

Guidance for Preparing a Supporting Statement

In order to obtain OMB approval, the NRC submits a supporting statement to justify the need for the information collection. The statement provides information about how the NRC uses this information and the number of hours it takes for respondents to provide the information to the NRC and third parties and to retain records. There are 18 mandatory questions and 5 additional questions that apply only if the collection involves statistical methods. Most NRC collections do not involve statistical methods.

This document provides guidance on completing the supporting statement.

OIS has developed boilerplate language that should be copied and pasted in response to certain items. This language ensures that NRC supporting statements are consistent. In this document, boilerplate language appears in italics.

DRAFT / FINAL SUPPORTING STATEMENT
FOR
INSERT TITLE OF INFORMATION COLLECTION
(3150-XXXX)
NEW / EXTENSION / REVISION / REINSTATEMENT (*select one*)

Description of the Information Collection

Provide a brief description of the information being collected.

A. JUSTIFICATION

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

Provide background reasons for the information collection. Why does the NRC need this information?

If the collection is required by NRC regulations, state the involved regulations and a brief summary of the requirements. What is the NRC's authority to collect the information?

2. Agency Use of Information

Explain how the NRC uses the information. For a new collection, explain how the NRC plans to use the information. How, by whom, and for what purpose is the information used?

3. Reduction of Burden Through Information Technology

Describe whether, and to what extent, the NRC is using automated, electronic, mechanical, or any other technological techniques to collect the information. Specifically describe use of technology to reduce burdens. Provide an estimated percentage of electronic data submissions. Following is a standard statement that should be used in all supporting statements; however, additional information specific to the information collection may be added:

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 XX% of the responses will be filed electronically.

4. Effort to Identify Duplication and Use Similar Information

Explain the availability of any similar information and why it cannot be used or modified. Following is a standard statement that should be used in all supporting statements; however, additional information specific to the information collection may be added:

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

If the collection of information does not affect small businesses, indicate “*Not applicable.*” If small businesses are affected, note how many businesses are affected and describe any methods used to minimize the burden on them. If the number of small businesses is unknown, provide an estimated percentage of the respondents who are small businesses.

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

Describe consequences or the impact upon programs and policies if the information was not collected or was collected less frequently. If applicable, provide any technical or legal reasons why the information must be collected on the current schedule.

7. Circumstances Which Justify Variation from OMB Guidelines

If any of the following circumstances apply to the collection, provide a justification:

- Information is collected more often than quarterly
- Responses are due in less than 30 days
- More than an original and two copies are required
- Records must be retained for more than three years
- A statistical survey cannot be generalized to the universe of the study
- A statistical data classification is involved that OMB has not approved
- Certain types of confidentiality pledges are required
- Proprietary trade secrets or similar confidential information are required

If the above circumstances do not apply, indicate “*Not applicable.*”

8. Consultations Outside the NRC

For the draft supporting statement, include the following statement:

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

In the final supporting statement, add the publication date and page number of the Federal Register notice that solicited public comments for a 60-day period. For example:

Opportunity for public comment on the information collection requirements for this clearance package was published in the Federal Register on Month Day, Year (insert Federal Register citation). No comments were received.

If comments were received from the public as a result of the Federal Register notice, summarize the comments and address the NRC's position. Describe what changes, if any, were made in response to the comments.

In some cases, it is desirable to talk to stakeholders (such as licensees) about some aspect of the information collection (for example, to determine whether the burden estimate for the collection is accurate). When contacting stakeholders, **do not contact more than nine people**. Describe feedback received from these stakeholders regarding the information collection.

9. Payment or Gift to Respondents

Describe any payments or gifts to respondents, but do not include remuneration to contractors or grantees. If there are no payments or gifts, indicate "*Not applicable.*"

10. Confidentiality of Information

Include the following statement:

Confidential and proprietary information is protected in accordance with NRC regulations at 10 CFR 9.17(a) and 10 CFR 2.390(b).

Add to paragraph if applicable:

However, no information normally considered confidential or proprietary is requested.

If the information collection includes an NRC Form with a Privacy Act statement on it, use the following statement:

The information collected on NRC Form (insert form #) is maintained in a Privacy Act system of records designated as NRC (insert SORN#) and described at 77 FR 67203 (November 8, 2012).

11. Justification for Sensitive Questions

Provide a justification for any questions that are commonly considered private (sexual behavior and attitudes, religious beliefs, etc.). Indicate “*Not applicable*” if there are no sensitive questions.

12. Estimated Burden and Burden Hour Cost

Estimates in item #12 should be based on the annual number of respondents and responses during the three year period of the clearance. If the number of respondents will vary over the three year period, take the average (for example, 12 respondents in year 1, 8 respondents in year 2, and 10 respondents in year 3 = an annual average of 10 respondents per year).

