

Appendix A:

INCREMENTAL LICENSEE ACTIVITIES AND COST EQUATIONS FOR
INDIVIDUAL PROVISIONS OF THE PROPOSED RULE

A.1 SECTION 73.55: ONE-TIME COSTS FOR LICENSEES**Update Plans**

Licensee submits amended Physical Security, Training and Qualification, and Safeguards Contingency Plans within 180 days of the effective date of the final rule.

Note: This calculation accounts for revisions to the Plans required by several proposed sections of the rule: [e.g., 73.55(e)(8)(vi); 73.55(e)(11)(ii); Appendix B II.C.(1); Appendix C 3.(b)(iii); Appendix C 4.(d); Appendix B III.B.(3)(C)].

Hours of senior manager time per set of plans	300.0
Wage of senior manager per hour	x \$100
<i>Cost of senior manager time per set of plans</i>	<i>\$30,000</i>
Hours of manager time per set of plans	80.0
Wage of manager per hour	x \$50
<i>Cost of manager time per set of plans</i>	<i>\$4,000</i>
Hours of staff time per set of plans	160.0
Wage of staff per hour	x \$35
<i>Cost of staff time per set of plans</i>	<i>\$5,600</i>
Hours of clerical time per set of plans	20.0
Wage of clerical worker per hour	x \$20
<i>Cost of clerical worker time per set of plans</i>	<i>\$400</i>
<i>Subtotal cost per set of plans</i>	<i>\$40,000</i>
<i>Number of sites</i>	<i>65</i>
<i>Percentage of sites affected</i>	<i>x 100%</i>
Total Cost	<i>(\$2,600,000)</i>

Amend Contracts

Licensees must amend contracts with security personnel contractors to clearly state that no individual may be issued a firearm or otherwise be assigned to an unsupervised position involving detection, assessment, or response to unauthorized activities, unless that individual has satisfied the requirements of 10 CFR 73.56 and 73.57.

Hours of manager time per site	40.0
Wage of manager per hour	x \$50
<i>Cost of manager time per site</i>	<i>\$2,000</i>
Hours of legal consultant time per site	20.0
Wage of legal consultant per hour	x \$100
<i>Cost of legal consultant per site</i>	<i>\$2,000</i>
Hours of clerical worker time per site	20.0
Wage of clerical worker per hour	x \$20
<i>Cost of clerical worker time per site</i>	<i>\$400</i>
<i>Subtotal cost per site</i>	<i>\$4,400</i>
<i>Number of sites</i>	<i>65</i>
<i>Percentage of sites affected</i>	<i>x 50%</i>
Total Cost	<i>(\$143,000)</i>

Note: Citations to specific sections of the proposed rule may not reflect the most recent draft of the rule.

ONE-TIME COSTS FOR LICENSEES (Continued)**Video Capture**

The Isolation Zone video surveillance and assessment equipment must be designed to provide real-time and play-back/recorded video images in conjunction with an alarm annunciation in a manner that allows timely assessment of activities prior to and after the alarm annunciation.

Note: This calculation accounts for the video technology requirements in Sections 73.55(i)(1)(i), 73.55(i)(3), 73.55(i)(4)(iv) and 73.55(i)(7)(ii)(A) and (C).

*Cost to install real-time and play-back/recorded
video images in conjunction with alarm
annunciation capabilities to the CAS and SAS per
site
Number of sites*

Total Cost		\$140,000
		65
Percentage of sites affected	x	5%
		<u>(\$455,000)</u>

ONE-TIME COSTS FOR LICENSEES (Continued)**Duplicative Capabilities in CAS and SAS**

Intrusion detection systems must annunciate, and video assessment equipment images shall display concurrently in the Central Alarm Station and Secondary Alarm Station and both alarm stations must be designed and equipped with equivalent capabilities for detection, assessment, monitoring, observation, surveillance, and communications.

<i>Cost to reconfigure intrusion detection equipment and other alarm station systems per site</i>		<i>\$200,000</i>
<i>Number of sites</i>		<i>65</i>
<i>Percentage of sites affected</i>	<i>x</i>	<i>25%</i>
Total Cost		(\$3,250,000)

Uninterrupted Power

Licensees must install uninterrupted power to the entire intrusion detection and assessment system.

