

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 (ADM), 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. Contractors 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, NRC's cognizant Contracting Officer, and the NRC's cognizant Contracting Officer's Representative. 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](http://www.ipp.gov). It is estimated that approximately 99% 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 99 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 April 15, 2021 (87 FR 22583). The NRC received one comment from Don Beckman of Beckman & Associates, Inc. during the comment period. **Comment:** Beckman & Associates, Inc. is concerned that providing a method of submittal which does not afford a suitable opportunity for the contractor to apply their due diligence to the information submitted is inappropriate; and the diversity in the data collection, processing, invoice preparation and electronic accounting systems across the spectrum of NRC and its contractors begs the question of whether an IT curative solution for minimizing burden

might not be so difficult as to have the unintended consequences of increased burden and contractor costs. **NRC response:** The NRC is taking steps to streamline government processes, including data collection and invoice processes, so that the burden of the information collection and invoice processing be minimized.] In addition, a public consultation was conducted and the following stakeholders were contacted [Beckman & Associates, inc.; Energy Research, Inc.; Numark Associates, Inc.; S C & A, Inc.; University of Wisconsin System; and Xcel Engineering, Inc.] The NRC received one comment, as a result of public consultation, from Numark Associates, Inc. To date, NUMARK has only used the IPP system for invoice submission on one task order and their experience with the system is limited.

#### 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 Annual Burden Hours and Cost

The \$288 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 2021 (86 FR 32146, June 17, 2021).

The burden estimates for this information collection are based on a projected 36 active fee billable and non-fee billable cost-reimbursement contracts/task orders (i.e., 36 respondents). These contracts are divided into the following type of contracts:

- Seven (7) contracts have no task orders (TOs) associated with them, and are generally billed monthly, with an average of 7 billings per contract (49 billings annually).
- Five (5) contracts have TOs which are for projects **not** related to license fees, and are generally billed monthly, with an average of 65 billings per contract (325 billings annually).
- 24 contracts have TOs which are for projects related to license fees, and are generally billed monthly, with an average of 14 billings per contract (336 bills annually). [NOTE: These contracts require 336 annual burden hours for reparation of fee recoverable work, associated with Task Orders; and the licensing fee costs, generally, applies to contracts for plant inspections, licensing actions or other site-specific activities.]

- The total hourly burden reporting for this collection is 1046 hours.

### Estimated Annual Reporting Requirements

Contract/Task Order Type	Number of Contracts	Avg. # Invoices per TO	Annual Responses per Respondent/ Task Order	Total # Responses	Burden per Response (Hours)	Total Annual Burden Hours	Cost @ \$288/Hr.
<b>NRC Cost Type Contracts</b>							
No Task Order or License Fee Recovery Contract	7	N/A	7	49	1	49	\$14,112
Task Order – <b>Not</b> License Fee Related	5	65	5	325	1	325	\$93,600
Task Order – License Fee Related	24	14	24	336	1	336	\$96,768
<b>License Fee Recovery Cost Contracts</b>							
Preparation of License Fee Recovery Cost Summary for License Fee Related Task Orders	24	14	24	336	1	336	\$96,768
<b>Total</b>	<b>36</b>			<b>710</b>		<b>1046</b>	<b>\$301,248</b>

#### 13. Estimate of Other Additional Costs

There are no additional costs.

#### 14. Estimated Annual 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 \$602,496, as calculated by the table below.

## 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 @ \$288/Hr.
<b>NRC Cost Type Contracts</b>							
No Task Order or License Fee Recovery Contract	7	N/A	7	49	2	98	\$28,224
Task Order – <b>Not</b> License Fee Related	5	65	5	325	2	650	\$187,200
Task Order – License Fee Related	24	14	24	336	2	672	\$193,536
<b>License Fee Recovery Cost Contracts</b>							
Preparation of License Fee Recovery Cost Summary for License Fee Related Task Orders	24	14	24	336	2	672	\$193,536
<b>Total</b>	<b>36</b>			<b>710</b>		<b>2092</b>	<b>\$602,496</b>

### 15. Reasons for changes in Burden or Cost

The number of responses increased from 696 to 710. The number of annual burden hours increased from 568 to 1,046. The burden increase is primary due to an increase in the number of fee-related contracts and tasks orders. The change in responses is the result of two offsetting factors. There is an increase in responses due to an observed increase in the average number of invoices per task order. This increase was partially offset by a decrease due to a change in how the agency is calculating the number of responses to better reflect the structure of the contracts.

### 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.