

DESIGNATED ORIGINAL

PAUL TITTS SMITH

3 1 5 0

301 492-4124

NRC Form 277, Request for Visit or Access Approval

Executive Order 12356

X

DF02

8903270023 890316
PDR ORG EUSOMB
PDC

OMB SUPPORTING STATEMENT FOR

NRC FORM 277

Request for Visit or Access Approval

Description of the Information Collection

The information collection associated with the NRC Form 277, "Request for Visit or Access Approval," affects any employee of approximately 22 licensees and 35 contractors who: (1) holds an NRC access authorization; and (2) needs to make a visit to NRC, other contractors/licensees or government agencies in which access to classified information will be involved or unescorted area access is desired. The completed NRC Form 277 contains a signature certification of the NRC access authorization and of an official need-to-know. Only a minimal amount of other identifying/pertinent information (e.g., date of birth, clearance type, dates of visit) are requested by the form.

A records retention period of three years following the expiration of the visit by both the requesting and visited facility is required for the form. Personal information contained on the completed form is handled and protected in accordance with the NRC directives and provisions of the Privacy Act of 1974. Other information contained on, or pertaining to the form (e.g., recordkeeping and reporting requirements) is available for public inspection in accordance with 10 CFR Part 9.

The use of NRC Form 277 affords some assurance that only properly cleared and authorized individuals, who require access as a part of their official duties, will have such access during visits to other facilities and agencies. Therefore, the use of the NRC Form 277 benefits the NRC security program and public at large.

A. JUSTIFICATION

1. Need for Collection of Information.

Section 4.1 Executive Order 12356 states: "A person is eligible for access to classified information provided that a determination of trustworthiness has been made...and provided that such access is essential to the accomplishment of lawful and authorized Government purposes." Further, Section 5.3 requires agencies to "...establish procedures to prevent unnecessary access to classified information,..."

The use of the NRC Form 277 as cited in Section 25.35 of 10 CFR Part 25 (applicable to licensees) and in NRC Management Directive 2101, Part IX (applicable to contractors) is the method by which NRC can provide assurance of compliance with the above provisions of E.O. 12356. The NRC Form 277 provides the facility/agency to be visited with verification of the visitor's NRC access authorization and certification of their official need-to-know for the classified information

regarding the visit. By requiring the information collection contained on the NRC Form 277 the facility/agency can assure that only properly cleared and authorized individuals will be permitted access during a visit.

2. Agency Use of Information.

The NRC Form 277 is forwarded by the licensee/contractor through the appropriate NRC office exercising oversight, licensing or regulatory authority for certification of need-to-know to the NRC Division of Security (SEC). After clearance verification, SEC forwards the completed form to the security office having cognizance over the facility to be visited. The security office of the facility being visited uses the information collected to confirm identity of the visitor and to permit the visitor access to the requested classified information/area. Failure to use the NRC Form 277 by the licensee/contractor may result in denied access to classified information or areas which are necessary in the accomplishment of official duties.

3. Reduction of Burden Through Information Technology.

No reduction in the information collection burden can be realized through information technology with respect to the NRC Form 277. The information contained/obtained on the form is visit specific. Also, original signatures are necessary for access authorization verification and need-to-know certification.

4. Effort to Identify Duplication.

In order to safeguard classified information, other Government agencies and certain facilities collect information of a nature similar to the NRC Form 277, to verify the access authorization and confirm the need-to-know of visitors. The information collection on a given NRC Form 277 does not duplicate or overlap other information collections made by the NRC or other Government agencies since each visit/access approval is unique. With respect to the actual form, essentially identical forms are used throughout the U.S. Government, yet there is no standard form available. Instead, there is reciprocal acceptance of the forms among facilities/agencies.

5. Effort to Use Similar Information.

There is no similar information collection made by NRC or any other Government agency which could be utilized, since each visit approval is unique and requires the establishment of specific permissible accesses for the visit.

6. Effort to Reduce Small Business Burden.

None of the licensees affected by the use of the NRC Form 277 qualify as small business enterprises or entities.

