

FINAL OMB SUPPORTING STATEMENT FOR  
NRC FORM 446  
REQUEST FOR APPROVAL OF INTERNATIONAL TRAVEL BY  
NON-GOVERNMENT PERSONNEL  
(OMB 3150-XXXX)

NEW

DESCRIPTION OF THE INFORMATION COLLECTION

This form is used to request approval by the U.S. Nuclear Regulatory Commission (NRC) Office of International Programs for official international travel by non-Federal consultants and invited travelers (i.e., non-NRC employees) conducting official business on behalf of the NRC under a contract with no provisions for official international travel. This approval is required in accordance with NRC Management Directive 5.13, "NRC International Activities, Practices, and Procedures" and Management Directive 14.1, "Official Temporary Duty Travel".

The form collects the traveler's name, employer, destination country, departure and return dates, the purpose of the travel, a list of NRC staff et al with whom the travel has been coordinated, other NRC travelers and contractors participating on the same trip, and a proposed itinerary. Additionally, the form requires pre-approval of the NRC Office or Region recommending travel, approval by the Office Director or Regional Administrator, and the Deputy Director of the Office of International Programs.

A. Justification

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

NRC Form 446 is the mechanism by which NRC is advised of and approves official international travel for its non-Federal consultants and invited travelers who are not working under an active NRC contract with provisions for official international travel.

2. Agency Use of Information

Information collected on NRC Form 446 is used to determine whether proposed official international travel for its non-Federal consultants and invited travelers who are not traveling under an active NRC contract with provisions for official international travel should be approved and to ensure that only the minimum number of individuals required proceed on an official trip.

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.

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. Electronic transmission and submittal of documents can be accomplished via the following avenues: (1) the Electronic Information Exchange (EIE) process, which is available from the NRC's "Electronic Submittals" Web page; (2) by Optical Storage Media (OSM) (e.g. CD-ROM, DVD); (3) by facsimile or; (4) by e-mail. However, because Form 446 requires

multiple signatures and concurrences it does not lend itself to electronic submission. No electronic submissions of NRC Form 446 are expected.

4. Effort to Identify Duplication and Use Similar Information

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

5. Effort to Reduce Small Business Burden

While potential respondents may represent a small business, the information requested provides the minimum information required to authorize the proposed official international travel and is independent of the size of the business responding.

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

Without the information collected through NRC Form 446, NRC will be unable to perform its fiduciary responsibilities associated as part of effective oversight of proposed official international travel by non-Federal consultants or contractors who are not working under an active NRC contract with provisions for official international travel 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 Federal Register on August 27, 2020 (85 FR 53023). Four potential respondents were contacted via email, each of whom is a non-federal employee with one of the potential respondents currently working under an active NRC contract that contains no provisions for official international travel. No comments or responses were received in response to these consultations.

9. Payment or Gifts to Respondents

Not applicable.

10. Confidentiality of the 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. Estimated Burden and Burden Hour Cost

It is estimated that 1 NRC Form 446 will be completed annually by individuals who are not NRC employees, contractors, or consultants. It is estimated that the annual burden will be 1 hour (1 respondent x 1 hour per response). The annual cost is \$278 (1 response x 1 hour per response x \$278 per hour). There is no recordkeeping burden imposed on respondents.

The \$278 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 2019 (84 FR 22331, May 17, 2019).

13. Estimate of Other Additional Costs

The NRC has determined that the records storage cost is roughly proportional to the recordkeeping burden cost. Based on a typical clearance, the records storage cost has been determined to be equal to 0.0004 times the recordkeeping burden cost. Since this clearance has no recordkeeping burden for 2020, the storage cost for this clearance is \$0.00 (0 recordkeeping hours x 0.0004 x \$278).

14. Estimated Annualized Cost to the Federal Government

The total estimated annualized cost to the NRC for reviewing and assessing NRC Form 446 is \$278 (\$278 per hour x 1 per form x 1 form per year).

15. Reasons for Changes in Burden or Cost

This is a new collection to collect international travel information from non-Federal travelers.

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. COLLECTIONS OF INFORMATION EMPLOYING STATISTICAL METHODS

Not applicable.