

FINAL SUPPORTING
STATEMENT FOR
INVOICE SUBMISSIONS BY CONTRACTORS FOR NRC
CONTRACTS/ORDERS

(3150-0109)
EXTENSION

Description of the Information Collection

The U.S. Nuclear Regulatory Commission's (NRC) Office of Administration, Acquisition Management Division (AMD) provides contractors with an invoice template and instructions for how to properly prepare invoices so that they are complete and accurate. AMD requires contractors to follow the instructions when submitting invoices to the NRC to ensure that billed costs are proper for payment. Use of the invoice template is voluntary; contractors may submit a voucher/invoice in alternate format provided all requirements of the billing instructions are sufficiently addressed. Invoices that are not prepared in accordance with the instructions may be rejected.

The invoices provide NRC with costs incurred during the performance and through the final payment of the contract/order, to ensure compliance with the terms and conditions of the contract. The invoice provides a summary description of the services performed or products submitted for the invoice period and specifies the section or Contract Line Item Number (CLIN) or SubCLIN in the contract pertaining to the required deliverable(s). These instructions and template stipulate the items and level of detail in which supporting cost data must be submitted to facilitate the NRC's review of costs billed. The Invoicing Processing Platform (IPP) is a Web- based system that provides one integrated, secure system to simplify the management of vendor invoices, is more efficient invoice processing while automating invoice collection, validation and approval workflows. Vendors can manage their receivables more easily using one system to transact with multiple agencies.

A. JUSTIFICATION

To support the submission of invoices and supporting documentation, the NRC supplies contractors billing instructions with templates to follow during their preparation.

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 Bureau of Fiscal Service, Administrative Resource Center (ARC), AMD and the NRC Contracting Officer's Representative (COR). 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

The NRC has issued Guidance for Electronic Submissions to the NRC which provides direction for the electronic transmission and submittal of documents to the NRC. Invoices/vouchers shall be submitted electronically to the NRC through the Invoice Processing Platform (IPP) at www.ipp.gov. It is estimated that approximately 100 % of the responses are filed electronically.

To reduce the burden on contractors, contractors were requested, effective May 1, 2008, to electronically submit all vouchers/invoices to the NRC. However, contractors still have the option of submitting a hardcopy voucher/invoice. Voucher/invoices are submitted electronically 100 percent of the time. IPP can help federal agencies avoid Prompt Payment penalties by supporting more efficient invoice processing while automating invoice collection, validation and approval workflows. Vendors can manage their receivables more easily using one system to transact with multiple agencies.

4. Effort to Identify Duplication Use Similar Information

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

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. Proper documentation is required in order to justify and issue payment to all contractors, regardless of size. The NRC does attempt to pay small businesses more quickly in order to reduce the burden.

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

Less Frequently

If the collection was not conducted, and the NRC did not receive proper documentation to support invoice payments to contractors, it is likely that the number of improper payments would increase.

7. Circumstances Which Justify Variation From OMB Guidelines

There are no variations from OMB guidelines.

8. Consultation Outside the NRC

Opportunity for public comment on the information collection requirements for this clearance package has been published in the Federal Register on February 15, 2019 (84 FR 4546). NRC received one comment from the public that was out of scope. NRC also contacted four licensees by email and there were no comments 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(b).

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 \$275 hourly rate used in the burden estimates is based on the Nuclear Regulatory Commission's fee for hourly rates as noted in 10 CFR 170.20 "Average cost per professional staff-hour." For more information on the basis of this rate, see the Revision of Fee Schedules; Fee Recovery for Fiscal Year 2018 (83 FR 29622, June 25, 2018).

The burden estimates for this information collection are based on a projected 23 active contracts (i.e., 23 respondents). These 23 contracts are divided into the following type of contracts:

- Eight contracts have no task orders (TOs) associated with them, and are billed monthly (i.e., 8 bills annually).
 - Four contracts have TOs which are for projects not related to license fees, and have a total of six (6) TOs and an average of four billings annually per TO.
 - 11 contracts have TOs for license fee recoverable projects with a total of 113 TOs and an average of four billings per TO.

- The 11 contracts listed above require an additional 220 hours for contractors to prepare the License Fee Recovery Cost Summary, which has a total of 113 TOs and is prepared an average of four times per year.

The total hourly reporting burden for this collection is 348 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 @ \$275/Hr.
NRC Cost Type Contracts							
No Task Order or License Fee Recovery Contract	8	NA	8	64	0.5	32	\$8,800
Task Order – Not License Fee Related	4	12	4	192	0.5	96	\$26,400
Task Order – License Fee Related	11	10	4	440	0.5	220	\$60,500
License Fee Recovery Cost Contracts							
Preparation of License Fee Recovery Cost Summary for License Fee Related Task Orders	11	10	4	440	0.5	220	\$60,500
Total	23			696		568	\$156,200

The license fee recovery section of the billing instructions is included in cost type contracts that include fee recoverable work. The section on licensing fee costs generally applies to contracts for plant inspections, licensing actions or other site-specific activities.

13. Estimate of Other Additional Costs

There are no additional costs.

14. Estimated Annualized Cost to the Federal Government

The staff has developed estimates of annualized costs to the Federal Government related to the conduct of this collection of information. These estimates are based on staff experience and subject matter expertise and include the burden needed to review, analyze, and process the collected information and any relevant operational expenses.

Total cost to the agency is \$251,900.

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 @ \$275/Hr.
NRC Cost Type Contracts							
No Task Order or License Fee Recovery Contract	8	NA	8	64	1.0	64	\$17,600
Task Order – Not License Fee Related	4	12	4	192	1.0	192	\$52,800
Task Order – License Fee Related	11	10	4	440	1.0	440	\$121,000
License Fee Recovery Cost Contracts							
Preparation of License Fee Recovery Cost Summary for License Fee Related Task Orders	11	10	4	440	0.5	220	\$60,500
Total	34			696		916	251,900

15. Reasons for Changes in Burden or Cost

The number of responses decreased from 1,506 to 696 , the number of burden hours decreased by 404 (from 752 to 348 hours) and the number of cost type contracts projected within the next 3 years decreased by 18 (from 41 to 23). Specific changes are described below:

- The agency utilized category management principles to reduce the overall number of active contracts at the NRC.
- Contracts which have no TOs or license fee recovery associated with them and provide for monthly billing decrease by 14 contracts (from 22 to 8).
- Four contracts which have TOs associated with them have no license fee recoverable.
- TOs associated with the 11contracts with recoverable license fees decrease by 7 (from 120 TOs to 113 TOs.)

Also, the number of active cost type contracts decreased (from 41 to 23), annual reporting costs decreased (from \$209,808 to \$97,500) and estimated annual cost to the Government decreased (from \$337,869 to \$251,900), notwithstanding an decrease in the cost for professional effort from \$279 to \$275 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.