DRAFT OMB SUPPORTING STATEMENT FOR NUREG/BR-0254, PAYMENT METHODS AND NRC FORM 629, "AUTHORIZATION FOR PAYMENT BY CREDIT CARD"

(3150-0190)

EXTENSION

Description of the Information Collection

The Nuclear Regulatory Commission (NRC) bills licensees, applicants, and individuals for the payment of civil penalties, full cost licensing fees, inspection fees, and other fees. The four methods used to pay bills owed to the NRC are: (1) Payment by Automated Clearinghouse Network (ACH); (2) Payment by Credit Card; (3) Payment by Electronic Funds Transfer/FedWire; and (4) Payment by Check. NUREG/BR-0254, "Payment Methods" provides instructions on how to transfer monies owed to the NRC; no information is collected by the NRC in using this brochure. NRC Form 629, "Authorization for Payment by Credit Card" is an optional form used to authorize payment by credit card. NRC Form 629, "Authorization for Payment by Credit Card" along with NUREG/BR-0254 is provided to bill recipients and is also available on the NRC's website.

NRC Form 628, "Financial EDI Authorization," was previously part of this clearance. NRC Form 628 provides the NRC's banking information needed for electronic data interchange payments. Since no information is collected by this form, it has been removed from this clearance.

A. JUSTIFICATION

1. <u>Need for and Practical Utility of the Collection of Information.</u>

NRC Form 629, "Authorization for Payment by Credit Card," is primarily used by licensees to authorize payment by credit card for license fees. The form is also used for payment of fees for fingerprint cards but use for this fee is infrequent. The form solicits information that includes the date of authorization, company name of licensee, name of cardholder, email address, account number, card expiration date, address, cards accepted, telephone number, license or docket number, security code, purpose of payment, total amount of transaction, and signature of cardholder.

There are no recordkeeping requirements associated with this collection.

2. Agency Use of Information.

The agency uses this information to properly credit monies received from credit card companies when this method is utilized by the licensees to pay their indebtedness to the NRC.

3. <u>Reduction of Burden Through Information Technology</u>.

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. It is estimated that approximately 90 percent of the potential responses are filed electronically for NRC Form 629.

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.

Approximately 18 percent of the invoices issued in FY 2019 were issued to small businesses. Efforts have been made to keep the method of collecting fees as simple as possible, and requirements for information have been kept to a minimum.

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

The impact to the NRC fee program if the collection is not conducted or is conducted less frequently will be minimal. Licensees, applicants and individuals will continue to have three options open to them to pay future bills and invoices mailed to them. They may send a paper check, send payment by ACH, or use an electronic funds transfer through FedWire. However, NRC Form 629 benefits respondents by providing the additional option for paying invoices by credit card.

7. <u>Circumstances which Justify Variation from OMB Guidelines.</u>

Not Applicable.

8. <u>Consultations Outside the NRC</u>.

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

9. Payment or Gift to Respondents.

Not Applicable.

10. <u>Confidentiality of the Information</u>.

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. Estimate of Annualized Burden and Burden Hour Cost.

For NRC Form 629, "Authorization for Payment by Credit Card," and NUREG/BR-0254, "Payment Methods," it is estimated that it takes approximately 10 minutes to read the instructions and complete the form. It is estimated that approximately 400 forms will be completed annually with an estimated burden of 66.67 hours (400 forms x (10/60) = 66.67 hours). The estimated annual burden hour cost is \$18,534.26 (66.67 hours x \$278).

The \$278 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 2019 (84 FR 22331, May 17, 2019).

13. Estimate of Other Additional Costs.

It is estimated that approximately 10 percent of NRC Form 629 "Authorization for Payment by Credit Card," are mailed. The estimated annual cost for mailing the form is \$19.60 (40 forms x \$0.49 postage).

14. Estimated Annualized Cost to the Federal Government.

Credit card forms (NRC Form 629) are processed by third party entities for the NRC annually. There is no cost to the NRC because the cost for this service by the third party is assumed by the Department of the Treasury.

15. Reasons for Changes in Burden or Cost.

There is a reduction in burden or cost. It is estimated that it still takes approximately 10 minutes to complete the form which remains the same. However, due to greater availability of electronic means to make payments, licensees are using Form 629 less often.

16. Publication for Statistical Use.

None.

17. <u>Reason for Not Displaying the Expiration Date</u>.

Not applicable.

18. <u>Exceptions to the Certification Statement</u>.

Not applicable.

B. COLLECTION OF INFORMATION EMPLOYING STATISTICAL METHODS Statistical methods are not used in this information collection.