

Guidance for Electronic Submissions to the NRC

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Revision 6.1



Note: This document will not appear in the Code of Federal Regulations.

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1. Introduction

1.1 Background

This document consolidates several pre-existing documents that provide guidance for electronic submittals to the U.S. Nuclear Regulatory Commission (NRC). The result is a single guidance document, which addresses electronic submittals to the NRC. The following documents have been consolidated into this guidance document and are superseded: ① Guidance for Submission of Electronic Docket Materials under 10 CFR Part 2, Subpart J, ② Guidance for Submission of Electronic Docket Materials (10 CFR Part 2, Subpart C, 10 CFR Part 13, 10 CFR Part 110) and ③ Appendix A, United States Nuclear Regulatory Commission (NRC), Guidance for Electronic Submissions to the Commission.

This guidance contains a new chapter providing guidance for Combined License Application (COLA) submittals and provisions for electronic filings in adjudications.

The NRC plans to update this guidance periodically to reflect changes in technology and agency experience by posting the latest version of the document on the NRC's Web site at www.nrc.gov. (To locate this document, scroll to the bottom of the screen. Under "Popular Documents" select the Electronic Submittals link. Located within the Electronic Submittal System Notices box, select the link to this document titled: Revision XX of the Guidance for Electronic Submissions to the NRC is now available link). While the Commission requires submission of electronic documents in adjudicatory proceedings, and encourages electronic submission of documents in other proceedings, submission of paper in many instances remains acceptable.

1.2 Scope

This guidance document will provide direction for the electronic transmission and submittal of documents to the NRC. This includes large documents consisting of hundreds of pages of textual and graphic-oriented materials (e.g., maps, photographs, charts, handwritten documents) or other large or complex electronic objects (e.g., computer programs, computer simulations, spreadsheets, audio and/or video files, data files) with electronic file sizes more than several hundred megabytes (MB). Electronic transmission and submittal of documents can be accomplished via the following avenues: the Electronic Information Exchange (EIE) process, which is available from the NRC's "Electronic Submittals" Web page (via the Adjudicatory submissions link or the General submissions link found under the "Electronic Submissions Systems" section), by Optical Storage Media (OSM) (e.g. CD-ROM, DVD), by facsimile or by e-mail.

The NRC has enhanced its electronic submittal capabilities with a robust system for facilitating the electronic transmission process. The NRC encourages its user community to use the electronic submittal method via the EIE process available on the NRC's "Electronic Submittals" Web page: http://www.nrc.gov/site-help/e-submittals.html.

Note: While the Commission mandates the submission of electronic adjudicatory filings, exemptions are available to submit paper documents if good cause is established by the requesting party in accordance with 10 CFR 2.302(g).

Consistent with 10 CFR 63.22 and 63.4, the Department of Energy (DOE) need not electronically submit its license application via the EIE process available on the NRC's "Electronic Submittals" Web page.

Upon successfully submitting documents to the NRC, the documents will ultimately be imported into the Agencywide Documents Access and Management System (ADAMS). Participants will have ready access to, and use of, such submittals, for example, in NRC adjudicatory proceedings via the Electronic Hearing Docket (EHD). The following is the url to the EHD libraries: http://ehd1.nrc.gov/EHD/. Eventually, electronic submittals will be transferred to the National Archives and Records Administration (NARA), in accordance with 36 CFR 1228.270. All publicly available documents are imported into the Publicly Available Records System (PARS) Library, which provides access to the publicly available documentation submitted to the NRC.

NRC's Electronic Information Exchange (EIE) System was created to allow NRC customers and stakeholders to submit secure electronic data and document submissions to the agency. In effect, the system ensures the exchanged information is secure and that the person submitting the material is, in fact, the purported submitter. The EIE system is the software behind Internet forms used to submit information for Adjudicatory Hearings, the Criminal History Program, Fitness for Duty, and the General Form Submission Program.

The EIE system receives submitted documents and forwards them to the NRC's document processing center for processing. This system allows the NRC to exchange information related to official agency business with its customers and other Federal agencies across the Internet. The EIE System uses a public key infrastructure and digital signature technology to authenticate documents and validate the identity of the person submitting the information. It requires the use of digital signatures and certain software plug-ins. Procedures for acquiring a digital ID certificate can be found in Section 3.1. Procedures for installing free software plug-ins can be found within Section 3.3.

This document does not address outgoing NRC communications.

1.3 Applicable Transactions

Documents or other information submitted under oath or affirmation, or other documents where secure transfer is either required or appropriate, should be submitted over the Internet using EIE or submitted on Optical Storage Media (OSM) (see Section 4.0). EIE can be easily accessed from the "Electronic Submittals" Web page (http://www.nrc.gov/site-help/e-submittals.html).

While e-mail and facsimiles are not appropriate for most submissions required by NRC regulations, they may be used for certain other correspondence and communications with the NRC, such as rulemaking petitions and comments on rulemaking proceedings, communications with States and other Federal agencies, requests for enforcement actions under 10 CFR 2.206, and Freedom of Information Act (FOIA) requests and appeals, but not for information covered under the Privacy Act.

E-mail may be addressed to either specific individual's names as contacts in Federal Register Notices or other agency communications, or to the office specified in the regulation or communication specific to the document(s) being submitted; to addresses the NRC Web site provides for individual program offices or specific agency functions or services; or to the

Office of Public Affairs. Individual program offices may be contacted through the NRC Web site at www.nrc.gov by selecting specific contact programs from the Contact Us link at the top of the home page. The Office of Public Affairs may be reached through the Contact Us link at the top of the home page or at OPA@nrc.gov. The sender will not receive an e-mail confirmation of receipt of the submission except for those communications using the EIE process available on the NRC's "Electronic Submittals" Web page.

1.3.1 Exceptions to Electronic Submissions

1.3.1.1 Circumstances When EIE Process Cannot Be Used

Communications with the NRC may be submitted electronically via the EIE process available on the NRC's "Electronic Submittals" Web page except for the following:

- 1. Classified information (e.g., National Security Information and Restricted Data), and Safeguards Information. This information may only be submitted electronically via OSM (see Section 4.0).
- 2. "Immediate" or "prompt" notifications to the NRC that NRC regulations require be made by telephone or telefax up to one week before or after an event (e.g., 10 CFR 30.50 or 30.55(c)).
- 3. Notice of filing of bankruptcy petition, whether voluntary or involuntary (e.g., 10 CFR 30.34(h)(1)).
- 4. Documents served on the NRC as a participant in Federal Court proceedings or in non-NRC administrative proceedings (such as administrative proceedings before the Merit Systems Protection Board, unless electronic submission is authorized by rule or order issued by a Federal Court or Agency).
- 5. NRC contractor proposals or invoices submitted in response to specific contractual requirements. (Because Federal Acquisition Regulation guidance as contained in Section 30 of the Office of Federal Procurement Policy Act [41 USC 426] allows the Federal Government to use electronic commerce whenever practical, guidance for electronic submittal of proposals and invoices will be addressed in individual procurements. Further guidance for submission of these documents will be issued at a later date.)
- Financial assurance instruments to meet decommissioning cost requirements and prescribed by regulation at 10 CFR 30.35(e) and (f), 10 CFR 40.36(d) and (e), and 10 CFR 70.25(e) and (f) (including surety bonds, letters of credit, lines of credit, and insurance).
- 7. Documents with special printing requirements (see <u>Section 2.11</u>). This information may only be submitted electronically via OSM.
- 8. Individual files >50 MB, which can not be segmented into smaller sized files. This information may only be submitted electronically via OSM.

1.3.1.2 Optical Storage Media (OSM) Submittal Exceptions

Communications with the NRC may be submitted electronically via OSM except for the following:

- 1. "Immediate" or "prompt" notifications to the NRC that NRC regulations require be made by telephone or telefax up to one week before or after an event (e.g., 10 CFR 30.50 or 30.55(c)).
- Notice of filing of bankruptcy petition, whether voluntary or involuntary (e.g., 10 CFR 30.34(h)(1)).
- Documents served on the NRC as a participant in Federal Court proceedings or in non-NRC administrative proceedings (such as administrative proceedings before the Merit Systems Protection Board, unless electronic submission is authorized by rule or order issued by a Federal Court or Agency).
- 4. NRC contractor proposals or invoices submitted in response to specific contractual requirements. (Because Federal Acquisition Regulation guidance as contained in Section 30 of the Office of Federal Procurement Policy Act [41 USC 426] allows the Federal Government to use electronic commerce whenever practical, guidance for electronic submittal of proposals and invoices will be addressed in individual procurements. Further guidance for submission of these documents will be issued at a later date.)
- 5. Financial assurance instruments to meet decommissioning cost requirements and prescribed by regulation at 10 CFR 30.35(e) and (f), 10 CFR 40.36(d) and (e), and 10 CFR 70.25(e) and (f) (including surety bonds, letters of credit, lines of credit, and insurance).

1.3.2 Electronic Forms and Payments

Each form referred to in NRC regulations can be found on the NRC Reading Room Web site at http://www.nrc.gov/reading-rm/doc-collections/forms/ in Portable Document Format (PDF) for viewing and printing.

Financial payments required by NRC regulations can be submitted electronically. To obtain the authorization to do so, please complete NRC Form 628. Payments by credit card of civil penalties, Part 170 licensing and inspection fees, Part 171 annual fees, and other fees, may be done after completing NRC Form 629 (Authorization for Payment by Credit Card) included with the invoice or civil penalty.

1.3.3 Submissions Requiring Oath or Affirmation

Submissions requiring oath or affirmation may be submitted electronically using the EIE process available on the NRC's "Electronic Submittals" Web page or via OSM. These include the following:

- Documents that by statute must be submitted under oath or affirmation (e.g., pursuant to section 182 of the Atomic Energy Act of 1954, as amended, 42 USC 2232). Generally, oath or affirmation requirements apply to applications for a license, amendments to a license, some licensee responses to Notices of Violation (NOV), and certain letters of transmittal. NRC's regulations in 10 CFR Parts 2, 50 and 52 implement these statutory requirements; certain regulations require an oath or affirmation for submission of documents (e.g., 10 CFR 50.54(f) and 10 CFR 50.30(b)).
- 2. Documents that must be sent by certified mail (e.g., 10 CFR Part 30, Appendix A II. C.2).
- 1.3.3.1 Oath and Affirmation for the EIE Process Available on the NRC's "Electronic Submittals" Web page

There are currently two acceptable methods for providing this oath when submitting via the EIE process available on the NRC's "Electronic Submittals" Web page:

1. Documents requiring oath or affirmation may use electronic submission via the EIE process available on the NRC's "Electronic Submittals" Web page, to digitally sign the affirmation on the document. Using this process, the document should conclude with a statement:

"I declare under penalty of perjury that the foregoing is true and correct. Executed on [date]."

The electronic document should be digitally signed (by clicking on the Signed By button) by the person affirming this statement. This person may then transmit the document electronically directly to the NRC (by clicking on the Submit Document button) or may forward the document to someone else for transmission to the NRC. In the latter case, the transmitter should also sign the document to authorize the electronic transmission.

Except as set forth below, multiple documents requiring individual digital signatures by different persons cannot be sent in a single electronic transmission. The current electronic submission process only allows one or two persons to digitally sign a single transmission. (For instance, in the case of the EIE system for adjudicatory submittals, only one digital signature is available for signing a pleading or other transmission submission, meaning any oath or affirmation affidavits attached to a filing cannot be signed digitally.) Therefore, the NRC recommends that the method described below in item 2 be used for submissions that require multiple oath or affirmations affidavits.

Note: When digitally signing a document, the submitter is actually digitally signing the transmission form, not the document. Signing the form, however, is the equivalent of signing the document.

 Oath or affirmation affidavits may also be signed with an "Executed in Accord with 10 CFR § 2.304 (d)" designation. The NRC staff may use a typed in "/RA/" meaning "Record Approved" designation rather than "Executed in Accord with 10 CFR § 2.304(d)."

Note: Although there are other methods available to electronically sign documents using word processing and other software, these are not currently acceptable for use in signing documents for submission to the NRC because they do not

provide the levels of authentication, certification, and non-repudiation that are present in the electronic submission process.

3. Oath or affirmation affidavits may also be created in hard copy and physically signed. The original paper copy may then be scanned to create a PDF Searchable Image (Exact) file of the original signature page. This page, with the rest of the PDF file of the entire attachment, may then be submitted using the EIE process available on the NRC's "Electronic Submittals" Web page.

Note: Although there are other methods available to electronically sign documents using word processing and other software, these are not currently acceptable for use in signing documents for submission to the NRC because they do not provide the levels of authentication, certification, and non-repudiation that are present in the EIE process.

1.3.3.2 OSM Oath or Affirmation

For an OSM submission, the signed original paper transmittal letter should contain the oath and the signature of the person swearing to or affirming the accuracy of the information submitted. Specifically, the letter should include the following statement:

"I declare under penalty of perjury that the foregoing is true and correct. Executed on [date]."

1.3.4 Other 10 CFR Part 2 Submissions

Rulemaking petitions, comments filed in rulemaking proceedings (10 CFR Part 2, Subpart H), and requests for enforcement action under 10 CFR 2.206 may be submitted electronically via the EIE process available on the NRC's "Electronic Submittals" Web page, via OSM, or e-mail. Other documents submitted pursuant to 10 CFR Part 2, Subpart B, "Procedure for Imposing Requirements By Order, or for Modification, Suspension, or Revocation of a License, or for Imposing Civil Penalties," may be submitted electronically via the EIE process available on the NRC's "Electronic Submittals" Web page or via OSM.

1.3.5 Freedom of Information Act (FOIA) and Privacy Act Requests

All FOIA and Privacy Act requests and appeals may be submitted by facsimile to (301) 415-5130 or electronically by e-mail to: FOIA.Resource@nrc.gov.

2. Parameters for Electronic Files Submitted to the NRC

Unless otherwise noted, all electronic documents submitted to the NRC, including all enclosures or attachments that are documents, should meet the file format specifications delineated in this section.

Electronic Submittals may also contain other forms of electronic information including data files, computer models, and video or audio clips that are not considered documents. These files are not required to conform to the file format specifications established for documents. However, be aware that these non-conforming files should be readable either by commercial off-the-shelf (COTS) software, or by providing, where appropriate, executable programs that should be submitted via OSM along with the submitted files. Only those products that do not require the end-user to purchase a license to use the products are acceptable.

Note: Any electronic file that can be converted to PDF format (spreadsheets, slide presentations, etc.) is considered a "document" by the NRC and is subject to these specifications. When submittals contain information that should be made publicly available and information that is deemed sensitive, the public information and the sensitive information should be separated into different files.

2.1 Who Should Follow This Guidance

This guidance is intended for licensees, applicants, external entities (including Federal, state, and local governments), vendors, and members of the public who submit documents to the NRC.

2.2 Submittal Description Table

When utilizing either the EIE process available on the NRC's "Electronic Submittals" Web page or OSM, the NRC anticipates that electronic documentary submittals will fall into three general categories based on the submittal type, size, and characteristics. The following table describes these categories and summarizes the applicable submission methods.

Submittal Type	Document Submittal Size	File Characteristics	Method
Simple	File <50 MB	One or more textual or graphic- oriented electronic files in PDF.	Use OSM or a single electronic transmission to submit the file(s) with a transmittal letter (See Note within Section 2.7).
Large	File <u>></u> 50 MB	Textual or graphic-oriented electronic files in PDF that can logically be segmented (by chapters, sections, etc.) into files of ≤50 MB (but preferably segmented into files no greater than 15 MB. See Section 2.5).	Use OSM segmented into multiple files (each less than 50 MB but preferably segmented into files no greater than 15 MB (See Section 2.5)) with a signed transmittal letter.

Complex	Any	Any combination of the following electronic object categories: • Textual or graphic-oriented electronic files in PDF. • Electronic files that cannot be segmented into ≤50 MB. • Other electronic objects, such as computer programs, simulations, video, audio, data files, and files with special printing requirements. • Files that contain classified national security information or safeguards information.	Use multiple electronic transmissions as follows: Use one or more electronic transmissions (<50 MB each) to submit a transmittal letter and (if applicable) single or multiple segmented PDF files or files that do not contain classified national security information or safeguards information. — and — Deliver the entire complex submission on OSM for a complete submission. Note: If adjudicatory material is only being submitted on OSM, a copy of the transmittal letter is submitted electronically via the EIE process available on the NRC's "Electronic Submittals" Web page.
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2.3 File Formats

2.3.1 Adjudicatory and Non-Adjudicatory Submissions

Electronic documents should be submitted in PDF or otherwise meet the specifications delineated in this section. The NRC does not endorse any particular software for making PDF files. PDF files can be made from any PDF authoring software. For the purposes of this guidance document, Adobe® Acrobat settings have been used as a point of reference. The following table defines the particular PDF output file formats and their use when submitting PDF electronic documents to the NRC:

Preferred PDF Output File Format:

File Format	Version	Filename Extension	Recommended Use
Adobe® Acrobat PDF Formatted Text and Graphics (formerly known as PDF Normal). Options should be set according to the settings described in Section 2.9 .	Current or 2 previous *	pdf	Textual documents converted from native applications only **, ***
Adobe [®] Acrobat PDF Searchable Image (Exact) (formerly known as PDF Original Image with Hidden Text). Options should be set according to the settings described in Section 2.9.	Current or 2 previous *	pdf	Textual documents converted from scanned documents.
Adobe [®] Acrobat PDF Image Only. Options should be set according to the settings described in <u>Section 2.9</u> .	Current or 2 previous *	pdf	Preferred format for graphic-, image-, and forms-oriented documents.

