FINAL OMB SUPPORTING STATEMENT FOR NRC FORM 445 REQUEST FOR APPROVAL OF OFFICIAL FOREIGN TRAVEL (OMB 3150-0193)

REVISION

DESCRIPTION OF THE INFORMATION COLLECTION

Information forwarded on the above, "Request for Approval of Foreign Travel" form is supplied by non-Federal consultants, contractors and The Nuclear Regulatory Commission (NRC) invited travelers (i.e., non-NRC employees) who must travel to foreign countries in the course of conducting business for the NRC. In accordance with 48 CFR 20, "NRC Acquisition Regulation," contractors traveling to foreign countries are required to complete this form. The information requested includes the name of the NRC office recommending travel, approval by an Office Director, Regional Administrator or Chairman, as appropriate, the traveler's identifying information, the purpose of the travel, a listing of trip coordinators, other NRC travelers and contractors attending the same meeting, and a proposed itinerary.

In this latest revision request, the NRC has made a few updates to the form. These updates became necessary to identify the actual authorizing official (e.g., Deputy Director, not Director) and ensure that the traveler has the necessary documentation needed to return to the U.S. at the conclusion of the trip. The revisions also capture more useful information regarding the traveler's passport and the dates of travel. Lastly, the traveler's signature block was repurposed to serve as the traveler's certification that they will attend a briefing on the latest threat environment and will use government-issued IT equipment for all official communications while on official travel. It is estimated these changes will increase the time needed to complete the form, however, the revisions serve to increase the safety of the traveler.

A. JUSTIFICATION

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

NRC Form 445 is the mechanism by which NRC is advised of and approves foreign travel for its non-Federal consultants, contractors and invited travelers.

2. <u>Agency Use of Information</u>

Information from NRC Form 445 is used by NRC to determine whether proposed foreign travel for its non-Federal consultants, contractors and invited travelers should be approved.

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 of making submissions electronically via CD-ROM, e-mail, special Web-based interface, or other means. It is estimated that approximately **0%** of the potential responses are filed electronically. However, because Form 445 requires multiple signatures and concurrences and is infrequently used by individual respondents, it is not efficient to establish a process that would readily lend itself to electronic filings. Therefore, we anticipate no electronic filings for this information collection.

4. <u>Effort to Identify Duplication and Use Similar Information</u>

No sources of similar information are available. There is no duplication of requirements. 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

Completion of NRC Form 445 by NRC's non-Federal consultants, contractors and invited travelers is the minimum information needed to authorize the proposed foreign travel.

6. <u>Consequences to Federal Program or Policy Activities if the Collection Is</u> Not Conducted or is Conducted Less Frequently

Absence of NRC Form 445 would result in NRC's not being able to perform effective oversight of proposed foreign travel by its non-Federal consultants, contractors and invited travelers.

7. Circumstances Which Justify Variation From OMB Guidelines

Not applicable.

8. Consultations Outside the NRC

Opportunity for public comment on the information collection requirements for this clearance package was published in the <u>Federal Register</u> on July 2, 2014 (79 FR 37781). No comments were received.

9. Payment or Gifts to Respondents

Not applicable.

10. <u>Confidentiality of the Information</u>

Confidential and proprietary information is protected in accordance with NRC regulations at 10 CFR 9.17(a) and 10 CFR 2.390(b).

This information is maintained in a system of records designated as NRC-20, Official Travel Records, and described at 77 *Federal Register* 67218 (November 8, 2012).

11. <u>Justification for Sensitive Questions</u>

Not applicable.

12. Estimated Burden and Burden Hour Cost

It is estimated that 20 NRC Form 445s will be completed annually by NRC's non-Federal consultants, contractors and invited travelers. The current rate of travel is lower than previous years, and has varied greatly from year to year during the most recent renewal cycle (16 in 2011, 11 in 2012 and 6 in 2013). It is estimated that the annual burden for the next cycle will be 40 hours (20 respondents x 2 hours per response). At a professional hourly rate of \$272/hr., the annual cost is \$10,880.

13. Estimate of Other Additional Costs

There are no additional costs.

14. Estimated Annualized Cost to the Federal Government

The total estimated annualized cost to the NRC for reviewing and assessing NRC Form 445 is \$5,440 (\$272 per hour x 1 hour per form x 20 forms per year). This cost is fully recovered through fee assessment to NRC licensees pursuant to 10 CFR Parts 170 and/or 171.

15. Reasons for Changes in Burden or Cost

The overall burden for completing NRC Form 445 has decreased by 10 burden hours from 50 hours to 40 hours. The reason for the change is due to both a downward adjustment in the number of respondents (from 50 to 20 respondents), and an increase in the per-respondent time needed to complete the form (from 1 hour to 2 hours per form).

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There has also been an increase in the cost of the hourly fee rate from \$259 to \$272 per hour.

16. <u>Publication for Statistical Use</u>

This information will not be published for statistical use.

17. Reason for Not Displaying the Expiration Date

Not applicable. The expiration date is displayed on the form.

18. Exceptions to the Certification Statement

Not applicable.

B. COLLECTIONS OF INFORMATION EMPLOYING STATISTICAL METHODS

Not applicable.