

## Section 30

### FINAL SUPPORTING STATEMENT FOR TRAINING AND QUALIFICATION OF NUCLEAR POWER PLANT PERSONNEL

10 CFR 50.120, 10 CFR 50.120(b)(1) and 10 CFR 50.120(b)(2)

#### DESCRIPTION OF THE INFORMATION COLLECTION

10 CFR 50.120(b)(1) and 10 CFR 50.120(b)(2) require that applicants and licensees establish, implement, and maintain training programs for 9 categories (non-licensed operator, shift supervisor, shift technical advisor, instrument and control technician, electrical maintenance personnel, mechanical maintenance personnel, radiological protection technician, chemistry technician and engineering support personnel) of nuclear power plant direct-hire and contract personnel. Applicants and licensees are required to have available for NRC inspection, records sufficient to document that the requirements of 10 CFR 50.120 have been met. Specifically, documents related to the establishment, implementation, and maintenance of the training programs must be kept. Documentation demonstrating the job performance qualifications of personnel covered by 10 CFR 50.120 is to be retained for the duration of employment.

#### A. JUSTIFICATION

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

Section 306 of the Nuclear Waste Policy Act of 1982, Public Law 97-425, directed the NRC to “promulgate regulations or other appropriate Commission regulatory guidance for the training and qualifications of civilian nuclear power plant operators, supervisors, technicians and other appropriate operating personnel.” In April 1993, the NRC published 10 CFR 50.120.

10 CFR 50.120 requires that each applicant for, and holder of, an operating license for a nuclear power plant establish, implement, and maintain training programs for 9 categories of power plant personnel that provide qualified personnel to operate and maintain the facility in a safe manner in all modes of operation.

10 CFR 50.120(b)(1) requires that applicants and licensees develop and maintain these training programs with a “systems approach to training (SAT)” based on job performance requirements. Section 10 CFR 50.120 builds on existing industry practice related to training. Training for the personnel covered by 10 CFR 50.120 has already been developed and implemented by the industry.

10 CFR 50.120(b)(2) requires power plant applicants and licensees to periodically evaluate and revise the training programs to reflect industry experience, changes to the site, procedures, regulations, and quality assurance requirements.

10 CFR 50.120(b) (2) also requires periodic review of the training programs by licensee management, and requires licensees and applicants to maintain and keep available for NRC inspection, materials sufficient to verify the adequacy of the

training programs. Documents related to the establishment, implementation, and maintenance of the training programs must be kept. Documentation demonstrating the job performance qualifications of personnel performing in positions covered by 10 CFR 50.120, including contractor personnel, must be maintained for each employee for the duration of employment.

2. Agency Use of Information

Requirements for recordkeeping related to the licensees' and applicants' training programs are necessary to allow the NRC to perform for-cause inspections to fulfill NRC's statutory authority to verify that training programs are being effectively implemented and result in qualified nuclear power plant personnel. Routine compliance inspections are not conducted.

3. Reduction of Burden through Information Technology

There are no legal obstacles to reducing the burden associated with this information collection. The NRC encourages respondents to use information technology when it would be beneficial to them. NRC issued a regulation on October 10, 2003 (68 FR 58791), consistent with the Government Paperwork Elimination Act, which allows its licensees, vendors, applicants, and members of the public the option to make submissions electronically via CD-ROM, e-mail, special Web-based interface or other means. It is estimated that approximately 100% of the potential responses are stored and maintained electronically and would be filed electronically when required.

4. Effort to Identify Duplication and Use Similar Information

No sources of similar information are available. There is no duplication of requirements. NRC has in place an ongoing program to examine all information collections with the goal of eliminating all duplication and/or unnecessary information collections.

5. Effort to Reduce Small Business Burden

No small businesses are affected by the information collection requirements.

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

10 CFR 50.120 specifies that the necessary records be maintained and kept available for NRC inspection to verify the adequacy of the specified training programs. If these records are not maintained, it would not be possible to verify that the training programs are being effectively implemented and maintained and could result in unqualified licensed nuclear power plant personnel.

7. Circumstances that Justify Variation from OMB Guidelines

Rather than requiring records to be routinely submitted to the NRC, 10 CFR 50.120 requires sufficient records to be maintained on-site to permit NRC verification of the adequacy of the programs. Pursuant to 10 CFR 50.71, program records are to be

retained until termination of the license. Job performance qualifications are to be retained and maintained for each employee for the duration of employment. These record retention requirements result in an auditable trail for ensuring that training is developed, evaluated, and revised based on job performance requirements, and that power reactor personnel are qualified to perform their jobs.

