

REQUEST FOR OMB REVIEW

(Under the Paperwork Reduction Act and Executive Order 12291)

Important — Read instructions (SF-83A) before completing this form. *Submit the required number of copies of SF-83, together with the material for which review is requested to:*

Office of Information and Regulatory Affairs
Office of Management and Budget
Washington, D.C. 20503

<p>1. Department/Agency and Bureau/Office originating request U.S. Nuclear Regulatory Commission</p>	<p>3. Name(s) and telephone number(s) of person(s) who can best answer questions regarding request Valeria Wilson (301) 492-8972</p>
<p>2. 6-digit Agency/Bureau number (first part of 11-digit Treasury Account No.) 3 1 5 0</p>	<p>4. 3-digit functional code (last part of 11-digit Treasury Account No.) 2 7 6</p>
<p>5. Title of Information Collection or Rulemaking Mark I Containment Program</p>	<p>C. Is this a rulemaking submission under Section 3504(h) of P.L. 96-511? (Check one) <input checked="" type="checkbox"/> No (Section 3507 submission) <input type="checkbox"/> Yes, NPRM. Expected date of publication: _____ <input type="checkbox"/> Yes, final rule. Expected date of publication: _____ Effective date: _____</p>
<p>6. A. Is any information collection (reporting or recordkeeping) involved? (Check one) <input checked="" type="checkbox"/> Yes and proposal is attached for review <input type="checkbox"/> Yes but proposal is not attached — skip to question D. <input type="checkbox"/> No — skip to question D.</p>	<p>D. At what phase of rulemaking is this submission made? (Check one) <input checked="" type="checkbox"/> Not applicable <input type="checkbox"/> Major rule, at NPRM stage <input type="checkbox"/> Major Final rule for which no NPRM was published <input type="checkbox"/> Major Final rule, after publication of NPRM <input type="checkbox"/> Nonmajor rule, at NPRM stage <input type="checkbox"/> Nonmajor rule, at Final stage</p>
<p>B. Are the respondents primarily educational agencies or institutions or is the purpose related to Federal education programs? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	

COMPLETE SHADED PORTION IF INFORMATION COLLECTION PROPOSAL IS ATTACHED

<p>7. Current (or former) OMB Number N/A</p>	<p>8. Requested Expiration Date Sept 21, 1985</p>	<p>12. Agency report form number(s) N/A</p>
<p>Expiration Date N/A</p>		<p>13. Are respondents only Federal agencies? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>
<p>9. Is proposed information collection listed in the information collection budget? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>	<p>10. Will this proposed information collection cause the agency to exceed its information collection budget allowance? (If yes, attach amendment request from agency head.) <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	<p>14. Type of request (Check one) <input type="checkbox"/> preliminary plan <input checked="" type="checkbox"/> new (not previously approved or expired more than 6 months ago) <input type="checkbox"/> revision <input type="checkbox"/> extension (adjustment to burden only) <input type="checkbox"/> extension (no change) <input type="checkbox"/> reinstatement (expired within 6 months)</p>
<p>11. Number of report forms submitted for approval None</p>		

