

PAPERWORK REDUCTION ACT SUBMISSION

*Designated Original
NDOC*

Please read the instructions before completing this form. For additional forms or assistance in completing this form, contact your agency's Paperwork Clearance Officer. Send two copies of this form, the collection instrument to be reviewed, the Supporting Statement, and any additional documentation to: **Office of Information and Regulatory Affairs, Office of Management and Budget, Docket Library, Room 10102, 725 17th Street NW, Washington, DC 20503.**

1. Agency/Subagency originating request U.S. Nuclear Regulatory Commission	2. OMB control number <input checked="" type="checkbox"/> a. 3150 - 0185 <input type="checkbox"/> b. None
3. Type of information collection (check one) <input type="checkbox"/> a. New collection <input type="checkbox"/> b. Revision of a currently approved collection <input type="checkbox"/> c. Extension of a currently approved collection <input type="checkbox"/> d. Reinstatement, without change , of a previously approved collection for which approval has expired <input checked="" type="checkbox"/> e. Reinstatement, with change , of a previously approved collection for which approval has expired <input type="checkbox"/> f. Existing collection in use without an OMB control number	4. Type of review requested (check one) <input checked="" type="checkbox"/> a. Regular <input type="checkbox"/> c. Delegated <input type="checkbox"/> b. Emergency - Approval requested by (date): _____
	5. Will this information collection have a significant economic impact on a substantial number of small entities? <input type="checkbox"/> a. Yes <input checked="" type="checkbox"/> b. No
	6. Requested expiration date <input checked="" type="checkbox"/> a. Three years from approval date <input type="checkbox"/> b. Other (Specify): _____

7. Title
NRC's Handling of Your Concerns

8. Agency form number(s) (if applicable)
NRC Form 592

9. Keywords
Allegation, Customer, Survey

10. Abstract
NRC Form 592 is used to conduct a voluntary survey of allegeders who bring health and safety concerns to the NRC. It is also used to determine the allegeders level of satisfaction with NRC's handling of their allegation. The results of this survey will be used by NRC management to gauge the effectiveness of its existing program and to develop programmatic revisions, as needed, to improve its handling of allegations.

11. Affected public (Mark primary with "P" and all others that apply with "X") <input type="checkbox"/> a. Individuals or households <input type="checkbox"/> d. Farms <input checked="" type="checkbox"/> b. Business or other for-profit <input type="checkbox"/> e. Federal Government <input checked="" type="checkbox"/> c. Not-for-profit institutions <input checked="" type="checkbox"/> f. State, Local or Tribal Government	12. Obligation to respond (Mark primary with "P" and all others that apply with "X") <input checked="" type="checkbox"/> a. Voluntary <input type="checkbox"/> b. Required to obtain or retain benefits <input type="checkbox"/> c. Mandatory
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13. Annual reporting and recordkeeping hour burden a. Number of respondents: <u>240</u> b. Total annual responses: <u>240</u> 1. Percentage of these responses collected electronically: <u>0.0</u> % c. Total annual hours requested: <u>240</u> d. Current OMB inventory: <u>0</u> e. Difference: <u>240</u> f. Explanation of difference: 1. Program change: <u>240</u> 2. Adjustment: _____	14. Annual reporting and recordkeeping cost burden (in thousands of dollars) a. Total annualized capital/startup costs: _____ b. Total annual costs (O&M): _____ c. Total annualized cost requested: _____ d. Current OMB inventory: _____ e. Difference: _____ f. Explanation of difference: 1. Program change: _____ 2. Adjustment: _____
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15. Purpose of information collection (Mark primary with "P" and all others that apply with "X") <input type="checkbox"/> a. Application for benefits <input checked="" type="checkbox"/> e. Program planning or management <input checked="" type="checkbox"/> b. Program evaluation <input type="checkbox"/> f. Research <input type="checkbox"/> c. General purpose statistics <input type="checkbox"/> g. Regulatory or compliance <input type="checkbox"/> d. Audit	16. Frequency of recordkeeping or reporting (check all that apply) <input type="checkbox"/> a. Recordkeeping <input type="checkbox"/> b. Third-party disclosure <input checked="" type="checkbox"/> c. Reporting <input checked="" type="checkbox"/> 1. On occasion <input type="checkbox"/> 2. Weekly <input type="checkbox"/> 3. Monthly <input type="checkbox"/> 4. Quarterly <input type="checkbox"/> 5. Semi-annually <input type="checkbox"/> 6. Annually <input type="checkbox"/> 7. Biennially <input type="checkbox"/> 8. Other (describe) _____
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17. Statistical methods Does this information collection employ statistical methods? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	18. Agency contact (person who can best answer questions regarding the content of this submission) Name: <u>Debra McCain, NRR</u> Phone: <u>301-415-1219</u>
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19. Certification for Paperwork Reduction Act Submissions