* The acceptable versions of conversion software used to create PDF output files include the current market (non-beta) version distributed by the software vendor, the version distributed immediately prior to the current version, and the version distributed two versions prior to the current version.

Note: Adobe has a fourth PDF output file format (PDF Searchable Image (Compact)) that uses compression techniques to reduce file sizes of images. This is <u>not</u> an acceptable format for submission to the NRC because it uses lossy compression techniques that do not result in a true and accurate representation of the original document.

- ** Textual documents scanned from the original paper copies and converted into PDF Formatted Text and Graphics result in the capture of only a text file that contains Optical Character Recognition (OCR) conversion errors. This inaccurate representation of the original document is not acceptable for capture by the NRC as an archival record. If the native format of a document is not available for creating a PDF file, the NRC recommends that Searchable Image (Exact) PDF be generated from a scanned image of the document. This will create a PDF file that contains a 100% accurate representation of the original document which will be acceptable for transfer to the National Archives.
- *** Adobe® PDF Formatted Text and Graphics files that contain embedded images of text will not be accepted. These files are usually a result of using word processing applications to cut and paste images of text instead of the text itself; from one document to another. This practice results in a picture (image) of the text being created that is not full text searchable. However, images of text that is intended as a graphical representation only and are not meant to convey the information contained in the text will be accepted.

<u>Note</u>: PDF/A (ISO 19005) is an acceptable file format **providing** it also meets the specifications contained in this guidance document.

Images originally created in a Tagged Image File Format (TIFF) that are primarily graphicoriented in nature (non-textual) may be converted to PDF for submission to NRC using the PDF Image Only format as described above. Moreover, images embedded in a document may be converted to PDF using lossless JPEG2000 compression techniques, which NARA will accept.

The NRC recommends that the results of spreadsheet applications be converted to one of the acceptable PDF file formats. The NRC staff may also need the native file spreadsheet data to perform additional calculations/analyses. Spreadsheet data may be submitted using the following acceptable native file formats:

Acceptable Spreadsheet File Format Table:

Native File Format	Version	Filename Extension	Preferred Use	
Microsoft [®] Excel	Current or 2 previous *	xls	Spreadsheet calculations	
Corel [®] QuattroPro	Current or 2 previous *	wb3	Spreadsheet calculations	
Lotus [®] 1-2-3	Current or 2 previous *	wk3/wk4	Spreadsheet calculations	

^{*} The acceptable versions of spreadsheets include the current market (non-beta) version distributed by the software vendor, the version distributed immediately prior to the current version, and the version distributed two versions prior to the current version.

2.4 Naming Convention

When electronically submitting documents to the NRC, the naming convention for each file should conform to ISO 9660 format, including the Joliet extension. Filenames are limited to a total of 49 characters, which includes the ".", spaces and the three-character filename extension.

The 49-character limit is subject to the following criteria:

- The first three characters of the file name should always be used to identify the correct sequential order of the submitted files (e.g., 001, 002, 003).
- The filename should reflect, to the extent possible within the remaining characters, the chapter or section number (based on the logical breakpoint used for segmentation of the document as described in <u>Section 2.18</u>) and the title of the file/segment being submitted.
- When segmenting a ≥50 MB file for a multi-part (bundle) submission, each part must include the following: if the file was segmented into three parts, the name ending of the first part would be Part 1 of 3, the second, Part 2 of 3 and so on (see <u>File Naming</u> <u>Example Table</u> below).
- The file should retain the default three-character file extension associated with the format.

Example: 001 Est of Long-Term Geochem Behavior Sec 1.pdf

(Example explanation: <u>001</u> belongs to the first document attached to the submittal; therefore, the next document attached would begin with 002. <u>Est of Long-Term Geochem Behavior</u> is the title of the document. <u>Sec 1</u> is Section 1 of the document, therefore the next document attached would be Section 2. <u>.pdf</u> is the file extension of an Adobe[®] Acrobat document.)

File Naming Example Table:

Document Title	File Name		
Multiple-Part (Bundle) File Documents		
Chapter 1, Estimate of Long-Term Geo- chemical Behavior	001 C1 Long-Term Geochem Behavior Part 1 of 3.pdf		
Chapter 2, Estimate of Long-Term Geo- chemical Behavior	002 C2 Long-Term Geochem Behavior Part 2 of 3.pdf		
Appendix A Estimate of Long-Term Geo- chemical Behavior	003 ApA Long-Term Geochem Behavior Part 3 of 3.pdf		
Single File Documents			
Attachment II, CAL-EBS-NU-000017 Rev 003 Calculation, Radiolytic Specie Generation from Internal Waste Package Criticality	001 Att 2 CAL-EBS-NU-000017 R003.pdf		
List and Schedule for Model Validation Reports related to Criticality	001 List-Schd for MVRs related to Criticality.pdf		

Special Instructions for COLA only:

See Section 8.3.1 for the specific naming convention for COL Applications.

2.5 File Size Limitations

Large files create challenges for both the NRC staff and the public when viewed or downloaded. Therefore, the NRC requests that submitters make every effort to limit the size of each file or the total size of all the files included with a single electronic submission to ≤50 MB. It should be noted, however, that operational experience has shown that files over 17 MB have been known to time-out due to limitations on the size of files that can be uploaded via a submitter's internet service provider. Although the NRC can accept 50 MB files, to minimize the risk that a submission will not be timely received, it is highly recommended that files be segmented to no more than 15 MB per submission.

Additionally, small files can sometimes be problematic. Large volumes of files require significant resources to capture and profile in electronic document management systems. Therefore, in the non-adjudicatory context, NRC encourages submitters to combine files that are components of larger documents to create 50 MB files that can be more economically and efficiently managed. For adjudicatory filings, however, with the exception of pre-filed testimony and exhibits, see 10 CFR 2.304(g), each separate motion or pleading, along with any exhibits/attachments to and the certificate of service for the motion/pleading, should be submitted in a single file via a single e-filing transaction (assuming the file size is <50 MB).

Special Instructions for COLA only:

See Section 8.3.3 for the specific file size limitations for COL Applications.

The maximum size of the file(s) submitted to the NRC governs the acceptable method of transmission. For example, submitters may use a single transmission to electronically submit one or more PDF files and/or accepted spreadsheet files so that the total size of the submitted file(s) does not exceed 50 MB, including all attachments. Submitters should use the OSM transmission method in all other cases unless e-mail or facsimile is a more appropriate option.

The use of compression techniques (zipped files, downsized files, etc.) is not allowed for electronic files submitted to the NRC because they use lossy compression techniques that do not result in a true and accurate representation of the original document. The table below summarizes the size limitations based on the method of file transmission:

File Size Limitations Based on Transmission Method Example Table:

Method of Transmission	File Size Limitations
EIE process available on the NRC's "Electronic Submittals" Web page	<50 MB *
OSM	≤50 MB per individual file on OSM **, ***
E-mail	<10 MB *

^{*} Total, combined size of message and attachments comprised of PDF file(s) and accepted spreadsheet format file(s). >50 MB files broken into segments of <50 MB per file (but preferably segmented to files no greater than 15 MB) can be sent using multiple electronic submissions.

Note: Oversize drawings and other files with special printing requirements (Section 2.11), regardless of the file size, should be provided on OSM.

2.6 Security/Access Settings

Submissions should not contain any security settings, password protections, or any other attributes that would preclude full NRC access to and use of the files. NRC's internal security and archival processes will maintain the integrity of the materials that are submitted.

2.7 Transmittal Letters

Each submittal of two or more files (regardless of size) should include a transmittal letter that provides explanatory information that will enable the NRC to ensure the completeness and

^{**} The total OSM capacity may be used but submitters are urged to limit individual files to <50 MB.

^{***} In some cases a single page document or object (e.g., oversize color drawing) may exceed the 50 MB file size limit. Submission of an oversize file (>50 MB limit) is allowed in these instances.

integrity of the submission (see examples within Section 9).

On the first page of the transmittal letter, submitters should include the following information:

- Organization or individual name and the address of the author.
- Docket number (if applicable).
- Subject line (a non-sensitive, brief, but descriptive narrative of the subject of the submission).
- Any requests for withholding from public disclosure in accordance with 10 CFR 2.390, 2.1003 or 2.1006.

On the last page of the transmittal letter, submitters should provide:

- The name, mailing and e-mail addresses, and phone number of a point of contact who can resolve discrepancies in document submittals, should they arise.
- A complete listing of the components (electronic files and/or physical objects) that make up the submittal. The components should be listed in the order in which they are submitted. Additionally, if OSM is utilized, the component listing should include the total number of OSM that are being submitted by expedited delivery (same day or overnight courier) (see Section 4).
- A detailed statement describing any deviation among the submitted files from the use of PDF formatting.
- A disclaimer statement for any submittal of file(s) that may have links to another file(s) or to the Internet (see <u>Sections 2.12.1</u> and <u>10.1</u> for examples).
- A list of parties served with the submission.

Each of the listed components should indicate the following information:

- The filename (as defined in Section 2.4, including file extension).
- The size of the file.
- Sensitivity level (e.g., publicly available, proprietary, classified, etc.) (see <u>Sections 2.19</u> and 2.20).
- An indication of whether the component is being submitted electronically and/or submitted on OSM.
- A file that provides a non-sensitive description of all electronic components characterized as Binary Large Objects (BLOBs) or other physical objects.
- Any special instructions or information necessary to view or use the information, such as the use of the OSM, computer operating system, or software requirements for data files, computer models, etc.

<u>Special Instructions for HLW Repository Licensing Proceeding Submittals only:</u> Any Licensing Support Network (LSN) numbers associated with documents filed with a pleading or other submission (e.g., LSN numbers associated with prefiled exhibits) should also be included in the transmittal letter.

Special Instructions for COLA only:

See <u>Section 8.3.5</u> for the specific instructions regarding packing slips (a file describing the contents of the DVD or CD-ROM) which are provided with COL Applications. The COLA packing slip fills the requirement identified in this section for itemizing the contents of the OSM.

2.8 Resolution

To comply with NARA Standards, PDF documents should be created using the following resolution guidelines:

- Bi-tonal (black and white) PDF resolution, not less than 300 pixels per inch (ppi).
- Color PDF resolution, not less than 300 ppi.
- Grayscale PDF resolution, not less than 300 ppi.

Note: Because some systems round off, the NRC will accept a PDF with image(s) scanned at 299.97 dpi or greater.

Submittals under 10 CFR Part 2, Subpart J, may use the minimum effective resolution for color and grayscale images specified in that subpart.

Resolution Flexibility Table for 10 CFR Part 2, Subpart J:

Special Situation	Bi-tonal Resolution	Color Resolution	Grayscale Resolution
A document created after January 1, 2004 contains an image scanned before January 1, 2004	300 ppi	150 ppi	150 ppi
A document created before January 1, 2004	300 ppi	150 ppi	150 ppi

In these cases, the submitter should maintain the integrity of the scanned image, the quality of the graphic presentation, and a readable representation of the original work capable of being duplicated and/or reproduced.

Note: A submitter can run a resolution test by using Preflight (included with Adobe® Acrobat 6/7/8/9 Professional). Preflight guidance can be found on the NRC's "Reference Materials for Electronic Submissions" Web page (http://www.nrc.gov/site-help/electronic-sub-ref-mat.html). This information is available in PDF document form and in video clips.

2.9 Settings for Creating PDF Formatted Text and Graphic Files

The NRC has established a custom optimization that strikes a balance between print and screen optimizations. This custom optimization provides adequate retrieval response time for online viewing while providing sufficient clarity and resolution for printing. The settings established for this custom optimization are listed below and should be used on all submittals to the NRC. The settings are specific to Adobe® Acrobat 9.0. However, when PDF creation software other than Adobe® Acrobat 9.0 is used, the PDF creation software should be configured with values equivalent to those listed below. All fonts should be embedded in the PDF file to ensure compliance with NARA guidelines except on scanned images.

Note: PDF/A (ISO 19005) is an acceptable file format **providing** it also meets the specifications contained in this guidance document.

Note: If you are using an Adobe[®] product, to maintain documents compatibilities and ensure all security vulnerabilities are resolved, we recommend that you check Adobe's website at http://www.adobe.com/downloads/updates periodically to get the

latest revision updates for your Adobe® version.

Note: Additional guidance on PDF settings, as well as PDF generation, can be found on the NRC's "Reference Materials for Electronic Submissions" Web page (http://www.nrc.gov/site-help/electronic-sub-ref-mat.html). This information is available in PDF document form and in video clips to assist users in preparing PDFs in compliance with NRC guidelines. Additionally available from the NRC's "Reference Materials for Electronic Submissions" Web page (http://www.nrc.gov/site-help/electronic-sub-ref-mat.html) are pre-configured PDF Adobe Distiller profiles for Adobe 5/6/7/8/9 (joboptions).

Requirements for PDFs generated from Native Applications such as MS-Word, etc.

Criteria
Optimized for Fast Web View
Embedded Fonts
Searchable Text
Security Method = "No Security"
File size <= 50MB (except for single image or data file)

Requirements for PDFs generated from Scanner

Criteria
Optimized for Fast Web View
Resolution >=300 ppi
Searchable Text by Optical Character Recognition (OCR) process
Lossless Compression
Security Method = "No Security"
File size <= 50MB (except for single image or data file)

PDF Settings Example Table:

General Options	Recommend Optimal on Adobe [®] Acrobat 9.0.x	
Compatibility	1.5, 1.6, 1.7 or 1.8	
Object Level Compression	Tags only	
Optimize for Fast Web View	☑ (selected)	
Embed Thumbnails	□ (unselected)	
Auto-Rotate Pages	Off	
Binding	Left	
Resolution (dpi)	300	

Images Options		Recommend Optimal on Adobe [®] Acrobat 9.0.x	
Color Images:	Downsample	Off	
	For images above	300 ppi	
Compression		Zip	
	Quality	8-bit	
Grayscale:	Downsample	Off	
	For images above	300 ppi	
	Compression	Zip	
	Quality	8-bit	
Monochrome:	Downsample	Off	
	For images above	450 ppi	
	Compression	CCITT – Group 4	
Anti-Alias to Gray		Off	

Fonts Options	Recommend Optimal on Adobe [®] Acrobat 9.0.x	
Embed All Fonts ¹	☑ (selected)	
Embed OpenType Fonts	☐ (unselected)	
Subset embedded fonts when percent of characters used is less than 100%	☑ (selected)	
When Embedding Fails	Wam & Continue	

¹You should check the license(s) for any font(s) you intend to embed to verify that embedding is allowed. In some cases, the program will warn you if a font is not licensed for embedding, but this varies by vendor. Fonts should be embedded to comply with NARA guidelines.

Color Options	Recommend Optimal on Adobe [®] Acrobat 9.0.x	
Setting File	None	
Color Management Policy	Tag Everything for Color Management	
Intent	Preserve	
Gray	None	
RGB	SRGB IEC61966-2.1	
CMYK	US Web Coated (SWOP)v2	
Preserve Overprint Settings	☑ (selected)	
Preserve Under Color Removal	☑ (selected)	
Transfer Function	Preserve	
Preserve Halftone	☐ (unselected)	

Advanced Options	Recommend Optimal on Adobe [®] Acrobat 9.0.x	
Use Prologue ps & Epilogue ps	□ (unselected)	
Allow PS to Override Job Options	☑ (selected)	
Allow PostScript XObjects	☐ (unselected)	
Preserve Level 2 copypage semantics	☑ (selected)	
Save Job Ticket	☑ (selected)	
Illustrator Mode	☑ (selected)	
Gradients to Smooth Shades	☑ (selected)	
ASCII Format	□ (unselected)	
Process DSC Comments	☑ (selected)	
Log DSC Warnings	☐ (unselected)	
Resize for EPS	☑ (selected)	
Preserve EPS Info	☑ (selected)	
OPI Comments	☑ (selected)	
Preserve Doc Info from DSC	☑ (selected)	

2.10 Use of Color

The NRC discourages the use of color because it significantly increases file size. If the use of color adds no value to understanding the information presented, its use should be avoided. If color is required to make the document understandable, its limited use is acceptable. Examples of color documents that meet these criteria are graphs, bar-charts, and engineering drawings that depend exclusively on the differences in color to understand the information and data being presented. Additionally, logos (e.g., company letterhead, NRC emblem) are acceptable uses of color as they do not appreciably inflate a file's overall size.

2.11 Files with Special Printing Requirements

Documents that contain electronic files with special printing requirements, such as oversize drawings or graphics that require a paper size larger than 11 inches by 17 inches, or documents that require the use of a plotter or other special equipment to print, or document that contain other enhancements such as 3D images, etc., should only be submitted electronically via OSM as separate files. If special software components (e.g., printer drivers) are necessary, include those components, their configuration parameters, and any hardware configuration requirements on the same OSM.