<p>15. a. Approximate size of universe (if sample) N/A</p> <p>b. Size of sample N/A</p> <p>c. Estimated number of respondents or record keepers per year 16</p> <p>d. Reports annually by each respondent (item 25) 1</p> <p>e. Total annual responses (item 15c x 15d) 16</p> <p>f. Estimated average number of hours per response 3,000</p> <p>g. Estimated total hours of annual burden in Fiscal Year (item 15e x 15f) 16,000</p>	<p>16. Classification of Change in Burden (explain in supporting statement)</p> <table border="1" style="width:100%; border-collapse: collapse;"> <thead> <tr> <th></th> <th>No. of Responses</th> <th>No. of Reporting Hours</th> <th>Cost to the Public</th> </tr> </thead> <tbody> <tr> <td>a. In inventory</td> <td align="center">0</td> <td align="center">.0</td> <td align="center">\$</td> </tr> <tr> <td>b. As proposed</td> <td align="center">16</td> <td align="center">16,000</td> <td align="center">\$</td> </tr> <tr> <td>c. Difference (b-a)</td> <td align="center">16</td> <td align="center">16,000</td> <td align="center">\$</td> </tr> </tbody> </table> <p>Explanation of difference (indicate as many as apply)</p> <table border="1" style="width:100%; border-collapse: collapse;"> <thead> <tr> <th>Adjustments</th> <th></th> <th></th> <th></th> </tr> </thead> <tbody> <tr> <td>d. Correction-error</td> <td align="center">+</td> <td align="center">+</td> <td align="center">+ \$</td> </tr> <tr> <td>e. Correction-reestimate</td> <td align="center">+</td> <td align="center">+</td> <td align="center">+ \$</td> </tr> <tr> <td>f. Change in use</td> <td align="center">+</td> <td align="center">+</td> <td align="center">+ \$</td> </tr> <tr> <td colspan="4">Program changes</td> </tr> <tr> <td>g. Increase</td> <td align="center">+ 16</td> <td align="center">+ 16,000</td> <td align="center">+ \$</td> </tr> <tr> <td>h. Decrease</td> <td align="center">-</td> <td align="center">-</td> <td align="center">- \$</td> </tr> </tbody> </table>		No. of Responses	No. of Reporting Hours	Cost to the Public	a. In inventory	0	.0	\$	b. As proposed	16	16,000	\$	c. Difference (b-a)	16	16,000	\$	Adjustments				d. Correction-error	+	+	+ \$	e. Correction-reestimate	+	+	+ \$	f. Change in use	+	+	+ \$	Program changes				g. Increase	+ 16	+ 16,000	+ \$	h. Decrease	-	-	- \$
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17. Abstract—Needs and Uses (50 words or less) NRC has issued orders requiring BWR licensees with Mark I Containments to make modifications to restore intended Safety margin. The NRC is evaluating the licensees plant unique analyses to determine their acceptability against NUREG-0661. To complete the review additional information related to deviations from NUREG-0661 and issues which are part of the Mark I program but not specifically addressed in NUREG-0661 will have to be provided.

18. Related report form(s) (give OMB number(s), IRCN(s), internal agency report form number(s) or symbol(s)) NUREG-0661	20. Catalog of Federal Domestic Assistance Program Number N/A 21. Small business or organization <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
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19. Type of affected public (Check as many as apply) 1 <input type="checkbox"/> individuals or households 2 <input type="checkbox"/> state or local governments 3 <input type="checkbox"/> farms 4 <input checked="" type="checkbox"/> businesses or other institutions (except farms)	22. Type of activity of affected public—indicate 3-digit Standard Industrial Classification (SIC) code(s) (up to 10) — if over 10, check <input type="checkbox"/> Multiple or <input type="checkbox"/> All 4 8 3
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23. Brief description of affected public (e.g., "retail grocery stores," "State education agencies," "households in 50 largest SMSAs")
BWR licensees and applicants with Mark I Containments

24. Purpose (Check as many as apply. If more than one, indicate predominant by an asterisk) 1 <input type="checkbox"/> application for benefits 2 <input type="checkbox"/> program evaluation 3 <input type="checkbox"/> general purpose statistics 4 <input checked="" type="checkbox"/> regulatory or compliance 5 <input type="checkbox"/> program planning or management 6 <input type="checkbox"/> research	26. Collection method (Check as many as apply) 1 <input checked="" type="checkbox"/> mail self-administered 2 <input type="checkbox"/> other self-administered 3 <input type="checkbox"/> telephone interview 4 <input type="checkbox"/> personal interview 5 <input type="checkbox"/> recordkeeping requirement: Required retention period: _____ years 6 <input type="checkbox"/> other—describe:
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25. Frequency of Use 1 <input checked="" type="checkbox"/> Nonrecurring Recurring (check as many as apply) 2 <input type="checkbox"/> on occasion 6 <input type="checkbox"/> semiannually 3 <input type="checkbox"/> weekly 7 <input type="checkbox"/> annually 4 <input type="checkbox"/> monthly 8 <input type="checkbox"/> biennially 5 <input type="checkbox"/> quarterly 9 <input type="checkbox"/> other—describe:	27. Collection agent (Check one) 1 <input checked="" type="checkbox"/> requesting Department/Agency 2 <input type="checkbox"/> other Federal Department/Agency 3 <input type="checkbox"/> private contractor 4 <input type="checkbox"/> recordkeeping requirement 5 <input type="checkbox"/> other—describe:
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28. Authority for agency for information collection or rulemaking—indicate statute, regulation, judicial decree, etc. Commission Order	30. Do you promise confidentiality? (If yes, explain basis for pledge in supporting statement.) <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
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29. Respondent's obligation to reply (Check as many as apply) 1 <input type="checkbox"/> voluntary 2 <input checked="" type="checkbox"/> required to obtain or retain benefit 3 <input type="checkbox"/> mandatory—cite statute, not CFR (attach copy of statutory authority)	31. Will the proposed information collection create a new or become part of an existing Privacy Act system of records? (If yes, attach Federal Register notice or proposed draft of notice.) <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No 32. Cost to Federal Government of information collection or rulemaking \$ 290,000
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COMPLETE ITEMS 33 THRU 35 ONLY IF RULEMAKING SUBMISSION

