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Comment On: NRC-2025-0874-0001

Information Collection: NRC Form 361, Reactor Plant Event Notification Worksheet; NRC Form 361A, Fuel Cycle and Materials Event Notification Worksheet; NRC Form 361N, Non-Power Reactor (NPR) Event Notification Worksheet

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Comment on FR Doc # 2026-07709, NRC-2025-0874-0001, from Constellation Energy Generation

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General Comment

Comments on each of the four (4) questions related to NRC FORM 361 have been provided in the attached .doc file. Thank you for your time and consideration.

Attachments

NRC FORM 361 Federal Register Feedback

1. Is the proposed collection of information necessary for the NRC to properly perform its functions? Does the information have practical utility? Please explain your answer.

Timely and accurate event notification is essential for the NRC to fulfill its oversight responsibilities under 10 CFR 50.72 and related requirements. NRC Form 361 can provide value as a structuring tool to promote completeness and consistency during event notifications.

The form itself does not materially change regulatory outcomes, and its value is maximized only when it:

- Serves as a flexible aid rather than a prescriptive checklist, particularly during emergent conditions
- Aligns closely with actual NRC information needs during Operations Center interactions
- Avoids introducing additional expectations beyond regulatory requirements or NUREG-1022 guidance

To the extent the form facilitates clearer communication and reduces follow-up clarification, it provides practical utility. Where it results in duplication or introduces implicit expectations, its utility is reduced.

2. Is the estimate of the burden of the information collection accurate? Please explain your answer.

The current estimated burden (time) per response to comply with the voluntary collection request is 30 minutes. The estimate is understated because the total effort should include more than preparing the response document. For transmittals, the dominant contributors are procedure adherence, cross-functional review, feedback incorporation, and management approvals.

The stated burden of approximately 30 minutes per response does not fully reflect the actual effort required during real-world event notifications.

While completing the form itself may take ~30 minutes, the total burden includes:

- Event recognition, classification, and validation under time constraints
- Coordination across operations, engineering, and licensing organizations
- Verification of plant conditions, system responses, and regulatory applicability
- Preparation for and participation in NRC Operations Center discussions
- Follow-up clarification during and after the initial notification

As a result, the incremental burden attributable to the form alone is modest, but the overall reporting burden associated with the information collection is significantly higher than estimated. Any burden assessment should distinguish between:

- Form completion effort (~30 minutes)
- End-to-end event reporting effort (~2-4 hours)

3. Is there a way to enhance the quality, utility, and clarity of the information to be collected?

The quality and usefulness of the information collected can be improved through the following:

- Clearer alignment with regulatory basis
 - Ensure each data element corresponds directly to regulatory requirements such as listed for 50.72 NON-EMERGENCY events
 - Emphasize which key plant status, safety function impacts, and risk-relevant conditions are necessary for the NRC Ops Center's decision making
- Reduction of ambiguous or duplicative fields
 - Eliminate or clarify elements that are not necessary for NRC Operations Center decision-making
 - Engage with NRC resident inspectors and utilize plant specific data to obtain information that is not needed emergently or determined to be duplicative to FORM 361 inputs
- Reinforcement of flexibility
 - Explicitly state that equivalent formats or licensee-developed tools are acceptable.
- Consistency with NRC questioning practices
 - Align the structure of the form with actual Operations Center expectations to minimize iterative clarification and follow up questions during the call

4. How can the burden of the information collection on respondents be minimized, including the use of automated collection techniques or other forms of information technology?

The NRC FORM 361 is not a reliable, editable, and savable document directly from the NRC's website. Licensees must take several steps to obtain a form that can be edited and saved without error. This has led to time constraints and procedure enhancements by the Licensees to explain how to obtain a FORM 361 from the NRC's website, save it twice, and then validate that the edited form can be saved. To eliminate this burden, the FORM 361 shall be fully electronic, fillable with auto-save functionality, and utilize standardized fields where possible. The FORM shall also be compatible with common industry tools (e.g., Microsoft Word, Adobe PDF) to ease the burden on the Licensee during the iterative review and approval process prior to transmitting to the NRC. These improvements will reduce administrative burden while improving data quality, consistency, and usability for both the NRC and licensees.