REPORTING

Provide a description of:

- the annual number of respondents that report information
- the frequency of responses
- the estimated amount of time (burden hours) required to respond
- the calculation for total estimated burden hours for reporting (for example: respondents x responses x hours = TOTAL)

RECORDKEEPING

In addition, if there is a requirement for the respondents to retain records, include a description of:

- the annual number of recordkeepers
- the estimated amount of time (burden hours) required to maintain records
- the calculation for the total estimated burden hours for recordkeeping (for example, recordkeepers x hours per recordkeeper = TOTAL)

THIRD PARTY NOTIFICATION

If there is a requirement for the respondents to provide information or a notification to a third party, include a description of:

- the annual number of respondents that must provide a notification to a third party
- the frequency of responses
- the estimated amount of time (burden hours) required to respond
- the calculation for total estimated burden hours for reporting (for example: respondents x responses x hours = TOTAL)

Calculate the cost to respondents by multiplying the total number of annual burden hours by the NRC's current fee rate (XX hrs x fee rate = \$XX,XXX).

If the information collection involves multiple requirements with different burden estimates, include a table that breaks down the burden according to the section of the CFR containing the requirement (see Tables 1, 2, and 3 at the end of this document). Complex CFR Parts should include Excel spreadsheets as an attachment (see Excel templates on the Information Collections website). Include a summary of total burden hours, total cost, number of respondents and number of responses below the tables.

13. Estimate of Other Additional Costs

Provide a description of other costs, such as capital/start-up costs, operation/maintenance, and any costs for contracts to perform work on the information collection. Include a breakdown of these costs. Do not include costs already mentioned in item #12.

In addition, if there is a recordkeeping requirement, include an estimate for records storage costs. Following is a standard statement that can be modified modify for this purpose:

NRC has determined that the records storage cost is roughly proportional to the recordkeeping burden cost. Based on a typical clearance, the recordkeeping storage cost has been estimated to be equal to .0004 percent of the recordkeeping burden. Therefore, the recordkeeping storage cost for this collection is estimated to be \$XXX (XX,XXX recordkeeping hours x fee rate x .0004).

Following is a standard statement if there are no additional costs:

There are no additional costs.

14. Estimated Annualized Cost to the Federal Government

Include an estimated cost that includes staff hours (multiplied by the fee rate for professional staff and \$47/hr for clerical staff), overhead, printing, and payment to contractors.

15. Reasons for Change in Burden or Cost

If there has been an increase or a decrease in the number of hours it will take respondents to provide information and/or maintain records since the last time the clearance was approved, explain that change here. The response to this item is essential to receiving OMB approval. Be sure that the cause for any changes is clearly described. If the collection is complex (such as a large Part of the CFR with an extensive burden table), and there have been multiple changes, summarize the largest burden changes. Calculations showing the changes are also helpful.

If there is no change in burden include the following statement:

There is no change in burden; however, costs have increased due to an increase in the fee rate from \$XXX/hr to \$XXX/hr.

16. Publication for Statistical Use

If results will be published, outline plans, timetables and publication dates. Otherwise indicate, “*Not applicable.*”

17. Reason for Not Displaying the Expiration Date

Indicate “*The expiration date will be displayed*” or explain any reasons that display of OMB's expiration date would be inappropriate.

If the requirement is contained in a regulation AND the collection does not involve an NRC form, use the following statement:

The recordkeeping and reporting requirement for this information collection are associated with regulations and are not submitted on instruments such as forms or surveys. For this reason, there are no data instruments on which to display an OMB expiration date. Further, amending the regulatory text of the CFR to display information that, in an annual publication, could become obsolete would be unduly burdensome and too difficult to keep current.

18. Exceptions to the Certification Statement

The following statements should be true for the information collection. If any of them are NOT true, provide a justification in this section:

- It is necessary for the proper performance of agency functions;
- It avoids unnecessary duplication;
- It reduces burden on small entities;
- It uses plain, coherent, and unambiguous terminology that is understandable to respondents;
- Its implementation will be consistent and compatible with current reporting and recordkeeping practices;
- It indicates the retention period for recordkeeping requirements;
- It informs respondents of the information called for under 5 CFR 1320.8(b)(3);
- Why the information is being collected;
- Use of information;
- Nature of response (voluntary, required for a benefit, or mandatory);
- Nature and extent of confidentiality; and
- Need to display currently valid OMB control number;
- It was developed by an office that has planned and allocated resources for the efficient and effective
- management and use of the information to be collected (see note in Item 19 of the instructions);
- It uses effective and efficient statistical survey methodology; and

- It makes appropriate use of information technology.

If these statements are all true, indicate "*There are no exceptions.*"

B. COLLECTIONS OF INFORMATION EMPLOYING STATISTICAL METHODS

Most NRC information collections do not involve surveys or employ statistical methods, and the response to this item would be "*Not applicable*" and the following five questions will not be included in the supporting statement submitted to OMB.

