FINAL OMB SUPPORTING STATEMENT FOR
NRC FORM 277
"Request for Visit or Access Approval"

(3150-0051)
Extension Request

Description of the Information Collection

The information collection associated with the NRC Form 277, "Request for Visit or Access Approval," affects any employee of two current NRC contractors who: (1) hold an NRC access authorization, and (2) need to make a visit to NRC, other contractors/licensees or government agencies in which access to classified information will be involved or unescorted area access is desired. The completed NRC Form 277 contains a signature certification of the NRC access authorization and of an official need-to-know. Only a minimal amount of other identifying or pertinent information (e.g., date of birth, clearance type, dates of visit) is requested by the form.

Personal information contained on the completed form is handled and protected in accordance with NRC directives and provisions of the Privacy Act of 1974.

Other information contained on, or pertaining to, the form (e.g., reporting requirements) is available for public inspection in accordance with 10 CFR Part 9.

The use of NRC Form 277 affords some assurance that only properly cleared and authorized individuals, who require access as a part of their official duties, will have such access during visits to other facilities and agencies. Therefore, the use of the NRC Form 277 benefits the NRC security program and public at large.

A. JUSTIFICATION

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

Section 4.2 Executive Order (E.O.) 12958 states a person may have access to classified information provided that: (1) a favorable determination of eligibility for access has been made by an agency head or the agency head's designee ... and the person has a need-to-know the information. Further, Section 4.3 requires agencies to "... establish controls over the distribution of classified information to assure that it is distributed only to organizations or individuals eligible for access who also have a need-to-know the information. The use of the NRC Form 277, as cited in NRC Management Directive 12.3 applicable to contractors, is the method by which NRC can provide assurance of compliance with the above provisions of E.O. 12958. The NRC Form 277 provides the facility/agency to be visited with verification of the visitor's NRC access authorization and certification of their official need-to-know for the classified information regarding the visit. By requiring the information collection contained on the NRC Form 277, the facility/agency can assure that only properly cleared and authorized individuals will be permitted access during a visit.

2. Agency Use of Information

The NRC Form 277 is forwarded by the contractor through the appropriate NRC office exercising oversight authority for certification of need-to-know to the NRC Division of Facilities and Security (DFS). After clearance verification, DFS forwards the completed form to the security office having cognizance over the facility to be visited. The security office of the facility being visited uses the information collected to confirm identity of the visitor and to permit the visitor access to the requested classified information/area. Failure to use the NRC Form 277 by the contractor may result in denied access to classified information or areas which are necessary in the accomplishment of official duties.

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. It is estimated that approximately 98% of the potential responses are filed electronically.

4. Effort to Identify Duplication and Use 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

The burden associated with the occasional use of this form is so minimal that there would be no significant burden on a contractor, if they did qualify as a small business enterprise or entity.

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

The frequency of information collection is dependent on the number of visits an individual makes to Government agencies or facilities. In most cases, a less frequent collection would mean eliminating the collection, as visits by contractors, for which the NRC Form 277 would be required, are infrequent. If the information is not collected, access by the visitor to classified information or areas, necessary in the accomplishment of official duties, may be denied. Further, a reduction in the collection of the information required by the NRC Form 277 would reduce the assurance that only properly cleared and authorized individuals will be permitted access during a visit. Thus, less frequent collection

may endanger the U.S. common defense and national security.

7. Circumstances Which Justify Variation from 0MB Guidelines

There is no variation from OMB Guidelines in the collection of information.

8. Consultations Outside the Agency

Opportunity for public comment on the information collection requirements for this clearance package was published in the Federal Register on February 7, 2007 (72 FR 5754). No comments were received.

9. Payment or Gift to Respondents

Not applicable.

10. Confidentiality of the 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

NRC does request sensitive information on this form.

12. Estimated Annualized Burden and Burden Hour Cost

An estimated 10 minutes (based on staff experience) is required to complete each NRC Form 277, resulting in a total annual burden to the public of 1 hour (6 responses X 10 minutes ÷ 60.) The estimated annual cost shared between the two contractors is $214.00 (1 hour X $214 per hour.)

13. Estimate of Other Additional Costs

None

14. Estimated Annualized Cost to the Federal Government

The estimated annual cost to the Federal Government associated with the NRC Form 277 is $173.53. The cost was computed as follows:

NOTE: Annual form usage for NRC contractors is estimated as 6.

COST:
Annual clerical effort
(6 x 10 minutes = 1.0 hrs. X $60/hr.) = $ 60

Annual professional effort

(6 x 5 minutes = 0.5 hrs. X $214/hr.) = $ 107

Annual record holding (3 yrs.)
(1/32 cu. ft. X $209/cu. ft.) = $ 6.53

Total estimated annual cost = $ 173.53

This cost is fully recovered through fee assessment to NRC licensees pursuant to 10 CFR Parts 170 and/or 171.

15. Reasons For Changes in Burden or Cost

There was no change in burden during the past 3 year clearance cycle. However, the cost for professional effort has increased in accordance with Part 170 from $156.00 to $214.00 per hour.

16. Publication for Statistical Use

There is no application of statistics in the information collection related to NRC Form 277 and no publication of the information.

17. Reason for Not Displaying the Expiration Date

The expiration date is displayed.

18. Exceptions to the Certification Statement

Not applicable.

B. COLLECTIONS OF INFORMATION EMPLOYING STATISTICAL METHODS

Statistical methods are not used in this collection of information.