

Final OMB SUPPORTING STATEMENT FOR
NUREG/BR-0238, Materials Annual Fee Billing Handbook,
NRC Form 628, "Financial EDI Authorization"
NUREG/BR-0254, Payment Methods
NRC Form 629, "Authorization for Payment by Credit Card"

(OMB Clearance No. 3150-0190)

EXTENSION RENEWAL WITH BURDEN ADJUSTMENT

Description of the Information Collection

The Office of the Chief Financial Officer is responsible for billing licensees, applicants, and individuals for payment of civil penalties, full cost licensing fees, and inspection fees. The four methods used to pay bills owed the NRC are: (1) Payment by Automated Clearinghouse Network (ACH); (2) Payment by Credit Card; (3) Payment by Electronic Funds Transfer; and (4) Payment by Check. NUREG/BR-0238, "Materials Annual Fee Billing Handbook", and NUREG/BR-0254, "Payment Methods" are used in the billing cycle to instruct licensees how to transfer monies owed the NRC. The payment methods are also defined in these NUREGs. The Materials Annual Fee Billing Handbook (NUREG/BR-0238) is an information handbook only that provides answers to frequently asked questions, as well as payment methods and procedures, and accompanies invoices submitted to materials licensees. NRC Form 628, "Financial EDI Authorization," and Payment Methods (NUREG/BR-0254) which has an accompanying NRC Form 629, "Authorization for Payment by Credit Card," are the payment methods that impose information collection burdens on licensees and are described in this Supporting Statement.

A. JUSTIFICATION

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

NRC Form 628, "Financial EDI Authorization," is an option used to make payment through the Automated Clearinghouse (ACH) Network. This form authorizes the licensee's bank to pay invoices to the NRC through the ACH. The NRC Form 628 requests the licensee's name, electronic funds transfer contact, telephone number, address, authorized signature and title.

NRC Form 629, "Authorization for Payment by Credit Card," is another option used to authorize payment. The credit card authorization form is used by licensees to authorize payment by credit card for license fees and for payment of fees for fingerprint cards. The form solicits information that identifies the cardholder's name, address, account number, card expiration date, cards accepted, cardholder's signature, invoice number or license number.

There are no recordkeeping requirements associated with this collection.

2. Agency Use of Information.

The agency properly credits monies received through the ACH and credit card companies when these two methods are utilized by the licensees to pay their indebtedness to the NRC.

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 90% of the potential responses are filed electronically for NRC Form 629. It is estimated that approximately 100% of the potential responses are filed electronically for NRC Form 628.

4. Effort to Identify Duplication and Use Similar Information.

The collection of the information required is not a duplication of other information. No sources of similar information are available and 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

Many of the licensees billed annually are small businesses. Efforts have been made to keep the method of collecting fees as simple as possible and requirements for information have been kept to a minimum.

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

The impact to the NRC fee program if the collection is not conducted or is conducted less frequently will be minimal. Licensees, applicants and individuals will continue to have two options open to them to pay future bills and invoices mailed to them. They may send a check or use an electronic funds transfer through FedWire.

7. Circumstances which Justify Variation from OMB Guidelines.

Not Applicable.

8. Consultations Outside the NRC.

An opportunity for public comment on the Information Collection Requirements for this clearance package was published in the Federal Register on December 13, 2007 (72 FR 70898). No comments were received.

9. Payment or Gift to Respondents.

Not Applicable.

10. Confidentiality of the Information. NRC provides no pledge of confidentiality for the collection. To the extent information is business confidential, procedures are in place to protect the information from improper disclosures.

11. Justification for Sensitive Questions.
Not applicable.

12. Estimate of Annualized Burden and Burden Hour Cost.
For NRC Form 628, Financial EDI Authorization, it is estimated that it takes approximately 5 minutes to read the instructions and complete the form. It is estimated that approximately 10 forms will be completed annually with an estimated burden of .8 hour (10 forms x .08 = .80 hours). The estimated annual cost is \$206.40 (.8 hours x \$258).

For NRC Form 629, "Authorization for Payment by Credit Card," and NUREG/BR-0254, it is estimated that it takes approximately 5 minutes to read the instructions and complete the form. It is estimated that approximately 456 forms will be completed annually with an estimated burden of 37 hours (456 forms x .08 = 37 hours). The estimated annual cost is \$9,546 (37 hours x \$258).

The total estimated burden is 38 hours (.8 hour + 37 hours) at a cost of \$9,752.40 (\$206.40 + \$9,546.00).

13. Estimate of Other Additional Costs.
None.

14. Estimated Annualized Cost to the Federal Government.
EDI Financial Forms (NRC Form 628) and Credit Card Forms (NRC Form 629) are processed by third party entities for the NRC annually. There is no cost to the NRC because the cost for this service, by the third party, is assumed by the Department of the Treasury.

15. Reasons for Changes in Burden or Cost.
The overall estimated burden decreased by 573 hours from 611 to 38 hours and the estimated number of responses decreased by 6,864 from 7,330 to 466 responses because of the following:

- (1) The burden for NRC Form 628, Financial EDI Authorization has remained the same.
- (2) The burden for NRC Form 629, authorization for Payment by Credit Card and NUREG/BR-0254 has decreased by 573 hours from 610 to 37 hours because the actual number of forms received was 456 instead of the estimated 7,320. The decrease in burden hours is in direct correlation to the decrease in the number of responses. A major reason for the

decrease in burden is due to NRC's mandate that all fingerprint fees be paid electronically through the PAY.GOV, significantly decreasing the number of credit card forms processed.

16. Publication for Statistical Use

None.

17. Reason for Not Displaying the Expiration Date.

Not applicable.

18. Exceptions to the Certification Statement.

Not applicable.

B. COLLECTION OF INFORMATION EMPLOYING STATISTICAL METHODS

Statistical methods are not used in this information collection.