

Date: September 15, 2011

FINAL SUMMARY OF INFORMATION COLLECTION REQUEST

Title: 48 CFR Chapter 20, U.S. Nuclear Regulatory Commission (NRCAR) (3150-0169)

Current Burden/Responses: 26,095 hours (25,462 reporting + 632.5 recordkeeping)
3,837 responses (3,482 responses + 355 recordkeepers)

Proposed Burden/Responses: 21,579.5 hours (20,484 reporting + 1,095.5 recordkeeping)
5,425 responses (5,313 responses + 112 recordkeepers)

Frequency of Response: On occasion

Number of Respondents: 2,803

Reasons for Changes in Burden/Responses:

The overall burden has decreased by 4,515.25 hours, from 26,094.75 to 21,579.5 hours (20,484 Reporting and 1,095.5 Recordkeeping hours) because of the staff's re-estimates of burden and responses based on recent history over the past three years. However, the number of responses increased by 1,588 from 3,837 to 5,425 because a new methodology for calculating respondents was employed in 2011. The respondents (equivalent to number of contracts) varied significantly from past years for most NRCAR clauses, and when applied to existing data, increased the number of responses while showing a decrease in the overall total burdened hours from those reported in 2008.

The overall reporting burden has decreased by 4,978 hours, from 25,462 to 20,484 hours because of:

- NRC Clause 2009.570-5(b) – No change. The annual burden is 4 hours.
- NRC Clause 2052.209-72 (c) (1) & (d) (2) – No change. The annual burden is 60 hours.
- NRC Clause 2009.570-8 decreased by 2 respondents, from 5 to 3 respondents. Since the need to report under this clause is very infrequent, a 5% factor was applied to the number of contracts. [Calculation: $131 \text{ contracts} + 22 \text{ R\&D contracts} = 153/3 \text{ years} = 51 \times .05 = 2.55 \text{ (rounded to 3)}$] – The annual burden has decreased by 10 hours, from 25 to 15 hours.
- NRC Clause 2027.305-3(a) & (b) decreased by 1 respondent, from 5 to 4 respondents. Since the need to report under this clause (reporting royalties) is rare, a 1% factor was applied to the number of contracts. [Calculation: $174+468+420 = 1062/3 \text{ years} = 354 \text{ (closed contracts)} \times .01 = 3.54 \text{ (rounded to 4)}$] – The annual burden has decreased by 8 hours, from 40 to 32 hours.

- NRC Clause 2042.803(a)(2)(i) decreased by 5 respondents, from 8 to 3 respondents. Since the need to report under this clause is rare, a 1% factor was applied to the number of contracts. [Calculation: $937 \text{ (total contracts)} / 3 = 312 * .01 = 3$] – The annual burden has decreased by 50 hours, from 80 to 30 hours.
- NRC Clause 2042.803(b) decreased by 5 respondents, from 8 to 3 respondents. Since the need to report under this clause is rare (similar to 2042.803(a)(2)), a 1% factor was applied to the number of contracts. [Calculation: $937 \text{ (total contracts)} / 3 = 312 * .01 = 3$] – The annual burden has decreased by 10 hours, from 16 to 6 hours.
- NRC Clause 2052.214-71 decreased by 5 respondents, from 5 to 0 respondents. This change reflects that the agency has not had any bids over the last three years. [Calculation: Bids 0] – The annual burden has decreased by 3 hours, from 3 to 0 hours.
- NRC Clause 2052.214-72(e) burden decreased by 5 respondents, from 5 to 0 respondents. This change reflects that the agency has not had any bids over the last three years. [Calculation: Bids 0] – The annual burden has decreased by 5 hours, from 5 to 0 hours.
- NRC Clauses 2052.214-74 & 215-74 decreased by 5 respondents, from 5 to 0 respondents. This change reflects that the agency has not had any bids over the last three years. [Calculation: Bids 0] – The annual burden has decreased by 1.25 hours, from 1.25 to 0 hours.
- NRC Clause 2052.215-71(f) decreased by 7 respondents, from 10 to 3 respondents. Since the need to report under this clause is very infrequent, a 5% factor was applied to the number of contracts. [Calculation: $131 \text{ contracts} + 22 \text{ R\&D} = 153 / 3 = 51 * .05 = 3$] – The annual burden has decreased by 28 hours, from 40 to 12 hours.
- NRC Clause 2052.215-75, Alt. 1 & 2 decreased by 75 respondents, from 200 to 125 respondents. This change is due to a decrease in the number of applicable contracts. [Calculation: Base: $374 \text{ DO/TO} / 3 \text{ years} = 125$] – The annual reporting burden has decreased by 4,800 hours, from 12,800 to 8,000 hours.
- NRC Clause 2052.216-72 decreased by 14 respondents, from 25 to 11 respondents. This change is due to a decrease in the number of applicable IDIQ contracts. In addition, the responses per respondent were reduced from 6 to 1 since the contractor is only required to insert the applicable clauses into the contract one time upon issuance of a task or delivery order. [Calculation: $34 \text{ IDIQs} / 3 \text{ years} = 11$] – The annual burden has decreased by 3,336 hours, from 3,600 to 264 hours.
- NRC Clause 2052.235-70(c) decreased by 43 respondents, from 50 to 7 respondents. This change is due to a decrease in the number of

applicable contracts. [Calculation: Base: 22 R&D contracts/ 3 years = 7]
– The annual burden has decreased by 21.5 hours, from 25 to 3.5 hours.

