

Request for OMB Review

Paullette Smith

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

10 CFR Part 74 - Material Control and Accounting of Special Nuclear Material

NUREG-1065 - Acceptance Criteria for the Low Enriched Uranium Reform Amendments

NUREG-1280 - Standard Format and Content Acceptance Criteria for the Material Control and Accounting (MC&A) Reform Amendment

5. Legal authority for information collection or rule (cite United States Code, Public Law, or Executive Order)

42 USC 2201(o)

6. Affected public (check all that apply)

- 1 ☐ Individuals or households
2 ☐ State or local governments

- 3 ☐ Farms
4 ☒ Businesses or other for-profit

- 5 ☐ Federal agencies or employees
6 ☐ Non-profit institutions
7 ☒ Small businesses or organizations

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

1. Regulation Identifier Number (RIN)

or None assigned ☐

2. Type of submission (check one in each category)

Classification

- 1 ☐ Major
2 ☐ Nonmajor

Stage of development

- 1 ☐ Proposed or draft
2 ☐ Final or interim final, with prior proposal
3 ☐ Final or interim final, without prior proposal

Type of review requested

- 1 ☐ Standard
2 ☐ Pending
3 ☐ Emergency
4 ☐ Statutory or judicial deadline

3. CFR section affected

10 CFR

4. Does this regulation contain reporting or recordkeeping requirements that require OMB approval under the Paperwork Reduction Act and 5 CFR 1320?

☐ Yes ☐ No

5. If a major rule, is there a regulatory impact analysis attached?

1 ☐ Yes 2 ☐ No

If "No," did OMB waive the analysis?

3 ☐ Yes 4 ☐ 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

12. (OMB use only)

DF02
11

PART III.—Complete This Part Only If the Request is for Approval of a Collection of Information Under the Paperwork Reduction Act and 5 CFR 1320.

13. Abstract—Describe needs, uses and affected public in 50 words or less "Radioactive Materials, Atomic Energy Facilities"
10 CFR Part 74 establishes requirements for material control and accounting of special nuclear material and for documenting the transfer of special nuclear material. The recordkeeping and reporting requirements are designed to provide timely detection of the loss, theft or diversion of special nuclear material.

14. Type of information collection (check only one)

Information collections not contained in rules

☐ Regular submission

☐ Emergency submission (certification attached)

Information collections contained in rules

☒ Existing regulation (no change proposed)

☐ Final or interim final without prior NPRM

7. Enter date of expected or actual Federal Register publication at this stage of rulemaking (month, day, year) _____

☐ Notice of proposed rulemaking (NPRM)

A ☐ Regular submission

☐ Final NPRM was previously published

B ☐ Emergency submission (certification attached)

15. Type of review requested (check only one)

☐ New collection

☐ Reinstatement of a previously approved collection for which approval has expired

☐ Revision of a currently approved collection

☒ Extension of the expiration date of a currently approved collection without any change in the substance or in the method of collection

☐ Existing collection in use without an OMB control number

16. Agency report form number(s) (include standard/optional form number(s))

N/A

22. Purpose of information collection (check as many as apply)

☐ Application for benefits

☐ Program evaluation

☐ General purpose statistics

☒ Regulatory or compliance

☐ Program planning or management

☐ Research

☐ Audit

Annual reporting or disclosure burden

Number of respondents

9

Number of responses per respondent

1.67

Total annual responses (line 1 times line 2)

15

Hours per response

54.87

Total hours (line 3 times line 4)

823

17. Annual recordkeeping burden

Number of recordkeepers

9

Annual hours per recordkeeper

1,409.3

Total recordkeeping hours (line 1 times line 2)

12,684

Recordkeeping retention period: Varies 3 years to

years

18. Total annual burden: duration of license

Requested (line 17.5 plus line 18.3)

13,507

In current OMB inventory

27,685

Difference (line 1 less line 2)

-14,178

Explanation of difference:

Program change

Adjustment

-14,178

23. Frequency of recordkeeping or reporting (check all that apply)

☒ Recordkeeping

Reporting

☒ On occasion

☐ Weekly

☐ Monthly

☐ Quarterly

☐ Semi-annually

☒ Annually

☐ Biennially

☒ Other (describe): One-time plan submission

20. Current (most recent) OMB control number or comment number

3150-0123

24. Respondents' obligation to comply (check the strongest obligation that applies)

☐ Voluntary

☐ Required to obtain or retain a benefit

☒ Mandatory

21. Requested expiration date

3 years from approval date

25. Are the respondents primarily educational agencies or institutions or is the primary purpose of the collection related to Federal education programs? ☐ Yes ☒ No

26. Does the agency use sampling to select respondents or does the agency recommend or prescribe the use of sampling or statistical analysis by respondents? ☐ Yes ☒ No

27. Regulatory authority for the information collection

10 CFR Part 74

; or FR _____ ; or, Other (specify): _____

Paperwork Certification

In submitting this request for OMB approval, the agency head, the senior official or an authorized representative, certifies that the requirements of 5 CFR 1320, the Privacy Act, statistical standards or directives and any other applicable information policy directives have been complied with.

Signature of program official

Date

Signature of agency head, the senior official or an authorized representative

Date

Joyce A. Amenta, DSO for Information Resources Management

5/4/90

SUPPORTING STATEMENT
FOR
10 CFR PART 74
MATERIAL CONTROL AND ACCOUNTING
OF SPECIAL NUCLEAR MATERIAL

NUREG 1065, ACCEPTANCE CRITERIA FOR THE
LOW ENRICHED URANIUM REFORM AMENDMENTS

AND

NUREG 1280, STANDARD FORMAT AND CONTENT
ACCEPTANCE CRITERIA FOR THE MATERIAL CONTROL
AND ACCOUNTING (MC&A) REFORM AMENDMENT

Need for and Agency Use of the Information Collection

NRC regulations in 10 CFR Part 70 establish procedures and criteria for the issuance of licenses to receive title to, own, acquire, deliver, receive, possess, use, or transfer special nuclear material (SNM). NRC regulations in 10 CFR Part 74 establish requirements for material control and accounting (MC&A) of special nuclear material of low strategic significance licensed pursuant to Part 70. The regulations are issued pursuant to the Atomic Energy Act of 1954, as amended, and Title II of the Energy Reorganization Act of 1974, as amended.

Part 74 incorporates recordkeeping and reporting requirements for licensees that possess and use formula quantities of strategic special nuclear material. The records required to be maintained pursuant to Section 74.31 are those deemed necessary for the timely discovery of inadvertent losses of low enriched uranium to the environment, or the theft or diversion of low enriched uranium by potentially hostile groups. Either of these events could endanger the public health and safety. The reporting requirements imposed on the licensee are intended to point up record anomalies which might indicate loss of material control, to provide necessary information to resolve identified

anomalies, to alert the Commission to the condition, and to supply information that would assist in the recovery of SNM in the event of a confirmed loss.

The MC&A requirements applicable to licensees that possess and use formula quantities of strategic special nuclear material (SSNM) are contained in §§ 74.51, .53, .55, .57, and .59. The recordkeeping and reporting requirements in the indicated sections of Part 74 provide timely detection and enhanced localization of anomalies that could be potentially indicative of a theft or diversion of SSNM. The information provides the ability to resolve alarms by identifying the cause as innocent or malevolent. In the latter case, the probability of material recovery will be significantly enhanced.

Fundamental nuclear material control plans (FNMCs) that describe how licensees intend to comply with the requirements of the regulations are required to be submitted for review and approval. Approved plans will be the basis for inspections by regional inspectors who must verify that the licensee is in compliance with the performance objectives specified in the rule. Plan reviews will be initiated within 30 days after submittal. The availability of supporting acceptance criteria will contribute to expeditious plan reviews. Reports of unresolved inventory differences and abnormalities identified through material control tests and item monitoring will be reviewed by NRC Regional Offices as soon as possible after receipt. Records of material control tests and anomaly investigation will be maintained by the licensees in order that inspectors may determine that performance objectives and commitments have been met.

