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ENCLOSURE

NUCLEAR ENERGY INSTITUTE (NEI)
 DETAILED TECHNICAL COMMENTS ON
 The US Nuclear Regulatory Commission's
 Proposed Design Standards and Functional Requirements

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For
 The Licensing Support Network supporting Licensing Proceedings for the
 Receipt of High-Level Radioactive Waste at a Geologic Repository

General Comments:

The proposed LSN design standards in this rulemaking along with the LSN Level One and Two Functional Requirements contained in Andrew Bates' August 16, 2000 memorandum represent a significant and positive step forward by the NRC. This system appears to be a valuable tool for facilitating an effective and fair Yucca Mountain licensing process. The key to the success of this system will be in how well it is implemented. The LSN Advisory Review Panel's (LSNARP) role in providing appropriate guidance to facilitate implementation will be critical.

Such guidance is clearly necessary. For example, at NEI, we have a fairly sophisticated system and system operators. However, were we to participate in this process we would need much more information than what has been given to us in this rulemaking and its supporting documents, in order to "certify the compliance of our system with the LSNA".

Also, the Level One and Level Two Functional requirements in the August 16 memorandum appear to be significantly more stringent than the minimum design standards specified in the rule. Although NEI understands the need to standardize, it appears that NRC has over-engineered these requirements, which might hinder system implementation and result in burdensome oversight of the participant web sites.

The LSNARP should carefully examine these Functional Requirements and any other expectations that are to be imposed in addition to or as guidance upon the LSN rule to assure that they are necessary and appropriate for all participants.

NEI would welcome the opportunity to participate actively in future LSNARP and associated Technical Working Group activities. NEI maintains a number of web sites and has expertise in this area.

Comments on Supplementary Information – II. LSN Design Standards:

On Page 50939, middle column, near top of page, NRC stipulates, in permitting participants to correct or revise documents that, "[3] Other parties or potential parties are notified of the change." This requirement needs clarification in terms of how it will be accomplished. Will there be a central way of notifying the other parties? Will participants know whom all of the participating parties are?

How is this tracked? Is this actually necessary or should each participant be responsible for assuring that it is using the latest information from other participants sites?

On Page 50939, middle column, near top of page, in item 2., NRC discusses its proposed requirement for a bibliographic header. NRC should also provide an actual example of this header with the final rulemaking. In the August 16 memorandum there is a Table A that refers to the structure of the header, but details on how this required could be implemented should also be provided. Guidance in this area from the LSNA is recommended.

On Page 50939, right hand column, near top of page, in item 4. NRC states, "Participants should store images on their servers as single-image-per-page to facilitate retrieval of no more than a single page" - does this mean that all multi-page documents need to be broken up into individual documents by page with a tracking number? That would be burdensome - more explanation is needed.

Comments on Supplementary Information – III. LSN Site Design:

On Page 50940, middle column, near the bottom of page, NRC states that its recommended design is "based on a proven technical solution that has been successfully implemented." Examples of such implementation should be provided.

Comments on Regulatory Analysis

On Page 50943, middle column, NRC discusses its proposed portal architecture. Has NRC made specific decisions with regard to the portal software (i.e.: Which one? Who makes it? What does it cost? Is it proprietary?, etc.). Does NRC intend to make such decisions in consultation with the LSNARP?

Comments and questions on the Andrew Bates Memorandum of August 16, 2000:

Cover letter - P. 1 - "All participants must certify that they have identified and made available electronically all of their documentary material" – How will this be accomplished?

LSN 2.06.03 - How is the bibliographic data in a SQL database tied to the individual document ID numbers on the participant's website? How are they then indexed? Is there an example of this with supporting code?

LSN 1.08 - Are these advanced boolean queries to be performed by the LSN or the participants?

LSN 2.13.01 - This needs further explanation. Will participants need to retrofit documents that do not comply?

LSN 2.13.02 - Are there any existing formatting guidelines?

LSN 2.14.02 – NRC stipulates that, “Specific access shall include SNMP monitoring of network utilization...” NEI cautions against this approach. SNMP or Simple Network Management Protocol is not usually turned on through a firewall to let outside organizations monitor your network as a participant. While ICMP access is a given, NRC needs to define “as well as access to the normal web distribution facility”.

LSN 2.14.03 - “...and summary formats...” - Summaries of raw web data logs are usually done by an application such as Webtrends or SiteData. Does this section imply the use of this software at each participant site, or are the raw data files sufficient?

LSN 1.17 - 2.18.04 – Who will review the participant guidelines and procedures for internal posting to the LSN site? Is it absolutely necessary that NRC know how the documents make it to the site so long as they do? This seems overly invasive.

LSN 1.19 - Will there be an onsite inspection and certification procedure by the NRC and DOE? Is every 12 months an appropriate interval for such an activity? What format do these certifications take?

LSN 2.20.08 - As it reads, this clause basically requires that all of the LSN related documents be placed on a single server and that links to existing document stores on other servers can not be made. This is quite restrictive for large repositories of information and should be made to include “virtual server” and “virtual directory” access.

LSN 2.23.06 - Does every multi-page document have to be broken down in to single page documents? This could be untenable and compromise the utility of the system.

LSN 2.24.01 – An example should be provided.

LSN 2.24.03 – Additional explanation is necessary.

LSN 2.25.02 - How will the latency be certified - by whom?

LSN 2.25.03 - Last sentence - What software is being referred to? An example should be provided.

LSN 2.29.01, .02 - Who certifies this? What tool is used to assess?

LSN 2.45.02 - In order to provide an electronic log of all emails that are sent regarding LSN activities, it would be incumbent upon the LAN administration to setup a separate mail server for these activities to avoid providing data mixed with other email business - a major security issue. This has the potential to significantly and adversely affect the cost of the project.

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