

**PAPERWORK REDUCTION ACT SUBMISSION**

ADAMS JAVOUCS  
Designated Original

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.**

<p>1. Agency/Subagency originating request <b>U.S. Nuclear Regulatory Commission</b></p>	<p>2. OMB control number a. <b>3150 - 0109</b> <input type="checkbox"/> b. None</p>
<p>3. Type of information collection (check one)</p> <p><input type="checkbox"/> a. New collection</p> <p><input checked="" type="checkbox"/> b. Revision of a currently approved collection</p> <p><input type="checkbox"/> c. Extension of a currently approved collection</p> <p><input type="checkbox"/> d. Reinstatement, <b>without change</b>, of a previously approved collection for which approval has expired</p> <p><input type="checkbox"/> e. Reinstatement, <b>with change</b>, of a previously approved collection for which approval has expired</p> <p><input type="checkbox"/> f. Existing collection in use without an OMB control number</p>	<p>4. Type of review requested (check one)</p> <p><input checked="" type="checkbox"/> a. Regular <input type="checkbox"/> c. Delegated</p> <p><input type="checkbox"/> b. Emergency - Approval requested by (date):</p> <p>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</p> <p>6. Requested expiration date <input checked="" type="checkbox"/> a. Three years from approval date <input type="checkbox"/> b. Other (Specify):</p>
<p>7. Title <b>Billing Instructions for NRC Cost Type Contracts</b></p>	
<p>8. Agency form number(s) (if applicable)</p>	
<p>9. Keywords <b>Contracts, Administration</b></p>	
<p>10. Abstract <b>NRC in administering its contracts to ensure that contractor costs billed for payment are proper, provides billing instructions for its contractors to follow in preparation of invoices.</b></p>	
<p>11. Affected public (Mark primary with "P" and all others that apply with "X")</p> <p><input checked="" type="checkbox"/> a. Individuals or households <input type="checkbox"/> d. Farms</p> <p><input checked="" type="checkbox"/> b. Business or other for-profit <input checked="" type="checkbox"/> e. Federal Government</p> <p><input checked="" type="checkbox"/> c. Not-for-profit institutions <input checked="" type="checkbox"/> f. State, Local or Tribal Government</p>	<p>12. Obligation to respond (Mark primary with "P" and all others that apply with "X")</p> <p><input type="checkbox"/> a. Voluntary</p> <p><input checked="" type="checkbox"/> b. Required to obtain or retain benefits</p> <p><input type="checkbox"/> c. Mandatory</p>
<p>13. Annual reporting and recordkeeping hour burden</p> <p>a. Number of respondents <u>80</u></p> <p>b. Total annual responses <u>3,952</u></p> <p>1. Percentage of these responses collected electronically _____ %</p> <p>c. Total annual hours requested <u>1,851</u></p> <p>d. Current OMB inventory <u>2,000</u></p> <p>e. Difference <u>(149)</u></p> <p>f. Explanation of difference</p> <p>1. Program change _____</p> <p>2. Adjustment <u>149</u></p>	<p>14. Annual reporting and recordkeeping cost burden (in thousands of dollars)</p> <p>a. Total annualized capital/startup costs _____</p> <p>b. Total annual costs (O&amp;M) _____</p> <p>c. Total annualized cost requested _____</p> <p>d. Current OMB inventory _____</p> <p>e. Difference _____</p> <p>f. Explanation of difference</p> <p>1. Program change _____</p> <p>2. Adjustment _____</p>
<p>15. Purpose of information collection (Mark primary with "P" and all others that apply with "X")</p> <p><input checked="" type="checkbox"/> a. Application for benefits <input type="checkbox"/> e. Program planning or management</p> <p><input type="checkbox"/> b. Program evaluation <input type="checkbox"/> f. Research</p> <p><input type="checkbox"/> c. General purpose statistics <input type="checkbox"/> g. Regulatory or compliance</p> <p><input type="checkbox"/> d. Audit</p>	<p>16. Frequency of recordkeeping or reporting (check all that apply)</p> <p><input type="checkbox"/> a. Recordkeeping <input type="checkbox"/> b. Third-party disclosure</p> <p><input checked="" type="checkbox"/> c. Reporting</p> <p>1. On occasion <input type="checkbox"/> 2. Weekly <input checked="" type="checkbox"/> 3. Monthly</p> <p>4. Quarterly <input type="checkbox"/> 5. Semi-annually <input type="checkbox"/> 6. Annually</p> <p>7. Biennially <input type="checkbox"/> 8. Other (describe) _____</p>
<p>17. Statistical methods</p> <p>Does this information collection employ statistical methods?</p> <p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	<p>18. Agency contact (person who can best answer questions regarding the content of this submission)</p> <p>Name: <u>Mary Lynn Scott</u></p> <p>Phone: <u>301-415-6179</u></p>

