



Union of Concerned Scientists

April 9, 2001

Mrs. Lynn B. Scattolini
United States Nuclear Regulatory Commission
Washington, DC 20555-0001

SUBJECT: PROBLEMS THAT ADAMS CAUSES UCS

Dear Mrs. Scattolini:

I have been criticizing ADAMS at every opportunity and will continue to do so. Not just because ADAMS is such an easy target, but because ADAMS has made my work—and the work of many other public stakeholders—much more difficult. I now have used ADAMS for about the same time period that I used for agency's prior document access system (BRS). The BRS was not perfect, but I was able to seek and obtain information using it far easier than I can access information via ADAMS. Here's a partial listing of the reasons why I believe that I consider ADAMS to be a huge step backward from an information technology standpoint:

- ② **Cannot stop ADAMS searches without exiting:** I recently entered "reactor core isolation cooling" in the "Document Text Contains" field for a 'simple' search and clicked "Find Now." I went to the rest room and returned. The search was still ongoing. I walked around the corner to CVS to purchase a cartoon of Coke and a birthday card for my mother. When I returned, the search was still ongoing. Unable to stop the futile search, I had to exit ADAMS and re-enter for another attempt. I entered "RCIC" in the "Title Contains" field and clicked "Find Now." I went upstairs to the UCS work room to make a few copies, address several envelopes, and use our Pitney-Bowes postal metering machine to stamp the envelopes. When I returned to my office, the search was still ongoing. I had to exit ADAMS. I did not attempt another ADAMS search for information about the reactor core isolation cooling system. I am apparently not young enough to finish that search on ADAMS before reaching retirement age in twenty-plus years.
- ② **No legacy documents:** Despite early and repeated claims to the contrary, the pre-November 1999 document index has not been added to ADAMS, except for a small, token collection. In the good old days, I used BRS to find old and new documents. Now, I have to use ADAMS to search for new documents and BRS to find old documents. Therefore, ADAMS increased the unnecessary regulatory burden on me.
- ② **Blank pages in PDF files:** During a short break between an NRC public meeting on fuel failures at Palo Verde and a meeting with Chairman Meserve, I went to the PDR to use ADAMS to obtain a copy of a document that I had in my office but forgot to bring with me. I found the document in ADAMS as a PDF file. Many of the pages in the PDF file were blank, even though I knew these

pages were not blank in the original. The PDR librarian told me that this phenomenon happened sometimes with PDF files. She was able to retrieve the non-blank pages and provide me copies before my meeting with the Chairman. But if I had not already seen the document, I may not have known that several pages were missing from the ADAMS version. The quality assurance for documents entered into ADAMS seems lacking.

- ⊗ **Turtle-like downloads**: If the old adage "Speed Kills" is true, certainly ADAMS won't even bruise anyone. Here are the actual download times that I recently clocked:

Accession No.	No. Pages	Size (Mb)	Start Time	Finish Time	Duration
ML003748299	158	13.8	9:02am	9:44am	42 minutes
ML003727905	50	4.5	9:54am	10:21am	27 minutes
ML003719804	55	3.3	1:04pm	1:30pm	26 minutes
ML003727107	40	2.2	1.32pm	1.47pm	15 minutes

At UCS, I use a new Dell desktop computer with a Pentium Pro processor, 128-Mb RAM, and a T1 line for internet access. I have downloaded much larger files from DOE (EIA) and other internet sources much, much faster than I can download information from ADAMS.

- ⊗ **Automatic, unwanted exits after downloads**: Frequently, but not every time, ADAMS treats me to an automatic, unwanted exit for a document download is completed. I'll be downloading one hour and the next minute I'm back at the white "ICA link launched" screen. Sometimes, that feature saves me the trouble of clicking to exit. But more often, that feature causes me the trouble of losing my document search list and forcing me to start over at Square One, with a heightened feeling of utter frustration.
- ⊗ **Mis-filed documents**: I encounter mis-filed documents, or conversely cannot find documents because they are mis-filed, far more frequently in ADAMS than I encountered in BRS. For example, just today I came across two mis-filed documents when searching Indian Point 2 records for a reply to an NRC "chilling effects" letter:

ML003778179 - shown as dated December 5, 1958, but really is dated December 5, 1985.

ML003775086 - shown as dated September 19, 1960, but really is dated September 19, 1980.

Mis-filed documents make finding documents more difficult. Documents were undeniably mis-filed in BRS, but the far more useful search capability in BRS created the potential for users like me to find the documents anyway. Mis-filed documents in ADAMS, with its totally inadequate search function, generally mean that the documents are essentially lost to us forever.

In theory, ADAMS affords users like me many advantages over BRS. In reality, ADAMS today provides users like me with less access to so-called publicly available documents than BRS. Until ADAMS is fixed at least to the access level that we had prior to November 1999, I'll continue to complain.

Sincerely,



David A. Lochbaum
Nuclear Safety Engineer
Union of Concerned Scientists