2.12 File Linkages (Hyperlinks)

Links within a single electronic PDF file are acceptable if those links are created using PDF authoring software. Multiple linked PDF files may be combined into a single PDF file using utilities often included in PDF authoring software. On the other hand, if a large PDF file (>50 MB) containing internal links is broken into segments and transmitted via multiple electronic

transactions then the links between segments will become inoperable within ADAMS and cannot be recreated.

Files containing objects (e.g., pictures, tables, spreadsheets, and images of text) using link protocols such as Object Linking and Embedding (OLE), Dynamic Data Exchange (DDE), or any other object linking between electronic files are not practicable for the NRC to accept because the relationships among links in multiple file submissions are lost when captured in ADAMS or other agency electronic record keeping systems.

Electronic submissions to the docket for placement on the EHD cannot rely on the use of any hyperlinks to other electronic files or web sites in order to generate additional documentary material. If the submittal contains such hyperlinks, then it should include a disclaimer to the effect that the hyperlinks are either inoperable or are not essential to the use of the filing (see Sections 2.12.1 and 9).

If the submittal relies on Internet-based material, then the Internet-based material should be submitted as part of the filing. If the submittal contains hyperlinks to material in another electronic file, and such hyperlinks are necessary to access that material, then either a reference to the material should be provided or the material itself should be submitted.

Special Instructions for COLA only:

See <u>Section 8.3.2</u> for the specific direction on File Linkages in regards to COL Applications. Also, see the diagram within <u>Section 10.2</u> for acceptable use of links within COLA submittals.

2.12.1 Required Disclaimers

For a submittal that consists of a **single** PDF document of <50 MB, include the following in the body of the submittal if the PDF document contains <u>hyperlinks</u> to other PDF documents or to the Internet:

This PDF file contains hyperlinks to other files or to the Internet. These hyperlinks are either inoperable or are not essential to the use of the filing. Any material referenced by hyperlinks to the Internet that was essential for use of this filing has been submitted as part of the filing. Any material referenced by a hyperlink to another PDF that was essential for the use of this filing has either been included by reference or submitted as part of this filing.

<u>For a submittal that consists of *more than one* PDF document, include the following in the transmittal memorandum if one or more PDF documents contain <u>hyperlinks to other files or</u> to the Internet:</u>

This submittal contains PDF files, one or more of which contains hyperlinks to other files or to the Internet. These hyperlinks are either inoperable or are not essential to the use of the filing. Any material referenced by hyperlinks to the Internet that was essential for use of this filing has been submitted as part of the filing. Any material referenced by a hyperlink to another PDF that was essential for the use of this filing has either been included by reference or submitted as part of this filing.

Special Instructions for COLA only:

Disclaimers are required for hyperlinks contained within a COLA submittal. Although the links are operable, the disclaimer should be included to provide the exact location of the linked file along with all applicable information, such as the revision, chapter and version number, etc. (see diagram within <u>Section 10.2</u>).

2.13 Viruses

Files received by the NRC will be checked for viruses prior to acceptance. Any submission identified as having a virus will be rejected and returned to the submitter with an explanation for the rejection.

2.14 Macros

Macros in files such as Microsoft® Excel are sometimes detected as viruses. Therefore, the use of macros should be limited.

2.15 Copyrighted Information

Submitting information electronically to the NRC shall be deemed to constitute authority for the NRC to place a copy of the information on its public document database and for the NRC to reproduce and distribute sufficient copies to carry out its official responsibilities. NRC use of the information specified herein does not constitute authority for others to use the information outside the applicable requirements of copyright law.

2.16 Copies

Those submitting documents electronically should not send hard copies of the electronic documents. In instances where the NRC requires a paper copy for accessibility or other reasons, the NRC will make every effort to produce the copy using NRC resources. However, in those instances where the agency is unable to successfully generate an accurate paper copy from the electronic submittal, the NRC may require a paper copy from the submitter. This will be handled on a case-by-case basis.

Note: The DOE is required under 10 CFR Part 2 and 63.22 to submit hard copies of the Yucca Mountain License Application (LA) in addition to submitting the LA on OSM, consistent with these regulatory requirements.

Many NRC regulations require submission of copies of documents to multiple NRC locations (e.g., Headquarters, Regional Offices). This practice continues for submissions that are made on OSM. However, only a single copy of the OSM is required to be submitted to each location by the licensee or vender. Electronic submission via the EIE process available on the NRC's "Electronic Submittals" Web page does not require submission to multiple locations.

2.17 Graphic-oriented and Large and Complex Electronic Objects

To the extent practical, textual files, graphic-oriented files, and other electronic objects (e.g., spreadsheets, audio and/or video files) should be submitted electronically as PDF files. In rare instances, PDF conversion may not be successful due to technical reasons (e.g., fatal hardware, software, or operating systems errors) that prevent completion of the conversion. In addition, if the applicable file size and resolution restrictions (see Sections 2.5 and 2.8) cannot be met for a given graphic-oriented file or other electronic object, users should not submit that file or object in PDF. Submission of non-PDF files should include a detailed statement for each file that explains why PDF submission is not practical.

The NRC recommends submitting oversize image files that do not successfully convert to PDF in a non-proprietary format that does not utilize lossy compression (e.g., tagged image file format, also known as TIFF). Similarly, the NRC recommends submitting video and audio files in a format compatible with COTS playback devices.

Electronic objects specific to highly specialized software applications, such as special-purpose computer programs, simulations, and data files, are acceptable in their native file format. Submission of specialized electronic objects that are COTS-specific should include the following information about the software:

- Software title and version.
- Compatible computer operating system.
- Hardware requirements (including the minimum recommended hardware configuration).
- A list of user-controlled parameters used with the software.

Submission of specialized electronic objects that are non-COTS specific should include: ① a freely distributable "run-time" version of all software components that the submitter used to create the files, and ② the following information:

- Compatible computer operating system.
- Software and hardware installation/configuration parameters.
- Hardware requirements (including the minimum recommended hardware configuration).
- Other information to ensure seamless access to and review, duplication, and printing of the files.

Special Instructions for HLW Repository Licensing Proceeding Submittals only:

For the High Level Waste (HLW) repository licensing proceeding: Images made available by the Department of Energy (DOE) via the Licensing Support Network (LSN) that are rendered in Tagged Image File Format (TIFF) may be embedded in a PDF format. To submit these files in a format that will meet the technical specifications identified in the NRC guidance document, these TIFF files should be subjected to an Optical Character Recognition (OCR) process (such as is available using Adobe Acrobat 8 Professional) that will ensure the resulting PDF file will be searchable. In the case of a document consisting of multiple TIFF images that is being submitted as a pre-filed evidentiary hearing exhibit or as pre-filed testimony, in accordance with the E-Filing Rule, that document must be submitted as a single file. This can be done by merging the TIFF images into a single file, creating a PDF file from the TIFF file, and then OCRing the PDF file. If a document consisting of TIFF images is being included with a pleading as an attachment/exhibit/enclosure, the pleading and the image for the attachment/exhibit/enclosure should be combined into a single PDF file, OCR'd, and submitted as a single PDF file (so long as the pleading and all the attachments in that single PDF file remain under 50 MB).

2.18 Segmentation of Large Documents

Large documents with file sizes >50 MB should be divided in file segments of \leq 50 MB (and preferably segmented into files no greater than 15 MB (See Section 2.5)) at logical breakpoints such as:

- Chapters
- Sections
- Subsections
- Appendices
- Exhibits or attachments
- Charts, tables, or formulae
- For large transcripts, the end of a witness' testimony or session recess

If the recommended file size cannot be achieved, consider moving the graphics (which are often large files) into an appendix or attachment. If, however, a graphic or other Binary Large Object (BLOB) that exceeds the 50 MB limit, but cannot logically be divided, it should not be segmented. In such a case, the graphic or BLOB should not be sent via the EIE process available on the NRC's "Electronic Submittals" Web page and should be provided on OSM in accordance with guidance in Section 4.

Note: Oversize drawings and other files with special printing requirements (see <u>Section 2.11</u>), regardless of the file size, should be provided on OSM.

When OSMs are submitted, use electronic folders to organize the contents at the chapter level consistent with the file name guidance outlined in <u>Section 2.4</u>. The numeric portion of the file name should be sequential across all folders. This means the following:

- Each chapter should have its own folder, which should then contain all files associated with that chapter, including sections, subsections, and graphics (either embedded within those sections/subsections or provided separately).
- The sections/subsections should be placed in logical sequential order within a folder.
- Separate folders may be created for appendices, exhibits, or attachments. Each item should have a file name that reflects the folder where it resides, if practical, in conjunction with complying with the file name guidance.

Special Instructions for COLA only:

See Section 8.3.3 for guidance on segmenting large documents within a COL Application.

2.19 Sensitive Information

This section does not apply to documents containing safeguards information, which are discussed in Section 2.20. If a document contains information that is deemed Sensitive Unclassified Non-Safeguards Information (SUNSI), it may be electronically submitted via the EIE process available on the NRC's "Electronic Submittals" Web page or on OSM. Transmittal documents used to transmit one or more documents containing SUNSI, must be marked to indicate the fact that SUNSI is contained in the documents being transmitted. A header marking must be placed on each page of the transmittal document indicating the type of SUNSI (i.e., "Security-Related Information – Withhold Under 10 CFR 2.390", or "Proprietary Information – Withhold Under 10 CFR 2.390.") Note that NRC's internal procedure for these documents is to mark them as "Official Use Only - Security-Related Information," or "Official Use Only – Proprietary Information." Additionally, if the transmittal document does not contain SUNSI and only the enclosures contain SUNSI, the following marking must be placed at the bottom of the first page: "Enclosure(s) transmitted herewith contain(s) SUNSI. When separated from enclosure(s), this transmittal document is decontrolled." Other Federal agencies submitting documents should follow the above guidance regarding transmittal documents; however, they should use their markings for designating sensitive information.

If it is not practical to submit a large document containing SUNSI via the EIE process available on the NRC's "<u>Electronic Submittals</u>" Web page, submit the document via OSM. Submissions made on OSM should be accompanied by a transmittal letter that contains information regarding the sensitivity level of the transmitted documents (see <u>Section 2.7</u>). The transmittal letter should not have a SUNSI header unless SUNSI is contained in it.

When submitting documents via OSM that contain both publicly and non-publicly available files, all of the files should be included. In addition, separate OSM should be provided, containing only the publicly available files. Each OSM should be clearly labeled indicating its availability. Files contained on OSM labeled as "Publicly Available" will be released to the public.

If SUNSI, classified, or safeguards documents are appended to filings in the adjudicatory proceeding, the submitter shall seek an appropriate order from the presiding officer pursuant to 10 CFR Part 2, Subpart C, Part 13, or Part 110, or follow the procedures for Classified Information in 10 CFR Part 2, Subpart I.

For additional information on the procedures for marking and control of SUNSI, the following documents are available on the NRC Public Web site (www.nrc.gov):

- NRC Regulatory Issue Summary 2005-26, "Control of Sensitive Unclassified Non-Safeguards Information Related to Nuclear Power Reactors", dated November 7, 2005
- NRC Regulatory Issue Summary 2005-31, "Control of Security-Related Sensitive Unclassified Non-Safeguards Information Handled by Individuals, Firms and Entities to NRC Regulation of the Use of Source, Byproduct and Special Nuclear Material", dated December 22, 2005
- NRC Regulatory Issue Summary 2007-04, "Personally Identifiable Information Submitted to the U.S. Nuclear Regulatory Commission", dated March 9, 2007

 In addition to the above guidance, other government agencies may designate, mark, and control information according to their procedures. Such information, if not safeguards information or classified information, will be handled by NRC as SUNSI when submitted to the NRC without requiring additional markings.

2.20 Classified or Safeguards Information

Documents containing Classified or Safeguards Information shall not be submitted via the EIE process available on the NRC's "Electronic Submittals" Web page.

OSM containing classified information shall be processed and produced on systems approved under the provisions of 10 CFR 95.49. Each OSM should be clearly labeled as containing classified information. The mailing package containing OSM with documents comprised of safeguards information should be processed, marked and transmitted in accordance with the requirements set forth in 10 CFR 73.21(e), 73.21(g), and 73.21(h), as appropriate. OSM containing classified information (e.g., National Security Information or Restricted Data), shall be packaged and submitted to the NRC in accordance with the requirements contained in 10 CFR 95.37, 95.39, and 95.41. If sensitive unclassified, classified, or safeguards documents are appended to filings in the adjudicatory proceeding, the submitter shall seek an appropriate order from the presiding officer pursuant to 10 CFR Part 2, Subpart C, Part 13, or Part 110, or follow the procedures for Classified Information in 10 CFR Part 2, Subpart I.

2.21 Accessibility

Section 508 of the Rehabilitation Act and the accessibility standards set forth in implementing regulations require that Federal Agencies' electronic and information technology be accessible to people with disabilities. Tools and plug-ins are now available to allow PDF files to comply with Section 508, but care should be taken in developing documents and converting them to PDF to ensure that the author has constructed the documents and used the appropriate tools with accessibility in mind. The submitter should consider accessibility issues during document authoring. The use of simple layouts, consistent application of styles, accessible table formats, and the inclusion of alternate text for images improves the ability of people with disabilities to use the information. Ensure the language selection is English (U.S.). The NRC is not currently checking nor rejecting PDF files that are NOT Section 508 compliant.

2.22 Living Document Updates

Historically, many large documents submitted to the NRC have been maintained as living documents and have used a page-replacement approach when updated. Paper submissions can still use this approach for providing updates to living documents.

However, revised sections of a document will not be accepted when the document is only submitted electronically. If changes to the submitted document are necessary, the document (including all of the electronic files and electronic objects that comprise the document) should be re-submitted in its entirety on OSM, as that version will become a new

document. The subsequent transmittal letter should indicate the part(s) (e.g., chapter, section, or graphic) that has been changed as well as the general scope of the change. The document should be identified as a new version and file identification information submitted accordingly. Each changed page should include both a change indicator (track changes) for the area changed (for example, a bold line vertically drawn in the margin adjacent to the portion actually changed), and a page change identification including either the date of change, a change number, or both.

Special Instructions for COLA only:

See <u>Section 8.1</u> for specific instructions on the handling of submitting document updates for COL Application.

2.23 Rejection of Submissions

When electronically submitting documents to the NRC via any method, failure to follow the guidance outlined in this document may result in a submittal being rejected. Resubmission of the submittal would then be required.

The NRC may reject any submittal if any inconsistencies are found and will inform the submitter of the rejection. The following issues will result in a submittal rejection:

- Inconsistencies between the description of the transmitted files or physical objects in the transmittal letter and the files or physical objects received
- Failure to apply additional sensitive information requirements (see <u>Section 2.17</u>) to a submittal in which the optical storage devices contain classified information (e.g., National Security Information and Restricted Data), sensitive unclassified information, or non-public documents
- Virus-infected files
- Compressed files
- Encrypted files
- Unknown file formats
- Corrupt/unreadable files
- Macros that are identified as potential viruses
- Disabled Fast Web View
- File formats other than those listed in <u>Section 2.1</u> (except submittals may also contain other forms of electronic information including data files, computer models, and video or audio clips)
- OSMs that contain both publicly and non-publicly available files on a single OSM, unless a second OSM with only publicly available information is also provided
- OSMs containing OLE, DDE, or any other object linking
- E-mails with attachments that exceed the 10MB size requirement
- Fonts not embedded (originated by native apps such as MS[®] Word, PowerPoint, not from a scanned source)
- Non-searchable text on scanned images
- Incorrect naming conventions

Special Instructions for COLA only:

See Section 8.3.1 for specific instructions regarding COLA naming conventions.

3. Guidance for "Electronic Submittals" through NRC's EIE Process

The EIE process accessible through NRC's "Electronic Submittals" Web page is designed to ensure that electronic documents can be transmitted to the NRC via the Internet in a secure and unalterable manner. Submittals such as those that are required to be submitted under oath or affirmation (see Section 1.3.3.1) may be safely transmitted electronically through this process. To utilize the EIE process each individual must obtain a digital ID certificate. The digital ID certificate allows the submitter to digitally sign and submit the form used to transmit documents, and, in the case of adjudicatory submissions, to access the external server to retrieve documents. Additionally, there is a software plug-in that must be downloaded and installed and the computer or workstation must be set up properly (as described in Sections 3.2 and 3.3).

3.1 How to Register

The NRC provides for overall administration of a digital ID certificates program for its customers and stakeholders

To request an NRC digital ID certificate prospective participants must first determine which NRC program meets his/her needs. Each program area will want basic information from you including your name, email address, phone number, organization, role in the organization and reason for submitting documents to the NRC.

Criminal History Program participants should call (301) 415-6511 or send an email request to the NRC's Criminal History Program staff at: CrimHist@nrc.gov

Adjudicatory Proceedings Program participants should call (301) 415-1679 or call (301) 415-1966 or send an email request to the NRC's Office of the Secretary staff at: HearingDocket@nrc.gov.

NRC General Form Program participants should call (301) 415-0439 or send an email request to the NRC's General Form Program staff at: GeneralForm@nrc.gov.