33. Compliance costs to the public \$ _____	34. Is there a regulatory impact analysis attached? <input type="checkbox"/> Yes <input type="checkbox"/> No	35. Is there a statutory or judicial deadline affecting issuance? <input type="checkbox"/> Yes. Enter date _____ <input type="checkbox"/> No
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CERTIFICATION BY AUTHORIZED OFFICIALS SUBMITTING REQUEST—We certify that the information collection or rulemaking submitted for review is necessary for the proper performance of the agency's functions, that the proposal represents the minimum public burden and Federal cost consistent with need, and is consistent with applicable OMB and agency policy directives. Signature and title of

APPROVED OFFICIAL FOR AGENCY Patricia G. Norry	DATE 9-21-82	SUBMITTING OFFICIAL R. Stephen Scott	DATE 9/21/82
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Supporting Statement for Mark I Containment Program and
NUREG-0661, "Mark I Containment Long Term Program"

1. JUSTIFICATION

Need for the Information Collection

The first generation of General Electric (GE) BWR nuclear steam supply systems are housed in a containment structure designated as the Mark I containment system. The original design of the Mark I containment system considered postulated accident loads previously associated with containment design. However, since the establishment of the original design criteria additional loading conditions have been identified. These additional loads result from the dynamic effects of drywell air and steam being rapidly forced into the suppression pool (Torus) during a postulated LOCA and from suppression pool response to safety-relief valve (SRV) operation generally associated with plant transient operation conditions. As a result of letters to the utilities from the NRC in April 1975 requesting that the owners quantify the hydrodynamic loads and assess the effects of these loads on the Mark I containment structure, the affected utilities formed an "ad hoc" Mark I Owners Group with GE the Lead technical organization. The Owners Group divided this task into a short term (STP) and long term program (LTP).

The objectives of the STP were to verify that each Mark I containment system would maintain its integrity and functional capability when subjected to the most probable loads induced by a postulated design-basis LOCA, and to verify that licensed Mark I BWR facilities could continue to operate safely, without endangering the health and safety of the public, while a methodical, comprehensive LTP was being conducted. The staff in the "Mark I Containment Short-Term Program Safety Evaluation Report," NUREG-0408 concluded that sufficient margin of safety had been demonstrated to assure the functional performance of the containment system and, therefore, any undue risk to the health and safety of the public was precluded. Subsequently, the staff granted the operating Mark I facilities exemptions relating to the structural factor of safety requirements of 10 CFR 50.55(a).

The objectives of the LTP were to establish design-basis (conservative) loads that are appropriate for the anticipated life of each Mark I BWR facility (40 years), and to restore the originally intended design-safety margins for each Mark I containment system. The principle thrust of this program has been the development of generic methods for the definition of suppression pool hydrodynamic loading events and the associated structural assessment techniques for the Mark I configuration. The generic analysis techniques are intended to be used to perform

a plant-unique analysis (PUA) for each Mark I facility. The staff in the "Mark I Containment Long-Term Program Safety Evaluation Report," NUREG-0661 concluded that the load definition procedures utilized by the BWR Owner Group, as modified by the staff's requirements, provide conservative estimates of these loading conditions, and that the structural acceptance criteria are consistent with the requirements of the applicable codes and standards.

For the staff to assess the acceptability of these modifications, the licensees and applicants have committed to submitting these PUA for audit review. Since the licensees and applicants are taking some exceptions to the criteria contained in NUREG-0661, additional information will be required by the staff in order to ensure the acceptability of the deviations from the criteria. In addition, there are issues associated with the Mark I containments that were discovered too late for inclusion in NUREG-0661 and, therefore, were not addressed. Since the licensees and applicants were involved in the development of the acceptance criteria for NUREG-0661, they are aware of these issues and have been working on their resolution. The licensees and applicants will have to provide information regarding the resolution of these issues to the NRC for completion of our review.

