



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

July 10, 1985

Mr. James B. MacRae
Office of Management and Budget
Reports Management, Room 3201
New Executive Office Building
Washington, D.C. 20503

Dear Mr. MacRae:

In accordance with Section 3507 of Public Law 96-511 and regulations of the Office of Management and Budget, I am enclosing for OMB review copies of Standard Form-83 and Supporting Statements covering reporting, recordkeeping and application requirements of 10 CFR 50 "Domestic Licensing of Production and Utilization Facilities."

10 CFR 50 regulations are promulgated by the Nuclear Regulatory Commission pursuant to the Atomic Energy Act of 1954, as amended, and Title II of the Energy Reorganization Act of 1974, amended, to provide for the licensing and regulation of production and utilization facilities. They contain the reporting, recordkeeping and application requirements as they are generally applied in the NRC's licensing and regulatory process. Specific requirements for each licensee are contained in documents called "Technical Specifications" that are issued for every utilization facility licensed to operate. (See 10 CFR 50.36) Guidance on acceptable means of compliance with 10 CFR 50 is provided through publications called NRC "Regulatory Guides." These "Guides" often cite standards and other requirements established by national standards bodies such as the American National Standards Institute (ANSI) and the American Society of Mechanical Engineers (ASME).

10 CFR 50 affects various types of facilities, including nuclear power plants, research reactors and test reactors, at various stages in the licensing process, including application, construction, operation, amendment, suspension, renewal and shutdown. Therefore, the number of respondents actually affected by each requirement varies depending on the number of licensing requests initiated and/or completed and the number of regulatory reports required by operating events and/or conditions.

Reporting requirements obviously are directed toward licensees or applicants. However, reporting requirements may not only be reactor specific, but they may be of a type that applies to a site which is occupied by one or more reactors that have different licensees. Other requirements may be utility specific and, thus, refer to several reactors at more than one site. These considerations may cause apparent conflicts in the use of the terms licensees, reactor sites, or facilities in our individual estimates of burden.

8509230601 850717
PDR REVGP NRCORGR
MEETING075 PDR

For estimating purposes, we have assumed the following annual average number of respondents:

Operating Power Reactor Licenses - 93
Operating Research/Test Reactors - 75
Construction Permits - 34
New Applications for Construction Permits - 0
New Applications for Operating Licenses - 0
Applications for Amendments - 1000 (total for 93 power reactor licenses and 2 testing facilities)

In those instances where a reporting/recordkeeping requirement applies to both power reactor and research/test reactor licensees, we have calculated a combined cumulative average burden of compliance. For requirements that are event dependent, we have estimated frequency.

Based on the above methodology, the information collection burden represented by this submittal is approximately 3.87 million hours annually. This burden reflects a reduction of 2.02 million hours that resulted from a rule promulgated by the NRC on Sept. 12, 1984, which eliminates requirements with respect to financial qualifications for applicants for a license to operate a production or utilization facility. Also, there are fewer design and construction deficiencies anticipated under 50.55(e) because no new plants have been scheduled and fewer plants remain under construction. Moreover, our previous submittal reflected an estimate of 50 applications for operating licenses. During the requested three-year clearance, we do not anticipate any new applications for construction permits or operating reactor licenses. Therefore, a burden reduction associated with Quality Assurance Records (Appendix B) has also been realized.

To facilitate your review of the submittal, we have grouped the pertinent sections of 10 CFR 50 into logical parts, each with a separate Supporting Statement. A summary of the statements is enclosed for your use. Unless contrary to the statements below, no information is provided in the Supporting Statements for each separate part for the following:

1. Tabulation and Publication Plans

Application information submitted to NRC is used to prepare NRC's Safety Evaluation Reports. Reportable information provided by licensees is systematically evaluated by NRC and made available in the Public Document Rooms unless deemed proprietary.

2. Time Table for Data Collections and Publication

Not applicable unless specified.

3. Consultations Outside the Agency

All requirements of 10 CFR 50 have been (or are currently) the subject of rulemaking proceedings during which the Commission considered (or is considering) public comments.

4. Sensitive Questions

Not applicable unless specified.

5. Practical Utility of Information Collection

10 CFR 50 affects various types of facilities at various stages in the licensing process. The requested information is reviewed and acted upon consistent with the governing NRC regulation or the Atomic Energy Act of 1954, as amended, whichever is appropriate. For example, when a submittal can be completed without adjudication, the collected information can usually be acted upon within 1 to 6 months. However, submittals which result in litigation may not be completed for 2-8 years.

Justifications for the number of copies required for various submittals, recordkeeping and record retention requirements are not generally included in the separate Supporting Statements. Rather, generic justifications are provided below.