<i>Cost to install uninterrupted power per site</i>		<i>\$300,000</i>
<i>Number of sites</i>		<i>65</i>
<i>Percentage of sites affected</i>	<i>x</i>	<i>15%</i>
Total Cost		(\$3,003,000)

ONE-TIME COSTS FOR LICENSEES (Continued)**No Single Act**

Licensees must ensure that no single act can disable both the CAS and the SAS. Licensees must assess their current configuration, and as needed, make plan changes (alternative measures) or hardware modifications.

Assessment:

Hours of manager time per site	2650.0
Wage of manager per hour	x \$50
<i>Cost of manager time per site</i>	<u>\$132,500</u>
Hours of staff time per site	4000.0
Wage of staff per hour	x \$35
<i>Cost of staff time per site</i>	<u>\$140,000</u>
<i>Cost of manager and staff time per site</i>	\$272,500
Number of sites	65
Percentage of sites affected	x 100%
<i>Subtotal cost of assessment</i>	<u>\$17,712,500</u>

Hardware Modifications

Cost of hardware modifications	\$750,000
Number of sites	65
Percentage of sites affected	x 30%
<i>Subtotal cost of hardware modifications</i>	<u>\$14,625,000</u>
<i>Subtotal cost of assessment</i>	\$17,712,500
<i>Subtotal cost of hardware modifications</i>	+ \$14,625,000
Total Cost	(\$32,337,500)

Cyber Security

Licensees must establish cyber security programs to protect important computer systems. This requirement will result in procedures, training, and hardware modifications.

Assessment and program implementation:

Hours of IT Manager time per site	2000.0
Wage of IT Manager per hour	x \$75
<i>Cost of IT Manager time per site</i>	<u>\$150,000</u>
Hours of IT Staff time per site	3000.0
Wage of IT Staff per hour	x \$50
<i>Cost of IT Staff time per site</i>	<u>\$150,000</u>

Equipment and Installation:

<i>Cost of equipment and installation per site</i>	\$375,000
--	-----------

Training:

Hours of staff time	1.0
Wage of staff per hour	\$35
Number of people requiring training per site	x 2000.0
<i>Cost of training per site</i>	<u>\$70,000</u>
<i>Subtotal cost</i>	\$745,000
Number of sites	65
Percentage of sites affected	x 100%
Total Cost	(\$48,425,000)

Note: Citations to specific sections of the proposed rule may not reflect the most recent draft of the rule.

A.2 SECTION 73.55: ANNUAL COSTS FOR LICENSEES**Escort of Vehicles**

Vehicles operated by an individual with unescorted access to the protected area or vital area no longer need a security escort.

Number of vehicles entering the protected area operated by an individual with unescorted access per year per site		400.0
Number of hours spent per escorted vehicle	x	1.50
<i>Number of security escort hours needed per year per site</i>		<i>600.00</i>
Wage of security escort per hour		\$25
Number of security escort hours needed per year per site	x	600.00
<i>Savings due to security escort requirement relaxation per site</i>		<i>\$15,000</i>
<i>Subtotal savings per site</i>		<i>\$15,000</i>
<i>Number of sites</i>		<i>65</i>
<i>Percentage of sites affected</i>	x	<i>100%</i>
Total Savings		\$975,000

Cyber Security

Licensees must establish cyber security programs to protect important computer systems. This requirement will result in ongoing training and equipment maintenance costs.

Hours of staff time		1.0
Wage of staff per hour		\$35
Number of people requiring training per site	x	2000.0
<i>Cost of training per site</i>		<i>\$70,000</i>
<i>Cost of cyber security equipment maintenance per site</i>		<i>\$75,000</i>
<i>Subtotal cost of cyber security staff and equipment maintenance per site</i>		<i>\$145,000</i>
<i>Number of sites</i>		<i>65</i>
<i>Percentage of sites affected</i>	x	<i>100%</i>
Total Cost		(\$9,425,000)

A.3 SECTION 73.56: ONE-TIME COSTS FOR LICENSEES**Records**

The licensee must update and document procedures relating to the retention of records relating to unescorted access authorization program and written agreement of services.