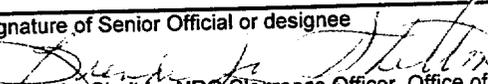
On behalf of this Federal agency, I certify that the collection of information encompassed by this request complies with 5 CFR 1320.9.

NOTE: The text of 5 CFR 1320.9, and the related provisions of 5 CFR 1320.8 (b) (3), appear at the end of the instructions. *The certification is to be made with reference to those regulatory provisions as set forth in the instructions.*

The following is a summary of the topics, regarding the proposed collection of information, that the certification covers:

- (a) It is necessary for the proper performance of agency functions;
- (b) It avoids unnecessary duplication;
- (c) It reduces burden on small entities;
- (d) It uses plain, coherent, and unambiguous terminology that is understandable to respondents;
- (e) Its implementation will be consistent and compatible with current reporting and recordkeeping practices;
- (f) It indicates the retention periods for recordkeeping requirements;
- (g) It informs respondents of the information called for under 5 CFR 1320.8 (b) (3):
 - (i) Why the information is being collected;
 - (ii) Use of information;
 - (iii) Burden estimate;
 - (iv) Nature of response (voluntary, required for a benefit, or mandatory);
 - (v) Nature of extent of confidentiality; and
 - (vi) Need to display currently valid OMB control number;
- (h) It was developed by an office that has planned and allocated resources for the efficient and effective management and use of the information to be collected (see note in Item 19 of the instructions);
- (i) It uses effective and efficient statistical survey methodology; and
- (j) It makes appropriate use of information technology.

If you are unable to certify compliance with any of these provisions, identify the item below and explain the reason in Item 18 of the Supporting Statement.

Signature of Authorized Agency Official	Date
Signature of Senior Official or designee  Brenda Jo. Shelton, NRC Clearance Officer, Office of the Chief Information Officer	Date 11/3/99

**FINAL SUPPORTING STATEMENT
FOR
NRC FORM 592, "NRC'S HANDLING OF YOUR CONCERNS"**

**REINSTATEMENT
(OMB Clearance No. 3150-0185)**

DESCRIPTION OF INFORMATION COLLECTION

The NRC plans to reinstate a voluntary survey of all individuals who have submitted allegations to the Agency to determine the level of satisfaction, or dissatisfaction, with the Agency's handling of their allegations. The survey will be sent to all allegeders in various categories (allegers whose allegations were resolved but not substantiated; resolved and substantiated; or resolved and partially substantiated); whose allegations were filed in each of the four NRC Regional offices and the two major program offices, the Office of Nuclear Reactor Regulation (NRR) and the Office of Nuclear Material Safety and Safeguards (NMSS). The responses to the survey will be completely voluntary. Survey participants will be asked to give their views, attitudes, and beliefs about the courtesy, timeliness, helpfulness, and responsiveness of the NRC in resolving their allegations. The results of this survey will be used by Agency management to gauge the effectiveness of its existing program and to develop programmatic revisions, as needed, to improve the Agency's handling of allegations. The earlier random surveys in 1995 and 1997 were one of the recommendations of an NRC Review Team in June 1994, which performed a reassessment of the NRC's program for protecting allegeders against retaliation. A comprehensive, all-allegger, programmatic assessment form to be included in all case close-out correspondence was a recommendation of the General Accounting Office (GAO) when it issued a comprehensive report in March 1997, on nuclear safety concerns. NRC is requesting a revision to a previously existing form, NRC Form 592, that will be used in the collection of this information. This revision increases the average burden estimate from 1/3 hour (20 minutes) to 1 hour which allows time for the allegeder to read a booklet, "NUREG/BR-0240, Revision 1," and express any dissatisfaction with NRC's handling of their concerns.

