

PDR

Request for OMB Review

DESIGNATED OFFICIAL
Paul Little Wood

Important

Read instructions before completing form. Do not use the same SF 83 to request both an Executive Order 12291 review and approval under the Paperwork Reduction Act.

Answer all questions in Part I. If this request is for review under E.O. 12291, complete Part II and sign the regulatory certification. If this request is for approval under the Paperwork Reduction Act and 5 CFR 1320, skip Part II, complete Part III and sign the paperwork certification.

Send three copies of this form, the material to be reviewed, and for paperwork—three copies of the supporting statement, to:

Office of Information and Regulatory Affairs
Office of Management and Budget
Attention: Docket Library, Room 3201
Washington, DC 20503

PART I.—Complete This Part for All Requests.

1. Department/agency and Bureau/office originating request U. S. Nuclear Regulatory Commission		2. Agency code 3 1 5 0
3. Name of person who can best answer questions regarding this request Don Kasun		Telephone number (301) 492-3379
4. Title of information collection or rulemaking NRC Form 327 - Special Nuclear Material (SNM) Physical Inventory Summary Report		
5. Legal authority for information collection or rule (cite United States Code, Public Law, or Executive Order) 42 USC 2201(o) or		
6. Affected public (check all that apply)		
1 <input type="checkbox"/> Individuals or households	3 <input type="checkbox"/> Farms	5 <input type="checkbox"/> Federal agencies or employees
2 <input type="checkbox"/> State or local governments	4 <input checked="" type="checkbox"/> Businesses or other for-profit	6 <input type="checkbox"/> Non-profit institutions
		7 <input type="checkbox"/> Small businesses or organizations

PART II.—Complete This Part Only if the Request is for OMB Review Under Executive Order 12291

7. Regulation Identifier Number (RIN) _____ or, None assigned

Classification	Stage of development	Type of review requested
1 <input type="checkbox"/> Major	1 <input type="checkbox"/> Proposed or draft	1 <input type="checkbox"/> Standard
2 <input type="checkbox"/> Nonmajor	2 <input type="checkbox"/> Final or interim final, with prior proposal	2 <input type="checkbox"/> Pending
	3 <input type="checkbox"/> Final or interim final, without prior proposal	3 <input type="checkbox"/> Emergency
		4 <input type="checkbox"/> Statutory or judicial deadline

9. CFR section affected _____ CFR _____

10. Does this regulation contain reporting or recordkeeping requirements that require OMB approval under the Paperwork Reduction Act and 5 CFR 1320? Yes No

11. If a major rule, is there a regulatory impact analysis attached? Yes No
If "No," did OMB waive the analysis? Yes No

Certification for Regulatory Submissions

In submitting this request for OMB review, the authorized regulatory contact and the program official certify that the requirements of E.O. 12291 and any applicable policy directives have been complied with.

Signature of program official	Date
Signature of authorized regulatory contact	Date

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12. (OMB use only)

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SUPPORTING STATEMENT
FOR
NRC FORM 327
SPECIAL NUCLEAR MATERIAL (SNM)
PHYSICAL INVENTORY SUMMARY REPORT
(10 CFR 74.17)

Justification

Need for the Information Collection

Special nuclear material (SNM) is required to be controlled and accounted for because of the government's national security obligation to prevent or detect loss, diversion or theft, or the appearance thereof, of quantities of SNM that could be used for clandestine nuclear devices. To meet this obligation, NRC's safeguards material control and accounting regulations for fuel facilities require the conduct of physical inventories of SNM on a periodic basis by licensees. 10 CFR Section 74.17 requires the reporting of physical inventory results on NRC Form 327 each time that a physical inventory is conducted by a fuel facility.

Agency Use of Information

The information is used by NRC to:

- Determine whether SNM is lost, diverted, or stolen;
- Assess the material control and accounting performance and compliance of SNM licensees;
- Make safeguards regulatory decisions;
- Fulfill the Commission's commitment to report to the public in NUREG-0430 differences between licensees' book and physical inventories.

Reduction of Burden Through Information Technology

There are no legal obstacles to reducing the burden by the use of improved information technology. However, respondents report classified information and thus must adhere to security regulations. Because of the type and relatively small amount of information, the reports do not lend themselves readily to the use of automated information technology.

Effort to Identify Duplication

The Information Requirements Control Automated System (IRCAS) was searched to determine duplication. None was found.

Effort to Use Similar Information

The physical inventory data requested on NRC Form 327 is not available in any other NRC data collection system. NRC requires periodic SNM material status reports from all SNM licensees (DOE/NRC Forms 742 and 742C), but that information is based on licensees' book records and is not necessarily the immediate result of a physical inventory. In addition, there are quantities requested on Form 327 that are not included on the DOE/NRC Forms.

Effort to Reduce Small Business Burden

NRC has determined that the licensees required to submit NRC Form 327 are not small entities as that term is defined in the Regulatory Flexibility Act.

Consequences of Less Frequent Collection

The reporting period corresponds to the inventory frequencies required by NRC regulations. The frequency depends essentially on the strategic significance of the SNM covered by a particular license. Three existing strategic SNM licensees are required by 10 CFR 70.51(e)(3) to inventory every two months. Thus, these three licensees would submit a total of 18 reports per year. Two licensees have low enriched uranium of moderate strategic significance, which must be inventoried every six months. Thus, there are four reports per year in this category. Six licensees have low enriched uranium of low strategic significance, which presently must be inventoried annually. Thus there are six reports per year in this category. Hence, there would be a total of 28 inventory reports required per year. Less frequent reporting would result in unacceptable delays in determining whether SNM is lost, diverted, or stolen.

Circumstances Which Justify Variation from OMB Guidelines

There is no variation from OMB guidelines.

