

FINAL SUPPORTING STATEMENT
FOR
NRC FORM 171, "DUPLICATION REQUEST"
(3150-0066)

EXTENSION

Description of the Information Collection

As indicated in 10 CFR 9.21(b), various Nuclear Regulatory Commission (NRC) documents are made available to the public through the NRC Public Document Room (PDR). In addition to ensuring accessibility to reading the documents, the NRC has a contractor provide reproduction services to the public. Although individuals may utilize the NRC microfiche reader-printers, as well as the public computers with access to the Agencywide Documents Access and Management System (ADAMS), to print and pay for full text documents, they often request the contractor to perform this reproduction service.

A. JUSTIFICATION

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

Only one form is required to capture the different electro-mechanical processes necessary to complete the different reproduction services requested by the public.

2. Agency Use of Information

The reproduction form is completed by the Technical Information Center Section/ PDR personnel in response to requests from the public, for which the contractor's reproduction services are to be utilized. The specific data on this form permits the contractor to reproduce the correct items, to contact the requester when problems arise, to charge the appropriate fees, and to provide an Invoice and receipt for services rendered. The requester, if onsite, maintains a copy for his records. Otherwise, the PDR staff retains this copy, the contractor returns a copy of the completed request to the requester, and a third copy is maintained by the contractor in request order number sequence in case a question arises concerning a past service performed. No Personally Identifiable Information is retained beyond 90 days, after which the forms are securely destroyed. The contractor provides the Public Document Room/Technical Information Center Section each month with a summary report. This report includes the number of users in the past month, and the number of pages of paper, microfiche, and aperture cards reproduced, and of the number of CDs and DVDs copied during the previous month for requesters. This data is utilized by the NRC in its annual report to Congress.

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 new automated 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.

Requests for NRC documents can be made by e-mail. However, there is no mechanism currently in place to submit orders directly to the contractor. Due to the documents being physically available only in the Public Document Room, the contractor cannot directly take orders from the public.

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 on-going 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 information required is needed for all individuals regardless of the size of the entity, if any, by which they are employed. The information requested is basic to the information search and retrieval, and cannot be reduced.

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

The respondent determines the frequency of completing the form. A form is completed only at the time documents are requested for reproduction at the PDR.

7. Circumstances Which Justify Variations from OMB Guidelines

This information collection does not vary from OMB guidelines.

8. Consultation Outside the NRC

Opportunity for public comment on the information collection requirements for this clearance package was published in the Federal Register on September 5, 2012, (77 FR 54617). 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

This form includes questions about address, phone number, e-mail address, and credit card information necessary for billing the customer correctly. The PDR staff does not maintain credit card information on the copy of the form kept for their records.

12. Estimate of Annualized Burden and Burden Hour Cost

Documents for duplication are requested by the public. The PDR staff submits an individual NRC Form 171 per each request for duplication. The estimated burden for submission of requests is based on the number of requests received during the current clearance period, observation, and sampling and is as follows:

Total Requests 200

Total Burden: $17 = 200 \text{ requests} \times 5 \text{ minutes} = 1000 \text{ minutes}/60$

Cost: \$4,658 (17 hours x \$274/hr)

Based on the number of requests received during the current clearance period, we estimate an 83% decrease in the number of requests during this 3-year renewal period.

13. Estimate of Other Additional Costs

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 0 hours, the storage cost for this clearance is \$00.00 (0 hours x 0.0004 x \$274/hour).

14. Estimated Annualized Cost to the Federal Government

Estimated burden for NRC staff to record telephone requests and verify all requests for NRC documents is as follows:

It is estimated that it takes the NRC staff 5 minutes each to fill out the NRC Form 171 for a total cost for 17 hours of \$4,658 (200 requests @ 5 minutes each of 1,000 minutes/60 minutes = 17 hours x \$274/hr).

This cost is fully recoverable by fee assessments to NRC licensees pursuant to 10 CFR Part 171.

15. Reasons for Change in Burden

The burden hours decreased by 83 hours from 100 to 17 hours as a result of more microfiche documents being retrofitted or scanned into ADAMS. This has made more of the agency's public documents accessible to all Internet access users. Users can now view and print these documents without making a duplication request. Since the deployment of Web-based ADAMS to the public, there has been a decrease in the number of requests from the public to duplicate documents. Based on the number of requests received during the current clearance period, we estimate an 83% decrease in the number of requests during this 3-year renewal period.

The changes in burden cost reflect an increase in NRC's recoverable fee rate, which increased from \$257/hr to \$274/hr.

16. Publication for Statistical Use

The reproduction contractor provides the Public Document Room /Technical Information Center Section each month with a summary report. This report includes the number of users in the past month, and the number of pages of paper, microfiche, and aperture cards reproduced, and of the number of CDs and DVDs copied during the previous month for requesters. This data is utilized by the NRC in its annual report to Congress.

17. Reason for not Displaying the Expiration Date

Not applicable.

18. Exceptions to the Certification Statement

There are no exceptions.

B. COLLECTIONS OF INFORMATION EMPLOYING STATISTICAL METHODS

Statistical methods are not used in the collection of information.