D-103

## 19. Certification for Paperwork Reduction Act Submissions

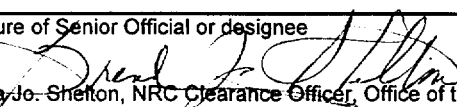
On behalf of this Federal agency, I certify that the collection of information encompassed by this request complies with 5 CFR 1320.9.

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 2/14/2008

FINAL SUPPORTING STATEMENT FOR BILLING  
INSTRUCTIONS FOR NRC COST TYPE CONTRACTS  
(3150-0109)  
CLEARANCE EXTENSION

Description of Information Collection

The NRC Division of Contracts and Property Management (DCPM), in administering its contracts to ensure that contractor costs billed for payment are proper, provides Billing Instructions for its contractors to follow in their preparation of invoices. These instructions stipulate the level of detail in which supporting cost data must be submitted for NRC review of costs billed. Included with the instructions is a voucher/invoice format sample for the contractor's reference. The contractor may submit a voucher/invoice in alternate formats provided all requirements of the billing instructions are addressed.

A. JUSTIFICATION

1. Need for the Collection of Information. The cost information is needed for license fee recovery and to assure that costs incurred are allowable and allocable and that the amount requested is proper for payment.
2. Agency Use of Information Vouchers and supporting documentation are reviewed by the Division of Accounting and Finance, the DCPM, and the Project Officer. Taken together, the review ensures that costs are billed per the contract rates and the costs incurred are commensurate with work performed. The instructions provide contractors with a clear idea of the level of detail required to support their voucher submissions. Receipt of properly prepared vouchers expedites the review process and permits prompt payment.
3. Reduction of Burden Through Information Technology There are no legal obstacles to reducing the burden associated with this information collection through the use of information technology assuming that sensitive information can be protected from improper disclosure. NRC encourages the use of information technology whenever possible.
4. Effort to Identify Duplication and to Use Similar Information The Billing Instructions for NRC Cost Type Contracts, use of a sample voucher/invoice format, and use of a monthly contracting cost summary report for fee billings for collection of information are unique to NRC. The Information Requirements Control Automated System (IRCAS) was searched and no duplication was found. Costs incurred are unique to the contract and the billing period for which payment is requested. Cost information to be provided by the contractor is not otherwise available.
5. Effort to Reduce Small Business Burden. The collection represents the minimum information required for submission of a proper voucher and supporting detail required for review to assure that costs billed are proper for payment.
6. Consequences to Federal Program or Policy Activities if the Collection is Not Conducted or is Conducted Less Frequently. Contractors are required to completed and submit invoices and attachments in an original and three copies once each month unless otherwise authorized by the Contracting Officer. The consequence of not collecting the data or of less frequent collection would be withholding of reimbursement to the contractor of costs incurred as the work

progresses counter to the provisions of FAR Clause 52.216-7, which required that payment be made upon request but (except for small business concerns) not more often than once every two weeks.

7. Circumstances Which Justify Variation From OMB Guidelines. An original and three copies of the invoice are required to ensure that payment is made to the contractor promptly upon receipt of a properly approved invoice or within 30 calendar days of the official agency receipt date, whichever is earlier. This procedure ensures compliance with the requirements of the Prompt Payment Act, as amended.