ERDS participants should send an email request to the NRC's ERDS staff at: ERDS.Resource@nrc.gov

Fitness for Duty Reporting participants should call (301) 415-5949 or send an email request to the NRC's Fitness for Duty Reporting staff at: FFDProgram.Resource@nrc.gov

Program area personnel will provide a digital ID certificate approval code to the requestor. This approval code will be used during the digital ID certificate on-line enrollment process. Following acceptance of the enrollment request, the requestor will receive e-mail instructions on how to download the digital ID certificate.

3.2 What is Required to Participate

Participating individuals in the electronic submittal initiative may use their existing workstations with standard desktop configuration. The recommended workstation configuration requires a Pentium 133 MHZ (or higher) with a minimum of 32 MB of RAM, 20MB of available disk space, and access to the World Wide Web (Web) through an Internet Service Provider (ISP). The operating system should be either Windows NT/2000, Windows

95, or higher. In addition, each workstation should be equipped with the browser software consisting of Microsoft® Internet Explorer 5.0 or higher.

3.3 How to Obtain Software Plug-ins

It is recommended that users download and install the required IBM Workplace Forms[™] Viewer software plug-in. The software plug-in can be downloaded and installed from the "Electronic Submittals" Web page (http://www.nrc.gov/site-help/e-submittals.html) by clicking on the Install the IBM Lotus Forms[™] Viewer link under "Forms Viewer" and following the instructions provided for installation.

3.4 How to Submit Documents

The submission of documents to the NRC via the "Electronic Submittals" Web page (http://www.nrc.gov/site-help/e-submittals.html) will require the use of the NRC's EIE form. The EIE form is a document based on Extensible Mark-up Language (XML). It allows participants to sign, enclose, submit, and verify documents via the Internet. The document to be submitted or transmitted should be presented as an attachment to the EIE form. The appropriate form can be accessed by going to the NRC the "Electronic Submittals" Web page and selecting the appropriate link located within the "Electronic Submission Systems" section.

Once the form is displayed, users will need to fill in the fields on the electronic form and attach the document(s) for submission to the NRC. Upon completion of the form with the documents attached, the form should be digitally signed.

In most cases, documents submitted via the EIE process do not need to be digitally signed by the author(s). They may be digitally signed by the person who transmits them, but the author(s) is accountable for the content of the document(s) submitted. Generally, the persons who will digitally sign documents and transmit them electronically to the NRC are the same persons who currently dispatch licensing documents through the mail to the NRC. However, specific rules apply to Adjudicatory E-Filing submittals (see 10 CFR 2.304(d)), which must be digitally signed using a participant's representative's digital ID certificate. Specific rules also apply to digital signature for documents submitted under oath or affirmation (see Section 1.3.3.1). Licensees and vendors submitting documents via the EIE process do not need to send confirming hard copies of the electronic documents.

Documents transmitted to the NRC electronically via the EIE process will be time and date stamped when the last bit of the transmittal is received by the EIE server. In the case of Adjudicatory submittals, for a multi-part electronic transmission, the time and date stamp will be applied when the last bit of the last transmittal is made. The time and date of the transmission will become part of the record in the NRC's ADAMS document management system. The time and date stamp will also constitute the official adjudicatory docket time and date stamp for the item submitted and will be captured by the Office of the Secretary in the official docket index for the relevant proceeding. The transmitter will be e-mailed a notice of receipt of the document. The notice will include the time and date the transmission was received at the NRC.

For more detailed information and step-by-step procedures and instructional videos on how to submit documents to the NRC via the EIE process see the NRC's "Electronic Submittals" Web page (http://www.nrc.gov/site-help/e-submittals.html) as well as the "Adjudicatory Submissions" Web page (http://www.nrc.gov/site-help/e-submittals/adjudicatory-sub.html), under the section titled: Related Instructional Resources.

3.5 Submittals to Regions (applicable to General Submissions)

Submissions intended for a specific Region should have the Region listed in the "Comment" field contained on the General Submission Form (see <u>Section 11.2</u>).

4. Optical Storage Media (OSM) Submission Guidance

4.1 OSM Submittal Criteria

Adjudicatory Filings:

OSM should be used in the following circumstances:

- The documentary material cannot be transmitted via the EIE process available on the NRC's "Electronic Submittals" Web page (e.g., file size, complex document).
- The file to be electronically submitted exceeds 50 MB.
- A document segment cannot be submitted via the EIE process available on the NRC's "<u>Electronic Submittals</u>" Web page although the remaining document portions could be transmitted electronically.
- The document contains safeguards information or classified information (e.g., National Security information or Restricted Data).
- An entire submission is contained on multiple OSMs, which consist of those files that
 were <u>submitted</u> through the EIE process available on the NRC's "<u>Electronic Submittals</u>"
 Web page and those files that <u>could not be submitted</u> via the EIE process available on
 the NRC's "<u>Electronic Submittals</u>" Web page.

<u>Note</u>: Place all files submitted through the EIE process available on the NRC's "<u>Electronic Submittals</u>" Web page on an OSM separate from the OSM containing the files that could not be submitted via the EIE process available on the NRC's "<u>Electronic Submittals</u>" Web page.

General Submissions:

Documents may be submitted via OSM except as noted in <u>Section 1.3.1.2</u> above. As mentioned in <u>Section 1</u>, there are also documents that should only be submitted using OSM, such as large documents exceeding 50MB and documents that contain special printing requirements. Documents containing Classified Information (i.e., National Security Information and Restricted Data) and Safeguards Information may only be submitted electronically on OSM and not via the EIE process available on the NRC's "<u>Electronic Submittals</u>" Web page or e-mail.

4.2 How to Submit the OSM

Submitters should transmit the OSM, along with the signed paper transmittal letter, by expedited delivery service. Given the paramount importance of submittal and document integrity and fidelity, expedited delivery of the OSM is essential to ensure coordinated processing with the companion submittals transmitted via the EIE process available on the NRC's "Electronic Submittals" Web page. In addition, to ensure that all intended information has been received, the NRC will not deem a submittal complete, "in-hand," or ready for further processing and staff review until the agency has received the last document.

For electronic submissions via OSM that contain classified information (e.g., National Security Information and Restricted Data), SUNSI information, safeguards information, or non-public documents, additional requirements apply as described in Sections 2.19 and 2.20.

4.2.1 OSM Content

Software used to produce the OSM should be configured to ensure that the OSM is "read only" prior to its delivery to NRC.

Large documents made up of multiple files, folders, etc., should generally be transmitted on an OSM.

4.2.2 Packaging/Labeling

The OSM should be labeled with the transfer media configuration (e.g., drive transfer rate) as well as any numbering, exterior marking, or labeling used to reference the submittal as it is provided through electronic submission. If appropriate, the version number should also be included.

The mailing package containing the OSM with documents comprised of proprietary, personal privacy, or Official Use Only information shall be an opaque envelope with no external markings to indicate the presence of sensitive unclassified non-safeguards information in accordance with the requirements set forth in Attachment 1 of the NRC's RIS-2005-31. Packages containing Safeguards Information shall comply with the requirements of 10 CFR 73.21(e), 73.21(g), and 73.21(h), as appropriate. OSMs containing Classified Information (e.g., National Security Information or Restricted Data) shall be packaged and submitted to the NRC in accordance with the requirements contained in 10 CFR 95.37, 95.39, and 95.41.

IMPORTANT NOTICE:

Subsequent to the anthrax mailings in late September 2001, incoming mail addressed to the Federal government may be irradiated prior to delivery. Irradiation of OSM may result in damage to the media and its contents. Therefore, packages containing OSM submission should be clearly marked "CONTENTS CONTAIN OPTICAL STORAGE MEDIA DO NOT IRRADIATE."

4.3 Where to Submit the OSM in Adjudicatory Proceedings

Use either of the following two addresses for delivering OSM (along with the signed paper copy transmittal letter) to the NRC via courier, express mail, and expedited delivery services:

Office of the Secretary of the Commission U. S. Nuclear Regulatory Commission Washington, DC 20555-0001

Office of the Secretary of the Commission
Attention: Rulemakings and Adjudications
Staff
U. S. Nuclear Regulatory Commission
11555 Rockville Pike
Rockville, Maryland 20852-2738

Parties making OSM filings should also serve copies of the OSM on the other parties on the Service List in accordance with any protective order governing the submission.

Special Instructions for COLA only:

See <u>Section 8.1</u> for specific instructions on submitting the COL Application on OSM.

5. E-mail Submission Guidance

5.1 E-mail Content

Files sent via e-mail should be sent as an attachment to the e-mail message in order to retain the original formatting of the document(s). Multiple document e-mail attachments are acceptable. The e-mail message should include the name of a contact person who can respond to questions about the submission, along with the contact person's daytime phone number, physical mailing address, and e-mail address. The e-mail should also identify/describe each document attached to the e-mail message. The format used to generate each of the identified file(s) should also be listed (see example within Section 11.3).

5.2 What Can Be Submitted

Documents (except for communications with States and other Federal agencies) submitted by e-mail, including the text of the e-mail, should contain only information that could be made available to the public and may be used for:

- Rulemaking petitions and comments in rulemaking proceedings.
- Requests for enforcement action under 10 CFR 2.206, which may be sent to 2206PETITIONS@NRC.GOV.
- All Freedom of Information Act (FOIA) and Privacy Act requests and appeals may be submitted electronically by e-mail. However, e-mail requests may not reveal personal privacy information.
- Responses to Federal Register Notices or other agency communications where NRC has provided a specific e-mail address.
- Information from export/import license applicants and licensees.

Multiple document attachments are acceptable, but the e-mail cannot exceed the 10MB size limitation.

5.3 Where to Submit E-mail

E-mail may be addressed to: ① specific individuals named as contacts or to the office specified in the regulation or communication specific to the document(s) being submitted, ② to addresses the NRC Web site (http://www.nrc.gov) provides (select the Contact Us link from the top of the screen) where a variety of e-mail communication contacts for the agency are listed), or ③ to the Office of Public Affairs (OPA@nrc.gov). The Office of the Secretary of the Commission may be contacted at 2206@NRC.GOV for 10 CFR 2.206 petitions or secv@nrc.gov for rulemaking comments and non-adjudicatory correspondence and hearingdocket@nrc.gov for hearing items and correspondence.

The sender will not be sent an e-mail confirmation of receipt of the e-mailed submission.

6. Facsimile (Telefax) Submission Guidance

6.1 Facsimiles (Telefaxes) Content

Telefaxes (faxes) should include the name of a contact person who can respond to questions about the submission, along with the contact person's daytime phone number and physical mailing address or e-mail address.

6.2 What Can Be Submitted Via Facsimile

Documents (except for communications with States and other Federal agencies) submitted by fax should contain only information that could be made available to the public and may be used for:

- Rulemaking petitions and comments in rulemaking proceedings.
- Requests for enforcement action under 10 CFR 2.206.
- Freedom of Information Act (FOIA) and Privacy Act requests and appeals. However, requests submitted by fax may not reveal personal privacy information.
- Responses to Federal Register Notices or other agency communications where NRC has provided for response by fax.
- Information from export/import license applicants and licensees.

6.3 Where to Submit Facsimiles (Faxes)

The NRC has established centralized receipt points for official submissions transmitted by fax to each of the Regional Offices and at NRC Headquarters. All official transmissions should be sent to one of these official receipt points to ensure they are captured as official records of the agency.

Facsimile Locations and User Assistance Table:

LOCATION:	FAX NUMBER:	USER ASSISTANCE and VERIFICATION
Headquarters (24-Hour	301-415-7010 OR	301-415-7000
Operation)	301-415-7020	301-413-7000
Office of International Programs	301-415-2395	301-415-1787
Office of the Secretary	301-415-1101	301-415-1966
Freedom of Information Act and Privacy Act Officer	301-415-5130	301-415-7169
Region 1	610-337-5324	610-337-5270
Region 2	404-562-4900	404-562-4827
Region 3	630-515-9915	630-829-9556
Region 4	817-860-8210	817-860-8100

7. Additional Resources

7.1 User Assistance

To obtain instructional information in the form of PDF documents and video clips, navigate to the following NRC's Web pages:

- "Electronic Submittals" Web page (http://www.nrc.gov/site-help/e-submittals.html)
- "Reference Materials for Electronic Submissions" Web page (http://www.nrc.gov/site-help/electronic-sub-ref-mat.html)
- "Adjudicatory Submissions" Web page (http://www.nrc.gov/site-help/e-submittals/adjudicatory-sub.html)
- "Obtain a Digital ID Certificate" Web page (http://www.nrc.gov/site-help/e-submittals/apply-certificates.html)

To obtain general information or discuss problems concerning making an electronic adjudicatory filing or a general submission; accessing documents filed electronically (viewing, printing, and downloading); or formatting a PDF document, contact the Meta-System Help Desk during the operating hours specified below by any of the following means:

Telephone: 1-866-672-7640

E-mail: MSHD.Resource@nrc.gov

Operating Hours of the Meta-System Help Desk:

8:00 a.m. - 8:00 p.m. ET, Federal workdays

Additional contact information:

For general help in finding the correct NRC point of contact, contact the Office

of Public Affairs: OPA@nrc.gov

For digital ID certificate assistance: DigitalIDHelp@nrc.gov

For Criminal History program specific assistance: CrimHist@nrc.gov

Also, see our web assistance site at:

http://www.nrc.gov/site-help/e-submittals/contact-us-eie.html

For assistance with ADAMS, contact the Public Document Room (PDR):

Telephone: 1-800-397-4209 or 301-415-4737

TTY (hearing impaired): 1-800-635-4512 Facsimile: 301-415-3548

E-mail: pdr.resource@nrc.gov

U. S. Mail: Public Document Room, (O1F13)

U. S. Nuclear Regulatory Commission

Washington, DC 20555-0001

Onsite at the PDR: One White Flint North

11555 Rockville Pike (First Floor)

Rockville MD

7.2 References

NRC, "Electronic Submittals" Web page: http://www.nrc.gov/site-help/e-submittals.html

The Code of Federal Regulations, Title 10 – Energy, which can be found on the NRC Reading Room Web page, under Document Collections (http://www.nrc.gov/reading-rm/doc-collections/). Select "Regulations (10 CFR)".

Freedom of Information Act, 5 U.S.C. 552

Privacy Act, 5 U.S.C. 552a

10 CFR Chapter I, RIN 3150-AH33, "Electronic Maintenance and Submission of Information", which can be found on the NRC's "Electronic Submittals" Web page: http://www.nrc.gov/site-help/e-submittals.html.

Section 508 of the Rehabilitation Act, http://www.section508.gov/

8. New Reactor-related Application Submittals

This section addresses specific guidance for Combined License Applications (COLA), Design Control Document (DCD) and Early Site Permit (ESP) submissions and supersedes any other guidance provided within this document.

8.1 COLA, DCD and ESP Submission Media and Format

An acceptable method exists for handling COLA, DCD and ESP submittals in OSM (e.g., DVD, CD-ROM).

The submission should contain folders, each of which contains files that compose the submission.

The submission should not contain any extraneous or additional files that are not an inherent and required part of the COL application or the related reference materials. Prohibited files include, but are not limited to autorun.exe, autorun.inf, readme.txt, and any

other instructional information on how to access or use the submission.

Adobe[®] Acrobat PDF indexes may be included in the submission and packing slip (i.e., electronic transmittal letter).

8.2 Folder Specifications

The maximum length of a folder name is 32 characters. Folder names may contain letters, numbers, spaces, dashes, and commas. The submission should contain a folder corresponding to each "part" of the COLA. The folder names for various parts of the COLA, DCD and ESP should be determined and agreed upon. For example COLA Parts may be:

- 01 General and Admin Information
- 02 Final Safety Analysis Report
- 03 Environmental Report
- 04 Technical Specifications
- 05 Emergency Plan
- 06 LWA-Site Redress Plan
- 07 Generic DCD Departures Rpt
- 08 Safeguards and Security Plans
- 09 Plant Specific PRA
- 10 ITAAC

A "document" is used to define submittal control. For COLAs, each part of the application is considered a "document" (i.e. FSAR, Environmental Report), the contents of which must reside in a separate folder. Each part (i.e., "document") may be made up of sub-folders to represent "chapters," "sections," or other logical pieces, and eventually these logical pieces will be represented by individual PDF files. There is no limit on the number of levels of subfolders that can be contained within each folder.

8.3 COLA, DCD and ESP Submittal Exceptions

The submitted files should conform to the guidelines set forth in this guidance document with the following notable exceptions:

8.3.1 Naming Conventions

File names for PDF files should follow some logic construct as an aid to users and should refer to the part, chapter or section to which they belong. File names should be descriptive, not cryptic. They are not required to follow a specified format, however, if the files need to appear in a certain order, it is recommended to prefix the file name with a sequence number with leading zeros. An applicant should be prepared to explain its naming conventions to its NRC project manager. Additionally, the file names for COLAs should not change from one version to the next version.

