

DRAFT SUPPORTING STATEMENT FOR
BILLING INSTRUCTIONS FOR NRC COST TYPE CONTRACTS
(3150-0109)
CLEARANCE EXTENSION

Description of the Information Collection

The NRC Division of Contracts (DC), in administering its contracts, provides contractors with Billing Instructions to follow when preparing invoices, to ensure billed costs are proper for payment. These instructions stipulate the level of detail in which supporting cost data must be submitted for the Nuclear Regulatory Commission (NRC) review of costs billed. Included with the instructions, for contractor reference, is a sample format that can be used when preparing the voucher/invoice. The contractor may submit a voucher/invoice in alternate formats provided all requirements of the billing instructions are addressed.

A. JUSTIFICATION

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 National Business Center (NBC) of the Department of the Interior, the DC, and the NRC Project Officer (PO). 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. To reduce the burden on contractors, effective May 1, 2008, contractors were requested to electronically submit all vouchers/invoices to the NBC. However, contractors still have the option of submitting a hardcopy voucher/invoice. Voucher/invoices are submitted electronically 100% of the time.
4. Effort to Identify Duplication Use Similar Information. The Billing Instructions for NRC Cost Type Contracts, use of a sample voucher/invoice format, and use of a monthly contracting cost summary report for fee billings for collection of information are unique to NRC. Costs incurred are unique to the contract and the billing period for which payment is requested. Cost information to be provided by the contractor is not otherwise available.
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.

6. Consequences to Federal Program or Policy Activities if the Collection Is Not Conducted or is Conducted Less Frequently. Contractors are required to complete and submit vouchers/invoices and attachments once each month unless otherwise authorized by the Contracting Officer. The consequence of not collecting the data, or of less frequent collection, would be withholding of reimbursement to the contractor of costs incurred as the work progresses. The provisions of FAR Clause 52.216-7, require payment be made upon request, but (except for small business concerns) not more often than once every two weeks.
7. Circumstances Which Justify Variation From OMB Guidelines. To ensure prompt payment is made to the contractor, the contractor must electronically submit a proper voucher/invoice, including supporting documentation, which is reviewed and approved by NBC. If it is determined that the voucher/invoice was properly prepared, payment will be made 30 calendar days from receipt of the proper voucher/invoice. If it is determined that the voucher/invoice is not proper, payment will be made 30 calendar days from receipt of the proper invoice. This procedure ensures compliance with the requirements of the Prompt Payment Act, as amended.

The agency-designated billing office for submittal of the voucher/invoice is the NBC. The payment process begins once NBC electronically receives a proper invoice. NBC sends the voucher/invoice electronically to the PO and DC for review and approval. The PO reviews and approves the electronic copy and then it is electronically sent to DC for final review and approval. After DC reviews and approves the voucher/invoice, it is electronically sent to NBC for final processing (payment).

8. Consultation Outside the NRC. The opportunity for public comment on the information collections was published in the Federal Register.
9. Payment or Gift to Respondents. None
10. Confidentiality of Information. NRC provides no pledge of confidentiality for this collection of information. To the extent information is business confidential, procedures are in place to protect the information from improper disclosure.
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 total annual contractor burden for the Billing Instructions and License Fee Recovery Cost Summary for NRC cost type contracts is estimated to be 1,202 hours. Billing burden is 812 hours at a cost of \$193,256 ((45 contracts x 12 invoices x .50 hr. (30 minutes) = 270 hrs.)

plus (271 task orders [195 task orders or 390 hours for license fee related task orders plus 76 task orders or 152 hours not license fee related task orders] x 4 invoices x .50 hr. (30 minutes) = 542 hrs.) = 812 hrs. x \$238/hr. = \$193,256). Licensee Fee recovery burden requires an additional 390 hours to prepare the

License Fee Recovery Cost Summary at a cost of \$92,820 (195 task orders x invoices x .50 hr. (30 minutes) = 390 hrs. x \$238/hr. = \$92,820). Total estimated cost to the public is \$286,076 (\$193,256 + \$92,820 = \$286,076).*

While the license fee recovery section of the billing instructions will be included in all cost reimbursement type contracts, the section on licensing fee costs generally only applies to task order contracts for plant inspections, licensing actions or other site specific activities.

*(Estimates are based on 64 active contracts. 45 contracts have no task orders or license fee recovery associated with them and provide for monthly billing. 19 contracts are task order contracts with an average of 4 billings per task order. 13 task ordering contracts are not license fee recoverable. 82 active task orders are associated with these 13 contracts. 6 task ordering contracts are license fee recoverable. 95 active task orders are associated with these 6 contracts. 542 hours are associated with all 271 task orders. The license fee related task orders require an additional 390 hours to prepare the License Fee Recovery Cost Summary.)

13. Estimate of Other Additional Costs. None.
14. Estimated Annualized Cost to the Federal Government. The cost to the agency for these Billing Instructions and the Licensee Fee Recovery Cost Summary was derived from experience as to the approximate number of hours contract specialists, program and paying office personnel expend in ensuring that contractors comply with the instructions. Contract, program and paying office personnel expend an average of 1 hour per response for a cost of \$386,512 ((45 contracts x 12 invoices x \$238/hr. = \$128,520) plus (271 task orders x 4 invoices x \$238/hr. = \$257,992) = \$386,512). Program and paying office personnel expend an average of .5 hour per response to review the License Fee Recovery Cost Summary for a cost of \$92,820 (195 task orders x 4 invoices x .5/hr. x \$238/hr. = \$92,820). These costs are fully recovered by fee assessments to NRC licensees pursuant to 10 CFR Part 171. Total cost to the agency is \$479,332 (\$386,512 + \$92,820) (See * in paragraph 12 above)
15. Reasons for Changes in Burden or Cost. There is no change in burden. However, the cost for professional effort has increased from \$201 to \$238 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.