Although the burden for the above sections decreased, the burden increased for the following sections:

- NRC Clause 2052.204-70(b) increased by 201 respondents, from 1 to 202 respondents. The new figure is based on consistent methodology as other changes included herein and more accurately represents how many contracts are affected by this reporting requirement. [Calculation: 22 R&D + 79 cost-reimbursement + 374 DO/TO + 131 contracts = 606/3 years = 202] – The annual burden has increased by 603 hours, from 3 to 606 hours.
- NRC Clause 2052.204-70(j): The reporting burden affects approximately 312 respondents annually. Since the clause is required in all subcontracts and purchase orders, the total number of contracts was used. [Calculation: 22 R&D + 79 cost-reimbursement + 374 DO/TO + 131 contracts + 331 purchase orders = 937/3 years = 312] – The reporting burden for this clause was not previously reported. The time required for the contractor to complete this task is estimated at 1 hour to insert sections (a) through (i) of the clause into a subcontract or purchase order. The burden increased by 312 hours.
- NRC Clause 2052.204-70(k) increased by 177 respondents, from 25 to 202 respondents. The new figure is based on consistent methodology as other changes included herein and more accurately represents how many contracts are affected by this reporting requirement. [Calculation: 22 R&D + 79 cost-reimbursement + 374 DO/TO + 131 contracts = 606/3 years = 202] – The annual burden has increased by 354 hours, from 50 to 404 hours.
- NRC Clause 2052.204-71 increased by 182 respondents, from 20 to 202 respondents. The new figure is based on consistent methodology as other changes included herein and more accurately represents how many contracts are affected by this requirement. NRCAR Clause 2052.204-71 includes a requirement for site access badges that the NRC now estimates to take approximately 7 hours to complete, -per application, so this figure was used in lieu of 100 hours. [Calculation: 22 R&D + 79 cost-reimbursement + 374 DO/TO + 131 contracts = 606/3 years = 202] – The annual burden has decreased by 586 hours, from 2,000 to 1,414 hours.
- NRC Clause 2052.209-70 increased by 2 respondents, from 200 to 202 respondents. This change is due to an increase in the number of applicable contracts. [Calculation: 22 R&D + 79 cost-reimbursement + 374 DO/TO + 131 contracts = 606/3 years = 202] – The annual burden has increased by 2 hours, from 200 to 202 hours.
- NRC Clause 2052.209-71(a) increased by 2 respondents, from 200 to 202 respondents. This change is due to an increase in the number of

applicable contracts. [Calculation: $22 \text{ R\&D} + 79 \text{ cost-reimbursement} + 374 \text{ DO/TO} + 131 \text{ contracts} = 606/3 \text{ years} = 202$] – The annual burden has increased by .5 hours, from 50 to 50.5 hours.

- NRC Clause 2052.209-72(d) (3) increased by 100 respondents, from 25 to 125 respondents. This change is due to an increase in the number of applicable contracts. [Calculation: $374 \text{ DO/TO} / 3 \text{ years} = 125$] – The annual burden has increased by 100 hours, from 25 to 125 hours.
- NRC Clause 2052.209-72(f) increased by 212 respondents, from 100 to 312 respondents. This change is due to an increase in the number of applicable contracts. [Calculation: $937/3 = 312$] – The annual burden has increased by 53 hours, from 25 to 78 hours.
- NRC Clause 2052.211.70 increased by 52 respondents, from 150 to 202 respondents. This change is due to an increase in the number of applicable contracts. [Calculation: $22 \text{ R\&D} + 79 \text{ cost-reimbursement} + 374 \text{ DO/TO} + 131 \text{ contracts} = 606/3 \text{ years} = 202$] – The annual burden has increased by 104 hours, from 300 to 404 hours.
- NRC Clause 2052.211-71 increased by 52 respondents, from 150 to 202 respondents. This change is due to an increase in the number of applicable contracts. [Calculation: $22 \text{ R\&D} + 79 \text{ cost-reimbursement} + 374 \text{ DO/TO} + 131 \text{ contracts} = 606/3 \text{ years} = 202$] – The annual burden has increased by 832 hours, from 2,400 to 3,232 hours.
- NRC Clause 2052.211-72 increased by 18 respondents, from 100 to 118 respondents. This change is due to an increase in the number of applicable contracts. [Calculation: $354 \text{ cost-reimbursement} / 3 \text{ years} = 118$] – The annual burden has increased by 648 hours, from 3,600 to 4,248 hours.
- NRC Clause 2052.215-70(b) increased by 48 respondents, from 3 to 51 respondents. This change is due to an increase in the number of applicable contracts. [Calculation: $131 \text{ contracts} + 22 \text{ R\&D} = 153/3 = 51$] – The annual burden has increased by 240 hours, from 15 to 255 hours.
- NRC Clause 2052.215-70(c) increased by 44 respondents, from 7 to 51 respondents. This change is due to an increase in the number of applicable contracts. [Calculation: $131 \text{ contracts} + 22 \text{ R\&D} = 153/3 = 51$] – The overall annual reporting burden has increased by 220 hours, from 35 to 255 hours.
- NRC Clause 2052.215-77(d) increased by 117 respondents, from 1 to 118 respondents. The new figure is based on consistent methodology as other changes included herein and more accurately represents how many contracts are affected by this reporting requirement. [Calculation: $354 \text{ cost-reimbursement} / 3 \text{ years} = 118$] – The annual burden has increased by 175 hours, from 2 to 177 hours.