Note: This calculation accounts for the records management activities required by the following proposed sections of the rule: 73.56(o)(2) and 73.56 (o)(4)

Hours of manager time per set of records	5.0
Wage of manager per hour	x \$50
<i>Cost of manager time per set of records</i>	<u>\$250</u>
Hours of legal time per set of records	25.0
Wage of legal staff per hour	x \$100
<i>Cost of legal time per set of records</i>	<u>\$2,500</u>
Hours of clerical time per set of records	20.0
Wage of clerical worker per hour	x \$20
<i>Cost of clerical time per set of records</i>	<u>\$400</u>
<i>Subtotal cost per site</i>	\$3,150
<i>Number of sites</i>	65
<i>Percentage of sites affected</i>	x 100%
Total Cost	<u>(\$204,750)</u>

Protection of Information

The licensee must maintain a system of files and procedures to protect personal information. Because C/V are allowed to terminate an individual's unescorted access authorization, licensees must ensure that C/V's may have access and must protect personal information.

Note: This calculation accounts for the records management activities required by the following proposed sections of the rule: 73.56(m)(2)

Hours of manager time for approval	10.0
Wage of manager per hour	x \$50
<i>Cost of manager time for approval</i>	<u>\$500</u>
Hours of legal time for approval	30.0
Wage of legal staff per hour	x \$100
<i>Cost of legal time for approval</i>	<u>\$3,000</u>
Hours of staff time for review	50.0
Wage of staff worker per hour	x \$35
<i>Cost of staff time for review</i>	<u>\$1,750</u>
Hours of clerical time for procedures	10.0
Wage of clerical worker per hour	x \$20
<i>Cost of clerical time for procedures</i>	<u>\$200</u>
<i>Subtotal cost per site</i>	\$5,450
<i>Number of sites</i>	65
<i>Percentage of sites affected</i>	x 100%
Total Cost	<u>(\$354,250)</u>

Note: Citations to specific sections of the proposed rule may not reflect the most recent draft of the rule.

ONE-TIME COSTS FOR LICENSEES (Continued)**Individuals are subject to an authorization program**

Any individual whose assigned duties and responsibilities permit the individual to take actions by electronic means, either on site or remotely, that could adversely impact a licensee or applicants operational safety, security, or emergency response capabilities are subject to an authorization program, and must receive a background check.

Note: This calculation accounts for the initial costs associated with 73.56(b)(1)(ii).

Number of individuals needing background checks	10.0
Number of hours to conduct a background check	6.0
Wage of manager per hour	x \$50
<i>Cost of background check per site</i>	<u>\$3,000</u>
 <i>Subtotal cost per site</i>	 \$3,000
<i>Number of sites</i>	65
<i>Percentage of sites affected</i>	x 100%
Total Cost	<u>(\$195,000)</u>

A.4 SECTION 73.56: ANNUAL COSTS FOR LICENSEES**Records**

The licensee must document and retain records relating to individual's unescorted access authorization status and written agreement of services.

Note: This calculation accounts for the records management activities required by the following proposed sections of the rule: 73.56(o)(2) and 73.56 (o)(4)

Hours of manager time per set of records	10.0
Wage of manager per hour	x \$50
<i>Cost of manager time per set of records</i>	<u>\$500</u>
 Hours of staff time per set of records	 10.0
Wage of staff per hour	x \$35
<i>Cost of staff time per set of records</i>	<u>\$350</u>
 Hours of clerical time per set of records	 20.0
Wage of clerical worker per hour	x \$20
<i>Cost of clerical time per set of records</i>	<u>\$400</u>
 <i>Subtotal cost per site</i>	 \$1,250
<i>Number of sites</i>	65
<i>Percentage of sites affected</i>	x 100%
Total Cost	<u>(\$81,250)</u>

Note: Citations to specific sections of the proposed rule may not reflect the most recent draft of the rule.

ANNUAL COSTS FOR LICENSEES (Continued)**Protection of Information**

The licensee must maintain a system of files and procedures to protect personal information. Because C/V are allowed to terminate an individual's unescorted access authorization, licensees must ensure that C/V's may have access and must protect personal information.