Practical Utility of the Information Collection

The information requested will be reported to the NRC. Without this additional information the NRC cannot assess the acceptability of the plant modifications to restore the originally intended margin of safety and an unacceptable resolution could exist, thereby potentially endangering the public health and safety. There is no source for the required information other than the licensees and applicants. Since most of the information to be requested is for a post-implementation review which is being performed by NRC contractors, it is the NRC's intent to provide this information to the contractors as soon as it is received so they can complete their evaluation of each licensee's or applicant's submittal in a timely manner once they have started.

The information provided will be docketed so a permanent record will be maintained by NRC. Therefore, once NRC has reviewed and approved their responses there is no further requirement for the licensees or applicants to maintain this information for NRC review.

Duplication with Other Collections of Information

This information is not available except through the licensees and applicants.

Consultations Outside the NRC

The NRC is utilizing two contractors Brookhaven National Laboratory (BNL) and Franklin Research Center (FRC) to evaluate the licensees and applicants PUA. They will also generate the requests for additional information and review the responses. Since these contractors were involved in the development of the acceptance criteria contained in NUREG-0661 they are well qualified to review the PUA's. Some of the concerns associated with the Mark I containments that have evolved after the issuance of NUREG-0661 will be reviewed by the staff and the remainder by the contractors. The NRC also consulted with the Mark I Owners Group.

2. DESCRIPTION OF THE INFORMATION COLLECTION

Number and Type of Respondents

These reporting requirements will affect fourteen operating power reactor licensees and two applicants for operating licenses.

Reasonableness of the Schedule for Collecting Information

The licensees and applicants will be submitting their PUA through December 1983. The licensees and applicants in a June 1981 status summary report provided realistic dates by which they could provide the PUA's. The NRC, except for renegotiated dates with two licensees, accepted the dates provided by the licensees and applicants. The schedule for responses to NRC and contractors questions pertaining to the PUA and other associated issues that evolve will be negotiated with the licensees and applicants.

Method of Collecting the Information

The information to be received from the licensees and applicants pertaining to the PUA is very voluminous (hundreds of pages). Since this information is to be reviewed by contractors, and in some instances consultants to the contractor, it is impractical to review this material other than at the

contractors' offices. In addition since the licensees are under Orders to make these plant modifications, the information they are providing has to be docketed. For the same reasons, any followup information on the PUA or other associated issues is to be provided in the manner as stated.

Adequacy of Description of the Information

NUREG-0661 "Mark I Containment Long-Term Program " adequately provides the criteria for the modifications made and the bases for the information to be provided. For the issues not addressed in NUREG-0661, detailed guidance will be provided in writing by the NRC, which will adequately identify the information required.

Record Retention Period

It is anticipated that the review of each PUA will take approximately two months and review of the total Mark I program will be completed within the next two years. Records only have to be retained by the licensees and applicants until the NRC has completed its review of the Mark I Program and associated issues, and provided an approval letter. However, the licensees and applicants will probably retain the material as reference documents.

Reporting Period

Only one report (PUA) or response to associated issues need be provided. If the submittal is found unacceptable by the NRC, licensees and applicants will have to provide additional information.

Copies Required to be Submitted

A total of 20 copies of the PUA report have to be submitted by each licensee for simultaneous review by the NRC and its contractors to ensure that reviews are completed on schedule.

3. ESTIMATE OF BURDEN

Estimated Hours Required to Respond to Collection

It is estimated that each of the licensees and applicants will spend 1000 person-hours in completing the PUA report (one time requirement) and an additional 2000 person-hours (total) in providing follow up information on the PUA and associated Mark I issues. Total Licensee

and applicant person-hours will be 48,000 (16 x 3000). On an annual basis it will be approximately 16,000 person-hours (48,000/3)

Source of Burden Data and Method for Estimating Burden

Source of burden data and method for estimating was obtained from a licensee and the Mark I Owners Group.

4. ESTIMATE OF COST TO FEDERAL GOVERNMENT

It is estimated that the NRC's burden to assess the responses to the PUA and associated issues will be 1000 staff-hours for a total cost of \$40,000 annually. The estimated contractor cost is \$500,000 over a two year period. Therefore, the total cost to the government on an annual basis will be approximately \$290,000.