Section 74.11 requires that each licensee who possesses 1 gram or more of contained uranium-235, uranium-233, or plutonium shall notify the NRC Operations Center within one hour of discovery of any loss, other than normal operating loss, or theft or other unlawful diversion of special nuclear material, or any incident in which an attempt has been made or is believed to have been made to commit a theft or unlawful diversion of such material. The information is used by the NRC staff to determine whether there has been a diversion or loss of material and to initiate prompt action for recovery of material. The NRC staff will respond according to the significance of the

event. Response to a significant event is usually made by the regional staff within 24 hours.

Section 74.13(a) requires each licensee authorized to possess at any one time and location SNM in a quantity totaling more than 350 grams of contained uranium-235, uranium-233, or plutonium, to submit DOE/NRC Form 742 on a semi-annual basis. These reports summarize the quantities of SNM received, produced, possessed, transferred, consumed, disposed of, or lost by the licensee. DOE/NRC Form 742C, which reflects the composition of the ending inventory, is also submitted. These forms have been previously cleared under the following OMB clearances:

DOE/NRC Form 742	OMB No. 3150-0004
DOE/NRC Form 742C	OMB No. 3150-0058

The licensee reports are sent to a DOE contractor facility for recording in an SNM tracking system. NRC staff reviews these reports. Discrepancies between the reports and licensees' records are investigated and reconciled.

Section 74.13(b) requires each licensee subject to the requirements of §70.51(e) to submit a report to the Director, Office of Nuclear Material Safety and Safeguards (licensees located in NRC Region II submit the reports to the Region II office), within 30 calendar days after the start of each annual physical inventory if the inventory difference exceeded both (i) its associated limit of error and (ii) 200 grams of plutonium or U-233, 300 grams of high enriched uranium or U-235 contained in high enriched uranium or 9,000 grams of U-235 contained in low enriched uranium; a statement of possible causes for the inventory differences, and action taken or planned to be taken to correct the inventory difference. This section also requires that, if for any material the limit of error of the inventory difference exceeds any applicable limits specified in 10 CFR §70.51(e)(5) or approved pursuant to 10 CFR §70.51(e)(6), a statement of the probable reasons for the limit of error and actions taken or planned to be taken with respect to the limit of error must be submitted.

The report is used to alert the NRC staff to a potential "out of control situation" at a licensee site. If the size of the inventory difference is significant, an inspector from the NRC Regional Office usually visits the site within 24 hours to observe the resolution of the inventory difference and the corrective action to be taken.

Section 74.15(a) requires each licensee who transfers and each licensee who receives special nuclear material to complete and distribute a Nuclear Material Transaction Report on DOE/NRC Form 741. This should be done in accordance with the printed instructions for completing the form whenever the licensee transfers or receives a quantity of special nuclear material of 1 gram or more of contained uranium-235, uranium-233, or plutonium. DOE/NRC Form 741 has previously been approved under OMB clearance number 3150-0003, which should be referred to for further supporting information and burden data.

Prior to a site visit, the NRC inspection staff obtains a computer printout of nuclear material transactions from the DOE/NRC database. The inspectors review licensee records with the printout data to assure agreement between the record and the report and to assure that shipper-receiver differences have been reconciled.

Section 74.17 requires that each licensee subject to the requirements of Section 74.31 must submit a completed Special Nuclear Material Summary Report on NRC Form 327 to the Director, Office of Nuclear Material Safety and Safeguards or, in certain cases, to the appropriate NRC Regional Office. The reporting period corresponds to the required inventory frequency. The frequency depends essentially on the strategic significance of the special nuclear material (SNM) covered by the particular license. Strategic SNM licensees are required to inventory every two months. Licensees possessing low enriched uranium of moderate strategic significance are required to inventory every six months. Licensees having low enriched uranium of low strategic significance must conduct inventories annually.

Special nuclear material 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. 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.

Section 74.31(b) established a time requirement for the submission and implementation of material control and accounting plans for licensees authorized to possess and use more than one effective kilogram of special nuclear material of low strategic significance, as required by §74.31(a). The objectives of the plan are to confirm the presence of special nuclear materials at the licensee facility, resolve indications of potentially missing material, and aid in investigation and recovery of material that is determined to be actually missing. This was a one-time submittal. All currently affected licensees have submitted the required plans.