Due to turnaround time required by the Prompt Payment Act, there is not sufficient time required to xerox the voluminous number of vouchers/invoices. The agency-designated billing office is DCPM for receipt of the original and three copies of the contract request for payment (voucher/invoice) to reduce unnecessary delay in the payment process. The payment process begins once DCPM receives a proper invoice. DCPM forwards two copies to the Project Officer for review and approval. DCPM holds the original voucher/invoice and one copy. The Project Officer retains one copy and signs and returns one copy to DCPM. Upon receipt of the Project Officer's signed copy, the original voucher/invoice and one signed copy are forwarded to the Division of Accounting and Finance (DAF) for final processing. DCPM retains one copy as a suspense copy until DAF pays the voucher/invoice.

8. Consultation Outside the NRC. Notice of opportunity was published in the Federal Register on 11/22/99 (64 FR 63832). No comments were received.
9. Payment or Gifts to Respondents. None.
10. Confidentiality of the Information. NRC provides no pledge of confidentiality for this collection of information. To the extent information is business confidential, procedures are in place to protect the information from improper disclosure.
11. Justification for Sensitive Questions. Normally sensitive information considered private or personal is not required or requested. This information is only required when contracts are processed which involve sensitive material. Proprietary data is protected under the Freedom of Information Act and 10 CFR Part 9.
12. Estimated Burden and Burden Hour Cost. The total annual contractor burden for the Billing Instructions and License Fee Recovery Cost Summary for NRC cost type contracts is estimated to be 1,851 hours. Billing burden is ((45 contracts X 12 invoices X .45/hr. = 243) plus (489 task orders X 4 invoices X .45/hr. = 880) = 1,123 x \$140/hr. = \$157,220). License Fee recovery burden is \$101,920 ((364 task orders X 4 invoices X .5/hr. = 728 X \$140/hr. = \$101,920). Total estimated cost to the public is \$259,140 (\$157,220 + \$101,920 = \$259,140). While the license fee recovery section of the billing instructions will be included in all cost reimbursement type contracts, the section on licensing fee costs generally only applies to task order contracts for plant inspections, licensing actions or other site specific activities.

(\*Estimates are based on 80 active contracts. 45 contracts have no task orders

or licensee fee recovery directly assigned to them. Direct license fee recovery is applicable to 12 contracts, all of which are task ordering contracts. 364 active task orders are associated with these 12 contracts. Licensee fee recovery is not applicable to 23 additional task ordering contracts. 125 active task orders are associated with these 23 contracts.)

13. Estimate of Other Additional Costs. None

14. Estimated Annualized Cost to the Federal Government

The cost to the Agency for these Billing Instructions and the Licensee Fee Recovery Cost Summary was derived from experience as to the approximate number of hours contract specialists, program and paying officer personnel expend in ensuring that contractors comply with the instructions. Contract, program and paying office personnel expend an average of 1 hour per response for a cost of \$349,440 ((45 contracts X 12 invoices X \$140/hr. = \$75,600) plus (489 task orders X 4 invoices X \$140/hr. = \$273,840) = \$349,440). Program and paying officer personnel expend an average of .5 hour per response to the review the License Fee Recovery Cost Summary for a cost of \$101,920 (364 task orders X 4 invoices X .5/hr. X \$140/hr. = \$101,920). These costs are fully recoverable by fee assessments to NRC licensees pursuant to 10 CFR Part 171.

Total cost to the agency is \$451,360 (\$349,440 + \$101,920). (See \* in paragraph 12 above).

15. Reason for Change in Burden or Cost. The number of active contracts has decreased. However, the number of task orders subject to license fee recovery has increased. The overall impact is a slight decrease in burden and cost.

16. Publication for Statistical use. Not applicable.

17. Reason for Not Displaying the Expiration Date. The OMB clearance expiration date is displayed.

18. Exceptions to the Certification Statement. Not applicable.

## B. COLLECTIONS OF INFORMATION EMPLOYING STATISTICAL METHODS

Statistical methods are not used in this collection of information.