

DRAFT OMB SUPPORTING STATEMENT FOR  
NRC FORM 446  
REQUEST FOR APPROVAL OF OFFICIAL FOREIGN TRAVEL BY NON-GOVERNMENT  
PERSONNEL  
(OMB 3150-XXXX)

(NEW)

DESCRIPTION OF THE INFORMATION COLLECTION

This form is used to request approval by the U.S. Nuclear Regulatory Commission (NRC) Office of International Programs for official international travel by non-Federal consultants and invited travelers (i.e., non-NRC employees) conducting official business on behalf of the NRC. This approval is required in accordance with NRC Management Directive 5.13, "NRC International Activities, Practices, and Procedures" and Management Directive 14.1, "Official Temporary Duty Travel".

The form collects the traveler's name, employer, destination country, departure and return dates, the purpose of the travel, a list of NRC staff et al with whom the travel has been coordinated, other NRC travelers and contractors participating on the same trip, and a proposed itinerary. Additionally, the form requires pre-approval of the NRC Office or Region recommending travel, approval by the Office Director or Regional Administrator, and the Deputy Director of the Office of International Programs.

A. Justification

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

NRC Form 446 is the mechanism by which NRC is advised of and approves official international travel for its non-Federal consultants and invited travelers.

2. Agency Use of Information

Information collected on NRC Form 446 is used to determine whether proposed official international travel for its non-Federal consultants and invited travelers should be approved and to ensure that only the minimum number of individuals required proceed on an official trip.

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: (1) the Electronic Information Exchange (EIE) process, which is available from the NRC's "Electronic Submittals" Web page; (2) by Optical Storage Media (OSM) (e.g. CD-ROM, DVD); (3) by facsimile or; (4) by e-mail. However, because Form 446 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 446 by NRC's non-Federal consultants and invited travelers provides the minimum information required to authorize the proposed official international travel.

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

Without the information collected through NRC Form 446, NRC will be unable to perform its fiduciary responsibilities associated as part of effective oversight of proposed official international travel by non-Federal consultants 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*.

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). This information is maintained in a system of records designated as NRC-20 and described at 81 Federal Register 81334-81335 (November 17, 2016).

11. Justification for Sensitive Questions

Not applicable.

12. Estimated Burden and Burden Hour Cost

It is estimated that 20 NRC Form 446s will be completed annually by individuals who are not NRC employees, contractors, or consultants. It is estimated that the annual burden for the next cycle will be 20 hours (20 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 \$278 hr., the annual cost is \$5,560. 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

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 2020, the storage cost for this clearance is \$0.00 (0 recordkeeping hours x 0.0004 x \$278).

14. Estimated Annualized Cost to the Federal Government

The total estimated annualized cost to the NRC for reviewing and assessing NRC Form 446 is \$5,560 (\$278 per hour x 1 per form x 20 forms per year).

15. Reasons for Changes in Burden or Cost

This is a new program.

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.