Section 74.31(c) describes the system capabilities that must be addressed in the plan in order to meet the general performance objectives of §74.31(a). Guidance for preparing the plan is provided in the Acceptance Criteria document (NUPEG 1065). The plan is reviewed by the NRC staff to determine whether the performance criteria have been satisfied. Initial NRC response to the plan is usually sent to the licensee within 60 days of receipt and docketing. The approved plan will be used by the appropriate NRC Regional Office staff to monitor actual licensee performance in reaching the performance objectives.

Section 74.31(d) requires each licensee to establish records that will demonstrate that the requirements of 74.31(c) have been met and to maintain those records for three years. The records to be maintained are selected by the licensee. The 3-year retention period is the shortest time span which assures the NRC that all data is available which might affect the audit period.

Section 74.51(a) requires licensees authorized to possess and use five or more formula kilograms of SSNM to establish, implement, and maintain a Commission-approved material control and accounting system that meets specified objectives.

Section 74.51(c)(1) requires licensees authorized to possess and use five or more formula kilograms of SSNM to submit a fundamental nuclear material control plan that describes how the licensee intends to comply with Section 74.51(b) in order to achieve the general performance objectives of Section 74.51(a). Guidance for preparing the plan is provided in the Standard Format and Content Acceptance Criteria document (NUREG 1280). Review of the FNMC plans enables the NRC to make a judgment on each licensee's capabilities to meet regulatory requirements. After approval, the plans are used by NRC inspectors to monitor licensee performance. This was a one-time submittal. All currently affected licensees have submitted the required plans.

Section 74.57(c) requires that a licensee must notify NRC immediately any time the licensee is unable to resolve a loss detection alarm within the time limit specified in its FNMC plan. In the case of a five formula kilogram loss, the maximum time for resolution is 24 hours. The early notification puts the NRC on alert to a potential loss of SSNM and thus allows for contingency planning in the event a diversion or theft is indicated. NRC and possibly other federal agency involvement at an early stage will enhance the likelihood of material recovery.

Section 74.57(d) requires that once an anomaly has been resolved, records must be updated and corrected to enable the licensee to maintain continuing compliance with detection and response requirements and permit NRC inspectors to evaluate the adequacy of the licensee's resolution procedures. A key factor in the resolution of alarms is the availability of auditable records that provide a history of the processing and storage of SSNM in bulk and item form. The majority of innocent causes of alarms are expected to be

identifiable from a review of pertinent records. The involved records will have been generated in the process of complying with the requirements of §§ 74.53, .55 or .59.

Section 74.57(f)(2) requires that licensees notify NRC within 24 hours if an abrupt loss detection estimate exceeds five formula kilograms of strategic special nuclear material. The early notification puts the NRC on alert to a potential loss of SSNM and thus allows for contingency planning in the event a diversion or theft is indicated. NRC and possibly other federal agency involvement at an early stage will enhance the likelihood of material recovery.

Section 74.59 contains the quality assurance and accounting requirements of the rule. Section 74.59(b) requires that licensees establish and maintain management structure, policies and procedures. Section 74.59(c) requires that licensees provide for personnel training and qualification. Section 74.59(d) requires that licensees establish and maintain a system of measurements for material control and accounting. Section 74.59(e) requires that licensees establish and maintain a system of measurement quality control, perform statistical analyses and process and engineering tests, and generate data on the performance of measurement processes. Section 74.59(f) requires that licensees perform a physical inventory every six months and perform inventory difference/standard error of inventory difference (ID/SEID) calculations, and ID/SEID investigations. Licensees must investigate and report the failure to resolve any excessive inventory difference. They must reconcile and adjust the plant and subsidiary book records to the results of the physical inventory. Licensees must maintain records and procedures to ensure the quality of physical inventories. Section 74.59(g) stipulates that licensees shall establish auditable records sufficient to demonstrate that the requirements of §§ 74.53, .55, .57 and .59 have been met and retain those records for at least three years. Section 74.59(h) requires that licensees establish procedures for shipper-receiver difference evaluations and investigations.