8.3.2 File Linkages

- Inter-file and intra-file linkages are permissible within a COLA and should be specified as path-relative hyperlinks to a file contained on the submission media (see diagram within Section 10.2).
- The link path should be specified relative to the linking file's folder location on the media and may contain the folder names and the file name concatenated using the slash "\".
- All links should be fully qualified (i.e., the link should provide a textual reference to the target of the link so that if the link is broken, the reader can easily find the target by reading the link text.
- Links to web pages or other http-based locations are not supported and may result in a rejection of the submittal.
- The target of a link may be one of the following:
 - ✓ Any file authored by the applicant that is contained in the submission.
 - ✓ Any document that is on the list of the allowable reference documents within ADAMS. Applicants should obtain information about reference documents and publicly-available records in ADAMS (such as the document number and the accession number) from the NRO project manager.

8.3.3 Segmentation of Large Documents

The guidance in this document (outlined in <u>Section 2.18</u>) regarding folder names and tables of contents are not applicable to COLA submissions.

Files should be broken into logical segments no larger than 50 MB. Single graphic images may be larger than 50 MB and can be submitted as an exception to this guidance.

8.3.4 Composition of OSM Submission

Each OSM submission should include a packing slip which precisely identifies the contents of the submission (and only that OSM), and requires a unique volume number. Additionally, the packing slip could include one or more of the following:

- A submission document, which is a document submitted for the first time or resubmitted due to a change.
- A reference document, which is any document that has already been submitted by means of a packing slip (and loaded into ADAMS as an Official Agency Record (OAR)) and has not changed from the previous submission.
- A reference record, which is a single PDF file that is represented by a single accession number in ADAMS. The submitter would reference this record as a pre-existing file that has already been loaded into ADAMS as an OAR.

8.3.5 Packing Slip Format

The OSM Submission should contain an XML packing slip in the root folder. The packing slip should comprehensively identify the contents of the submission and the contents of the submission media should, in turn, precisely match the packing slip. The format of the packing slip is determined by the NRC, which has provided the Packing Slip Wizard tool for

generating packing slips. The packing slip includes and supports the following sections and constructs:

- Submission Documents
- Reference Documents
- Reference Records
- XSD Schema

If a submission contains multiple volumes, a separate packing slip must be created for each volume, ensuring that the total volumes and total number are set correctly for each volume. The Packing Slip Wizard does not validate across multiple packing slips in a multi-volume submission. The Wizard supports scanning a submission document across multiple OSMs and also supports including a separate submission document on each OSM. Multiple volume submissions support the following common scenarios:

1. A submission document that spans multiple OSMs

In this case, it is imperative that the top-level folder is the same on all OSMs containing files for the submission document. Within the top-level folder, files will be filed into subfolders by sub-folder name. Therefore, if a sub-folder spans multiple OSMs, the same sub-folder should have the same name on all OSMs. Not all sub-folders must be included on each OSM, but it may be easiest to include the entire sub-folder structure on every OSM and only place files in certain branches of the sub-folder hierarchy on each OSM.

Using an FSAR as example: an FSAR may need to span multiple OSMs. In the example, the FSAR is stored in a top-level folder named "\FSAR". The top-level folder "\FSAR" may appear on multiple OSMs. The sub-folders for the FSAR may be split amongst, or duplicated across, the OSMs as necessary and appropriate.

One approach is to simply include all sub-folders on all OSMs and only have files in some of the sub-folders. In this case, many of the sub-folders may be empty on a particular OSM, but all the sub-folders are included on every OSM. An example, of this approach is:

OSM 1 may include:

Folder on OSM	Folder Contents on This OSM		
\FSAR\01 Introduction	Contains PDF Files		
\FSAR\02 Site Characteristics	Contains PDF Files		
\FSAR\03 Design of Structure	Empty		
\FSAR\04 Reactor	Empty		

And OSM 2 may include:

Folder on OSM	Folder Contents on This OSM		
\FSAR\01 Introduction	Empty		
\FSAR\02 Site Characteristics	Empty		
\FSAR\03 Design of Structure	Contains PDF Files		
\FSAR\04 Reactor	Contains PDF Files		

A second approach is to include only a subset of the sub-folders on one OSM and then the remaining sub-folders on another OSM. An example, of this approach is:

OSM 1 may include:

Folder on OSM	Folder Contents on This OSM		
\FSAR\01 Introduction	Contains PDF Files		
\FSAR\02 Site Characteristics	Contains PDF Files		

And OSM 2 may include

Folder on OSM	Folder Contents on This OSM	
\FSAR\03 Design of Structure	Contains PDF Files	
\FSAR\04 Reactor	Contains PDF Files	

2. A Separate Submission Document on each OSM

It is permissible to place each submission document on a separate OSM. Therefore, in this example, one may put an FSAR on OSM 1 and an Environmental Report on OSM 2. In this case, there is no spanning a submission document across OSMs.

OSM 1 may include:

Folder on OSM	Folder Contents on This OSM		
\FSAR\01 Introduction	Contains PDF Files		
\FSAR\02 Site Characteristics	Contains PDF Files		
\FSAR\03 Design of Structure	Contains PDF Files		
\FSAR\04 Reactor	Contains PDF Files		

And OSM 2 may include:

Folder on OSM	Folder Contents on This OSM		
\Environmental Report\Chapter 01	Contains PDF Files		
\Environmental Report\Chapter 02	Contains PDF Files		
\Environmental Report\Chapter 03	Contains PDF Files		
\Environmental Report\Chapter 04	Contains PDF Files		

8.3.5.1 Index Files within Packing Slips

PDF search index files (.pdx files) are optional and may be included in any submission document in the top-level folder (a submission document is represented by a top-level folder on the OSM) or any sub-folder of the submission document. This approach may commonly be used to provide search indexes that apply to only one submission document (e.g., FSAR.)

Additionally, PDF search index files may be included as a separate submission document in a top-level folder. This approach may commonly be used to provide search indexes that span all submission documents in the submission.

The associated files being indexed are simply another component of the submission document.

8.3.6 Document Updates

For Electronic Submission Revision (ESR) control, when part of a "document" is revised, all

electronic files associated with the "document" are considered a new ESR and should be submitted. For example, if an FSAR chapter is revised, the whole FSAR is now a new ESR and must be resubmitted electronically with some type of revision descriptor for the reviewer). An individual FSAR chapter thus cannot be revised and submitted alone - all files that constitute the "document" (i.e., the FSAR) should be resubmitted.

9. Transmittal Letter Submittal Examples

9.1 Submittal Example

The following is an example of a simple transmittal letter for a public submittal, which would accompany an electronic submission.

State of Xxxx Office of the Governor 12345 Main Street Anywhere, XX 56789

September 23, 2005

United States Nuclear Regulatory Commission Atomic Safety and Licensing Board 11555 Rockville Pike Rockville, MD 20852 WM-00011(PRE)

Enclosed are the State of XXXX's Response to DOE Interrogatories 3 and 7 and Notice of Appearance for J. Doe, Esq.

Questions concerning this submittal may be directed to:

State of XXXX

Office of the Governor

Attn: Mary Smith (000) 555-xxxx e-Mail: MESmith@stateofXX.us

12345 Main Street Anywhere, XX 56789

> Sincerely, J. Doe Attorney for the State of XX

cc: Provide list of parties served

Document Components:

001 State Transmittal Letter.pdf 1024 bytes 002 State Response to 3 &7.pdf, 15,683,112 bytes 003 Notice of Appearance-Doe.pdf, 1,056,011 bytes

9.2 Large Submittal Example

The following is an example of a transmittal letter for a large public submittal, which would accompany an electronic submission. The document has been disaggregated and each constituent part would be electronically submitted separately.

United States Department of Energy
Office of the General Counsel
Hearing Division
Washington, DC 20585

September 18, 2005

United States Nuclear Regulatory Commission
Atomic Safety and Licensing Board
11555 Rockville Pike
Rockville, MD 20852

WM-00011(PRE)

Enclosed are DOE's Response to Interrogatories Related to Quality Control Procedures

Questions concerning this submittal may be directed to:
US Department of Energy
Hearing Division
Attn: S. Smith (202) 555-xxxx
e-Mail: SESmith@usdoe.gov

Washington, DC 20585

J. Doe, Attorney for DOE

cc: Provide list of parties served

Document Components:

001 DOE Transmittal Letter.pdf 1024 bytes

002 Evaluation Quality Control (1 of 4) pdf 48,321,678 bytes

003 Evaluation Quality Control (2 of 4) pdf 47,421,178 bytes, Proprietary

004 Evaluation Quality Control (3 of 4).pdf 49,223,167 bytes

005 Evaluation Quality Control (4 of 4).pdf 37,522,178 bytes

9.3 Complex (OSM) Submittal Example

The following is an example of a transmittal letter for a complex public submittal, which would accompany an OSM submission.

United States Nuclear Regulatory Commission
Office of the General Counsel
Hearing Division
Washington, DC 20555

September 30, 2005

United States Nuclear Regulatory Commission Atomic Safety and Licensing Board 11555 Rockville Pike Rockville, MD 20852 WM-00011(PRE)

Enclosed are NRC Motion in Support of DOE's Site Characterization Plan - Estimates on Groundwater Travel in Area 16 of the Yucca Mountain Facility and Notice of Appearance for J. Jones, Esq.

Questions concerning this submittal may be directed to:
United States Nuclear Regulatory Commission
Office of the General Counsel
Hearing Division
Attn: Jane Doe, (301) 415-xxxx
e-Mail: xxx@nrc.gov
11555 Rockville Pike
Rockville, MD 20852

Jane A. Doe, Attorney for the NRC

cc: Provide list of parties served

Document Components:

001 NRC Transmittal Letter.pdf 1024 bytes

002 NRC Motion in Support of DOE Analysis.pdf, 15,679,411 bytes

003 Notice of Appearance for J. Jones, Esq.pdf, 1,056,911 bytes

004 Description Analytical Code DOE Site Plan.pdf, 142,846 bytes, Proprietary

005 Description Core Sample 3.pdf, 1,032,116 bytes, LSN-#######

006 Description Video - Jan. 21, 2003.pdf, 156,936 bytes, LSN-########

OSM#1:

Located in the OSM root:

000 Table of Contents.pdf

Located in the "documents" folder:

001 NRC Transmittal Letter.pdf 1024 bytes

002 NRC Motion in Support of DOE Analysis.pdf, 15,679,411 bytes

003 Notice of Appearance for J. Jones, Esq.pdf, 1,056,911 bytes

004 Description Analytical Code DOE Site Plan.pdf, 142,846 bytes, LSN-########

005 Description Core Sample 3.pdf, 1,032,116 bytes, LSN-#######

006 Description Video - Jan. 21, 2003.pdf, 156,936 bytes, LSN-#######

OSM#2

Located in the OSM root:

000 Table of Contents.pdf

Located in the "Analytical Code" folder:

001 DOE Site Characterization Plan Analysis.exe 123,311,123 bytes, (Description submitted via the Electronic Submission Web page), Proprietary

Located in the "Video" folder:

002 Video Recording of Jan. 21, 2003 Meeting.wmv, 236,561,440 bytes, (Description submitted via the Electronic Submission Web page), LSN-########

9.4 Sample Files Describing "BLOBs" or Physical Objects

004 Analytical Code Used for DOE Site Characterization Plan, Chpt 4, Groundwater Level Analysis, (Description submitted via the EIE process available on the NRC's "Electronic Submittals" Web page) LSN-D4567823
This enclosure provides the Analytical Code used for the analysis of information presented in Chapter 4 of DOE's Site Characterization. Code is run on a UNIX PC utilizing abcd Operating system,
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~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~
~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~
~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~
~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~
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005 Core Sample 3, Area 16 (Description submitted via the EIE process available on the NRC's "Electronic Submittals" Web page) LSN-C456789			
Core Sample 3 was taken from Area 16 on the southeastern slope of Yucca Mountain and displays strata from			
~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~			
~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~			
~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~			
~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~			
~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~			

006 Videotape of Jan. 21, 2003 Meeting to Discuss Core Sample Evaluations (Description submitted via the EIE process available on the NRC's "Electronic Submittals" Web page.

Video file submitted on OSM)

LSN-V987654

This is a video recording of the January 21, 2003 meeting between the US Department of Energy, the Center for Nuclear Waste Regulatory Analyses, and the Nuclear Regulatory Commission to discuss procedures used to perform core sample evaluations of area 22 on the southwestern slope of Yucca Mountain.

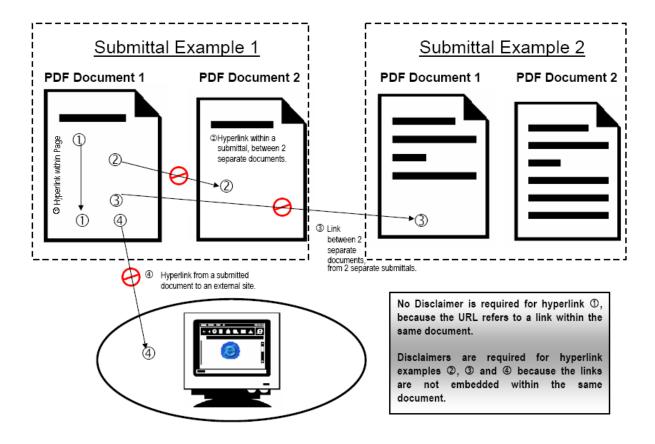
#### Technical Parameters/Special Instructions:

This video file was created using XXX software running on a 900 MHz personal computer utilizing Windows XP Video Viewer 123, which is widely available for free on the Internet. File Size is 236 MB. Total run time is approximately 1 hour and 20 minutes.

# 10. Hyperlink Examples and the Need for Disclaimers

# 10.1 Adjudicatory and Non-Adjudicatory Submittal Hyperlink Example

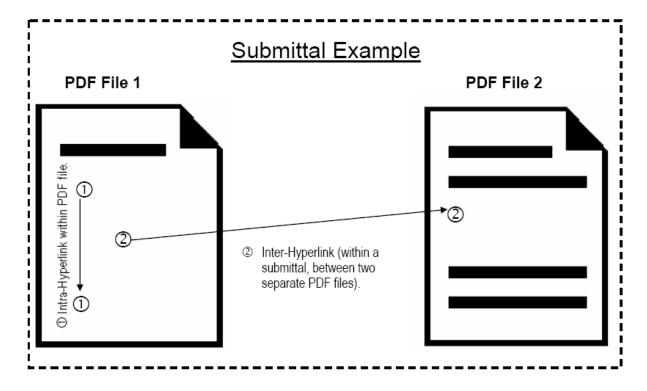
The following is a diagram explaining the acceptable methods of the use of hyperlinks within documents submitted electronically to the NRC (see <u>Section 2.12.1</u> for details).



Links within a single document will remain active and, therefore, require no disclaimer, while links within a document to other documents or to Internet Web sites require a disclaimer.

# 10.2 COLA Submittal Hyperlink Example

The following is a diagram explaining the appropriate use of hyperlinks within a COLA submittal.



Hyperlink examples ① and ② are acceptable within a COLA submission. All hyperlinks must be fully cited or fully qualified, meaning a very specific description should be provided as to where the target of the link is. If the link is broken, the reader should be able to find the references without needing the hyperlink.

Links to other Internet Web sites require a disclaimer.

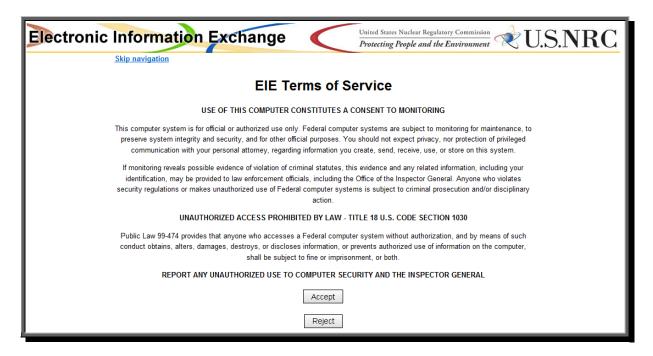
Intra-File Hyperlinks, which are links within a single PDF file and Inter-File Hyperlinks, which are links to a different PDF file, are acceptable uses of links within a COLA submittal. These links require a very detailed description as to the destination link to ensure the file can be accessed in the future.

# 11. Internet EIE "Electronic Submittals" Web page Form Examples

## 11.1 Adjudicatory Submittal Form

#### 11.1.1 EIE Terms of Service Screen

From the "<u>Electronic Submittals</u>" Web page, select the <u>Adjudicatory Submissions</u> link to navigate to the Adjudicatory Submissions screen. Select the <u>Submit Adjudicatory</u> Documents link to navigate to the following screen:



The Terms of Service requires the EIE user to recognize that the use of EIE constitutes consent to monitoring and is for official or authorized use only. Should monitoring reveal possible evidence of violation of criminal statues or Public Law, your identification may be provided to the appropriate law enforcement officials and subjects you to criminal prosecution, fine, imprisonment, or other disciplinary action.

The "Skip navigation" link allows users who are visually impaired to advance their screen reader to the Accept button without hearing all the preceding text.

To acknowledge the Terms of Service and proceed to EIE, click the "Accept" button.

Select the "Reject" button to terminate the session and display the NRC Electronic Submittals Web page.