7. Consequences of Less Frequent Collection.

The frequency of information collection is dependent on the number of visits an individual makes to Government agencies or facilities. In most cases, a less frequent collection would mean eliminating the collection, as visits by contractors/licensees, for which the NRC Form 277 would be required, are infrequent. If the information is not collected, access by the visitor to classified information or areas, necessary in the accomplishment of official duties, may be denied. Further, a reduction in the collection of the information required by the NRC Form 277 would reduce the assurance that only properly cleared and authorized individuals will be permitted access during a visit. Thus, less frequent collection may endanger the U.S. common defense and national security.

8. Circumstances Which Justify Variation from OMB Guidelines.

There is no variation from OMB Guidelines in the collection of information.

9. Consultation Outside the Agency.

No consultations were conducted since the last clearance submittal.

10. Confidentiality of Information.

The information collected is used to establish the permissible access associated with a visit for an individual. The information is protected from public disclosure under the Privacy Act of 1974 and is handled in accordance with routine uses specified in the Privacy Act Statement contained on the form.

11. Justification for Sensitive Questions.

NRC does not request sensitive information on this form.

12. Estimated Annualized Cost to Federal Government.

The estimated annual cost to Federal Government associated with the NRC Form 277 is \$263.06. This cost was computed as follows:

NOTE: Annual form usage for NRC licensees/contractors is estimated as 30.

COSTS:

Annual clerical effort = (30 X 10.00 minutes = 5.0 hrs. X \$20/hr.)	\$100.00
Annual professional effort = (30 X 5.00 minutes = 2.5 hrs. X \$60/hr.)	150.00
*Annual record holding (3 yrs.) = (1/16 cu. ft. X \$209/cu. ft.)	13.06
Total estimated annual cost =	\$263.06

13. Estimate of Burden.

The total estimated annual hours of burden to the public (based on the past staff experience) associated with the NRC Form 277 is 5.0 hours. The total estimated cost to the public for use of this form is \$313.06. These totals were computed as follows:

	<u>Burden-Hours</u>	<u>Cost</u>
30 annual responses X 10 minutes per response	5	\$300.00
Recordkeeping (3 years)	<u>5</u>	<u>13.06</u>
Totals	10	\$313.06

14. Reasons For Change in Burden.

The burden associated with recordkeeping was understated in the current clearance and is being adjusted to reflect present burden.

15. Publication for Statistical Use.

There is no application of statistics on the information collection related to NRC Form 277. There also is no publication of the information.

*The NRC Form 277 must be retained for three years following the expiration date of the visit authorization to permit periodic survey.

PRIVACY ACT STATEMENT

Pursuant to 5 U.S.C. 552a(e) (3), enacted into law by section 3 of the Privacy Act of 1974 (Public Law 93-579), the following statement is furnished to individuals who supply information to the Nuclear Regulatory Commission on NRC Form 277. This information is maintained in a system of records designated as NRC-39 and described at 40 Federal Register 44533 (September 26, 1976).

1. **AUTHORITY** Sections 145 and 161(i) of the Atomic Energy Act of 1954, as amended (42 U.S.C. 2165 and 2201(i)), and Executive Order 12356. Solicitation of the social security number is authorized by Executive Order 9897 dated November 22, 1943.
2. **PRINCIPAL PURPOSE(S)** Information entered on this form is used to verify an individual's security clearance and authorization for access during a classified visit.
3. **ROUTINE USES** The information is provided to the contractor, licensee or other organization or individual to be visited. The information may also be disclosed to an appropriate Federal, State, or local agency in the event the information indicates a violation of law and in the course of an administrative or judicial proceeding. In addition, this information may be transferred to an appropriate Federal, State, and local agency to the extent relevant and necessary for the NRC decision or to an appropriate Federal agency to the extent relevant and necessary for that agency's decision about you.
4. **WHETHER DISCLOSURE IS MANDATORY OR VOLUNTARY AND EFFECT ON INDIVIDUAL OF NOT PROVIDING INFORMATION** It is voluntary that you furnish the requested information. If the information is not furnished, you may be denied entrance and/or access to the agency or facility and the information to which access is requested. Your social security number is used as an identifier due to the large number of individuals with similar names and birth dates.
5. **SYSTEM MANAGER(S) AND ADDRESS**
Director, Division of Security
Office of Administration
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555