Information recorded and reported in accordance with the requirements in this section will enable NRC regional inspectors and licensing personnel to assess licensees' ongoing capabilities to control and account for SSNM in their possession. As indicated previously, these records and reports will be invaluable to the licensees and the NRC in the event of an attempted diversion or theft since they will permit localization of losses in space and time.

Reduction of Burden Through Information Technology

There are no legal obstacles to reducing the burden associated with this information collection. Applicants and licensees may use electronic information processing systems to prepare and submit required information. Licensees have the option of preparing certain of the reports on a computer generated facsimile of the report form and transmitting the information electronically.

Effort to Identify Duplication

In an effort to minimize duplication and licensee burden, NRC and the Department of Energy (DOE) jointly utilize a Nuclear Materials Management and Safeguards System (NMMSS). Common reporting forms are used to minimize the reporting burden on industry members required to provide nuclear materials data to one or both agencies in accordance with prevailing regulations or contractual obligations. The licensee is thus able to file one report to meet the requirements of both agencies.

The Information Requirements Control Automated System (IRCAS) was searched to determine duplication. There is a small amount of duplication in that, upon termination of licensed operations by a licensee, NRC requires the licensee to file NRC Form 314, reporting the transfer or other disposition of any remaining licensed material, and the date of transfer. This transfer must also be reported on DOE/NRC Form 741. This small duplication imposes a minimal burden on licensees, and is necessary to maintain accountability of

licensed material in NMMSS and to permit NRC to make a determination as to whether the facility has been cleared of radioactive material and is suitable for release for unrestricted use or whether additional decontamination measures may be required

Effort to Use Similar Information

To the extent possible the information collection requirements have been structured to permit licensees to use information already generated for other purposes such as production control, quality control, product certification, etc. Where new information must be generated, there is no other source that could be used.

Effort to Reduce Small Business Burden

A number of licensees who use special nuclear material are small businesses. Since the consequences to the common defense and security or to the health and safety of the public of the improper control or use of a given quantity of special nuclear material are the same for large and small entities, it is not possible to reduce the burden on small businesses by less frequent or less complete accounting or control procedures.

Consequences of Less Frequent Collection

Applications for new licenses and amendments may be submitted at any time. Applications for renewal of licenses are submitted every five years. Information submitted in previous applications may be referenced without being resubmitted. The Loss of Material Report required by §74.11 is submitted on the average of five times per year. In four out of five occurrences, the cause is usually found in less than 1 week and is a result of measurement error, accounting error, number transposition, or failure to list all inventory items.

Approximately once a year the quantity of material is significant, requiring submission of a detailed report and proposed action plan to the NRC. Less frequent reporting would preclude the NRC from being notified in time to provide rapid response and quick assistance in achieving timely resolution.

Failure to collect the information required by Sections 74.51 - 74.59 on the indicated frequencies would negate the purposes of the new requirements which are timely detection of anomalies potentially indicative of material losses and generation of information useful in the resolution of discrepancies when they do occur.

Circumstances Which Justify Variation from OMB Guidelines

Contrary to the OMB Guidelines in 5 CFR 1320.6(b), certain sections of Part 74 require that licensees submit reports to the NRC in less than thirty days.

Section 74.11, Material Loss Report, must be made within one hour of discovery. This requirement is needed to permit NRC to determine whether there has been a loss or diversion of special nuclear material and to initiate prompt action for recovery of such material.

Section 74.13(b), Inventory Difference Exceeds Limit of Error, must be reported within thirty days after the start of the inventory. This requirement is needed to alert the NRC Regional Office to a potential "out of control situation" at a licensee site. If the report indicates that the size of the inventory difference is significant, an NRC inspector will usually be dispatched to the site to observe the resolution and corrective action.

Sections 74.57(d) and (f) specify that a confirmed loss of an item and the failure to resolve loss detection alarms within agreed upon times must be reported to the NRC immediately. The reason for the short reporting times is to permit the Commission to take appropriate response actions in a timely manner in the event a diversion or theft is indicated.

