

Licensing Support Network Advisory Review Panel

Public Meeting



August 8, 2001



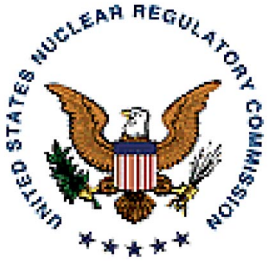
Agenda

- ***Opening Remarks & Introductions***
- *Progress Report of the LSN Administrator*
- *LSN Basics and Overview of the Rule Including Most Recent Revisions*
- *LSN Administrator Guidelines & Functional Requirements*
- *Guideline 14: Clarification on Updating Documents*
- *Hardware, Software & Cost Profile for Small Participant Systems*
- *Demo of LSN Portal*
- *NRC Project for Electronic Exchange of Adjudicatory Documents*
- *DOE Strategic Approach to Meeting LSN Requirements*
- *LSNARP and Public Interaction on LSN-Related Matters*

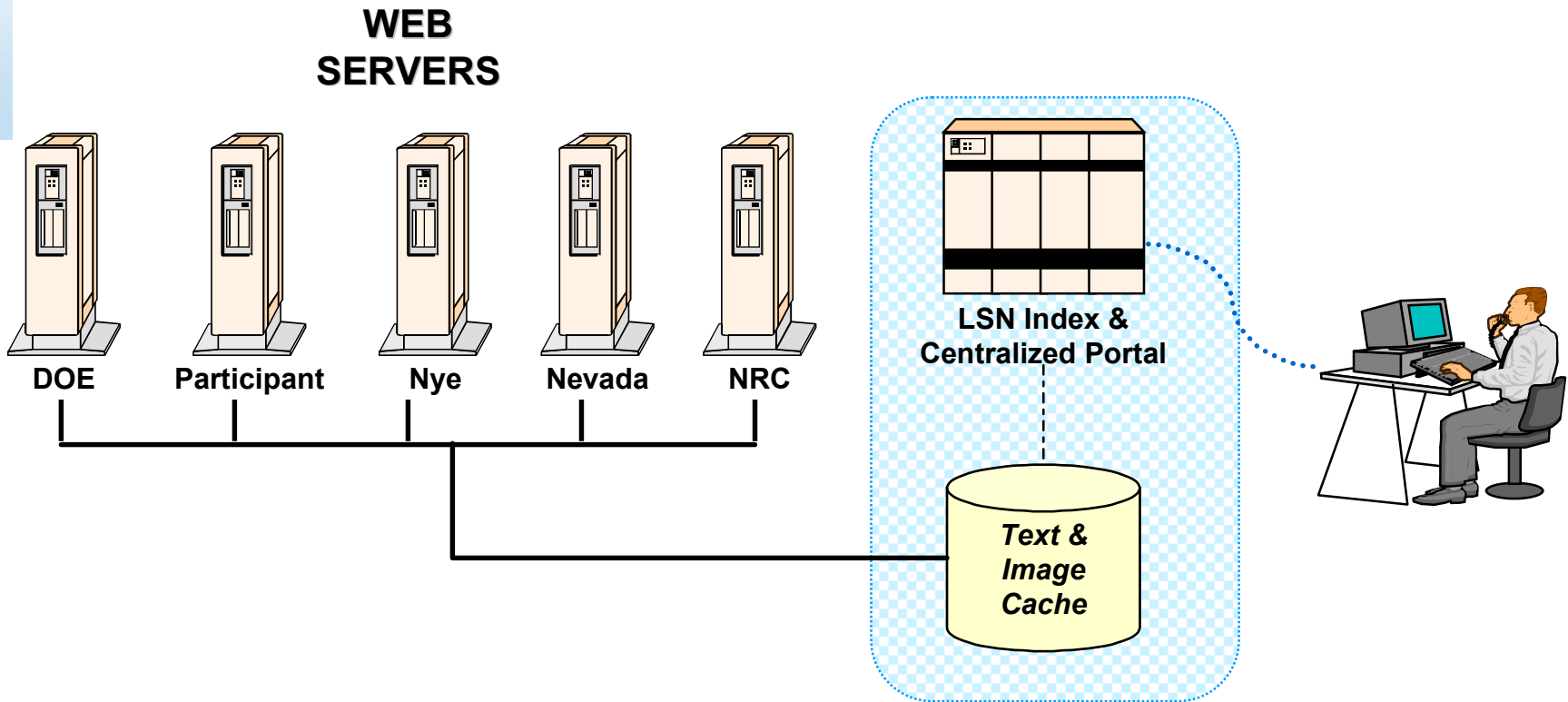


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System Presented to ARP in February 2000