Note: This calculation accounts for the records management activities required by the following proposed sections of the rule: 73.56(m)(2)

Hours of manager time for approval	5.0
Wage of manager per hour	x \$50
<i>Cost of manager time for approval</i>	<u>\$250</u>
Hours of legal time for approval	5.0
Wage of legal staff per hour	x \$100
<i>Cost of legal time for approval</i>	<u>\$500</u>
Hours of staff time for review	50.0
Wage of staff worker per hour	x \$35
<i>Cost of staff time for review</i>	<u>\$1,750</u>
Hours of clerical time for procedures	10.0
Wage of clerical worker per hour	x \$20
<i>Cost of clerical time for procedures</i>	<u>\$200</u>
<i>Subtotal cost per site</i>	\$2,700
<i>Number of sites</i>	65
<i>Percentage of sites affected</i>	x 100%
Total Cost	<u>(\$175,500)</u>

Individuals are subject to an authorization program

Any newly hired individual whose assigned duties and responsibilities permit the individual to take actions by electronic means, either on site or remotely, that could adversely impact a licensee's or applicant's operational safety, security, or emergency response capabilities are subject to an authorization program, and must receive a background check.

Number of new hires needing background checks	5.0
Number of hours to conduct a background check	6.0
Wage of manager per hour	x \$50
<i>Cost of background check per site</i>	<u>\$1,500</u>
<i>Subtotal cost per site</i>	\$1,500
<i>Number of sites</i>	65
<i>Percentage of sites affected</i>	x 100%
Total Cost	<u>(\$97,500)</u>

Note: Citations to specific sections of the proposed rule may not reflect the most recent draft of the rule.

A.5 SECTION 73.58: ONE-TIME COSTS FOR LICENSEES**Safety/Security Interface**

The licensee must assess and manage adverse effects on safety and security when implementing changes to plant configurations, facility conditions or security. To accomplish this, the licensee will need to develop and implement a set of safety/security interface procedures and provide initial training for staff.

Note: This calculation accounts for the safety-security interface activities required by the following proposed sections of the rule: 73.55(e)(8)(v), 73.55(s), and Appendix C, 7.(e).

Hours of manager time per set of procedures	60.0
Wage of manager per hour	x \$50
<i>Cost of manager time per set of procedures</i>	<u>\$3,000</u>
Hours of staff time per set of procedures	80.0
Wage of staff per hour	x \$35
<i>Cost of staff time per set of procedures</i>	<u>\$2,800</u>
Hours of legal time per set of procedures	15.0
Wage of legal staff per hour	x \$100
<i>Cost of legal time per set of procedures</i>	<u>\$1,500</u>
Hours of clerical time per set of procedures	20.0
Wage of clerical worker per hour	x \$20
<i>Cost of clerical time per set of procedures</i>	<u>\$400</u>
Number of managers attending initial safety-security interface training	8.0
Number of hours in training	2.0
Wage of manager per hour	x \$50
<i>Cost of manager time for training per site</i>	<u>\$800</u>
<i>Subtotal cost per site</i>	<u>\$8,500</u>
<i>Number of sites</i>	65
<i>Percentage of sites affected</i>	x 100%
Total Cost	<u>(\$552,500)</u>

A.6 SECTION 73.58: ANNUAL COSTS FOR LICENSEES**Safety/Security Interface**

The licensee must assess and manage adverse effects on safety and security when implementing changes to plant configurations, facility conditions or security. To accomplish this, the licensee will need to analyze planned maintenance actions on an ongoing basis.

Note: This calculation accounts for the safety-security interface activities required by the following proposed sections of the rule: 73.55(e)(8)(v), 73.55(s), and Appendix C, 7.(e).

Number of planned maintenance actions per year	104.0
Number of staff hours of analysis per planned maintenance action	4.0
Wage of staff per hour	x \$35
<i>Cost of staff analysis of planned maintenance actions</i>	<u>\$14,560</u>
<i>Subtotal cost per site</i>	<u>\$14,560</u>
<i>Number of sites</i>	65
<i>Percentage of sites affected</i>	x 100%
Total Cost	<u>(\$946,400)</u>

A.7 SECTION 73.71: ONE-TIME COSTS FOR LICENSEES**NRC Threat Notification**

The licensee must notify the NRC Operations Center as soon as possible, but no later than 15 minutes after discovery of an imminent or actual threat against the facility. This will entail revising the facility's procedures.

Note: This calculation accounts for the proposed new requirements in Appendix G, I.

