**DRAFT SUPPORTING STATEMENT**
For
NRC Form 212, "Qualifications Investigation
Professional, Technical, and Administrative Positions
(other than clerical positions)"

OMB Clearance No. 3150-0033

Extension Request

Description of Information Collection

This form is used for investigating the qualifications of external candidates for appointment to professional, technical, and administrative positions in the Nuclear Regulatory Commission (NRC). This extension package reflects a consistent number of forms projected to be received by the NRC and no change in the burden for the next three-year clearance period.

## A. JUSTIFICATION

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

   Information requested on NRC Form 212 is used to determine the qualifications and suitability of applicants for employment in professional, technical, and administrative positions (other than clerical positions) with the U.S. Nuclear Regulatory Commission. The completed form may be used to examine, rate and/or assess the prospective employee's qualifications. The information regarding the qualifications of applicants for employment is reviewed by professional personnel of the Office of Human Resources, in conjunction with other information in the NRC files, to determine the qualifications of the applicant for appointment to the position under consideration.

2. Agency Use of Information

   The NRC Form 212 is sent to former employers, supervisors, and other references indicated on job applications as a part of the investigation for suitability of external candidates for appointment to professional positions. The information obtained on NRC Form 212 is reviewed and evaluated by personnel of the Office of Human Resources in determining the qualifications of applicants for employment.

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. 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. The non-recurrence of each individual collection makes it difficult to reduce the burden through the use of

technology. However, the NRC encourages the respondents to use any innovative technology which would reduce burden. It is estimated that approximately 0% of the potential responses are filled electronically.

4. Effort to Identify Duplication and Use of Similar Information

No sources of similar information are available. There is no duplication of requirements. NRC has in place an ongoing program to examine all information collections with the goal of eliminating all duplication and/or unnecessary information collections.

5. Effort to Reduce Small Business Burden

Information may be requested from individuals associated with small businesses; however, the amount of information requested is kept to a minimum while still allowing a full investigation.

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

This information has to be collected and reviewed prior to making a decision on employment eligibility.

7. Circumstances Which Justify Variation from OMB Guidelines

This request does not vary from OMB guidelines.

8. Consultations Outside the NRC

Opportunity for public comment on the information collection requirements for this clearance package has been published in the *Federal Register*.

9. Payment of Gift to Respondents

Not applicable.

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

Not applicable.

12. Estimate of Annualized Burden and Burden Hour Cost

Past experience indicates that it takes about 15 minutes to complete a form. The total estimated burden for the approximately 1,200 forms received annually is 300 hours (.25 hours x 1,200 forms). The estimated annual cost is $64,200 (300 hours x $214.00/hour).

13. Estimate of Other Additional Costs

Not applicable.

14. Estimate of Annualized Cost to the Federal Government

The total estimated annual cost to the Federal Government for printing, handling, reviewing, and assessing the NRC Form 212 is $64,200 (300 hours x $214.00/hour). This cost is fully recovered through fee assessments to NRC licensees pursuant to 10 CFR Parts 170 and 171.

15. Reasons for Change in Burden or Cost

There is no change in burden. There has been an increase in the overall cost as a result of an increase in the rate from $157.00/hour to $214.00/hour.

16. Publication for Statistical Use

This information is not published for statistical use.

17. Reason for Not Displaying the Expiration Date

The expiration date is displayed on the form.

18. Exceptions to the Certification Statement

Not applicable.

## B. COLLECTION OF INFORMATION EMPLOYING STATISTICAL METHODS

Not applicable.