LSN Administrator Status Report on Development of LSN

- ⇒ *Contract awarded Dec. 14, 2000*
- ⇒ *Design Phase completed March 30, 2001*
- ⇒ *Server, operating system, telecommunications integrated*
- ⇒ *LSNNet web site appeared on April 3, 2001*
- ⇒ *Policy statements reviewed by NRC's OGC & OCIO*
- ⇒ *Sample screens currently being refined*
- ⇒ *Small DOE and NRC collections being prepared*
- ⇒ *Design/requirements locked down July 7, 2001*



Status Report (continued)

■ *On target:*

- *For Release 1.0 of portal software Sept. 10, 2001*
- *To have DOE & NRC servers connected*
- *To enter Operations Phase Jan. 15, 2002*



Technical Interactions

- *TWG Sessions Have Been Productive:*
 - *Data format issues raised – addressed in revised rule*
 - *Exchange protocol issues – negotiated with DOE & NRC*
 - *Functional Requirements – baselined for use in Government Test & Acceptance of system*
- *Outreach to State Librarians to Schedule Workshop Training Sessions*



Operations Phase

- *Activities for Sept. 15, 2001, through Jan. 15, 2002:*
 - *Validate logic check:*
 - *Headers for all documents*
 - *Text if non-restricted & not graphic*
 - *Graphic (image) if non-restricted & not textual*
 - *Ensure links between headers and files work properly*
 - *Evaluate text accuracy for all collections*
 - *Evaluate impact of “dirty OCR” on search precision*



Operations Phase (continued)

- *Continue connecting to other Participant servers*

NOTE: After Jan. 15, 2002, we continue accommodating access / security / scheduling but participants should meet data standards in place at that time



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What is the LSN?

- ***What is the Licensing Support Network (LSN)?***
 - *Distributed electronic data base*
 - *Documents and other material relevant to licensing*
- ***What are the objectives of the LSN?***
 - *Comply with three-year schedule mandated by the Nuclear Waste Policy Act*
 - *Provide information to enable participants to develop focused, quality contentions*
- ***How will these objectives be achieved?***
 - *Relevant documents made available in a full-text searchable form*
 - *Before DOE submits its license application*



LSN Requirements

- ***Where are the requirements for the LSN set forth?***
 - *10 C.F.R. Part 2, Subpart J of the Commission's regulations*
- ***How was the framework for the LSN initially developed?***
 - *Negotiated rulemaking committee*
 - *Representatives from the NRC, DOE, state, tribal, and local governments, the nuclear industry, the environmental community*



Structure of the LSN

- ***What is the structure of the LSN?***
 - *LSN Administrator website*
 - *“Central LSN site”*
 - *Provides search engine*
 - *Individual web servers of parties and potential parties*
 - *“Participant LSN websites”*
 - *Provide relevant documents*



Management of the LSN

- ***Who is responsible for the management of the overall design and implementation of the LSN?***
 - ***“LSN Administrator” (within Atomic Safety and Licensing Board Panel)***
 - *Coordinates access to, and proper functioning of, the LSN*
 - *Coordinates the resolution of problems regarding the availability and integrity of documentary material and data*
 - *Issues guidance to LSN participants*
 - *Reviews all participant websites to ensure they meet LSN standards*



Meeting LSN Requirements

- ***Who is required to comply with LSN requirements?***
 - *Parties and interested governmental participants to the HLW licensing proceeding*
- ***What are they required to do?***
 - *Make documentary material available on their websites in electronic files*
 - *Make “graphic-oriented” documentary material available in electronic images*
 - *Provide bibliographic header for both types of material*
 - *Designate responsible official*
 - *Procedures, training, certification*



What is Documentary Material?

- **Three distinct classes:**
 - *Information on which a party intends to rely and/or cite in support of its position*
 - *Information that is known to, and in the possession of, or developed by a party that is relevant to, but does not support its position*
 - *Reports and studies prepared by or on behalf of the party regardless of whether they will be relied on or cited by a party that are relevant to the license application **or** the Topical Guidelines in NRC Regulatory Guide 3.69*
- **Includes "graphic-oriented" documentary material, such as maps, field notes**



Exceptions to Making Documents Available

- ***Are there any exceptions to what must be placed in the LSN?***
 - *Drafts (that do not meet Section 2.1001 definition of “circulated draft”)*
 - *Exclusions in Section 2.1005*
 - *Privileged materials - discussed in Section 2.1006*



