

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

Description of the Information Collection

In administering its contracts, the NRC Division of Contracts provides Billing Instructions for its contractors to follow in preparing invoices. These instructions stipulate the level of detail for supporting data that must be submitted for NRC review. Included with the instructions is a voucher/invoice format sample for the contractor's reference. The contractor may submit a voucher/invoice in alternate formats provided all requirements of the billing instructions are addressed. The review of this information ensures that all payments made by the NRC are for valid and reasonable costs in accordance with the contract terms and conditions.

A. JUSTIFICATION

1. Need for the Collection of Information. The cost information is needed for license fee recovery and to assure that costs incurred are allowable and allocable and that the amount requested is proper for payment.
2. Agency Use of Information. Vouchers and supporting documentation are reviewed by the Division of Accounting and Finance (DAF), Division of Contracts (DC), and the Project Officer. Taken together, the review ensures that 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 submissions. Receipt of properly prepared vouchers expedites the review process and permits prompt payment.
3. Reduction of Burden Through Information Technology. There are no legal obstacles to reducing the burden associated with this information collection through the use of information technology assuming that sensitive information can be protected from improper disclosure. NRC encourages the use of information technology whenever possible. NRC issued a regulation on October 10, 2003 (68 FR 58791), consistent with the Government Paperwork Elimination Act, which allows its licensees, vendors, applicants, and members of the public the option to make submissions electronically via CD-ROM, e-mail, special Web-based interface, or other means. However, because this information collection does not readily lend itself to the use of information technology because of the varied formats in which the information can be submitted and the infrequency of the submission, there currently are no electronic submissions for this clearance.
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 and supporting detail required for review to assure that 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 invoices and attachments in an original and three copies 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 counter to the provisions of FAR Clause 52.216-7, which required that 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. An original and three copies of the invoice are required to ensure that payment is made to the contractor promptly upon receipt of a properly approved invoice or within 30 calendar days of the official agency receipt date, whichever is earlier. This procedure ensures compliance with the requirements of the Prompt Payment Act, as amended.

Due to the turnaround time required by the Prompt Payment Act, there is not sufficient time required to copy the voluminous number of vouchers/invoices. The agency-designated billing office is the DC for receipt of the original and three copies of the contractor request for payment (voucher/invoice) to reduce unnecessary delay in the payment process. The payment process begins once DC receives a proper invoice. DC forwards two copies to the Project Officer for review and approval. The Project Officer retains one copy and signs and returns one copy to DC. DC holds the original voucher/invoice and one copy. Upon receipt of the Project Officer's signed copy, the original voucher/invoice and one signed copy is forwarded to the DAF for final processing. DC retains one copy as a suspense copy until DAF pays the voucher/invoice.

8. Consultation Outside the NRC. An opportunity to comment on the Information Collection Requirements has been 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 are processed which involve sensitive material. 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 1,070 hours. Billing burden is 754 hours at a cost of \$151,554 ((35 contracts x 12 invoices x .50 hr. (30 minutes) = 210 hrs.) plus (272 task orders [158 task orders or 316 hours for license fee related task orders plus 114 task orders or 228 hours not license fee related task orders] x 4 invoices x .50 hr.(30 minutes) = 544 hrs.) = 754 hrs. x \$201/hr. = \$151,554). Licensee Fee recovery burden requires an additional 316 hours to prepare the License Fee Recovery Cost Summary at a cost of \$63,516 (158 task orders x 4 invoices x .50 hr. (30 minutes) = 316 hrs. x \$201/hr. = \$63,516). Total estimated cost to the public is \$215,070 (\$151,554 + \$63,516= \$215,070)*. 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 55 active contracts. Thirty-five contracts have no task orders or license fee recovery associated with them and provide for monthly billing. The other 20 contracts are task order contracts with an average of 4 billings per task order. License fee recovery is not applicable to 17 task ordering contracts. 114 active task orders are associated with these 17 contracts. License fee recovery is applicable to 3 contracts. 158 active task orders are associated with these 3 contracts. 544 hours are associated with all 272 task orders. The license fee related task orders require an additional 316 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 officer 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 \$303,108 ((35 contracts x 12 invoices x \$201/hr. = \$84,420) plus (272 task orders x 4 invoices x \$201/hr. = \$218,688) = \$303,108). Program and paying officer personnel expend an average of .5 hour per response to review the License Fee Recovery Cost Summary for a cost of \$63,516 (158 task orders x 4 invoices x .5/hr. x \$201/hr. = \$63,516). These costs are fully recovered by fee assessments to NRC licensees pursuant to 10 CFR Part 171. Total cost to the agency is \$366,624 (\$303,108 + \$63,516). (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 \$152 to \$201 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.