

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

Description of the Information Collection

The NRC Division of Contracts (DC), in administering its contracts, provides contractors with Billing Instructions to follow when preparing invoices, to ensure billed costs are proper for payment. These instructions stipulate the level of detail in which supporting cost data must be submitted for the Nuclear Regulatory Commission (NRC) review of costs billed. Included with the instructions, for contractor reference, is a sample format that can be used when preparing the voucher/invoice. The contractor may submit a voucher/invoice in alternate formats provided all requirements of the billing instructions are addressed.

1. Need for the Collection of Information. The cost information is needed for license fee recovery and to ensure costs incurred are allowable and allocable and that the amount requested is proper for payment.
2. Agency Use of Information. Vouchers/invoices and supporting documentation are reviewed by the National Business Center (NBC) of the Department of the Interior, DC, and the NRC Project Officer (PO). Taken together, the review ensures 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/invoice submissions. Receipt of properly prepared vouchers/invoices expedites the review process and permits prompt payment.
3. Reduction of Burden Through Information Technology. To reduce the burden on contractors, effective May 1, 2008, contractors were requested to electronically submit all vouchers/invoices to the NBC. However, contractors still have the option of submitting a hardcopy voucher/invoice. Voucher/invoices are submitted electronically 100% of the time.
4. Effort to Identify Duplication 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. The collection represents the minimum information required for submission of a proper voucher/invoice and required supporting documentation required for review, in order to ensure 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 complete and submit vouchers/invoices and attachments 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. The provisions of FAR Clause 52.216-7, require 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. To ensure prompt payment is made to the contractor, the contractor must electronically submit a proper voucher/invoice, including supporting documentation, which is reviewed and approved by NBC. If it is determined that the voucher/invoice was properly prepared, payment will be made 30 calendar days from receipt of the proper voucher/invoice. If it is determined that the voucher/invoice is not proper, payment will be made 30 calendar days from receipt of the proper invoice. This procedure ensures compliance with the requirements of the Prompt Payment Act, as amended.

The agency-designated billing office for submittal of the voucher/invoice is the NBC. The payment process begins once NBC electronically receives a proper invoice. NBC sends the voucher/invoice electronically to the PO and DC for review and approval. The PO reviews and approves the electronic copy and then it is electronically sent to DC for final review and approval. After DC reviews and approves the voucher/invoice, it is electronically sent to NBC for final processing (payment).

8. Consultation Outside the NRC. The opportunity for public comment on the information collection requirements for this clearance was published in the Federal Register on February 9, 2009 (74 FR 6421). No comments were received.
9. Payment or Gift to Respondents. None
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. However, no information normally considered confidentially or proprietary is requested.
11. Justification for Sensitive Questions. Normally sensitive information considered private or personal is not required or requested. This information is only required when contracts containing sensitive material are processed. Proprietary data is protected under the Freedom of Information Act and 10 CFR Part 9.
12. Estimate of Burden and Burden Hour Cost. The burden estimates for this information collection are based on a projected 64 active contracts (i.e., 64 respondents.). These 64 contracts are divided into the following type of contracts:
 - 45 contracts have no task orders associated with them, and are billed monthly (i.e., 12 bills annually.)
 - 13 contracts have task orders (TOs) which are for projects not related to license fee, and have a total of 76 task orders and an average of 4 billings annually per task order.
 - 6 contracts have task orders for license fee recoverable projects with a total of 195 task orders and an average of 4 billings per task order.
 - The 6 contracts listed above require an additional 390 hours for contractors to prepare the License Fee Recovery Cost Summary, which has a total of 195 task orders and is prepared an average of 4 times per year.

The total hourly reporting burden for this collection is 1,202 hours, which is described in the table below.

ANNUAL REPORTING REQUIREMENTS

Contract/Task Order Type	Number of Contracts	Avg. # Invoices per TO	Annual Responses per Respondent	Total # Responses	Burden per Response (Hours)	Total Annual Burden Hours	Cost @ \$238/Hr.
NRC Cost Type Contracts							
No Task Order or License Fee Recovery Contract	45	NA	12	540	0.5	270	\$64,260
Task Order – Not License Fee Related	13	5.8	4	304	0.5	152	\$36,176
Task Order – License Fee Related	6	32.5	4	780	0.5	390	\$92,820
License Fee Recovery Cost Contracts							
Preparation of License Fee Recovery Cost Summary for License Fee Related Task Orders	6	32.5	4	780	0.5	390	\$92,820
Total	64			2,404		1,202	\$286,076

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.

13. Estimate of Other Additional Costs.

There are no other additional costs.

14. Estimated Annualized Cost to the Federal Government. These costs are fully recovered by fee assessments to NRC licensees pursuant to 10 CFR Part 171. Total cost to the agency is \$479,332 (\$386,512 + \$92,820).

Estimated Annual Cost to the Federal Government

Contract/Task Order Type	Number of Contracts	Avg. # Invoices per TO	Annual Responses per Respondent	Total # Responses	Burden per Response (Hours)	Total Annual Burden Hours	Cost @ \$238/Hr.
NRC Cost Type Contracts							
No Task Order or License Fee Recovery Contract	45	NA	12	540	1.0	540	\$128,520
Task Order – Not License Fee Related	13	5.8	4	304	1.0	304	\$72,352
Task Order – License Fee Related	6	32.5	4	780	1.0	780	\$185,640
License Fee Recovery Cost Contracts							
Preparation of License Fee Recovery Cost Summary for License Fee Related Task Orders	6	32.5	4	780	0.5	390	\$92,820
Total						2,014	\$479,332

15. Reasons for Changes in Burden or Cost. The number of responses increased from 2,140 to 2,404 and the number of burden hours increased by 132 (from 1,070 to 1,202 hours) due to a net increase in the number of contracts projected within the next three years (from 55 to 64). These changes are describe below:

- Contracts which have no task orders or license fee recovery associated with them and provide for monthly billing are expected to increase by 10 contracts (from 35 to 45).
- Task orders associated with the 13 contracts not license fee recoverable are expected to decrease by 39 (from 114 total task orders to 76 total task orders.)
- Task orders associated with the 6 contracts with recoverable license fees are expected to increase by 37 (from 158 total task orders to 195 total task orders.)

In addition, the cost for professional effort has increased from \$201 to \$238 per hour.

16. Publication for Statistical Use. Results will not be tabulated or published.

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

The collection of information does not employ statistical methods.