

**Revisions to Policy Governing Public Availability of
Information Associated with
Category I Fuel Facilities**

Option 1: Apply SUNSI guidance to newly generated documents related to NFS and BWXT; except for proposed actions covered by Section 189 of the Atomic Energy Act, do not prepare and release redacted versions for the public of documents that contain sensitive information.

Pros	<ol style="list-style-type: none"> 1. Applicable Agency-wide for all documents related to BWXT and NFS. 2. Appears to meet the intent of DOE/NR's concern in 2004, because all documents being marked by NFS and BWXT as sensitive will continue to be withheld, and the SUNSI guidance will withhold NRC-generated sensitive documents. 3. Staff knowledgeable in using SUNSI guidance. 4. Minimal resource commitment to review future DOE/NR and NRC-generated documents. 5. Affords members of the public an opportunity to request a hearing under Section 189 of the Atomic Energy Act. 6. Addresses recent inquiries involving events at NFS and BWXT. 7. Supports Agency value of Openness.
Cons	<ol style="list-style-type: none"> 1. Some additional unbudgeted resources required to perform SUNSI review. 2. Some additional training of DOE/NR contractor in applying SUNSI review criteria.
Resources Estimates	<p>Estimated full-time equivalent (FTE): 0.4 each FY or \$56K.</p> <p>Assuming that NRC receives or prepares about 511 documents for BWXT and NFS per year, and we spend 1.0 hr per document to perform a SUNSI review, this would result in approximately 511 staff hours or 0.4 FTE. per year at \$140K per FTE = \$56K.</p> <p>Budget Years: FY 07, continuous.</p> <p>Work Impacts: Due to the small level of resource needs, the staff would implement Option 1 without the need for additional resources in the budget.</p> <p>Resources Currently Budgeted: Unbudgeted activity.</p>

Option 2: Apply SUNSI guidance to newly generated documents related to NFS and BWXT; prepare and release redacted versions for the public.

Pros	<ol style="list-style-type: none"> 1. Applicable Agency-wide for all documents related to BWXT and NFS. 2. Appears to meet the intent of DOE/NR's concern in 2004, because all documents being marked by NFS and BWXT as sensitive will continue to be withheld, and the SUNSI guidance will withhold NRC-generated sensitive documents. 3. Staff knowledgeable in using SUNSI guidance. 4. Affords members of the public an opportunity to request a hearing under Section 189 of the Atomic Energy Act. 5. Addresses recent inquiries involving events at NFS and BWXT. 6. Supports Agency value of Openness.
Cons	<ol style="list-style-type: none"> 1. Additional unbudgeted resources required to perform SUNSI review, other than in Option 1 for the preparation of public versions of NRC generated documents. 2. Some additional training of DOE/NR contractor in applying SUNSI review criteria. 3. Some additional resources required for BWXT and NFS to prepare public versions of document.
Resources Estimates	<p>Estimated FTE: 0.8 each FY or \$112K</p> <p>Assuming that NRC receives or prepares about 511 documents for BWXT and NFS per year, and we spend 1.0 hr for each document to perform a SUNSI review criteria and spend an additional 1.0 hr preparing a public version, this would result in approximately 1022 staff hours or 0.8 FTE. per year at \$140K per FTE = \$112K</p> <p>Budget Years: FY 07, continuous</p> <p>Work Impacts: For performing the SUNSI review, the staff would implement that portion of Option 2 without the need for additional resources in the budget. The staff would need approximately 0.4FTE or \$56K of contract support for preparing a public version of documents.</p> <p>Resources Currently Budgeted: Unbudgeted activity.</p>

Option 3: Apply SUNSI guidance to all documents related to NFS and BWXT; prepare and release redacted versions of documents containing sensitive information. This would include a retrospective review of documents previously generated that are now in non-public ADAMS.

Pros	<ol style="list-style-type: none"> 1. Applicable Agency-wide for all documents related to BWXT and NFS. 2. Appears to meet the intent of DOE/NR's concern in 2004, because all documents being marked by NFS and BWXT as sensitive will continue to be withheld, and the SUNSI guidance will withhold NRC-generated sensitive documents. 3. Staff knowledgeable in using SUNSI guidance. 4. Affords members of the public an opportunity to request a hearing under Section 189 of the Atomic Energy Act. 5. Addresses recent inquiries involving events at NFS and BWXT. 6. Supports Agency value of Openness.
Cons	<ol style="list-style-type: none"> 1. A significant amount of additional unbudgeted resources required to perform SUNSI review of documents in ADAMS currently listed as non-public. Other work activities would need to be delayed. 2. Some additional training of DOE/NR contractor in applying SUNSI review criteria.
Resources Estimates	<p>Estimated full-time equivalent (FTE): 3.8 FTE or \$532K.</p> <p>Option 2 resources of 0.8 FTE per year. Plus, currently, there are approximately 1900 documents for BWXT and NFS in ADAMS from January 2004 to date, that are not currently publicly available, and if we spend 1.0 hr for each document performing a SUNSI review and an additional 1.0 hr for each document preparing a public version it would result in approximately 3800 staff hours or 2.7 FTE. For a total of 3.5 FTE or \$490K (for FY-08) review resources. The staff also assumed that OCIO would require 0.20 hrs to return the documents or scan redacted documents into ADAMS. This would result in approximately 380 hrs or 0.3 FTE. Total: 3.8 FTE or at 140K per FTE = \$532K.</p> <p>Budget Years: FY 08 for retrospection review; FY 07, continuous, for prospective review.</p> <p>Work Impacts: For performing the SUNSI review of the prospective portion of Option 3, the staff would implement that portion, without the need for additional resources in the budget. The staff would need approximately 3.4 FTE or \$476K of contract support for preparing a public version of documents and having the redacted documents placed in ADAMS for the retrospective portion. If no additional funds are authorized by the Commission to perform Option 3, staff would reprogram 2.0 FTE and 250K currently allocated for performing 2 fuel cycle renewals. This will delay licensing decisions into FY-10.</p> <p>Resources Currently Budgeted: Unbudgeted activity.</p>