# 11.1.2 First Time EIE Users Only - Electronic Information Exchange Portal Screen

After accepting the Terms of Service, first time EIE users (those who have not yet been granted access to a Proceeding) will be presented with the following screen:

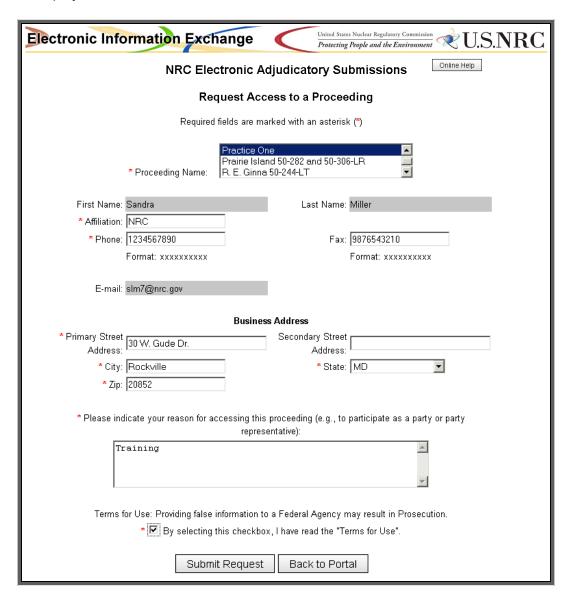


First time users will only be allowed access to one link: Request Access to a Proceeding.

The Adjudicatory Workflow Administrator receives an e-mail generated from the request for access and grants or withholds access.

## 11.1.3 Request Access to a Proceeding Screen

After selecting the <u>Request Access to a Proceeding</u> link, the following form is displayed:



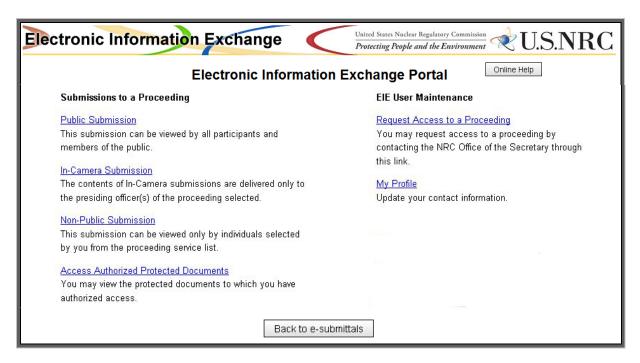
All required fields (annotated with a red asterisk (*)) must be completed in the format specified to enable the form to be successfully submitted.

Requests to multiple proceedings are acceptable by holding down the Control key and selecting each desired proceeding (highlighted in blue).

After completing and submitting the form requesting access to proceeding(s), the submitter will receive an email notification from <a href="https://nearingdocket@nrc.gov">hearingdocket@nrc.gov</a> stating access has been granted.

#### 11.1.4 Electronic Information Exchange Portal Screen

Once a user has been granted access to a proceeding, upon accepting the Terms of Service, the following screen is displayed:



From the Electronic Information Exchange Portal, a user may:

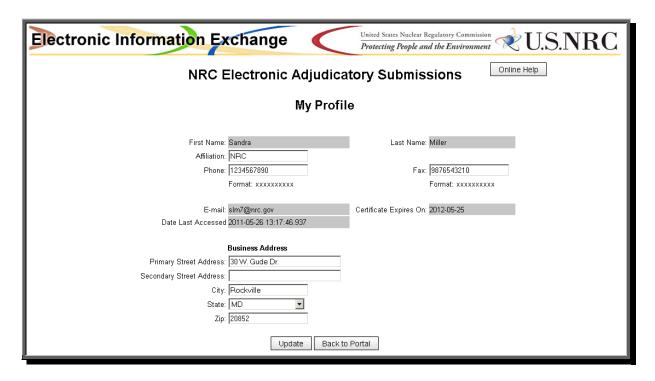
- Request access to a proceeding,
- Update your contact information via "My Profile", (see Section 11.1.5)
  - Begin the submission process by first determining if the filing is a Public, In-Camera or Non-Public Submission.
    - A <u>Public</u> submission can be viewed by all.
    - In contrast, a <u>Non-Public</u> submittal will have limited distribution, generally because it is being submitted pursuant to a protective order or is being submitted under seal.
    - An <u>In-Camera</u> submittal is viewed by only the Presiding Officer(s) of the Proceeding selected.

or

 View protected documents that you have authorized access to via "Access Authorized Protected Documents" (see <u>Section 11.1.14</u>).

#### 11.1.5 My Profile Screen

A user can modify their contact information via the "My Profile" page:



#### Edit or enter the following Profile fields:

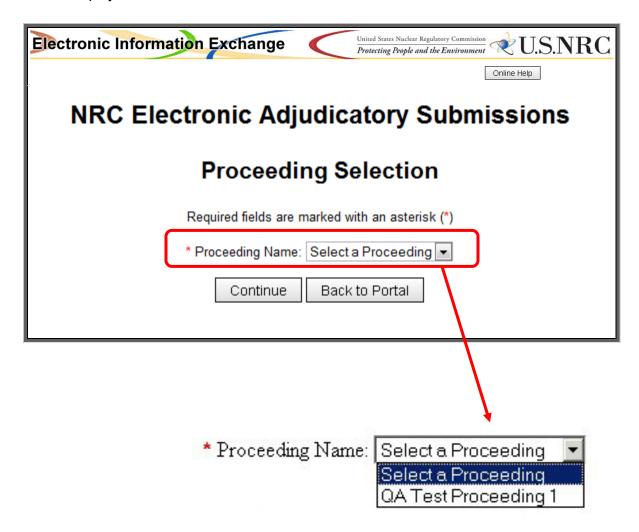
- First Name, Last Name, and E-mail address is read-only. This information is bound to the NRC-issued certificate and cannot be edited. If your name or e-mail information needs to be changed, a new NRC-issued certificate must be obtained to maintain authentication.
- The **Date Last Accessed** field is auto-populated with the date the EIE User last accessed the EIE system. This field cannot be edited and is read-only
- Affiliation: Enter the name of the organization, firm, or interest group you are representing. If you are not affiliated to any adjudicatory party, leave this field blank.
- Phone and Fax: Enter a 10-digit phone and/or fax number (no dashes or periods) in the following format: XXXXXXXXXX.
  - Primary Street Address: Enter your street address.
  - Secondary Street Address: Enter a secondary street address, such as P.O. Box or Suite information.
    - City: Enter your city.
    - State: Select from the State drop-down list.
    - Zip: Enter your zip code, 5-digit minimum.
    - Select the **Update** button to save your profile information.

Blue text at the top of the form "Member Profile updated successfully" confirms the update.

Select the Back to Portal button to return to the EIE Portal Web page.

# 11.1.6 NRC Electronic Adjudicatory Submissions Proceeding Selection Screen

From the Electronic Information Exchange Portal, once a user selects either the Public Submission link or the Non-Public submission link, the following screen is displayed:



Upon selecting the drop-down menu for the Proceeding Name, the only Proceedings listed will be those granted to you by the Office of the Secretary.

After selecting the appropriate Proceeding Name, select the Continue button to proceed with the submittal process.

#### 11.1.7 Adjudicatory Submissions Form – Public Submittal Screen

Notice the two boxes on the Adjudicatory submittal screen, explains that this is a Public submission and is available to all participants and to the general public, meaning there are no restrictions as to who may view this type of submitted document.

# **Public Submission** United States Nuclear Regulatory Commission Protecting People and the Environment U.S.NR **Electronic Information Exchange** Step 1 - Adjudicatory Step 2A - Ackno Step 4 - Sign, Serve Step 3 - Service List Step 2 - Attachments Submissions Home PDF Conversion and Submit Online Help **Public Submission Proceeding Name:** Practice One Presiding Officers: Karen Derringer Tom Ryan Required fields * Submitter Name: Sandra Miller Submitter Affiliation: Party Identifier: null Submission Title: * Submission Comments: This submission will be treated as a public submission. That is, all parties to this proceeding will receive an e-mail notice of this filing. The e-mail will contain a link that permits the recipient to retrieve a copy of the submission. Subsequently (within no more than 3 business days) it will be posted in the public docket for this proceeding and will be available for review by the general public. Agree and go to 'Step 2 - Attachments' Back to Portal Back to e-Submittals

This submission will be treated as a public submission. That is, all parties to this proceeding will receive an e-mail notice of this filing. The e-mail will contain a link that permits the recipient to retrieve a copy of the submission. Subsequently (within no more than 3 business days) it will be posted in the public docket for this proceeding and will be available for review by the general public.

While the Proceeding Name, Presiding Officers, Submitter Name and Submitter Affiliation fields are all auto-populated, there are three fields which can be populated by the submitter:

- The Submission Title (a required field) should be populated with a short descriptive title (only alpha and numeric characters are allowed in this field with a maximum length of 50 characters).
  - The Party Identifier field (not required) is populated with the three character designation.
- Comments may be entered pertaining to any submission considerations, within the Submission Comments field (not required). The comments are not part of the submission nor are they a part of an Official Agency Record.

After completing, proceed to Step 2 (Attaching the Files), see Section 11.1.10.

#### 11.1.8 Adjudicatory Submissions Form – Non-Public Submittal Screen

Notice the two boxes on the Adjudicatory submittal screen, explains that this is a Non-Public submission and is subject to limited distribution, meaning; only those individuals provided the rights to this document may view it. The general public will not be able to view this type of submitted document on the EHD.

### Non-Public Submission Electronic Information Exchange ited States Nuclear Regulatory Commission **U.S.NR** Protecting People and the Environment Step 1 - Adjudicatory Step 2A - Acknowledge Step 4 - Sign, Serve 3 - Service List Step 2 - Attachments Submissions Home PDF Conversion and Submit Online Help Non-Public Submission Practice One Proceeding Name: Presiding Officers: Karen Derringer Tom Ryan Required fields * Submitter Name: Sandra Miller Submitter Affiliation: null Party Identifier: Submission Title: * Submission Comments: This submission will be treated as a non-public submission. Only proceeding participants selected by you and certain NRC administrative personnel whose duties involve document processing and docket management functions will be notified of this submission. Agree and go to 'Step 2 - Attachments' Back to Portal Back to e-Submittals This submission will be treated as a non-public submission. Only proceeding participants selected by you and certain NRC

administrative personnel whose duties involve document processing and docket management functions will be notified of this submission.

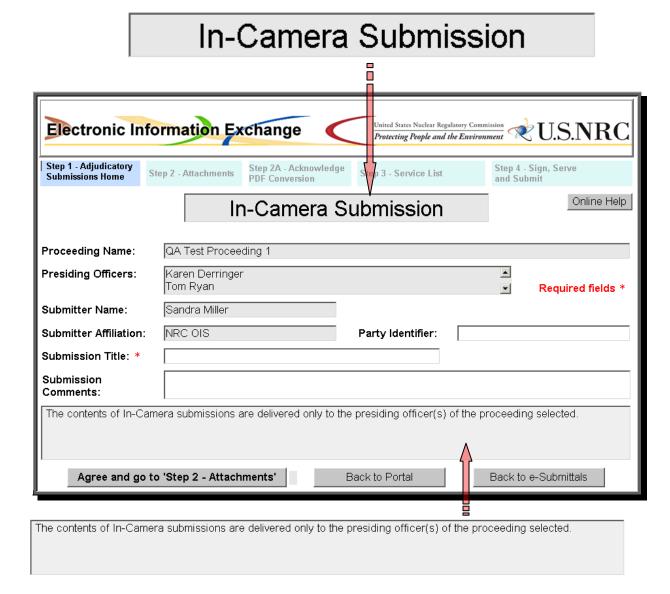
While the Proceeding Name, Presiding Officers, Submitter Name and Submitter Affiliation fields are all auto-populated, there are three fields which can be populated by the submitter:

- The Submission Title (a required field) should be populated with a short descriptive title (only alpha and numeric characters are allowed in this field with a maximum length of 50 characters).
  - The Party Identifier field (not required) is populated with the three character designation.
- Comments may be entered pertaining to any submission considerations, within the Submission Comments field (not required). The comments are not part of the submission nor are they a part of an Official Agency Record.

After completing, proceed to Step 2 (Attaching the Files), see Section 11.1.10.

## 11.1.9 Adjudicatory Submissions Form – In-Camera Submittal Screen

Notice the two boxes on the Adjudicatory submittal screen, explains that this is an In-Camera submission and is subject to limited distribution, meaning; only the Presiding Officer(s) of the Proceeding selected would be able to view it. The general public will not be able to view this type of submitted document on the EHD.



While the Proceeding Name, Presiding Officers, Submitter Name and Submitter Affiliation fields are all auto-populated, there are three fields which can be populated by the submitter:

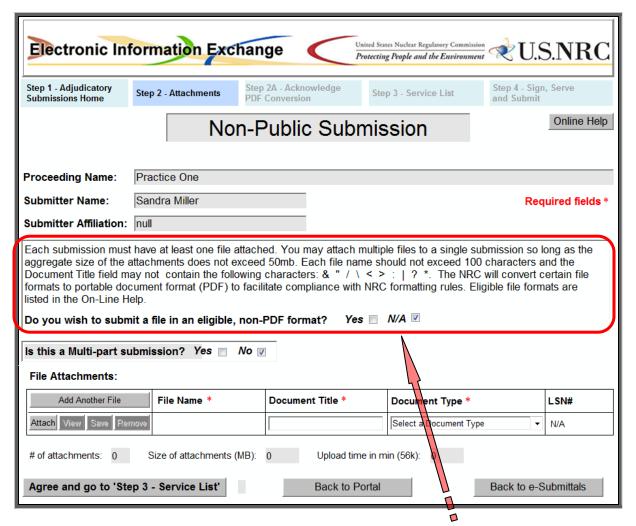
- The Submission Title (a required field) should be populated with a short descriptive title (only alpha and numeric characters are allowed in this field with a maximum length of 50 characters).
  - The Party Identifier field (not required) is populated with the three character designation.
- Comments may be entered pertaining to any submission considerations, within the Submission Comments field (not required). The comments are not part of the submission nor are they a part of an Official Agency Record.

After completing, proceed to Step 2 (Attaching the Files), see Section 11.1.10.

#### 11.1.10 Attach Files Screen

After selecting the "Agree and go to 'Step 2 – Attachments'" button, the following screen appears (see <u>Section 11.1.10.1</u>).

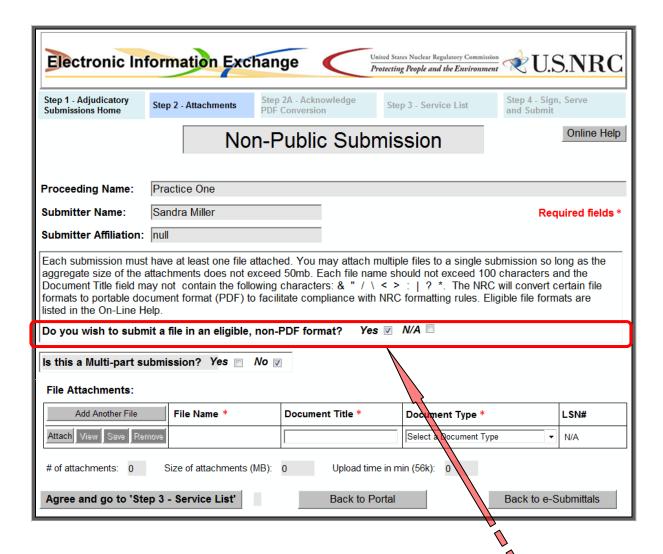
# 11.1.10.1 Submitting non-PDF Formatted Files



The NRC will permit the following non-PDF file types to be attached for adjudicatory submittals only:

*.PDF - (Portable Document File) *.XLS - (Microsoft Excel) *.XLSX – (Microsoft Excel for Microsoft Office 2007) *.DOC – (Microsoft Word) *.DOCX – (Microsoft Word for Microsoft Office 2007) *.PPT – (Microsoft PowerPoint) *.PPTX – (Microsoft PowerPoint for Microsoft Office 2007) *.TXT – (Text File) *.ODT – (OpenDocument for word processing Text Document) *.WPD – (Corel Word Perfect) *.ODS - (OpenDocument File for Spreadsheets) *.TIF – (Tagged Image File) *.ODP – (OpenDocument File for Presentations) *.PS – (PostScript File) *.PNG – (Portable Network *.BMP – (Bitmap or a BID, device-independent bitmap file Graphics File) format) *.JPG – (more commonly referred to as .JPEG, Joint *.JPEG – (Joint Photography Photography Experts Group File) Experts Group File)

# The NRC will convert non-PDF file(s) to PDF to facilitate compliance with NRC formatting rules.

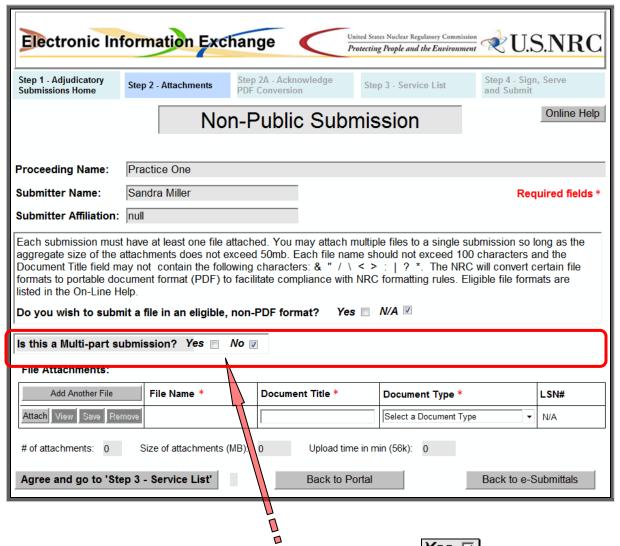


If attaching a file type other than a PDF, the submitter should answer yes to the question:

"Do you wish to submit a file in an eligible, non-PDF format?"