Consultations Outside NRC

There have been no consultations outside NRC since the previous clearance of this form.

Confidentiality of Information

The respondents' data for high enriched uranium is classified and low enriched uranium is usually treated as proprietary. Thus, the information is confidential. The only exception is the periodic publication of inventory difference data in NUREG-0430, which requires the Commission's approval before the information is released.

Sensitive Questions

None.

Estimated Annualized Cost to the Federal Government

The collection of information will require an average of two hours of NRC staff time per report to review and evaluate licensees' physical inventory results. Thus, the annual costs for this activity will be \$5,320 per year (28 reports/yr X 2 hrs/report X \$95/hr). In addition, the compilation, printing, and distribution of inventory difference information in NUREG-0430 is estimated to cost \$1,360 per year (\$600 for compilation, \$340 for printing, and \$420 for distribution). Therefore, the total annual cost to the Federal government will be approximately \$6,680.

Estimate of Burden

The completion of the SNM Physical Inventory Summary Report will require approximately 4 staff hours per licensee per report. The total industry burden would then be 112 hours (28 report X 4 hrs/report = 112). The total cost for all respondents is about \$10,640 (112 hours x \$95/hr).

Reason for Change in Burden

The burden is reduced because the number of licensees making inventory reports is lower.

Publication for Statistical Use

None.

**SPECIAL NUCLEAR MATERIAL (SNM)
PHYSICAL INVENTORY SUMMARY REPORT**

ESTIMATED BURDEN PER RESPONSE TO COMPLY WITH THIS INFORMATION
COLLECTION REQUEST: 4,000 HRS. FORCED COMMENTS REGARDING
BURDEN ESTIMATE TO THE INFORMATION AND RECORDS MANAGEMENT BR.
(M/R 8774) U.S. NUCLEAR REGULATORY COMMISSION, WASHINGTON, DC
20555, AND TO THE PAPERWORK REDUCTION PROJECT (3150-0129),
OFFICE OF MANAGEMENT AND BUDGET, WASHINGTON, DC 20503

LICENSEE NAME			
FACILITY LOCATION			
DESCRIPTION	GRAMS ELEMENT (U or Pu)	GRAMS ISOTOPE (U-233, U-235, or Pu-239 + Pu-241)	DOCKET NUMBER
BEGINNING INVENTORY			LICENSE NUMBER
RECEIPTS	+		REPORTING PERIOD FROM TO
SHIPMENTS	-		SPECIAL NUCLEAR MATERIAL CATEGORY
			HEU Pu U-233 LEU
MEASURED DISCARDS			LICENSEE'S CERTIFYING OFFICIAL DATE
ENDING INVENTORY	-		
NET SUM OF BIASES pertaining to but not included in the above quantities*	±	±	DESCRIPTION GRAMS ELEMENT GRAMS ISOTOPE
PRIOR PERIOD ADJUSTMENTS**	±	±	STANDARD ERROR OF THE ID (SEID)
			SEID LIMIT
INVENTORY DIFFERENCE (ID) (The algebraic sum of the above values.)	±	±	ID LIMIT

*If the net sum of all biases is positive, circle the "-" sign; if the net sum of all biases is negative, circle the "+" sign.
**If the sum of prior period adjustments increases the ID, circle the "-" sign, if the sum of prior period adjustments decreases the ID, circle the "+" sign.

ATTACH EXPLANATIONS OR COMMENTS TO THIS FORM ON CORPORATE LETTERHEAD

DEFINITIONS OF QUANTITIES REPORTED

BEGINNING INVENTORY: The quantity of SNM present at the facility as of the beginning of business on the first day of the period covered by the report. This quantity must agree with the ending inventory value (element and isotope) on the last report submitted.

RECEIPTS: The quantity of SNM received at the facility and other increases resulting from the introduction of additional SNM into the inventory during the reporting period.

SHIPMENTS: The quantity of SNM that was shipped from the facility during the reporting period. This includes any samples shipped for off-site analysis and parts of SNM receipts that were returned to the shipper. Measured discards are not to be included, even if shipped during the reporting period for disposal.

MEASURED DISCARDS: The quantity of SNM in the forms of gaseous, liquid and solid waste that has been discarded from the plant during the reporting period. This quantity includes the amounts of discarded SNM that have been transferred to an official holding account, released to the environment under license conditions or methods approved pursuant to 10 CFR 20, or shipped to an authorized recipient for disposal.

ENDING INVENTORY: The quantity of SNM that is indicated to be present at the facility as the result of the physical inventory.

BIAS: A fixed error which remains constant over replicated measurements. (Refer to the license conditions for specific operational procedures for calculating bias.)

PRIOR PERIOD ADJUSTMENTS: The quantity of SNM, increment or decrement, by which the centralized record system was adjusted during the current reporting period for verifiable corrections that were applicable to prior reporting periods. Typically, this quantity will involve corrections of shipments and receipts to reconcile shipper-receiver differences, or corrections of errors associated with the beginning inventory that were detected after the previous report was submitted. Any bias adjustments associated with these corrections should be included.

STANDARD ERROR OF THE INVENTORY DIFFERENCE (SEID): The standard deviation of an inventory difference that takes into account measurement error contributions to the components of the ID.

SEID LIMIT: The applicable quantity in 10 CFR 70.51(e)(5), 10 CFR 74.31(c)(4), 10 CFR 74.59(e)(5) or another quantity assigned to the licensee by the NRC.

ID LIMIT: The applicable quantity in 10 CFR 74.13(b)(1), 10 CFR 74.31(c)(5), 10 CFR 74.59(f)(1)(i) or another quantity assigned to the licensee by the NRC. If exceeded, this quantity of material would prompt an investigation and possibly the submittal of a subsequent special report to the NRC.