

DRAFT OMB SUPPORTING STATEMENT FOR  
NUREG/BR-0238, Materials Annual Fee Billing Handbook,  
NUREG/BR-0239, Financial EDI Authorization  
(NRC Form 628, "Financial EDI Authorization")  
NUREG/BR-0253, Fact Sheet -- Electronic Funds Transfer,  
and NUREG/BR-0254, Payment Methods  
(NRC Form 629, "Authorization for Payment by Credit Card")

(OMB Clearance 3150-0190)

REVISION

Description of the Information Collection

The Office of the Chief Financial Officer is responsible for billing licensees, applicants, and individuals for payment of civil penalties, full cost licensing fees, and inspection fees. The four methods used to pay bills owed the NRC are: (1) Payment by Automated Clearinghouse Network (ACH); (2) Payment by Credit Card; (3) Payment by Electronic Funds Transfer; and (4) Payment by Check. The above NUREGs are used in the billing cycle to instruct licensees how to transfer monies owed the NRC. The payment methods are defined in the above NUREGs. The ACH (NUREG/BR-0239) which now has an accompanying NRC Form 628, "Financial EDI Authorization," and Payment Methods (NUREG/BR-0254) which also has an accompanying NRC Form 629, "Authorization for Payment by Credit Card," are the payment methods that impose information collection burdens on licensees and are described in this Supporting Statement.

A. JUSTIFICATION

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

NRC Form 628, "Financial EDI Authorization," is an option used to make payment through the Automated Clearinghouse (ACH) Network. This form authorizes the licensee's bank to pay invoices to the NRC through the ACH. The NRC Form 628 requests the licensee's name, electronic funds transfer contact, telephone number, address, authorized signature and title.

NRC Form 629, "Authorization for Payment by Credit Card," is another option used to authorize payment by credit card. The Department of the Treasury has negotiated an agreement with the plastic card network that eliminated the ceiling of \$1,800 per transaction previously allowed. The credit card authorization form is used by licensees to authorize payment by credit card for license fees. The form solicits information that identifies the cardholder's name, address, account number, card expiration date, cards accepted, cardholder's signature, invoice number or license number.

There are no recordkeeping requirements associated with this collection.

2. Agency Use of Information.

The agency properly credits monies received through the ACH and credit card companies when these two methods are utilized by the licensees to pay their indebtedness to the NRC.

3. Reduction of Burden Through Information Technology.  
There is no legal obstacle to reducing the burden associated with this information collection by use of information technology. Moreover, NRC encourages licensees to make payment through Electronic Funds Transfer (EFT). This action is consistent with the Debt Collection Improvement Act of 1996.
4. Effort to Identify Duplication and Use Similar Information.  
The Information Requirements Control Automated System (IRCAS) was searched for duplication, and none was found.
5. Effort to Reduce Small Business Burden  
Many of the licensees billed annually are small businesses. Efforts have been made to keep the method of collecting fees as simple as possible and requirements for information have been kept to a minimum.
6. Consequences to Federal Program or Policy Activities if the Collection Is Not Conducted or Is Conducted Less Frequently.  
The impact to the NRC fee program if the collection is not conducted or is conducted less frequently will be a minimal effect. Licensees, applicants and individuals will continue to have two options open to them to pay future bills and invoices mailed to them. They may send a check or use an electronic funds transfer through FedWire.
7. Circumstances which Justify Variation from OMB Guidelines.  
Not Applicable.
8. Consultations Outside the NRC.  
The opportunity for public comment has been published in the Federal Register.
9. Payment or Gift to Respondents.  
Not Applicable.
10. Confidentiality of the Information. NRC provides no pledge of confidentiality for the collection. To the extent information is business confidential, procedures are in place to protect the information from improper disclosures.
11. Justification for Sensitive Questions.  
Not applicable.
12. Estimate of Burden and Burden Hour Cost.  
The total estimated time to read instructions and complete NRC Form 628 is about 5 minutes. It is estimated that approximately 50 forms will be completed annually at a cost of \$600 (5 minutes [.08 hr/form] x 50 forms x \$150). The annual estimated burden is 4 hrs (50 forms annually x .08 = 4hrs.).  
  
The total estimated time to read instructions and complete NRC Form 629 is about 5 minutes. It is estimated that approximately 40 forms will be completed monthly with an estimated 480 forms (40 monthly x 12) received annually at a cost of \$5,700 (5 minutes [.08 hr/form] x 480 form x \$150). The annual estimated burden is 38 hours (40 monthly x 12 = 480 x .08 hours)

The total estimated burden is 42 hours (4 hrs + 38 hours) at a cost of \$6,300 (\$600 + \$5,700).

13. Estimate of Other Additional Costs.  
None.
14. Estimated Annualized Cost to the Federal Government.  
EDI Financial Forms (NRC Form 628) and Credit Card Forms (NRC Form 629) are processed by third party entities for the NRC annually. There is no cost to the NRC because the cost for this service, by the third party, is assumed by the Department of the Treasury.
15. Reasons for Changes in Burden or Cost.  
The overall estimated burden decreased from 106 hours to 42 hours and the estimated number of responses also decreased from 1,320 to 530 because of the following:  
  
(1) the burden for NRC Form 628 was reduced by 20 hours from 24 to 4 hours because of a decrease in the number of forms received from 300 to 50, as licensees only need to sign up once to make payments through the Automated Clearinghouse Network. In March 1999, the brochure on EDI Authorizations (NUREG/BR-0239) was discontinued because of the high cost of printing by the lock box bank to send out to potential customers and also because NRC encountered problems with the prepaid postage stamp on the brochures, and was no longer able to use the prepaid postage brochure. Thus, the authorization forms are now enclosed with each invoice issued in addition to a copy of the payment methods brochure, which EDI is a payment method.  
  
(2) the burden for NRC Form 629 was reduced by 44 hours from 82 to 38 because of a decrease in the number of forms received from 1,020 forms to 480, because the initial burden over estimated the number of responses anticipated and the implementation of the new negotiated agreement with the plastic card network. Thus, the number of estimated licensees using the credit card authorization form did not materialize.
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. COLLECTION OF INFORMATION EMPLOYING STATISTICAL METHODS

Not applicable.