide PI information and is based on information from industry. The estimates include time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the information collection; however, the estimates include only additional hours needed above those already expended by licensees to report indicators to the Institute of Nuclear Power Operations or to comply with other regulatory requirements, such as the Maintenance Rule or event reporting.

There are currently 94 operating reactors. The NRC assumes there will be one response per reactor unit on a quarterly basis ($4 \times 94 = 376$ annual responses) and that each response will require 200 hours of effort. Thus, the total reporting burden is 75,200 hours ($376 \text{ responses} \times 200 \text{ hrs/response}$), and costs are estimated at \$19,777,600 ($75,200 \text{ hours} \times \$263/\text{hr}$).

Table 2 reflects the licensee recordkeeping burden. The recordkeeping estimate includes time to maintain utility procedures and occasionally refine the PIs and related procedures to incorporate improvements learned from experience. Procedure development and recordkeeping are performed by each utility or parent company. Based on the information provided in NUREG-1350, "2016-2017 Information Digest," Volume 28, dated August 2016, 24 parent companies exist for operating reactors. Since that publication, one site shut down, reducing the number to 23 (Fort Calhoun and Omaha Public Power District). The industry estimates 50 hours of annual recordkeeping time per parent company, for a total of 1,150 hours (23 recordkeepers x 50 hours per recordkeeper) and a cost of \$302,450 (1,150 hrs x \$263/hr).

The total reporting and recordkeeping burden is 76,350 hours (75,200 hours of reporting and 1,150 hours of recordkeeping), and the total cost is \$20,080,050 (76,350 hours x \$263/hr).

13. Estimate of Other Additional Costs

The NRC has determined that 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 times the recordkeeping burden cost. Because the recordkeeping burden is estimated to be 1,150 hours, the storage cost for this clearance is \$121.00 (1,150 hours x 0.0004 x \$263/hour).

14. Estimated Annualized Cost to the Federal Government

The information provided by these indicators was reviewed as a routine part of the previous inspection process and, therefore, incur minimal incremental cost to the government.

15. Reasons for Change in Burden or Cost

The burden is projected to slightly decrease from 81,250 hours for 425 responses to 76,350 hours for 399 responses, which is a decrease of 4,900 hours and 26 responses. The previous burden of 81,250 hours was based on 100 licensees responding quarterly at 200 hours per response (80,000 hours), plus 25 recordkeepers at 50 hours per recordkeeper (1,250 hours), for a total of 81,250 hours. The current burden of 76,350 hours is based on the permanent cessation of operation of one unit (Fort Calhoun). This extension will be applicable until January 1, 2021. While there is discussion of reactors shutting down prior to 2021, and possibly two new units starting up (Vogtle site), specific reactors and dates are either not established or too fluid to determine so it is estimated that there will be 94 reactors operating for the entire period. Thus, 94 licensees responding quarterly at 200 hours per response (75,200 hours) and 23 recordkeepers at 50 hours per recordkeeper (1,150 hours), for a total of 76,350 hours.

In addition, the hourly cost has decreased from \$272/hr to \$263/hr.

16. Publication for Statistical Use

Not applicable.

17. Reason for Not Displaying the Expiration Date

The expiration date will be displayed.

18. Exceptions to the Certification Statement

Not applicable.

B. COLLECTIONS OF INFORMATION EMPLOYING STATISTICAL METHODS

Not applicable.

TABLE 1
Annual Reporting Burden

	Number of Respondents	Responses per Respondent	Total Responses	Burden per Response	Total Annual Burden Hours	Cost at \$263/hour
PI Reporting	94	4	376	200	75,200	\$ 19,777,600

TABLE 2
Annual Recordkeeping Burden

	Number of Recordkeepers	Hours per Recordkeeper	Total Annual Burden Hours	Cost at \$263/hour
PI Recordkeeping	23	50	1,150	\$302,450

Total Annual Burden: 76,350 (75,200 reporting hours plus 1,150 recordkeeping)
Total Burden Hour Cost: \$20,080,050 (76,350 hours x \$263/hour)
Total Responses: 399 (376 responses plus 23 recordkeepers)