Hours of manager time per set of procedures	2.0
Wage of manager per hour	x \$50
<i>Cost of manager time per set of procedures</i>	<i>\$100</i>
Hours of staff time per set of procedures	8.0
Wage of staff per hour	x \$35
<i>Cost of staff time per set of procedures</i>	<i>\$280</i>
Hours of legal time per set of procedures	2.0
Wage of legal staff per hour	x \$100
<i>Cost of legal time per set of procedures</i>	<i>\$200</i>
Hours of clerical time per set of procedures	2.0
Wage of clerical worker per hour	x \$20
<i>Cost of clerical time per set of procedures</i>	<i>\$40</i>
<i>Subtotal cost per site</i>	<i>\$620</i>
<i>Number of sites</i>	<i>65</i>
<i>Percentage of sites affected</i>	x <i>100%</i>
Total Cost	<i>(\$40,300)</i>

A.8 SECTION 73.71: ANNUAL COSTS FOR LICENSEES**NRC Threat Notification**

The licensee must notify the NRC Operations Center as soon as possible, but no later than 15 minutes after discovery of an imminent or actual threat against the facility. For the purposes of this regulatory analysis, on-going incremental costs associated with these calls are estimated in the following equation.

Number of calls per quarter per site	1.00
Number of quarters per year	x 4.00
<i>Number of calls per year per site</i>	<i>4.0</i>
Hours of Shift Captain's time per site per call	0.08
Cost of Shift Captain's time per hour	\$50
Number of calls per year per site	x 4.0
<i>Cost of Shift Captain's time per year per site</i>	<i>\$17</i>
<i>Subtotal cost per site</i>	<i>\$17</i>
<i>Number of sites</i>	<i>65</i>
<i>Percentage of sites affected</i>	x <i>100%</i>
Total Cost	<i>(\$1,083)</i>

Note: Citations to specific sections of the proposed rule may not reflect the most recent draft of the rule.

A.9 PART 73, APPENDIX B: ONE-TIME COSTS FOR LICENSEES**Physical/Medical Examinations for Security Personnel**

The licensee must ensure that all current security personnel who are assigned duties and responsibilities associated with detection, assessment, and response to unauthorized activities (not just the armed personnel) meet minimum vision, hearing, medical, and physical fitness qualifications.

Cost per physical and medical examination		\$400
Number of unarmed members of the security organization hired per year per site	x	20.0
<i>Cost of physical and medical examinations per year per site</i>		<u>\$8,000</u>
Hours of clerical time per site		40.0
Cost of clerical time per hour	x	\$20
<i>Cost of clerical time per site</i>		<u>\$800</u>
<i>Subtotal cost per site</i>		\$8,800
<i>Number of sites</i>		65
<i>Percentage of sites affected</i>	x	100%
Total Cost		<u>(\$572,000)</u>

Note: Citations to specific sections of the proposed rule may not reflect the most recent draft of the rule.

ONE-TIME COSTS FOR LICENSEES (Continued)**On-The-Job Training**

The licensee must provide 40 hours of on-the-job training to each currently employed member of the armed and unarmed security organization. This analysis assumes that 75 percent of reactor sites need to increase current on-the-job training hours by 40 hours for each currently employed member of the security organization. Further, contingency response personnel need an additional 40 hours of on-the-job training. In addition, training managers must document and certify on-the-job training. The analysis assumes that none of the reactor sites are currently documenting on-the-job training; therefore, 100 percent of reactor sites must complete this documentation and certification.

Number of armed and unarmed security officers per site	120.0
Number of additional on-the-job training hours per	40.0
Wage of armed and unarmed security organization member per hour	x \$25
<i>Cost of on-the-job training for currently employed security members</i>	<i>\$120,000</i>
Number of contingency response personnel	110.0
Number of additional on-the-job training hours	40.0
Wage of contingency response personnel	x \$25
<i>Cost of on-the-job training for contingency response personnel</i>	<i>\$110,000</i>
Subtotal cost per site	\$230,000
Number of sites	65
Percentage of sites affected	x 75%
Subtotal Cost for on-the-job training	\$11,212,500
Number of hours for a training manager to document and certify all on-the-job training per year	120.0
Wage of training manager	x \$50
<i>Cost for on-the-job training documentation and certification per site</i>	<i>\$6,000</i>
Subtotal Cost for on-the-job training documentation and certification per site	\$6,000
Number of sites	65
Percentage of sites affected	100%
Subtotal Cost for on-the-job training documentation and certification	\$390,000
Total Cost	(\$11,602,500)

Note: Citations to specific sections of the proposed rule may not reflect the most recent draft of the rule.