Copy Requirements

10 CFR 50 contains varying requirements for submission of multiple copies. In some instances requirements for copies are unstated and left to a later determination to be specified by the NRC [e.g., See 50.30 (c)(2)]. On March 26, 1985 (50 FR 11882) NRC published a proposed regulation (10 CFR 50.4). The proposed 10 CFR 50.4 would establish the procedures for submitting correspondence, reports, applications, or other written communications pertaining to the domestic licensing of production and utilization facilities. The proposed rule would indicate the correct mailing address for delivery of the communications and specify the number of copies required to facilitate action by the NRC. Moreover it is expected to resolve a number of problems that have developed during the past several years regarding the submittal of applications and reports. In addition to clarifying the procedures, this rule would result in a reduction in reproduction and postage costs for the affected licensees. A copy of that rule is enclosed.

When the final rule is published, a copy will be submitted to OMB for inclusion in the 10 CFR 50 case file.

Recordkeeping Requirements

Recordkeeping required by 10 CFR Part 50 is of two broad types. The first type is the simple maintenance of copies of reports, letters, and other written documentation that already exist because of a reporting requirement found elsewhere in the regulations or in the license and technical specifications. The second type of recordkeeping is the generation and storage of reports because the information in the reports may need to be referred to for assessments or subsequent evaluations of occurrences at the facility.

The large volume of records which are kept for 10 CFR Part 50 are required primarily by the technical specifications, the quality assurance program, reports of changes specified in 50.59(b) and environmental qualification of equipment. Thus, a specific recordkeeping burden has been calculated for each of these technical areas. For all other technical areas, the recordkeeping burden was estimated to be 10% of the total burden (recordkeeping + reporting).

Record Retention Periods

Specific retention periods are in general not identified in 10 CFR 50. In most instances record retention periods are established by reference in plant-specific Technical Specifications which indicate that a constructor or licensee will or has established a Quality Assurance Program in accordance with NRC's Regulatory Guides 1.28 (Revision 3) "Quality Assurance Program Requirements (Design and Construction)" and Regulatory Guide 1.88 (Revision 2) "Collection, Storage, and Maintenance of Nuclear Power Plant Quality Assurance Records." These Regulatory Guides in turn reflect the standards adopted by ANSI and other standards-setting organizations.

In some cases, however, record retention periods have been designated in 10 CFR 50 to be determined by NRC on a case-by-case basis. NRC is currently developing a NUREG publication that will list all recordkeeping requirements that NRC imposes on its licensees/applicants; and, in conjunction with this effort, will amend its regulations to ensure that recordkeeping requirements contain specific retention periods. The records would generally be retained 3 years, 5 years, 10 years or life of the equipment, termination of license, etc. Those records that are retained beyond three years have been determined by staff to be directly related to public health and safety. These are primarily records required of reactor licensees as they relate to safety procedures and employee exposure.

Additional Requirements

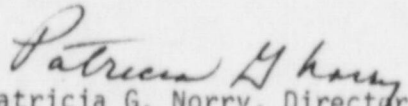
This submittal incorporates fourteen proposed information collection requirements under 10 CFR 50 that have been approved by OMB since our last overall submittal for 10 CFR Part 50 dated April 5, 1982. These requirements

are itemized below and are described in detail in the cognizant supporting statements.

- 50.34(g) - Implementation of Standard Review Plan
- 50.44(c) - Hydrogen Control
- 50.49 - Environmental Qualification of Electric Equipment
Important to Safety
- 50.54(bb) - Management of Irradiated Fuel
- 50.54(z) - Notification of NRC Operation Center
- 50.55(f) - Quality Assurance Program
- 50.60 - Acceptance Criteria for Fracture Prevention (in
conjunction with requirements of Appendices G and H)
- 50.61 - Pressurized Thermal Shock
- 50.62 - Anticipated Transient Without Scram (ATWS)
- 50.91(a)
and (b) - Notice and State Consultation
- 50.55(a) - (Proposed) - ASME Code requirements, incorporation of
various Addenda and Editions
- 50.64 - (Proposed) - Highly Enriched Uranium
- 50.74 - (Proposed) - Notification to NRC when status of licensed
reactor operator has changed.
- 50.33(k),
50.54(cc),
and
50.54(dd) - (Proposed) - Decommissioning Rule

In submitting this request for clearance of 10 CFR 50, we realize that its importance and complexity are such that our staff must work closely with yours. Mr. Barry Pineles of our Executive Legal Director's Office (492-7688) is available to provide any legal clarification and R. Stephen Scott (492-8585) of our Reports Clearance Staff is available to arrange for the participation of any NRC staff that your staff may feel are needed at any meetings.

Sincerely,


Patricia G. Norry, Director
Office of Administration

Enclosures:

1. Standard Form 83
2. Summary of Statements
3. Supporting Statements (Parts 1-23)
4. Proposed 10 CFR 50.4