Be aware that if multiple files are being attached and one or more of those files is a format other than PDF, the submitter must also answer 'yes' to the question.

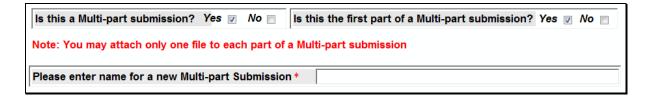
#### 11.1.10.2 Submitting Multi-Part Submittals



If submitting a multi-part (bundle) submittal, upon answering Yes v to the question:

# Is this a Multi-part submission?

the screen will update to accommodate the multi-part submittal process:



# 11.1.10.3 Attaching Files

Electronic Information Exchange  United States Nuclear Regulatory Commission Protecting People and the Environment  United States Nuclear Regulatory Commission Protecting People and the Environment						
Step 1 - Adjudicatory Submissions Home	Step 2 - Attachments	Step 2A - Acknowledge PDF Conversion	Step 3 - Service List	Step 4 - Sign and Submit	ı, Serve	
	Non-Public Submission Online Help					
Proceeding Name: Practice One						
Submitter Name: Submitter Affiliation:	Sandra Miller		Required fields *			
Each submission must have at least one file attached. You may attach multiple files to a single submission so long as the aggregate size of the attachments does not exceed 50mb. Each file name should not exceed 100 characters and the Document Title field may not contain the following characters: & " / \ < > :   ? *. The NRC will convert certain file formats to portable document format (PDF) to facilitate compliance with NRC formatting rules. Eligible file formats are listed in the On-Line Help.  Do you wish to submit a file in an eligible, non-PDF format? Yes N/A   Is this a Multi-part submission? Yes No						
File Attachments:						
Add Another File	File Name *	Document Title *	Document Type *		LSN#	
Attach View Save Ren	move		Select a Document Typ	e 🔻	N/A	
# of attackments: 0 Size of attachments (MB): 0 Upload time in min (56k): 0						
Agree and go to 'Step 3 - Service List'  Back to Portal  Back to e-Submittals						

Select the **Attach** button to begin attaching file(s). To attach more than one file, select the **Add Another File** button to receive additional fields.

All required fields (annotated with a red asterisk (*)) must be populated (i.e., File Name, Document Title, Document Type).

The selection of the **Document Type** is presented as follows:



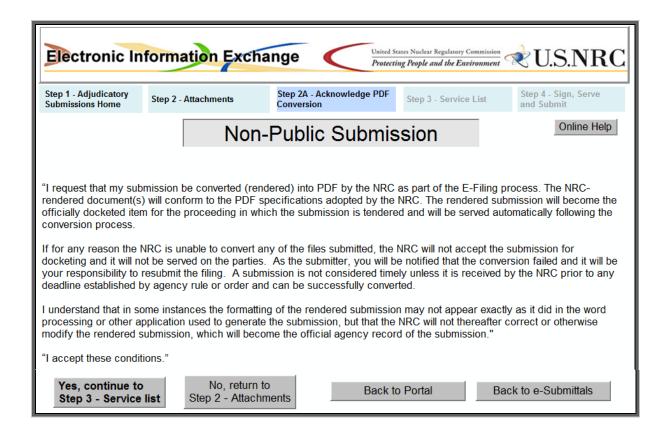


Public and Non-Public Submittal Document Types

Legal-In Camera Document Type

The file(s) must also be attached in order to proceed to "Agree and go to Step 3 - Service List", see Section 11.1.11.

## 11.1.11 Acknowledge PDF Conversion Agreement Screen



This PDF Conversion Agreement screen only appears **if** the **Yes** checkbox was selected (in Step 2, Attachments, see <u>Section 11.1.10.1</u>) to indicate the submitter wishes to attach <u>one or more non-PDF document(s)</u>.

After reading the acknowledgement information, the submitter should select the **Yes,** continue to Step 3 - Service List button to accept these conditions.

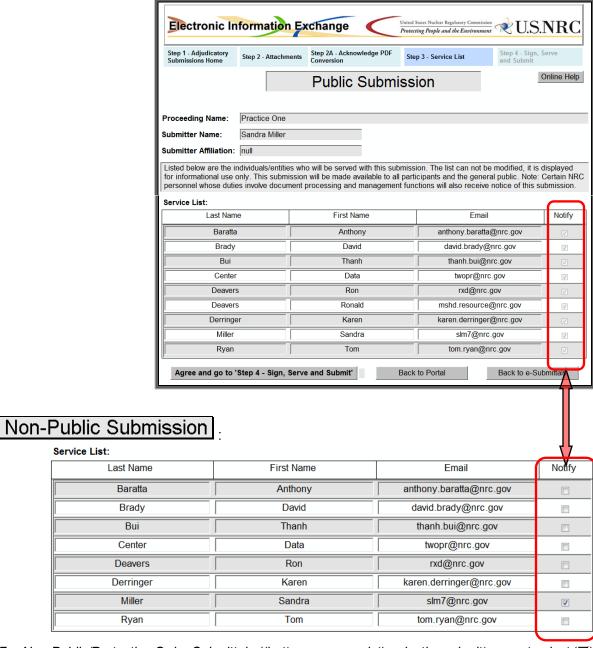
If, in error, the "Yes" checkbox was selected (in Step 2, Attachments), the submitter should select the **No, return to Step 2 - Attachments** button to return to the previous screen and select "N/A" in response to the file format question (see <u>Section 11.1.10.1</u>).

PDF file(s) submitted must comply with NRC standards outlined in this document (see <u>Section 2.9</u>).

# 11.1.12 Electronic Service List Recipients Screen

#### 11.1.12.1 Public and Non-Public Submission Service List Screen

Upon selecting the "Agree and go to 'Step 3 – Service List" button, the following screen appears for Public and Non-Public Submissions:



For Non-Public/Protective Order Submittals ((bottom screen print) <u>only</u>, the submitter must select (☑) within the "Notify" column, those who will receive a notification of the submittal via E-Filing e-mail.

Although this screen is also presented for Public Submittals (top screen print), to permit the submitter to ensure that the certificate of service accompanying the submission includes the appropriate individuals, making any selections to this screen is <u>not</u> an option.

To proceed, the submitter would select the "Agree and go to 'Step 4 – Sign, Serve and Submit" button, see Section 11.1.13.

#### 11.1.12.2 In-Camera Submission Service List Screen

Upon selecting the "Agree and go to 'Step 3 – Service List" button, the following screen appears for In-Camera Submissions only:

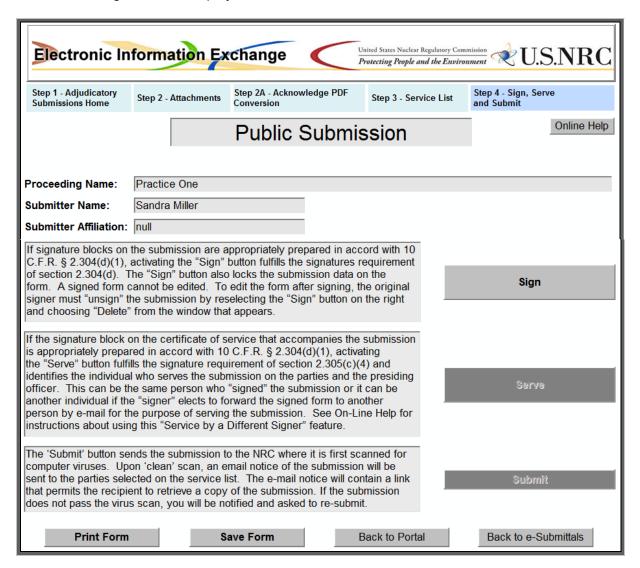


The In-Camera Service List screen presents a statement that only the Presiding Officer assigned to the hearing will be served with this submittal.

To proceed, the submitter would select the "Agree and go to 'Step 4 – Sign, Serve and Submit'" button, see Section 11.1.13.

## 11.1.13 Sign, Serve and Submit Submittal Screen

After selecting the "Agree and go to 'Step 4 – Sign, Serve and Submit" button, the following screen is displayed:



The submittal should be "signed" and "served" by the same individual using his/her digital ID certificate, or two different individuals each having their own digital ID certificates, prior to completing the "Submit" task.

Select the **Sign** button. A "Signature Information" dialogue box appears, displaying "No Signature", select the **Sign** button. The dialogue box will update stating the signature is valid. Select the **Close** button. The **Sign** button will update to reveal the signers name and email address. Repeat this process to "Serve" the submittal, by first selecting the **Serve** button. To complete the process, select the **Submit** button. The submitter will receive a notification screen confirming the NRC EIE has received the submittal.

<u>Note</u>: The submitter is afforded the opportunity (prior to submitting the form) to **print** and/or **save** the form by selecting the appropriate button at the bottom of the screen.

#### 11.1.14 Access Authorized Protected Documents

After selecting the <u>Access Authorized Protected Documents</u> link, from the EIE Portal, the following screen appears:



Upon selecting the drop-down menu for the Proceeding Name, the only Proceedings listed will be those granted to you by the Office of the Secretary.

After selecting the appropriate Proceeding Name, a table will appear listing all documents associated with the proceeding selected:



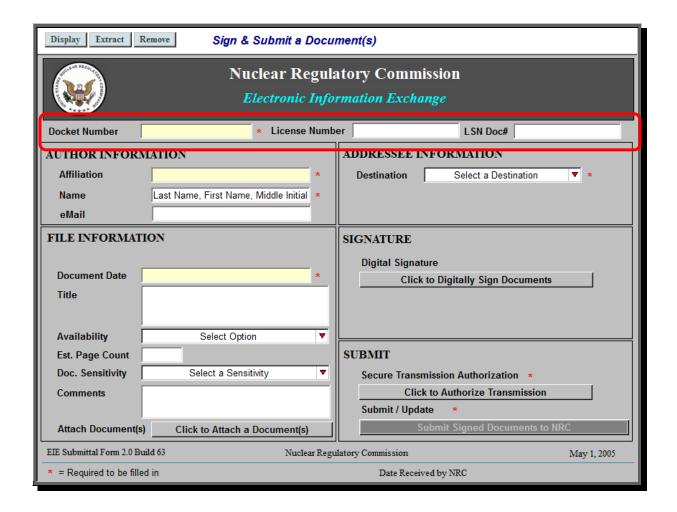
Each column, within the table, can be sorted in ascending or descending order, simply by selecting the column heading. Additionally, above the "Submitted Date" column (right side of table), is a Search field to aid in locating a particular document to be view.

Within the "Document" column (far left side of screen), to view a document select the applicable <u>document</u> link. The document will be displayed in PDF.

# 11.2 General Submittal Form (for Non-Adjudicatory Documents)

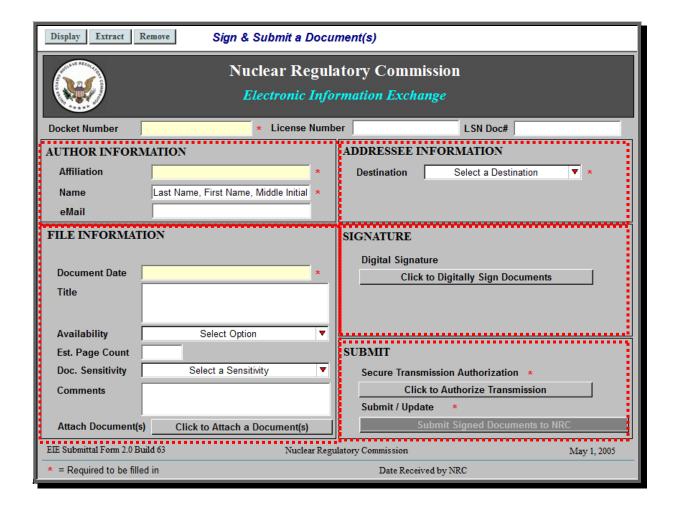
From the "Electronic Submittals" Web page, click on the <u>General Submissions</u> link to navigate to the General submittal screen:

11.2.1 Docket, License and LSN Doc Number Information



Within the **Docket Number** field, which is a required field, enter the appropriate docket for the submittal you are making.

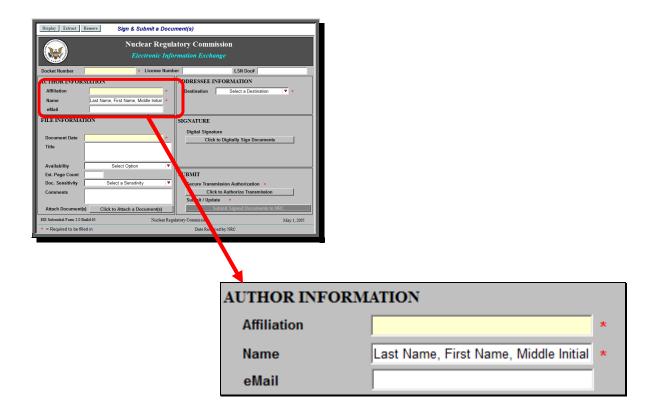
Although the **License Number** field and the **LSN Doc #** field are not required, if you know this information, you may populate these two fields.



There are five additional sections within the submittal form, which must be populated:

- ◆ Author Information (see <u>Section 11.2.2</u>)
- ◆ Addressee Information (see <u>Section 11.2.3</u>)
  - ◆ File Information (see <u>Section 11.2.4</u>)
    - Signature (see <u>Section 11.2.5</u>)
      - Submit (see <u>Section 11.2.6</u>)

#### 11.2.2 Author Information

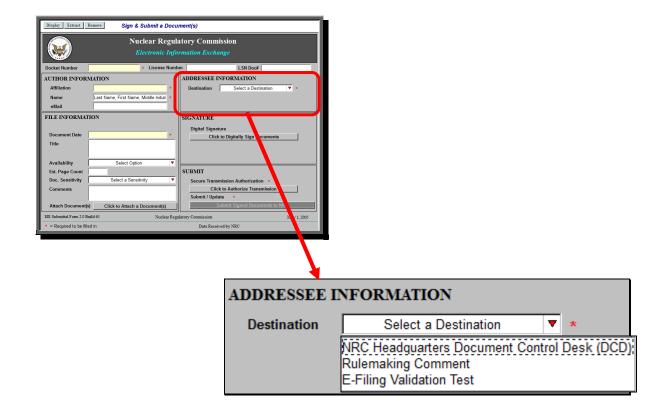


The first section to be populated is the **Author Information** section.

Be aware that the **Affiliation** field and the **Name** field are required fields, while the **e-mail** field is not a required field.

- Within the Affiliation field, enter the organization the author is representing.
  - Within the **Name** field, enter the author's last name, followed by the author's first name and then middle initial.
  - Populate the **e-mail** field with the author's e-mail address. It is encouraged to populate this field to aid the NRC staff in contacting the author with any questions regarding the submittal.

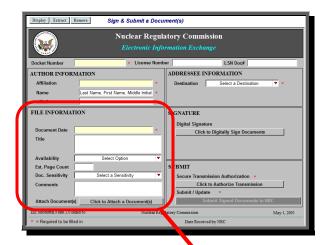
#### 11.2.3 Addressee Information

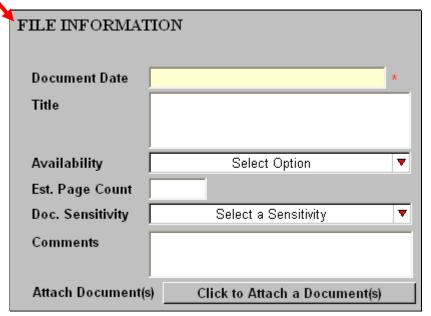


The next section to be populated is the **Addressee Information** section.

Within the **Destination** field, select to whom this document will be sent, by clicking on the drop-down button. Scroll to and select the appropriate destination.

#### 11.2.4 File Information





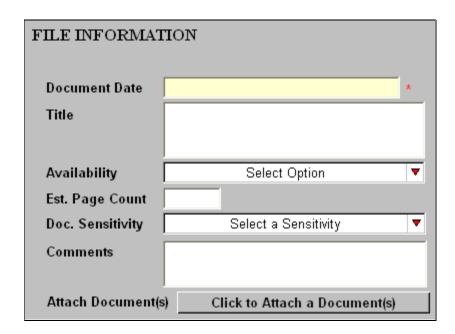
Next, populate the File Information section.

Enter, within the **Document Date** field, the date of the document to be submitted (be aware this is a required field). If attaching more than one document, enter the date of the first document attached to the submittal.

Within the **Title** field, enter the title of the document to be submitted. Again, if attaching more than one document, enter the title of the first document attached to the submittal.

Within the **Availability** field, select whether the submittal being made can be made publicly available or non-publicly available (and, therefore, would not be made available to the general public).

Next, enter the estimated number of pages within the **Est. Page Count** field.

