




UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D.C. 20555-0001

March 5, 2026

Class Deviation RFO-2025-19  
Supplement 1

MEMORANDUM TO: Acquisition Management Division and Buyers in the Regions

FROM: Eleni Jernell, Director  Signed by Jernell, Eleni  
Acquisition Management Division on 03/05/26  
Office of Administration

SUBJECT: Supplement to FAR Class Deviation for FAR Part 19 in  
Support of Executive Order 14275 on Restoring Common  
Sense to Federal Procurement

**1. PURPOSE:** This supplement approves changes to the class deviation to Federal Acquisition Regulation (FAR) Part 19 - "Small Business" for purposes of implementing the Federal Acquisition Regulatory Council's (FAR Council) updates to the model deviation text to FAR Part 19. Notable changes include updating clause 52.219-9, "Small Business Subcontracting Plan", to reflect the transition of subcontracting reporting from the decommissioned Electronic Subcontracting Reporting System (eSRS) to the new Subcontracting Plan Reporting (SPR) system at [SAM.gov](https://www.sam.gov), supporting small business subcontracting program reporting.

**2. BACKGROUND:**

- [Executive Order \(E.O.\) 14275 on Restoring Common Sense to Federal Procurement](#) signed April 15, 2025, mandates a comprehensive review and simplification of the Federal Acquisition Regulation (FAR).
- On December 11, 2025, NRC issued [Class Deviation RFO-2025-19](#) approving a class deviation to FAR Part 19 for purposes of implementing the FAR Council's model deviation text to FAR Part 19. The class deviation became effective immediately, December 11, 2025.
- While subcontracting reporting will continue, GSA decommissioned the Electronic Subcontracting Reporting System ([eSRS.gov](https://www.esrs.gov)) on February 20, 2026. Subcontracting reporting will transition to [SAM.Gov](https://www.sam.gov). This is part of the ongoing effort to modernize the suite of federal acquisition systems<sup>1</sup>.
- This supplement provides updates to the model deviation text to support the eSRS.gov transition.

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<sup>1</sup> For more information, please visit [SAM.gov/esrs](https://www.sam.gov/esrs).

### 3. SUMMARY OF CHANGES:

- Removes prescriptive manual process steps for contractors and contracting officers to review/approve/reject subcontract reports submitted to the new system. The new system will implement business rules to prevent reporting of most common errors.
- Agencies are given discretion for how to monitor subcontract reports, with best practices to be developed in the FAR companion. The new system will create reports to identify reporting needing the greatest attention.
- Extends the reporting requirement of Individual Subcontract Reports from 30 days after the reporting period to 45 days to align the FAR to SBA's current regulations.
- The Council's RFO Part 19 model deviation text has been updated with these changes and is available at [Acquisition.gov](https://www.acquisition.gov), under the "[FAR Overhaul](#)" link, and is incorporated into this class deviation.

### 4. INSTRUCTIONS:

- The NRC acquisition workforce must follow the RFO Part 19 model deviation text instead of FAR Part 19 as codified at 48 CFR Chapter 1.
- For new solicitations or contracts, when using the clause that has been revised (52.219-9 – Small Business Subcontracting Plan), utilize the RFO model deviation language at [RFO FAR Part 52](#).
- For open solicitations or awarded contracts, the contracting officer has discretion regarding the need to enforce or amend the clause in this supplement in the contract. Note that without some of the removed provisions or clauses, the contracting officer may be required to separately address certain aspects in the contract.
- Review templates and related standard operating procedures to align with this class deviation and remove unnecessary processes and steps.

**5. APPLICABILITY:** This class deviation applies to all NRC procurements.

**6. AUTHORITY:** This class deviation is issued under the authority of E.O. 14275, [OMB M- 25-26](#), and 48 CFR 1.4 and RFO FAR 1.304.

**7. EFFECTIVE DATE:** This class deviation is effective immediately, and remains in effect until rescinded or incorporated into the FAR.

Supplement to FAR Class Deviation for FAR Part 19 in Support of Executive Order 14275 on Restoring  
Common Sense to Federal Procurement DATE March 5, 2026

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