Another area of variation is in the number of copies of the FNMC plan to be submitted to demonstrate how compliance with rule requirements will be achieved. An original and four copies of the plan are required. The distribution will be as follows:

- | | | |
|---|-----------------------------|---|
| - | Safeguards Licensing Branch | 2 |
| - | NRC Regional Office | 2 |
| - | NRC Docket Room | 1 |

The Licensing Branch copies will be used in the review process. Two copies are necessary because of the involvement of more than one reviewer. The Regional Office copies will be used in their inspection program. The Docket Room copy will be kept on file under the licensee's docket number.

Consultations Outside the Agency

Consultations were held with representatives from the Department of Energy, the Department of State, and the Institute of Nuclear Materials Management (INMM) at various times during the development of the rulemaking concerning formula quantities of strategic special nuclear material. The INMM is a professional association whose members come from the nuclear industry, government agencies, science faculties and similar groups. The INMM subcommittee members who were involved in the discussions on that rulemaking were predominantly an industry group. All affected licensees were represented on the subcommittee. Comments from the above groups were taken into account in the rulemaking process. There have been no consultations outside the agency since the previous clearance.

Confidentiality of Information

None, except for proprietary or safeguards information.

Sensitive Questions

None.

Estimate of Compliance BurdenReporting Requirements

<u>Section</u>	<u>No. of Licensee Responses Annually</u>	<u>Licensee Staff Hours Per Submittal</u>	<u>Total Annual Burden</u>
74.11	5	15	75
74.13(a)	- See OMB Clearance Nos. 3150-0004, 3150-0058		
74.13(b)	2	350	700
74.15(a)	- See OMB Clearance No. 3150-0003		
74.17	- See OMB Clearance No. 3150-0139		
74.31(b),(c)	0	865	0
	One-time requirement, which has been completed		
74.51(c)	0	900	0
	One-time requirement, which has been completed		
74.57(c)	4	8	32
74.57(f)(2)	2	4	8
74.59(f)	2	4	8
Total:	<hr/> 15		<hr/> 823

Recordkeeping Requirements

	No. of <u>Records Annually</u>	<u>Hours/Record</u>	<u>Total Burden</u>
74.31(d)	6	1,012	6,072
74.51(a)	3	100	300
74.57(d)	12	1	12
74.59(b)	0	1.0	0
	One-time requirement, which has been completed		
74.59(c)	0	1.0	0
	One-time requirement, which has been completed		
74.59(d)	6,000	0.2 (12 min.)	1,200
74.59(e)	3,000	0.2 (12 min.)	600
74.59(f)	400	2.0	800
74.59(g)	3,000	1.0	3,000
74.59(h)	<u>700</u>	1.0	<u>700</u>
Total:	13,121		12,684

Total Number of Recordkeepers: 9

Total Recordkeeping Hours: 12,684

TOTAL ANNUAL BURDEN HOURS FOR PART 74: 13,507

Estimated Cost to Respond to the Collection

The estimated annual cost to licensees to respond to the collection requirements is \$1,242,644 (13,507 hrs X \$92/hr).

Source of Burden Data and Method for Estimating Burden

Consistent with the performance oriented nature of Part 74, the specific records that a licensee must keep are not explicitly defined. Licensees have the flexibility to develop a records system that is compatible with their particular programs. In so doing, each licensee will be able to satisfy recordkeeping requirements in the most cost-effective manner. The burden estimates reflected in the table are based on a hypothetical model system designed in accordance with the guidance provided in the Standard Format/Acceptance Criteria documents. There is a high probability that the licensees will propose systems similar to the model or systems that are most cost-effective without sacrificing essential qualifications. The baseline was taken from the burden estimates previously determined for the 10 CFR Part 70 clearance. The estimates for record and reporting requirements were developed from existing estimates for similar records and reports. The burden estimate for a major license amendment was taken from prior cost data since the effort should not be significantly different.

Reason for Change in Burden

Current licensees have made the required one-time submissions required under §§74.31(b), 74.51(c), and 74.59 (b) and (c), and no new licensees are expected to file plans in the next three years.

Estimate of Cost to the Federal Government

The total cost to the government is estimated to be \$105,800 (1,150 hrs X \$92/hr).