- NRC Clause 2052.215-78(d) increased by 117 respondents, from 1 to 118 respondents. The new figure is based on consistent methodology as other changes included herein and more accurately represents how many contracts are affected by this reporting requirement. [Calculation: Base: 354 cost-reimbursement/ 3 years = 118] – The annual burden has increased by 175 hours, from 2 to 177 hours.
- NRC Clause 2052.235.71 increased by 3 respondents, from 4 to 7 respondents. This change is due to an increase in the number of applicable contracts. [Calculation: Base: 22 R&D contracts/ 3 years = 7] – The annual burden has increased by 30 hours, from 40 to 70 hours.
- NRC Clause 2052.242-71 has increased by 4 respondents, from 2 to 6 respondents. Since the need to report under this clause is very infrequent, a 5% factor was applied to the number of contracts. [Calculation: 354 cost-reimbursement/ 3 years = 118 x .05 = 6] – The annual burden has increased by 32 hours, from 16 to 48 hours.

Recordkeeping burden increased by 463 hours, from 632.5 to 1,095.5 hours because of:

- NRC Clause 2052.204-70(k): In the case of recordkeeping, this calculation was limited to R&D contracts (22) and contracts (131), only, since the clause specifically involves retention of records pertaining largely to subcontracting. It is unlikely that this recordkeeping requirement would significantly impact delivery orders, task orders or purchase orders, so they were excluded from this figure. The number of recordkeepers increased by 26, from 25 to 51 recordkeepers. [Calculation: 131 contracts + 22 R&D = 153/3 = 51] – The overall annual recordkeeping burden has increased by 520 hours, from 500 to 1,020 hours.
- NRC Clause 2052.242-70: This estimate was based on R&D contracts (22) and contracts (131), as the clause applies to cost-reimbursement solicitations and contracts for professional services. The number of recordkeepers increased by 36, from 15 to 51 recordkeepers. [Calculation: 131 contracts + 22 R&D = 153/3 = 51] – The overall annual recordkeeping burden has increased by 18 hours, from 7.5 to 25.5 hours.

Although the burden for the above sections increased, the burden decreased for the following section:

- NRC Clause 2052.227-70: The number of annual recordkeepers that must retain drawings, designs and specifications is less than 25 per year. The estimate in future years is more likely to be 10 recordkeepers (or less) per year given that the agency leases much of its building space from the General Services Administration, and intends to consolidate resources in the coming years to meet growing budget constraints. The overall annual recordkeeping burden has decreased by 75 hours, from 125 to 50 hours.

Costs have increased due to an increase in the fee rate from \$238 to \$259.

Level of Concurrence: Director
Division of Contracts
Office of Administration

Recordkeeping Requirements in Accordance with the Retention Periods for Records/Rule:

The NRC has determined that the quantity of records to be maintained is roughly proportional to the recordkeeping burden and, therefore, can be used to calculate approximate records storage costs. Based on the number of pages maintained for a typical clearance, the records storage cost has been determined to be equal to 0.0004 times the recordkeeping burden cost. Because the recordkeeping burden is estimated to be 1,095.5 hours, the storage cost for this clearance is \$113.49 (1,095.5 recordkeeping hours x 0.0004 x \$259/hour).

Efforts 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.

Abstract:

The mandatory requirements of the NRCAR implement and supplement the government-wide Federal Acquisition Regulation (FAR), and ensure that the regulations governing the procurement of goods and services within the NRC satisfy the particular needs of the agency. Because of differing statutory authorities among Federal agencies, the FAR authorizes agencies to issue regulations to implement FAR policies and procedures internally and to include additional policies and procedures, solicitation provisions or contract clauses to satisfy the specific need of the agency.