A. JUSTIFICATION

1. Need for and Practical Utility of the Collection of Information

As a result of the NRC "reassessment" review completed in June 1994, and referenced above, the NRC determined that a random "customer satisfaction" survey was needed to determine how well the agency was meeting the expectations of allegeders who filed concerns with the Commission. Two random surveys were conducted in December 1995, and December 1997. The results of these surveys were used to identify program deficiencies and develop training to assist the staff in becoming more responsive to allegeders' concerns.

2. Agency Use of Information

The information obtained from the survey will be used to evaluate the effectiveness of the current method of handling and processing allegations. The

information collected will be used to judge the credibility of the allegation program and identify areas for improvement.

3. Reduction of Burden Through Information Technology

There are no legal obstacles to the use of information technology; however, the information provided by the allegor is sensitive in nature. The only way to submit the information electronically, would be to put the form on the NRC's external web-site. If this were done, there would be no assurance that the person submitting the NRC Form 592 is the person who submitted the allegation. This will create a potential for receiving inaccurate data. The form gives the opportunity for the allegor to express their opinion on how they felt the NRC handled their allegation. This could include mentioning NRC employees by name in a negative sense and could potentially damage their reputation. Having the ability to electronically submit this form would put the information in a vulnerable position. Therefore this process is not conducive to the use of modern information technologies. Additionally, the recipients may not have access to equipment to submit the information electronically.

4. Effort to Identify Duplication and Use of Similar Information

No similar information is available to the NRC staff. Furthermore, this information does not duplicate or overlap information collections made by the NRC or other government agencies.

5. Effort to Reduce Small Business Burden

This information collection does not significantly affect any small businesses; most of the allegors will be private individuals.

6. Consequences to Federal Program or Policy Activities if the Collection is Not Conducted or is Conducted Less Frequently

By not offering all allegors the opportunity to provide their views, the NRC would be losing a potentially valuable source of information. The previously conducted partial surveys resulted in a reassessment of NRC's allegation program. It is anticipated that a survey of all allegors will provide a broader response and more valuable insight.

7. Circumstances Which Justify Variation from OMB Guidelines

This information collection does not vary from OMB guidelines.

8. Consultations Outside the NRC

Opportunity for public comment was published in the Federal Register (64 FR 40901) on July 28, 1999. NRC received one comment letter (see attached). The

Union of Concerned Scientists recommended that the NRC Form 592 should be reformatted.

Union of Concerned Scientists Comment:

The Union of Concerned Scientists believes the NRC Form 592 should be reformatted to list the four graduations in a row: Strongly Agree / Agree / Disagree / Strongly Disagree

NRC Response

The NRC accepts the comment from the Union of Concerned Scientists and agrees to reformat NRC Form 592, "NRC's Handling of Your Concerns." A copy of the revised form is attached.

9. Payment or Gift to Respondents

Not applicable.

10. Confidentiality of Information

The results of this survey will be used to assist the NRC in evaluating the effectiveness of its handling of allegations. The surveys will be mailed to allegeders by Office Allegation Coordinators (OACs). The recipients will voluntarily return the forms to the Agency's Allegation Advisor (AAA)/Assistant AAA who will analyze the surveys. All information received will be treated as confidential and will be shared with the OACs to reconsider specific allegations or to make programmatic improvements.

11. Justification for Sensitive Questions

No sensitive questions will be used in the survey instruments.

12. Estimated Industry Burden and Costs

(a) Reporting Requirements

The number of allegations received each year varies. However, the NRC projects that approximately 800 allegations will be received annually. The survey form is completed on a voluntary basis. The NRC estimates that approximately 240 individuals will respond to the survey annually. This estimate is based upon the previous two surveys where the response rate was 30%. The estimated annual reporting burden per allegation response is 1 hour.

Total annual burden is $240 \times 1 = 240$ hours

(b) Recordkeeping Requirements

The AAA shall retain the survey forms from each respondent. Therefore, there are no requirements for industry to retain the survey forms.

(c) Total Industry Cost and Burden

240 survey forms \times 1 hour = 240 hours \times $\$141 = \$33,840$

Total annual industry burden is 240 hours. Total cost is $\$33,840$.

13. Estimate of Other Additional Costs

None.