Compliance with 10 C.F.R. Part 2, Subpart J

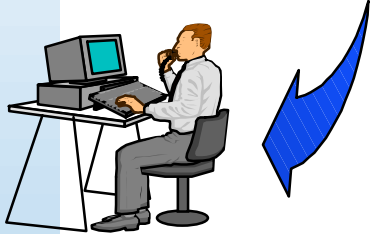
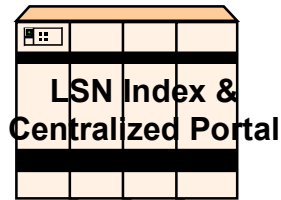
- ***When is a party or potential party required to comply with LSN requirements?***
 - *DOE initial certification six months before license application*
 - *NRC thirty days after this*
 - *Others ninety days after DOE certification*
- ***What happens if a potential party or party does not comply?***
 - *For DOE, no docketing of the license application*
 - *For others, no participation in the proceedings*
- ***Who is responsible for enforcing compliance with the LSN?***
 - *Pre□ License Application Presiding Officer/Atomic Safety and Licensing Board*



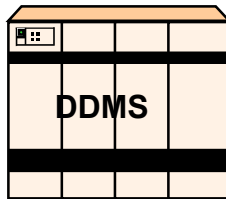
Digital Proceeding From Start to Finish

Documents, Transcripts, Simulation Models,
Full Motion Video Recordings of Proceedings,
Audio, Videotaped Depositions, Color Coded
Maps, and Other Non-Documentary Things

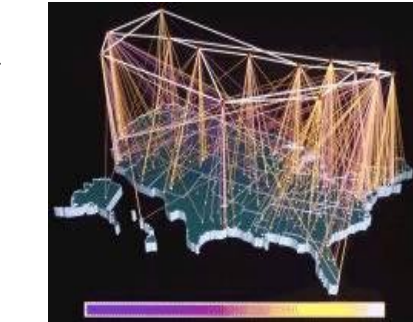
Licensing Support Network (LSN) Provides
Access to Repositories of
Discovery Documents



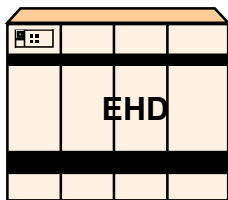
Participant Submits
Images, Header &
Text via Electronic
Information Exchange
(EIE)



Use DDMS to Work With Data in
the Courtroom



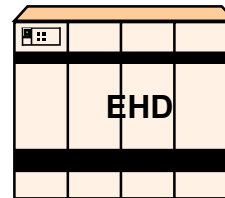
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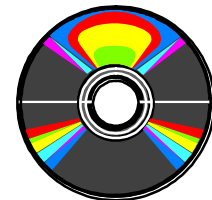
Documents Loaded to Electronic
Hearing Docket (EHD) in ADAMS

Documents Downloaded to
Digital Document
Management System
(DDMS)

Upload DDMS
Output to EHD



Generate a Case Record





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LSNA Guidelines and Functional Requirements

- *Document decisions by LSNARP and TWG*
- *Follow revised Rule*
- *Cover technical aspects of the Rule*



Baselined Design Requirements Dated 6/5/01

- *Derived from statements found in the Rule*
- *Reflect feedback received in Jan. 2001 meetings w/participants*
- *Serve different purpose than Functional Requirements*
 - *Test the delivered system*



Guidelines

- *Document hardware, software, and procedural issues regarding design of participant document collection websites*
- *Supersede LSNA's Compliance Assessment Program Guidelines dated Oct. 13, 1999*
- *Provide latitude for participants*



Guidelines (cont.)

- *Updated independently of each other*
 - *TOC will act as revision guide*
- *E-mailed to all LSNARP members*
- *Posted on the central LSN site for participants*
- *Available in ADAMS, accession no. ML011590116*



Participants' Duties

- *Participants should provide to LSNA:*
 - *Lists of changed documents*
 - ✓ *By LSN Accession Number*
 - ✓ *Description of change*
 - ✓ *Why it was necessary*
 - *Items of interest about their LSN website*
 - ✓ *Hours of availability*
 - ✓ *Scheduled outages*
 - *Procedures for a user to acquire authenticated image copies*
 - ✓ *PDF image & hidden text will be used for evidence submission in proceeding*



System Availability and Auditing

- *Ensure web hosting provider will allow crawler and access to log files*
- *Notify LSNA if web hosting provider is affected by crawl times or cost-per-transfer*
 - *Can be scheduled intermittently*



Disaster Recovery

- *Provide current disaster recovery plan or web hosting provider service level agreement to LSNA*



Searching the LSN

- *Participants may set up bibliographic header fields differently*
 - *Different control lists, e.g., for Organization*
- *Training will be key for those differences*
- *Can use pick lists for fields with few choices*
 - *Submit values used for coded-value fields*
 - ✓ *Access Control Code*
 - ✓ *Related Record Code*