ONE-TIME COSTS FOR LICENSEES (Continued)**Qualification of Security Instructors**

The licensee must ensure that all security instructors receive required training to qualify them for their duties.

Cost of training per instructor		\$1,500
Number of instructors per site	x	4.0
<i>Cost of training per site</i>		<u>\$6,000</u>
<i>Subtotal cost per site</i>		\$6,000
Number of sites		65
Percentage of sites affected	x	100%
Total Cost		<u>(\$390,000)</u>

Armorer Certification

Cost of training per staff person		\$3,200
Number of staff requiring training per site	x	2.0
<i>Cost of training per site</i>		<u>\$6,400</u>
<i>Subtotal cost per site</i>		\$6,400
Number of sites		65
Percentage of sites affected	x	100%
Total Cost		<u>(\$416,000)</u>

A.10 PART 73, APPENDIX B: ANNUAL COSTS FOR LICENSEES**Physical/Medical Examinations for Security Personnel**

The licensee must ensure that all newly hired security personnel who are assigned duties and responsibilities associated with detection, assessment, and response to unauthorized activities (not just the armed personnel) meet minimum vision, hearing, medical, and physical fitness qualifications.

Cost per physical and medical examination		\$400
Number of unarmed members of the security organization hired per year	x	5.0
<i>Cost of physical and medical examinations per year per site</i>		<i>\$2,000</i>
Hours of clerical time per site		10.0
Cost of clerical time per hour	x	\$20
<i>Cost of clerical time per site</i>		<i>\$200</i>
<i>Subtotal cost per site</i>		<i>\$2,200</i>
<i>Number of sites</i>		<i>65</i>
<i>Percentage of sites affected</i>	x	<i>100%</i>
Total Cost		(\$143,000)

Physical Requirements for Security Organization Personnel

The licensee must ensure that armed and unarmed members of the security organization must meet physical requirements annually. Current requirements require just armed members to meet these standards.

Cost of updating physical examination per person		\$150
Number of unarmed members of the security organization per site	x	20.0
<i>Cost of updating physical examination for unarmed members of the security organization per site</i>		<i>\$3,000</i>
Hours of clerical time per site		20.0
Cost of clerical time per hour	x	\$20
<i>Cost of clerical time per site</i>		<i>\$400</i>
<i>Subtotal cost per site</i>		<i>\$3,400</i>
<i>Number of sites</i>		<i>65</i>
<i>Percentage of sites affected</i>	x	<i>100%</i>
Total Cost		(\$221,000)

Note: Citations to specific sections of the proposed rule may not reflect the most recent draft of the rule.

ANNUAL COSTS FOR LICENSEES (Continued)**On-the-Job Training**

The licensee must provide 40 hours of on-the-job training to each new member of the armed and unarmed security organization prior to his or her assignment. This analysis assumes that 75 percent of reactor sites need to increase current on-the-job training hours by 20 hours per new hire. In addition, training managers must document and certify on-the-job training. The analysis assumes that none of the reactor sites are currently documenting on-the-job training; therefore, 100 percent of reactor sites must complete this documentation and certification.

Number of newly hired armed and unarmed members of the security organization per year	20.0
Number of additional on-the-job training hours per person	40.0
Wage of armed and unarmed security organization member per hour	x \$25
<i>Cost of newly hired armed and unarmed security organization members per site</i>	<i>\$20,000</i>
Number of armed and unarmed security organization trainers per site	40.0
Number of additional on-the-job training hours per person	20.0
Wage of armed and unarmed security organization trainers per hour	x \$40
<i>Cost of armed and unarmed security organization trainers per site</i>	<i>\$32,000</i>
Subtotal cost per site	\$52,000
Number of sites	65
Percentage of sites affected	x 75%
Subtotal Cost for on-the-job training	(\$2,535,000)
Number of hours for a training manager to document and certify all on-the-job training per year	20.0
Wage of training manager	x \$50
<i>Subtotal Cost for on-the-job training documentation and certification per site</i>	<i>\$1,000</i>
Subtotal Cost for on-the-job training documentation and certification per site	\$1,000
Number of sites	65
Percentage of sites affected	x 100%
Subtotal Cost for on-the-job training documentation and certification	(\$65,000)
Total Cost	(\$2,600,000)

Note: Citations to specific sections of the proposed rule may not reflect the most recent draft of the rule.

