

FINAL SUPPORTING STATEMENT  
FOR  
NRC FORM 171, "DUPLICATION REQUEST"

(OMB CLEARANCE NUMBER 3150-0066)  
REVISION REQUEST

Description of the Information Collection

As indicated in 10 CFR 9.21(b), various Nuclear Regulatory Commission (NRC) documents are made available to the public through the NRC Public Document Room (PDR). In addition to ensuring accessibility to reading the documents, the NRC has a contractor provide reproduction services to the public. Although individuals may utilize the contractor's coin operated paper copying machine or the NRC microfiche reader-printers, as well as the ADAMS terminals to print full text documents, they often request the contractor to perform this reproduction service.

A. JUSTIFICATION

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

Only one form is required to capture the different electro-mechanical processes necessary to complete the eight different reproduction services requested by the public.

2. Agency Use of Information

Reproduction form is completed by the individual member of the public making a request, or by the Public Document Room/Library Branch (PLB) personnel in response to letter and telephone requests from the public, for which the contractor's reproduction services are to be utilized. The specific data on this form permits the contractor to reproduce the correct items, to contact the requester when problems arise, and to provide a bill for services rendered. The requester maintains a copy for his records, the contractor returns a copy of the completed request, and a third copy is maintained by the contractor in request order number sequence in case a question arises concerning a past service performed. The NRC PLB maintains no records of the completed request form. "The contractor provides the Public Document Room/Library Branch each month with a statistical summary report related to the number of users in the past month and to the number of pages, microfiche, aperture cards, computer diskettes, audio and video cassettes reproduced the previous month for requesters. This data is utilized by the NRC in its annual report to Congress.

3. Reduction of Burden through Information Technology

There are no legal obstacles to reducing the burden associated with this information. The brief burden associated with the completion of this form is not currently amenable to a reduction through the use of information technology.

4. Effort to Identify Duplication and Use Similar Information

The Information Requirements Control Automated System (IRCAS) was searched to determine duplication, none was found. This information does not duplicate other information collections.

There is no source for the required information other than the requester. Information necessary to retrieve the document and for whom it is to be retrieved can only be supplied by the requester.

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 can not be reduced.

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

The respondent determines the frequency of completing the form. A form is completed only at the time the document is requested for reproduction at the PDR.

7. Circumstances Which Justify Variation from OMB Guidelines

This information collection does not vary from OMB guidelines.

8. Consultation Outside the NRC

The opportunity for public comment was published in the Federal Register July 2, 2003 (68 FR 39600). No comments were received.

9. Payment or Gift to Respondents  
Not Applicable.

10. Confidentiality of the Information  
The NRC provides no pledge of confidentiality for this collection of information.

11. Justification for Sensitive Questions  
The forms contain no sensitive questions.

12. Estimate of Annualized Burden and Burden Hour Cost  
Documents are requested by four means: e-mail, fax, telephone, or by submitting an NRC Form 171. The estimated burden for submission of requests is as follows:

NRC Form 171 - 1,000 requests  
E-mail - 4,000 requests  
Fax - 2,000 requests  
Letter - 500 requests  
Phone - 8,300 requests

Total Requests - 15,800

Burden - NRC Form 171, e-mail, fax and letter requests -  $7,500 \times 4 \text{ minutes}$   
 $(30,000 \text{ minutes}/60) = 500 \text{ hours}$

Phone requests -  $8,300 \times 10 \text{ minutes}$  ( $83,000 \text{ minutes}/60$ ) = 1,383 hours

Total burden - 1,883 hours (500 hours + 1,383 hours)

Cost - \$289,982 (1,883 hours x \$154 per hour)

13. Estimate of Other Additional Costs

Not applicable.

14. Estimated Annualized Cost to the Federal Government

Estimated burden for NRC staff to record telephone requests and verify all requests for NRC documents is as follows:

It is estimated that it takes the NRC staff 5 minutes each to process all requests with the exception of phone requests which take about 10 minutes each to process for a total cost of 2,008 hours or \$309,232. (7,500 requests @ 5 minutes each or  $37,500/60=625$  hours; and 8,300 requests @ 10 minutes each or  $83,000/60=1,383$  hours.)

This cost is fully recoverable by fee assessments to NRC licensees pursuant to 10 CFR Part 171.

15. Reasons for Change in Burden

The burden hours increased by 774 hours from 1,109 to 1,883 as a result of a re-estimate of the time required for the public to make phone requests, allowing for time spent waiting for the NRC to record the information before proceeding to the next question.

16. Publication for Statistical Use

The reproduction contractor provides the Public Document Room/Library Branch each month with a statistical summary report related to the number of users in the past month and to the number of pages, microfiche, and aperture cards reproduced the previous month for the users. These data are utilized by the NRC in its annual report to Congress.

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.