

FINAL SUPPORTING STATEMENT  
FOR  
NRC FORM 171, "DUPLICATION REQUEST"  
OMB CLEARANCE NUMBER 3150-0066

REVISION REQUEST

Description of the Information Collection

As indicated in 10 CFR 9.21(b), various Nuclear Regulatory Commission (NRC) documents are made available to the public through the NRC Public Document Room (PDR). In addition to ensuring accessibility to reading the documents, the NRC has a contractor provide reproduction services to the public. Although individuals may utilize the NRC microfiche reader-printers, as well as the ADAMS terminals, to print and pay for full text documents, they often request the contractor to perform this reproduction service.

A. JUSTIFICATION

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

Only one form is required to capture the different electro-mechanical processes necessary to complete the eight different reproduction services requested by the public. This form is needed because requests for duplication are received by the NRC's Document Processing Center or Public Document Room from requesters who often walk into those facilities. NRC Form 171 is used to specify exactly which documents are to be copied and the number of copies to be produced.

2. Agency Use of Information

Reproduction form is completed by the individual member of the public making a request, or by the Technical Information Center Section / PDR personnel in response to letter and telephone requests from the public, for which the contractor's reproduction services are to be utilized. The specific data on this form permits the contractor to reproduce the correct items, to contact the requester when problems arise, and to provide a bill for services rendered. The requester, if onsite, maintains a copy for his records otherwise, the PDR staff retain this copy, the contractor returns a copy of the completed request, and a third copy is maintained by the contractor in request order number sequence in case a question arises concerning a past service performed. No Personal Identifiable Information is retained beyond 90 days after which the forms are securely destroyed. The contractor provides the Public Document Room/Technical Information Center Section each month with a statistical summary report related to the number of users in the past month and to the number of pages, microfiche, aperture cards, computer diskettes, audio and

ADAMS Accession Numbers

Package: ML063110518  
Document: ML063110621

video cassettes reproduced the previous month for requesters. This data is utilized by the NRC in its annual report to Congress.

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 new automated 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. Requests which are not for personal records that require verification of identity of the requester are being accepted by electronic mail and facsimile transmission in addition to mail and in-person written request. It is anticipated that one third (33%) of all requests will be submitted electronically.

4. Effort to Identify Duplication and Use Similar Information

The collection of the information required is not a duplication of other information and no sources of similar information are available. NRC has in place an on-going 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

The information required is needed for all individuals regardless of the size of the entity, if any, by which they are employed. The information requested is basic to the information search and retrieval, and can not be reduced.

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

The respondent determines the frequency of completing the form. A form is completed only at the time the document is requested for reproduction at the PDR.

7. Circumstances Which Justify Variation from OMB Guidelines

This information collection does not vary from OMB guidelines.

8. Consultation Outside the NRC

The opportunity for public comment on the information collections was published in the Federal Register on September 1, 2006 (71 FR 52172). No comments were received.

9. Payment or Gift to Respondents

Not Applicable.

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10. Confidentiality of the Information

The NRC provides no pledge of confidentiality for this collection of information.

11. Justification for Sensitive Questions

The form include questions about address, phone number, e-mail address, and credit card information necessary for billing the customer correctly.

12. Estimate of Annualized Burden and Burden Hour Cost

Documents are requested by e-mail, fax, U.S. Mail, telephone, or by submitting an individual NRC Form 171. The estimated burden for submission of requests is based on the number of requests received during the current clearance period, observation, and sampling and is as follows:

NRC Form 171	800 requests	
	E-mail	2,400 requests
Fax		120 requests
Letter (U.S. Mail)	20 requests	
Phone		4,600 requests
	Total Requests	7,940

Burden: 223 hours - NRC Form 171, e-mail, fax and letter requests  
(3,340 requests x 4 minutes = (13,360 minutes/60))

Phone requests: 767 hours (4,600 x 10 minutes = (46,000 minutes/60))

Total burden 990 hours (223 hours + 767 hours), or approximately 8 minutes per response.

Cost	\$213,840 (990 hours x \$216/hr.)
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Based on the number of requests received during the current clearance period, we estimate a 50% decrease in the number of requests during this 3-year renewal period.

The estimated cost per burden hour is based upon NRC's annual fee recovery rule. This cost is fully recoverable by fee assessments to NRC licensees pursuant to 10 CFR Part 171.

13. Estimate of Other Additional Costs

Not applicable.

14. Estimated Annualized Cost to the Federal Government

Estimated burden for NRC staff to record telephone requests and verify all requests for NRC documents is as follows:

It is estimated that it takes the NRC staff 5 minutes each to process all requests with the exception of phone requests which take about 10 minutes each to process for a total cost of 1,045 hours or \$225,720. (3,340 requests @ 5 minutes each or  $16,700/60 = 278$  hours; and 4,600 requests @ 10 minutes each or  $46,000/60 = 767$  hours.  $278 + 767 = 1,045$  hours x \$216/hr.)

The estimated cost per burden hour is based upon NRC's annual fee recovery rule. This cost is fully recoverable by fee assessments to NRC licensees pursuant to 10 CFR Part 171.

15. Reasons for Change in Burden

The burden hours decreased by 893 hours from 1,883 to 990 hours as a result of the introduction of the agency's Web-based Agencywide Documents Access and Management System (ADAMS) in 2004, which has made the agency's public documents accessible to all Internet access users. Since the deployment of Web-based ADAMS to the public, there has been a decrease in the number of requests from the public to duplicate documents. Based on the number of requests received during the current clearance period, we estimate a 50% decrease in the number of requests during this 3-year renewal period.

The changes in burden cost reflect an increase in NRC's recoverable fee rate increased from \$154/hr to \$216/hr.

The estimated cost per burden hour is based upon NRC's annual fee recovery rule. This cost is fully recoverable by fee assessments to NRC licensees pursuant to 10 CFR Part 171.

16. Publication for Statistical Use

The reproduction contractor provides the Public Document Room /Technical Information Center Section each month with a statistical summary report related to the number of users in the past month and to the number of pages, microfiche, and aperture cards reproduced the previous month for the users. These data are utilized by the NRC in its annual report to Congress.

17. Reason for not Displaying the Expiration Date

Not applicable.

18. Exceptions to the Certification Statement

There are no exceptions.

A. COLLECTIONS OF INFORMATION EMPLOYING STATISTICAL METHODS

Statistical methods are not used in the collection of information.