

FINAL SUPPORTING STATEMENT  
FOR  
NRC FORM 531 "REQUEST FOR TAXPAYER IDENTIFICATION NUMBER"  
OMB 3150-0188

EXTENSION

Description of Information Collection

The Debt Collection Improvement Act of 1996 (P.L. 104-134) was signed into law on April 26, 1996. Under this law, Federal agencies are required to collect Taxpayer Identification Numbers (TINs) from all persons who do business with the government. NRC Form 531 is used to collect TINs and information sufficient to identify the licensee or applicant for licenses, certificates, approvals and registrations. In 1997, requests for TINs were mailed to licensees in the vendor database for which there was no TIN on file. Based on experience, 300 requests for TINs will be mailed to new licensees each year.

A. JUSTIFICATION

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

The Debt Collection Improvement Act of 1996 requires all Federal agencies to obtain TINs from all persons who do business with the Government including contractors and recipients of credit, licenses, permits, and benefits.

2. Agency Use of Information

The TIN will be requested from all licensees and applicants for which we have not previously collected a TIN. The TIN will be entered into the vendor file of the Financial Accounting and Integrated Management Information System (FAIMIS), the NRC accounting system. The TIN will be used on payments (refunds) made to licensees by electronic funds transfer by the Department of the Treasury. The Department of the Treasury will use the TIN to determine whether the refund can be used to administratively offset any delinquent debts reported to the Treasury by other government agencies. In addition, the TIN will be used to collect and report to the Department of the Treasury any delinquent indebtedness arising out of the licensee's or applicant's relationship with 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 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 5 percent of all requests will

be submitted electronically. The NRC Form 531, Request for Taxpayer Identification Number, is presently on NRC's Website where it is electronically accessible to the licensees.

4. Effort to Identify Duplication and 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 information required by NRC Form 531 is needed for both small and large businesses in order to issue refunds owed to licensees. Approximately 300 responses are received annually of which 75% are small businesses.

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

The impact to the NRC of not conducting or conducting the collection of information less frequently will result in licensees and applicants not receiving payment due them from the NRC and will result in the Department of the Treasury being unable to perform administrative offset of delinquent debts. The frequency cannot be reduced because this is a one-time request for information from the public.

7. Circumstances Which Justify Variation from OMB Guidelines

This request does not vary from OMB guidelines.

8. Consultations Outside the NRC

Opportunity for public comment on the information collection requirements for this clearance package was published in the Federal Register on July 22, 2015, (80 FR 43477). Additionally, we contacted via email six licensees from Florida Power and Light, Powertech Uranium, Strata Energy, Inc., Ameren Missouri, Exelon Corp, and DTE Energy.

The following comments were received.

1. Is the proposed collection of information necessary for the NRC to properly perform its functions? Does the information have practical utility?

Comment: Yes / Yes - the ability to accurately allocate costs/refunds is necessary.

NRC Response: The NRC agrees with the comment that the proposed collection of information is necessary for the NRC to properly perform its function and has practical utility.

2. Is the burden estimate accurate?

Comment: No - The time estimated to complete the form is shown as 5 minutes. This time is accurate once all information is at hand. However, for some licensees this information may be readily available. Others may need to contact internal accounting organizations which may not be immediately known, requiring research time. Suggest changing the time estimate to 1 hour.

NRC Response: While the NRC does not agree with the comment that the time estimate should be 1 hour, a revision to account for additional time needed has been updated to reflect 15 minutes in the final notice.

3. Is there a way to enhance the quality, utility, and clarity of the information to be collected?

Comment: While the form itself is very simple, it is limited to three license numbers per form. Those entities with more than three licenses would apparently be required to submit multiple forms for the same TIN. Suggest the form be amended to increase the number of licenses that can be listed, or to indicate that if more room is required that a separate sheet may be attached listing all licenses that apply to the TIN.

NRC Response: NRC does not agree with the comment that the form should be revised to increase the number of licenses that can be listed. The form is used only to request taxpayer identification numbers from only licensees that currently are not on file with the NRC. The NRC researched and found the licensees that exceed three licenses already has a tax payer identification number on file and would not be required to complete this form.

4. How can the burden of the information collection be minimized, including the use of automated collection techniques or other forms of information technology?

Comment: Because the TIN is already provided by the Federal Government, as are the license numbers, it appears that all the information required is already known by the Federal Government and the NRC should be able to obtain from existing lists of companies, docket numbers, financial reports, project managers, etc., without recourse to the licensees. To ensure accuracy, a confirmatory report could be distributed to each TIN indicating the current understanding of TIN vs. licenses vs. company and asking for any corrections, if necessary.

NRC Response: The NRC does not agree with this comment as the NRC does not have access to a government wide database to obtain tax payer identification number information.

9. Payment or Gift to Respondents

Not applicable.

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 (b).

11. Justification for Sensitive Questions

Not applicable

12. Estimate of Annualized Burden and Burden Hour Cost

The estimated time to complete the form is fifteen minutes. The annual number of requests for TINs is 300. The estimated annual burden is 75 hours (.25 hr x 300 TINs). The public cost is computed as follows: 75 hours x \$268 per hour equals \$20,100.

13. Estimate of Other Additional Costs

There are no additional costs.

14. Estimated Annualized Cost to the Federal Government

The estimated annual cost to the Federal Government for data entry is \$20,100 (15 minutes per form x 300)/60 x \$268 = \$20,100.

15. Reasons for Change in Burden or Cost

The time estimated to complete the NRC Form 531 was shown as 5 minutes. This time is accurate once all information is at hand. However, for some licensees this information may be readily available. Others may need to contact internal accounting organizations which may not be immediately known, requiring research time. The estimated time was revised from 5 minutes to 15 minutes to accommodate organizations which may not have the information readily available. Due to this change, the overall burden increased by 50 hours from 25 hours to 75 hours. The cost has also increased because of the increase in the hourly rate from \$257 to \$268.

16. Publication for Statistical Use

This information will not be published for statistical use.

17. Reason for Not Displaying the Expiration Date

The expiration date will be displayed.

18. Exceptions to the Certification Statement

There are no exceptions.

B. COLLECTION OF INFORMATION EMPLOYING STATISTICAL METHODS

Not applicable.