1. Respondent Description.

Describe (including a numerical estimate) the potential respondent universe and any sampling or other respondent selection methods to be used. Indicate expected response rates for the collection as a whole. If the collection had been conducted previously, include the actual response rate achieved during the last collection.

2. Procedures for collecting the information.

Describe the procedures for the collection of information including:

- Statistical methodology for stratification and sample selection,
- Estimation procedure,
- Degree of accuracy needed for the purpose described in the justification,
- Unusual problems requiring specialized sampling procedures, and
- Any use of periodic (less frequent than annual) data collection cycles to reduce burden.

3. Methods to maximize response rates and to deal with statistical issues of non-response.

Describe methods to maximize response rates and to deal with issues of non-response. The accuracy and reliability of information collected must be shown to be adequate for intended uses. For collections based on sampling, a special justification must be provided for any collection that will not yield "reliable" data that can be generalized to the universe studied.

4. Tests or procedures.

Describe any tests of procedures or methods to be undertaken. Testing is encouraged as an effective means of refining collections of information to minimize burden and improve utility. A proposed test or set of test may be submitted for approval separately or in combination with the main collection of information.

5. Contacts for Statistical Aspects and Data Collection.

Provide the name and telephone number of individuals consulted on statistical aspects of the design and the name of the agency unit, contractor(s), grantee(s), or other person(s) who will actually collect and/or analyze the information for the agency.

TABLE 1
ANNUALIZED REPORTING BURDEN, 10 CFR XX

Section	No. Of Respondents	Responses per Respondent	Total No. of Responses	Burden Hours per Response	Total Annual Reporting Burden (Hrs)
Description (10 CFR XX.XX)	Insert # of respondents	Insert # of responses per respondent	= the product of column 1 x column 2	Insert # of hours required per response	=column 3 x column 4
Description (10 CFR XX.XX)					
Description (10 CFR XX.XX)					
TOTAL	Insert the total number of respondents (depending on the collection, this may NOT be the sum of this column)	LEAVE THIS CELL BLANK	=SUM of this column	LEAVE THIS CELL BLANK	=SUM of this column

TABLE 2
ANNUALIZED THIRD PARTY NOTIFICATION BURDEN, 10 CFR XX

Section	No. Of Respondents	Responses per Respondent	Total No. of Responses	Burden Hours per Response	Total Annual Reporting Burden (Hrs)
Description (10 CFR XX.XX)	Insert # of respondents	Insert # of responses per respondent	= the product of column 1 x column 2	Insert # of hours required per response	=column 3 x column 4
Description (10 CFR XX.XX)					
Description (10 CFR XX.XX)					
TOTAL	Insert the total number of respondents (depending on the collection, this may NOT be the sum of this column)	LEAVE THIS CELL BLANK	=SUM of this column	LEAVE THIS CELL BLANK	=SUM of this column

TABLE 3
ANNUALIZED RECORDKEEPING BURDEN, 10 CFR XX

Section	No. of Recordkeepers	Burden per Recordkeeper	Total Annual Burden Hours
Description (10 CFR XX.XX)	Insert # of recordkeepers	Insert # of hours per recordkeeper	= the product of column 1 x column 2
Description (10 CFR XX.XX)			
Description (10 CFR XX.XX)			
TOTAL	Insert the total number of recordkeepers (depending on the collection, this may NOT be the sum of this column)	LEAVE THIS CELL BLANK	=SUM of this column

TOTAL BURDEN HOURS: XXX hours (XX hours reporting + XX hours third party notification + XX hours recordkeeping)

TOTAL BURDEN HOUR COST: \$XX,XXX (XXX hrs x \$XXX/hr)

ANNUAL RESPONDENTS: XX respondents¹

RESPONSES: XX responses (XX reporting responses + XX third party responses + XX recordkeepers²)

¹ The number of respondents should be the total number of licensees (or other entity) that must respond to the information collection. Each respondent should only be counted once, even if that respondent is required to both submit reports and keep records.

² Recordkeeping is considered a response. When calculating the number of responses, count each recordkeeper as one response.

TABLE 3

ANNUALIZED RECORDKEEPING BURDEN, 10 CFR XX

Section	No. of Recordkeepers	Burden per Recordkeeper	Total Annual Burden Hours
Description (10 CFR XX.XX)	Insert # of recordkeepers	Insert # of hours per recordkeeper	= the product of column 1 x column 2
Description (10 CFR XX.XX)			
Description (10 CFR XX.XX)			
TOTAL	Insert the total number of recordkeepers (depending on the collection, this may NOT be the sum of this column)	LEAVE THIS CELL BLANK	=SUM of this column

TOTAL BURDEN HOURS: XXX hours (XX hours reporting + XX hours third party notification + XX hours recordkeeping)

TOTAL BURDEN HOUR COST: \$XX,XXX (XXX hrs x \$XXX/hr)

ANNUAL RESPONDENTS: XX respondents

RESPONSES: XX responses (XX reporting responses + XX third party responses + XX recordkeepers)

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