8. Consultations Outside the NRC

Opportunity for public comment on the information collection requirements for this clearance package was published in the Federal Register on May 14, 2013 (78 FR 28244). No comments were received.

9. Payment or Gift to Respondents

Not applicable.

10. Confidentiality of Information

Confidential and proprietary information is protected in accordance with NRC regulations at 10 CFR 9.17(a) and 10 CFR 2.390(b). However, no information normally considered confidential or proprietary is requested.

11. Justification for Sensitive Questions

No sensitive information is requested.

12. Estimated Industry Burden and Burden Hour Cost

Power Reactor Sites

The annual recordkeeping burden to maintain records related to training and qualification for required categories of personnel is shown on Table 1. 65 power reactor sites are required to comply with this regulation.

Applicants

During the upcoming extension period, it is anticipated that 3 combined operating license (COL) applicants will develop and maintain training programs consistent with those conducted by licensed power reactor sites. The applicant burden to meet 10 CFR 50.120(b) for all required categories of personnel is shown on Table 1.

The total burden is estimated to be 55,020 hours for 68 recordkeepers (65 operating reactor sites + 3 applicants). The cost is estimated to be \$ 15,075,480 (55,020 hours x \$274/hr).

13. Estimate of Other Additional Costs

The quantity of records to be maintained is roughly proportional to the recordkeeping burden. Based on the number of pages maintained for a typical clearance, the records storage cost has been determined to be equal to 0.0004 times the recordkeeping burden cost. Therefore, the storage cost for this clearance is estimated to be \$6,030 (55,020 hours x .0004 x \$274).



14. Estimated Annualized Cost to the Federal Government

The information is kept at the sites and only submitted to the NRC during for- cause inspections. The government incurs minimal incremental cost.

This cost is fully recovered through fee assessments to NRC licensees pursuant to 10 CFR 170 and/or 10 CFR 171.

15. Reasons for Changes in Burden or Cost

There has been no change in the burden. There has been a change in the fee from \$257 to \$274.

16. Publication for Statistical Use

This information will not be published.

17. Reason for Not Displaying the Expiration Date

The requirement is contained in a regulation. Amending the Code of Federal Regulations to display information that, in an annual publication, could become obsolete would be unduly burdensome and too difficult to keep current.

18. Exceptions to the Certification Statement

None

B. COLLECTIONS OF INFORMATION EMPLOYING STATISTICAL METHODS

Not applicable.

**Table 1. Recordkeeping Burden for Training and Qualification Records**

	<b>Number of Recordkeepers</b>	<b>Annual Burden Hours per Recordkeeper</b>	<b>Total Annual Burden</b>	<b>Total Annual Cost (\$274/hour)</b>
<b>10 CFR 50.120(b), Operating Reactors</b>				
Job performance qualification documentation for direct-hire employees performing in the positions covered by 10 CFR 50.120	65	100	6,500	\$ 1,781,000
Documentation of the job performance qualifications for contract workers performing in positions covered by 10 CFR 50.120	65	200	13,000	\$ 3,562,000
Analyses of the positions covered by 10 CFR 50.120	65	160	10,400	\$ 2,849,600
Listing learning objectives derived from the analyses	65	40	2,600	\$ 712,400
Documentation related to the selection of instructional settings and methods; modes of implementation; training programs materials and tests; and trainee tests and performance evaluations including on-the-job training records	65	100	6,500	\$ 1,781,000
Records determining programs' effectiveness	65	100	6,500	\$ 1,781,000
Records of programs' revisions	65	80	5,200	\$ 1,424,800
<b>10 CFR 50.120(b), Applicants</b>				
Job performance qualification documentation for individuals performing in the positions covered by 10 CFR 50.120	3	450	1,350	\$ 369,900
Analyses for the positions covered by 50.120	3	540	1,620	\$ 443,880
The listing of learning objectives derived from the analyses	3	180	540	\$ 147,960
Documentation related to the selection of instructional settings and methods; modes of implementation; training program materials and tests; and trainee tests and performance evaluations including on-the-job training records	3	270	810	\$ 221,940
<b>TOTAL</b>	<b>68</b>		<b>55,020</b>	<b>\$ 15,075,480</b>