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DRAFT OMB SUPPORTING STATEMENT FOR
NRC FORM 445
REQUEST FOR APPROVAL OF OFFICIAL FOREIGN TRAVEL
(OMB 3150-0193)

- - -
EXTENSION

DESCRIPTION OF THE INFORMATION COLLECTION

NRC Form 445, "Request for Approval of Foreign Travel" form is used by non-Federal consultants, contractors and U.S. Nuclear Regulatory Commission (NRC) invited travelers (i.e., non-NRC employees) who must travel to foreign countries in the course of conducting business for the NRC. In accordance with 48 CFR 20, "NRC Acquisition Regulation," contractors traveling to foreign countries are required to complete this form. The information requested includes the name of the NRC office recommending travel, approval by an Office Director, Regional Administrator or Chairman, as appropriate, the traveler's identifying information, the purpose of the travel, a listing of trip coordinators, other NRC travelers and contractors attending the same meeting, and a proposed itinerary.

Consultants, contractors, and those invited by the NRC to travel (e.g., prospective employees) must file travel vouchers and trip reports in order to be reimbursed for their travel expenses. Travelers do not receive a travel advance but are paid on a reimbursement basis only. The information collected includes the name, address, social security number, and the amount to be reimbursed. Guidance on allowable travel expenses can be found in the General Services Administration (GSA) Federal Travel Regulations (FTR) and in NRC Management Directive 14.1, Official Temporary Duty Travel.

A. Justification

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

NRC Form 445 is the mechanism by which NRC is advised of and approves foreign travel for its non-Federal consultants, contractors and invited travelers.

2. Agency Use of Information

Information from NRC Form 445 is used by NRC to determine whether proposed foreign travel for its non-Federal consultants, contractors and invited travelers should be approved.

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.

The NRC has issued Guidance for Electronic Submissions to the NRC which provides direction for the electronic transmission and submittal of documents to the NRC. Electronic transmission and submittal of documents can be accomplished via the following avenues: the Electronic Information Exchange (EIE) process, which is available from the NRC's "Electronic Submittals" Web page, by Optical Storage Media (OSM) (e.g. CD-ROM, DVD), by facsimile or by e-mail. However, because Form 445 requires multiple signatures and concurrences and is infrequently used by individual respondents, it is not efficient to establish a process that would readily lend itself to electronic filings. Therefore, we anticipate no electronic filings for this information collection.

4. Effort to Identify Duplication and Use Similar Information

No sources of similar information are available. There is no duplication of requirements.

5. Effort to Reduce Small Business Burden

Completion of NRC Form 445 by NRC's non-Federal consultants, Contractors, and invited travelers is the minimum information needed to authorize the proposed foreign travel.

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

Absence of NRC Form 445 would result in NRC's not being able to perform effective oversight of proposed foreign travel by its non-Federal consultants, contractors and invited travelers.

7. Circumstances Which Justify Variation From OMB Guidelines

Not applicable.

8. Consultations Outside the NRC

Opportunity for public comment on the information collection requirements for this clearance package was published in the Federal Register on September 12, 2017. In addition, OIP sent the following survey to six persons in the public who were required to complete an NRC Form 445. Four of the persons responded.

1. Is the proposed collection of information necessary for the NRC to properly perform its functions? Does the information have practical utility?
2. Is the estimate of the burden of the information collection accurate?
3. Is there a way to enhance the quality, utility, and clarity of the information to be collected?
4. How can the burden of the information collection on respondents be minimized, including the use of automated collection techniques or other forms of information technology?

The following comments were received:

Question 1 responses about necessity and practical utility: “The information definitely has practical utility especially in discussion of needs, contacts, and program impacts. I don’t feel it would be appropriate for me to comment on whether it is necessary for the NRC.”

“Collection of information contained in Form 445 is not necessary for the NRC to properly perform its functions. The only practical utility is special travel considerations (late hotel check-out, class of travel and similar) that can be approved using 445. Yet, same can be accomplished through other communication as described below.” “Yes, it is necessary to assure that international travel is properly coordinated and that travel expenditures are properly approved prior to travel.”

“The information collected on NRC Form 445 describes the purpose and details of a proposed international travel that is undertaken to support NRC funded projects. The information is critical in determining whether the travel is necessary and supports the goals of the project. The information may also be used and has the practical utility in determining how to spend project or government funds in the most efficient manner considering both travel costs and man-power time.”

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Question 2 responses about the accuracy of the burden estimate: “That is approximately the amount of time for a trip that is less than one week. It would take more if the trip was longer or involved multiple countries.”

“The burden is small.”

“An hour is about right.”

“The estimated time to collect the required information and prepare the NRC form 445 is fairly accurate, as it generally requires less than 1 hour.”

Question 3 responses about ways to enhance quality, utility and clarity of the information collected: “Overall, I have found the form to be fairly easy to complete.”

“Suggest to incorporate a small section for comment where special requests can be stated/approved.”

“The form could be updated to better fit the pdf format so that the filled in form could be saved and typed information could flow from one line to the next (boxes on second page are very narrow)”

“[I] Do not have any suggestion on further improving the efficiency of the required information. It collects the basic necessary data for international travel.”

Question 4 responses about suggestions to minimize the burden: “Some items, such as itinerary could be entered electronically directly from our travel system.”

“Since burden is low, redesign of form to better fit pdf format is best on balance. Not worth the effort of an online system.”

“Possibly establishing an agency-wide electronic information data base with outside users logging in and filling out the required data online, and then submitting for approval.”

9. Payment or Gifts 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

Not applicable.

12. Estimated Burden and Burden Hour Cost

It is estimated that 50 NRC Form 445s will be completed annually by NRC’s non-Federal consultants, contractors and invited travelers. It is estimated that the annual burden for the next cycle will be 50 hours (50 respondents x 1 hour per response). The response time was reduced based on the form being changed to a more simplified design. At an hourly rate of \$263 hr., the annual cost is \$13,150.

13. Estimate of Other Additional Costs

The NRC has determined that the records storage cost is roughly proportional to the recordkeeping burden cost. Based on a typical clearance, the records storage cost has been determined to be equal to 0.0004 times the recordkeeping burden cost. Since this clearance has no recordkeeping burden for 2014, the storage cost for this clearance is \$0.00 (0 recordkeeping hours x 0.0004 x \$263).

14. Estimated Annualized Cost to the Federal Government

The total estimated annualized cost to the NRC for reviewing and assessing NRC Form 445 is \$13,150 (\$263 per hour x 1 per form x 50 forms per year).

15. Reasons for Changes in Burden or Cost

The overall burden for completing NRC Form 445 has increased by 10 burden hours from 40 hours to 50 hours. This is an increase due to the burden associated with this information collection. The number of respondents has increased but the time to complete the form has decreased. The estimated time to complete the form is reduced from 2 hours to 1 hour based on respondent feedback. The number of anticipated responses is believed to be a more accurate depiction of the number that we expect to receive, the previous clearance package estimated 20 forms which was found to be too low. There has been a decrease in the cost of the hourly fee rate from \$272 to \$263 per hour.

16. Publication for Statistical Use

None.

17. Reason for Not Displaying the Expiration Date

Not applicable.

18. Exceptions to the Certification Statement

Not applicable.

B. COLLECTIONS OF INFORMATION EMPLOYING STATISTICAL METHODS

Not applicable.