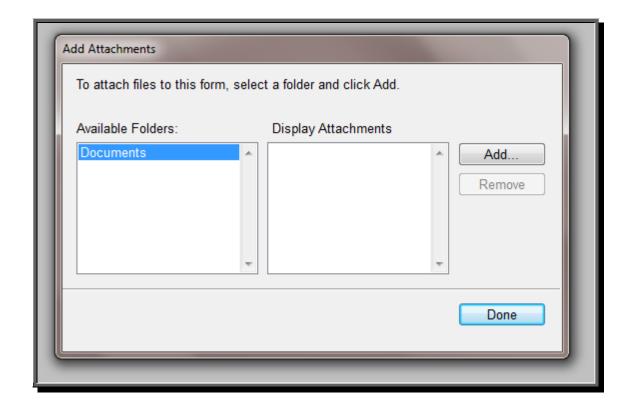


Within the **Doc. Sensitivity** field, from the drop-down menu, select from either:

- "Public Non-sensitive/Unclassified" (which means the document can be viewed by the general public) or
- "Sensitive Unclassified Non-Safeguards Information" (which is information that can not be made publicly available due to its sensitive content).

Next is the **Comments** field. Enter any type of information that would be useful to the processing of your submittal.

To begin attaching document(s) to the submittal form, select the Click to Attach a Document(s) button to the right of the Attach Document(s) field. Be aware that the size limitation for the entire submittal package is no greater than 15 MB.



Select the **Add** button. An "ATTACH: Choose File or Files" dialogue box will appear.

Navigate to the file path location of the document to be attached. After locating the document, click **on** the document name, and then select the **Open** button.

The file(s) selected will display within the "Display Attachments" box (located within the middle portion of the "Add Attachments" dialogue box).

To remove a file attached in error, simply click on the file name within the "Display Attachments" section, then select the **Remove** button.

If attaching more than one document to the submittal, select the **Add** button again to navigate to the next document. You would repeat the steps of attaching documents until all documents have been attached for this submission. Be aware that the size limitation for the entire submittal package is no greater than 15 MB.

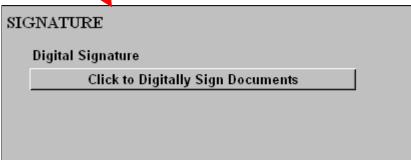
Select the **Done** button.

## 11.2.5 Signature

All required fields (annotated with a red asterisk (*)) should be populated and the file(s) attached in order to proceed.

See <u>Section 1.3.3.1</u> for instructions on the oath or affirmation statement to be included if the certifying individual or someone else in the certifying individual's organization is going to digitally sign the document submission.





To successfully submit the document(s), you must sign the transmission. To accomplish this, select the **Click to Digitally Sign Documents** button, within the "Signature" section.

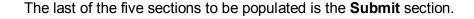
The "Digital Signature Viewer" dialogue box will display the caption No Signature. This indicates that the form has not been signed. Select the **Sign** button.

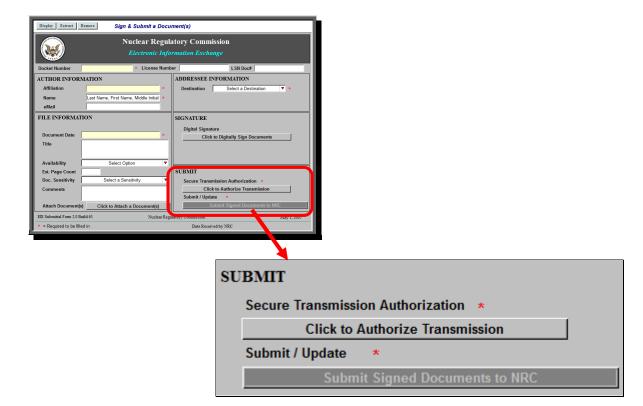
If you receive a "Select Your Signature Identify" dialogue box, click <u>on</u> the applicable ID (multiple ID's may be listed), then select the **OK** button.

A "Signing data with your private exchange key" dialogue box will appear. Enter the certificate password within the **CryptoAPI Private Key** field, then select the **OK** button.

The system will validate your certificate and the prompt at the top of the window will change to 'Signature is Valid'. Select the OK button.

Within the "Signature" section, the **Click to Digitally Sign Documents** button will update, displaying your name and e-mail address as the signer.





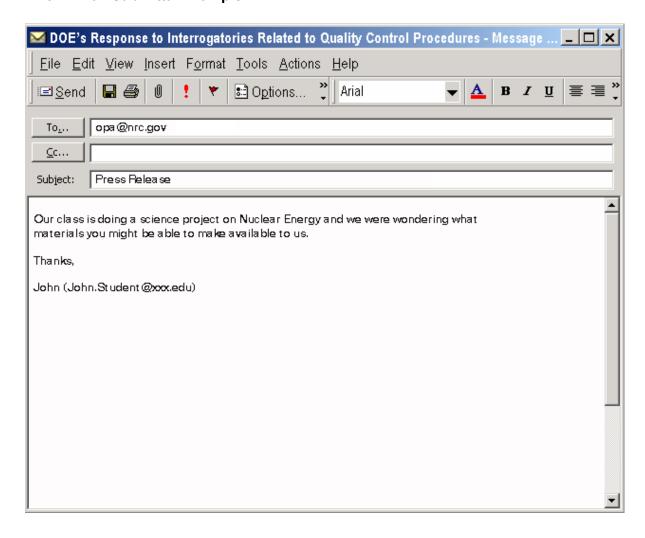
Repeat the steps outlined in <u>Section 11.2.5</u>, by first selecting the **Click to Authorize Transmission** button.

After completing the steps and your name and email address are displayed within the Click to Authorize Transmission button, the Submit Signed Documents to NRC button will become activated.

To transmit the submittal to the NRC, select the **Submit Signed Documents to NRC** button.

A screen will appear with the statement: **Your form has been submitted**. At this point, if you desire, you may save or print this screen for your records.

# 11.3 E-mail Submittal Example



# 12. Acronyms and Abbreviations

- ACL Authorized Certificate List
- ADAMS Agencywide Documents Access and Management System
- BLOBs Binary Large Objects
- CA Certificate Authority
- CD Compact Disc
- CFR Code of Federal Regulations
- COLA Combined License Application (also Combined Construction Permit and Operating License Application)
- COTS Commercial Off-The-Shelf
- DCD Design Control Document
- DDE Dynamic Data Exchange
- DOE Department of Energy
- DPI dots per inch (dpi)
- EHD Electronic Hearing Docket
- EIE Electronic Information Exchange
- ESP Early Site Permit
- ESR Electronic Submission Revision
- FOIA Freedom of Information Act
- ISP Internet Service Provider
- LRA Local Registration Authority
- LSN Licensing Support Network
- MB Megabyte
- NARA National Archives and Records Administration
- NOV Notice of Violation
- NRC U.S. Nuclear Regulatory Commission
- OAR Official Agency Record
- OCR Optical Character Recognition
- OLE Object Linking and Embedding
- OPA Office of Public Affairs
- OSM Optical Storage Media
- PARS Publicly Available Records System
- PDF Portable Document Format
- PDR Public Document Room
- PKCS Public Key Certificate Services
- PKI Public Key Infrastructure
- POF Protective Order Files
- PPI pixels per inch (ppi)
- SUNSI Sensitive Unclassified Non-Safeguards Information
- TIFF Tagged Image File Format
- XFDL Extensible Forms Definition Language
- XML Extensible Mark-up Language

# 13. Glossary

Agencywide Documents Access and Management System (ADAMS) - ADAMS is the NRC's primary document management and electronic recordkeeping system that contains the bibliographic header (metadata), searchable text, and an electronic copy for recordkeeping purposes if applicable.

<u>Bibliographic Header</u> - A structured description of a document, file, or object.

<u>Binary Large Object File (BLOB)</u> - A large file, typically an image or sound file, that should be handled (e.g., uploaded, downloaded, or stored in a database) in a special way because of its size.

**Bundle** – See Multi-Part Submittal.

<u>Commercial Off-The-Shelf (COTS)</u> - A COTS product is an item (such as computer software), which is available and sold or traded to the general public from a vendor in the course of normal business operations at prices based on an established catalog or fair market value. COTS products are un-customized items.

<u>Complex Document</u> - A document that consists (entirely or in part) of electronic files having substantial portions of which are neither textual nor image in nature, and graphic or other Binary Large Objects that exceed 50 MB and cannot logically be divided.

**Disclaimer** - A statement added to a document to provide clarification.

<u>Document</u> - Written printed, recorded, magnetic, graphic-oriented matter, or other documentary material, regardless of form or characteristic.

<u>Documentary Material</u> - Any information upon which a party, potential party or interested governmental participant intends to rely and/or to cite in support of its position in a proceeding.

**Electronic Hearing Docket (EHD)** -. EHD is a Web site (<a href="http://ehd1.nrc.gov/EHD/">http://ehd1.nrc.gov/EHD/</a>) that provide access to an electronic data base that contains publicy available and non-publicly available materials submitted in the NRC's adjudicatory proceedings submission. It is located in the Electronic Reading Room, which is available at <a href="http://www.nrc.gov/reading-rm.html">http://www.nrc.gov/reading-rm.html</a>. Some materials contained within EHD are not publicly available and require the user to have a digital ID certificate to gain access to that information.

**Electronic Information Exchange (EIE)** - Electronic Information Exchange is the electronic mechanism established by the NRC for the electronic transmission of documents to the agency via the Internet. The documents are transmitted in a verifiable and certifiable mode through the use of digital signatures. EIE is a Public Key Infrastructure (PKI) system using RSA Labs' 128-bit encryption, Verisign's Public Key Certificate Services (PKCS), and PureEdge's Extensible Forms Definition Language (XFDL) web form.

**<u>File Format</u>** - File format is data organizational layout of a file.

<u>Hidden Text</u> - Text that is visible to the search engines but is invisible to humans. It is mainly accomplished by using text in the same color as the background color of the page. It is primarily used for the purpose of including extra keywords in the page without distorting the aesthetics of the page. Most search engines penalize web sites which use such hidden text.

<u>Length of Path (ISO 9660, Joliet Extension)</u> - The Joliet Extension to ISO 9660 allows filenames of 64 characters in length and is the least restrictive interchangeable naming format. However, the ISO 9660 standard imposes a limit on the length of the path to each file that cannot exceed 255 characters. Length of path is the sum of the lengths of all

relevant directories, the length of the file name and extension, and the number of relevant directories.

<u>Licensing Support Network (LSN)</u> - The Licensing Support Network (LSN) is a web portal that provides access to multiple document collections pertaining to the HLW repository construction authorizing licensing proceeding. Using "crawler" technology to index the various collections, the LSN provides web-based access to the document collection that permits the search and retrieval of both structured information (bibliography) and unstructured information (content files, image files).

<u>Lossy</u> - A lossy image is one in which the after-compression image is different from the original image due to lost information. The use of lossy compression techniques is not allowed in connection with materials submitted to the NRC because they are not acceptable for transfer to the National Archives as official records.

<u>Macro</u> - A macro is any programming or user interface that, when activated, expands a single language statement or computer instruction into a number of instructions. The macro statement contains the name of the macro definition and usually some variable parameter information. Macros are especially useful when a sequence of instructions needs to be employed a number of times. For example, in Microsoft® Word and other programs, a macro is a saved sequence of commands or keyboard strokes that can be stored and recalled with a single command or keyboard stroke.

<u>Multi-Part Submittal</u> – (Also called a Bundle) A document that has been disaggregated by chapters, sections, etc. into smaller documents, each of which are ≤50 MB (but preferably segmented to files no greater than 15 MB). Each constituent document should be individually submitted electronically and within the file name marked as Part 1 of X, Part 2 of X, etc. A bundle submittal is permitted via the Adjudicatory link found on the "Electronic Submittals" Web page.

Optical Character Recognition (OCR) - Optical Character Recognition involves the recognition and translation of printed or written text characters into digital code that can be read by and stored on a computer. OCR involves photo scanning text character by character, analyzing the scanned-in image, and then translating the character image into computer-readable character codes, such as ASCII. During the OCR process, the scanned image is analyzed for light and dark areas to identify each alphabetic letter or numeric digit. Once a character is recognized, it is converted into an ASCII code. OCR can be accomplished either through software, or a combination of specialized hardware and software. NOTE: Documents converted using OCR technologies are not acceptable for submission as records to the NRC. OCR files are only acceptable for use for search and retrieval purposes and should be accompanied by the original file (Image) for recordkeeping purposes.

Optical Storage Media (OSM) - Storage media, such as a compact disc (CD), that holds content in digital form written and read by a laser. This type of media includes all the various CD and DVD variations, as well as optical jukeboxes and autochangers. Optical media have a number of advantages over magnetic media such as floppy disks. Optical disk storage capacity ranges up to 6 gigabytes, or 6 billion bytes, compared to the 1.44 million bytes (1.44 MB) on a floppy disk. (One optical disk holds about the equivalent of 500 floppy disks worth of data.) Optical media generally are more durable as well, lasting up to seven times as long as traditional storage media.

Packing Slip - A packing slip is an electronic transmittal sheet, which is to be included on

every Combined License Application (COLA) OSM Submission Media (CD/DVD) and provides a description of the contents of the media (Submission Documents and Reference Collections).

Portable Document Format (PDF) - Adobe® Systems, Incorporated's Acrobat document publishing software package output format. The current release is Acrobat 9.0. Though proprietary to Adobe, the PDF standard has been published and is freely available so that the capability to create PDF documents has been integrated into many other software applications. Because PDF documents can be generated from any application that can generate Postscript printer files (a popular printing language standard), anything that can be printed can be represented in PDF. When files are converted from standard applications to PDF, the information and pagination are "locked down" for the general user, who can then access the content through the use of PDF viewer software. NOTE: The use of different types of PDF formats is restricted for recordkeeping purposes because of issues related to preservation. See guidance for the acceptable uses of each format type. The following definitions describe the principal types of PDF formatting:

<u>Formatted Text & Graphics</u> - Formerly known as "PDF Normal," this type of PDF is a popular output file format created when materials have been produced on a word processing or publishing system. It contains the full text of the page with appropriate coding to define font types, sizes, etc. The files are relatively small and the screen display and printed versions have comparable content readability.

<u>Searchable Image (Exact)</u> - Formerly known as "PDF Original Image with Hidden Text," when this type of PDF is used to create a document, the resulting file consists of two layers: a bit-mapped layer and a hidden text layer. The bitmapped layer maintains the visual representation of the original document, while the text layer is created through optical character recognition software (OCR). There are two "flavors" of this type of PDF:

**Searchable Image (Exact)** - Formally known as 'PDF Original Image + Hidden Text.," the Searchable Image (Exact) format preserves the look of the original scanned image, making it ideal for meeting legal requirements.

<u>Searchable Image (Compact)</u> - This format captures the same image as Searchable Image (Exact), but produces smaller file sizes. Although the general look and feel of the image is retained and is searchable, the quality is not as good as the Exact method because of the "lossy" compression routines used in conjunction with this format. Consistent with NARA guidance, the NRC will not accept any documents rendered in this format.

**Image Only** - This type of PDF is essentially a scanned image of the page in a PDF wrapper that contains no searchable text, and thus does not permit text searching within the document. The image quality is dependent on the quality of the source materials and the quality of the scanning operation.

(See Section 2.3 and 11.1.10.1 for the preferred PDF file formats.)

<u>Pixels Per Inch</u> - A measure of the amount of scanned information. The finer the optics of the scanner, the higher the scan resolution.

<u>Publicly Available Records System (PARS)</u> - PARS is an electronic library where all publicly available documentation submitted to the NRC can be accessed via the NRC Web site (<a href="https://www.nrc.gov">www.nrc.gov</a>). Select the <a href="https://www.nrc.gov/reading-rm/adams.html">NRC Library</a> link, followed by selecting the <a href="https://www.nrc.gov/reading-rm/adams.html">ADAMS Public</a> Documents link (<a href="https://www.nrc.gov/reading-rm/adams.html">https://www.nrc.gov/reading-rm/adams.html</a>).

<u>Section 508</u> - Section 508 refers to the section within the Rehabilitation Act, as amended by Congress in 1998, that requires Federal agencies to make their electronic and information technology accessible to people with disabilities, thereby eliminating information technology barriers, providing new opportunities for people with disabilities, and encouraging the development of technologies that will help achieve the goal of accessibility.

<u>Segment</u> - A segment is subpart or subunit of a document, usually created at a logical division such as a chapter, section, or subsection of a the document.

<u>Sensitive Unclassified Non-Safeguards Information (SUNSI)</u> - Any information which, if lost, misused, modified, or accessed without authorization, can reasonably be foreseen as causing harm to the public interest, the commercial or financial interest of the entity or individual to whom the information pertains, the conduct of NRC and Federal programs, or the personal privacy of individuals. SUNSI has been organized into the following seven groups:

- Allegation information
- Investigation information
- Security-related information
- Proprietary information
- Privacy Act information
- Federal, State, Foreign Government, and international agency controlled information
- Sensitive internal information

<u>Submittal</u> - An information package that is delivered to the NRC for a specific purpose and may consist of one or more documents.