14. Estimated Annualized Cost to the Federal Government

Although it is difficult to determine how much time will be spent by the Agency Allegation Advisor and Assistant and the Office Allegation Coordinators reviewing the survey forms and reexamining allegations that may be identified as problematic by the allegers in their completed survey forms, a reasonable estimate is 1.5 hours per case. With an estimated survey return rate of 30%, based upon previous experience, for the approximately 800 allegations the NRC anticipates receiving this fiscal year, this would amount to approximately 360 hours of review on the 240 anticipated responses by the various NRC officials.

Based upon previous experience, approximately 40% of the 240 responses will contain negative comments by the allegers, or 96 responses will require follow-up activity, based upon experience with the two previous surveys. Such follow-up could be as simple as a case review by the inspector or resident who conducted the initial review or inspected the allegation, which could take 1.5 hours, or conduct a new inspection, which could take considerably more time. The average time to complete the follow-up of an allegation is approximately 50 hours. If 25% of the 96 negative responses needed some type of follow-up, approximately 24 cases would need follow-up. The effort to review the 24 allegations needing follow-up would take 1,200 hours of effort ($24 \times 50 = 1,200$). The other 72 negative responses would only require the 1.5 hours of effort by the inspector or resident mentioned above, for a total time on the responses of 108 hours (72×1.5 hours = 108 hours).

Along with the initial 360 hours of review, this would total 1,668 hours of effort ($360 + 1,200 + 108 = 1,668$). At a per hour cost of $\$141$ this would total $\$235,188$.

This cost is fully recoverable by fee assessments to NRC licensees pursuant to 10 CFR Parts 170 and/or 171.

15. Reasons for Change in Burden or Cost

The change was due to the addition of the booklet, "Reporting Safety Concerns to the NRC," NUREG/BR-0240, Revision 1, which is recommended reading before responding to item 1 of the revised NRC Form 592. Also, items 2 and 5 give the public an opportunity to respond to any unsatisfactory treatment of their allegation.

16. Publication for Statistical Use

This information is not published for statistical use.

17. Reasons for Not Displaying the Expiration Date

The expiration date is displayed.

18. Exceptions to the Certification Statement

None.

B. COLLECTION OF INFORMATION EMPLOYING STATISTICAL METHODS

Statistical methods are not employed in the collection of information.

NRC'S HANDLING OF YOUR CONCERNS

Estimated burden per response to comply with this voluntary collection request: 1 hour. This information is requested by NRC to assess how effectively the NRC is handling allegations that are received from individuals. Send comments regarding burden estimate to the Records Management Branch (T-6 E6), U.S. Nuclear Regulatory Commission, Washington, DC 20555-0001, or by internet e-mail to bjs1@nrc.gov, and to the Desk Officer, Office of Information and Regulatory Affairs, NEOB-10202, (3150-0185), Office of Management and Budget, Washington, DC 20503. If a means used to impose an information collection does not display a currently valid OMB control number, the NRC may not conduct or sponsor, and a person is not required to respond to, the information collection.

ALLEGATION NUMBER: _____

The NRC welcomes your feedback on its handling of your concern(s). Please respond to the statements listed below.

1. I was satisfied with the NRC's allegation process as outlined in the NRC brochure, "Reporting Safety Concerns to the NRC."

- STRONGLY AGREE AGREE DISAGREE STRONGLY DISAGREE

2. The NRC understood and acknowledged my concerns.

- STRONGLY AGREE AGREE DISAGREE STRONGLY DISAGREE

The concerns NRC did not understand and/or acknowledge are specified below.

3. I was satisfied with the timeliness in resolving my concerns.

- STRONGLY AGREE AGREE DISAGREE STRONGLY DISAGREE

4. I was satisfied with the NRC's explanation of their resolution of my concern.

- STRONGLY AGREE AGREE DISAGREE STRONGLY DISAGREE

5. If you were less than satisfied with NRC's allegation process, check all areas in which the NRC's performance could have been better. Check as many as apply, but explain your dissatisfaction with each item in the space below.

- INITIAL CONTACT CLOSURE LETTER IDENTITY PROTECTION
- ACKNOWLEDGMENT LETTER COURTEOUS AND PROFESSIONAL TREATMENT TECHNICAL REVIEW OF MY CONCERN
- STATUS LETTER TIMELINESS SAFETY BROCHURE

Explanation of dissatisfaction in areas in which the NRC's performance could have been better.

6. Based on my experience, I would use the Allegation Program again.

- STRONGLY AGREE AGREE DISAGREE STRONGLY DISAGREE

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