

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

REVISION

Description of the Information Collection

As indicated in 10 CFR 9.21(b), various publically available Nuclear Regulatory Commission (NRC) documents are made available to the general public through the NRC Public Document Room (PDR). In addition to ensuring accessibility to reading the documents, individuals may use the NRC microfiche reader-scanner, as well as the public computers with access to the Agencywide Documents Access and Management System (ADAMS) to print full-text documents. Additionally, the NRC has a contractor who will provide reproduction services to the public if desired.. The NRC Form 171, "Duplication Request," is used to request contractor reproduction services.

A. JUSTIFICATION

1. Need for the Collection of Information

The information collected on Form 171, "Duplication Request," is necessary for the contractor to process and fulfill reproduction service orders from members of the public. 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 and Practical Utility of Information

Form 171, "Duplication Request," is completed by the NRC PDR personnel in response to requests from the public for contractor's reproduction services.. The information collected on this form permits the contractor to reproduce the correct items ("Document File Information" section), to contact the requester when problems arise ("Send To" section), to charge the appropriate fees, and to provide an Invoice and receipt for services rendered ("Bill To" and "Shipping Methods" sections). The PDR staff retains a copy of the completed form (with charge information removed), the contractor returns a copy of the completed request to the requester, and a third copy is maintained by the contractor in 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.

3. Reduction of Burden through Information Technology

The PDR staff collects the information for the NRC Form 171 by telephone to ensure security of credit card information provided. Due to the small number of forms submitted annually, the NRC has determined that it is not cost effective to develop an electronic submission portal with the security features that would be required for the transmission of the information (including credit card numbers) on this form. The PDR staff provide the completed form to the duplication contractor.

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

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 number of requests determines the frequency of completing the form. A form is completed only at the time documents are requested for reproduction at the PDR. If an NRC Form 171 were not completed for each request, the contractor would not have sufficient information to complete the request and determine the appropriate charges for the duplication service.

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 August 14, 2018 (83 FR 40341). Eight potential public respondents were contacted via email as part of the public consultation process. These potential respondents are regular users of the Public Document Room and have ordered copies of documents on microfiche in the recent past. One comment was received but it was determined to be out of scope.

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

The NRC Form 171 was reviewed in 2018 by the NRC's Privacy Officer. Because the form is not filed or retrieved by an individual's name or personal identified, it does not need a Privacy Act Statement. The form is filed by order number. The record is destroyed after 90 days.

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 is based on the historical average number of requests received annually. NRC staff anticipates that the number of requests received during the upcoming clearance period will be similar to the past three years.

Total Average Annual Requests: 74

Total Burden: 6 hours = 74 requests x 5 minutes = 370 min./60 min.

Cost: \$1,578 (6 hours x \$ 263/hour)

The \$263 hourly rate used in the burden estimates is based on the Nuclear Regulatory Commission's fee for hourly rates as noted in 10 CFR 170.20 "Average cost per professional staff-hour." For more information on the basis of this rate, see the Revision of Fee Schedules; Fee Recovery For Fiscal Year 2017 (82 FR 30682; June 30, 2017).

13. Estimate of Other Additional Costs

Customers must pay the contractor \$0.80 per page for duplication services.

14. Estimated Annualized Cost to the Federal Government

The staff has developed estimates of annualized costs to the Federal Government related to the conduct of this collection of information. These

estimates are based on staff experience and subject matter expertise and include the burden needed to review, analyze, and process the collected information and any relevant operational expenses.

Estimated burden for NRC staff to record telephone and email 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 each the NRC Form 171 for a total cost for 6 hours of \$1,578(74 requests @ 5 minutes each = 370 minutes/60 minutes = 96 hours x \$263/hr).

15. Reasons for Change in Burden

The burden has decreased by 3 hours from 9 to 6 hours as a result of more microfiche documents being retrofitted or scanned into ADAMS. 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 past three years, we estimate a 68.5% decrease in the number of requests during this 3-year renewal period.

The changes in burden cost reflect an decrease in NRC's recoverable fee rate, which decreased from \$279/hr. to \$263/hr.

16. Publication for Statistical Use

Not applicable.

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.