ANNUAL COSTS FOR LICENSEES (Continued)**Qualification of Security Instructors**

The licensee must ensure that all security instructors receive requalification training every three days. For the purposes of this analysis it is assumed that instructors attend a three-day requalification training every three years. To estimate the annual cost, this analysis assumes there is one day of requalification training each year.

Cost of training per instructor per year		\$250
Number of instructors per site	x	4.0
<i>Cost of training per year per site</i>		<u>\$1,000</u>
<i>Subtotal cost per site</i>		\$1,000
Number of sites		65
Percentage of sites affected	x	100%
Total Cost		<u>(\$65,000)</u>

Armorer Certification

Cost of training per staff member per year		\$1,067
Number of staff requiring training per site	x	2.0
<i>Cost of training per year per site</i>		<u>\$2,133</u>
<i>Subtotal cost per site</i>		\$2,133
Number of sites		65
Percentage of sites affected	x	100%
		<u>(\$138,667)</u>

Note: Citations to specific sections of the proposed rule may not reflect the most recent draft of the rule.

A.11 PART C, APPENDIX C: ONE-TIME COSTS FOR LICENSEES**None.****A.12 PART 73, APPENDIX C: ANNUAL COSTS FOR LICENSEES****Drill Exercise**

Licensees must train staff in accordance with the drill exercise requirements of the proposed rule.

Cost of training per person		\$500
Number of staff requiring training	x	40.0
<i>Cost of training per site</i>		<u>\$20,000</u>
 <i>Subtotal cost per site</i>		 \$20,000
<i>Number of sites</i>		65
<i>Percentage of sites affected</i>	x	100%
		<u>(\$1,300,000)</u>

Note: Citations to specific sections of the proposed rule may not reflect the most recent draft of the rule.

A.13 PART 73, APPENDIX G: ONE-TIME COSTS FOR LICENSEES**None. See Section 73.71.****A.14 PART 73, APPENDIX G: ANNUAL COSTS FOR LICENSEES****NRC Suspicious Activity Notification**

Cost of training per Shift Captain		\$50
Number of Shift Captains per site	x	6.0
<i>Cost of training per site</i>		<u>\$300</u>
<i>Cost per site</i>		\$300
<i>Number of sites</i>		65
<i>Percentage of sites affected</i>	x	100%
<i>Subtotal Cost</i>		<u>\$19,500</u>
Hours of Shift Captain's time per site per call		0.08
Cost of Shift Captain's time per hour		\$50
Number of calls per year (all sites)	x	388.0
<i>Cost of Shift Captain's time per year (all sites)</i>		<u>\$1,552</u>
<i>Cost of Shift Captain's time per year (all sites)</i>		\$1,552
<i>Percentage of sites affected</i>	x	100%
<i>Subtotal Cost</i>		<u>\$1,552</u>
<i>Subtotal Cost for Training</i>		\$19,500
<i>Subtotal Cost for Reports</i>	+	<u>\$1,552</u>
Total Cost		<u>(\$21,052)</u>

Tampering Notification

Cost of training per Shift Captain		\$50
Number of Shift Captains per site	x	6.0
<i>Cost of training per site</i>		<u>\$300</u>
<i>Subtotal cost per site</i>		\$300
<i>Number of sites</i>		65
<i>Percentage of sites affected</i>	x	100%
<i>Subtotal Cost</i>		<u>\$19,500</u>
Hours of Shift Captain's time per site per call		0.08
Cost of Shift Captain's time per hour		\$50
Number of calls per year (all sites)	x	388.0
<i>Cost of Shift Captain's time per year (all sites)</i>		<u>\$1,552</u>
<i>Cost of Shift Captain's time per year (all sites)</i>		\$1,552
<i>Percentage of sites affected</i>	x	100%
<i>Subtotal Cost</i>		<u>\$1,552</u>
<i>Subtotal Cost for Training</i>		\$19,500
<i>Subtotal Cost for Reports</i>	+	<u>\$1,552</u>
Total Cost		<u>(\$21,052)</u>

Note: Citations to specific sections of the proposed rule may not reflect the most recent draft of the rule.