Confidentiality of Your Search

- *Registered Users' stored searches accessible only to themselves or their defined organization*
- *Owner of documents is able to see what documents are downloaded*
 - *Documents are provided by the owner's server*
 - *Server knows Internet address of requestor*
- *Search strategy/search results cannot be seen*



Passwords

- *Request password through participant's business POC*
- *LSNA will issue as many usernames and passwords as requested*
 - *One user per password per session*
 - *Will delete them if not used*
 - *Would like count/listing of users*



Testing

- *To facilitate connectivity testing:*
 - *Submit site URL and contact information*
 - *Make portion of documentary material available (online or “sneakernet”) ASAP*
 - *Documents*
 - *Headers*
- *Provide feedback via LSNWebmaster link on LSNNet.gov site (after Aug. 10, 2001)*



Disclosure of Documentary Material

- *Do not add text or image URL to header of privileged material!*



Certification

- *Each participant must designate an official*
 - *Someone authorized by the organization to provide a written certificate*
 - *Who?*
- *Official must certify that:*
 - *Procedures created have been implemented*
 - *Documentary material is identified and electronically available*



Submitting Text Files or Image Files

- *Electronic images must:*
 - *Meet standards for an official record version, or*
 - *Individually identify that it is not authenticated*
 - *Non-text images must be authenticated image, whereas text document's image might only be a convenience*
- *Notify LSNA if using nonstandard file extensions*



Impact of Dirty OCR

- *Spurious characters, misreads, omitted characters*
- *Question usability for cut-and-paste reuse*
 - *Requires editing and cleanup*
- *May return unpredictable results*
- *Concern with effect on LSN usability and user confidence levels*
- *Not appropriate for adjudicatory proceeding*
 - *PDF image & hidden text will be required for EHD*



OCR Accuracy Guideline

- *98.5% overall accuracy objective*
 - *99.95% for non-OCR'd documents*
 - *Native word processing*
 - *HTML*
 - *99.5% for OCR'd documents*
 - *98.5% for each individual page for consistency*
- *Voluntary, but LSNA will be performing random sampling*



Image File Formats

- *Revised Rule established basic data structure and transfer standards for participants*
- *Participants must identify POC for obtaining authenticated images*
 - *If not available on LSN*
- *Participants must submit procedures to give authenticated images to requestor*
 - *Procedures and POCs will be posted on central LSN site*



Image File Formats (cont.)

- *Federal participants are responsible for complying with section 508 of Rehabilitation Act*
 - *Provide POC to LSNA*
- *Documents to be introduced into the EHD will be PDF image & hidden text or TIFF for graphic documentary material*



Records Mgmt & Official Docket Requirements

- *Hyperlinks within documents are ineffective in the EHD*
 - *All referenced supporting documentation must be submitted in a package*
- *Submittal of privileged, classified, security, and safeguards information should be coordinated with NRC's SECY*



Loading LSN Documentary Material Files

- *Will initial load be bulk or incremental?*
- *What is schedule after initial load?*
 - *Dates, times*
 - *Suggest between midnight and 6 a.m. ET*
 - *Reasonably contemporaneous with creation*



Comments/Suggestions?

Provide comments and suggestions on the Baseline Design Requirements and LSNA Guidelines to:

Margie Shepherd

301-415-7245

MAS5@NRC.GOV



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Guideline 14: Clarification on Updating Documents

- *Participants are allowed to correct or revise a document already available if:*
 - *Corrected or updated document is noted as superseding a previously provided document*
 - *Previous version is not removed*
 - *Others are notified of the change*



Three Objectives

- *Address the correction of errors discovered in the previous entry of a document*
 - *Headers must reference each other*
- *Provide for the entry of updated pages*
 - *Headers must reference each other*
- *Address revisions that are new “standalone” revisions*



Impact on Using Updated Pages

- *Documents submitted as evidence must be transmitted electronically to the docket*
- *Parties must submit one complete electronic file for the revised document*
 - *Docket is not responsible for compiling the electronic file of the original document and the updated pages together*



Therefore ...

- *If a participant requests a copy of a document that was revised or corrected using updated pages, authoring participant must supply entire revised document in one file*



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Hardware, Software & Cost Profile for Small Participant Systems

- *Participant document collection*
 - *File Transfer Protocol (FTP) and Hypertext Transfer Protocol (HTTP)*
 - *Directory structure*
 - *Documents, headers, logs*
 - *Access to common log files such as NCSA format*
 - *Communicating with the LSN*



Producing Headers and Processing Documents

- *Demo of Header Generator*
- *Processing documents*
 - *Text files*
 - *HTML, WordPerfect, Word, etc.*
 - *Image files*
 - *PDF, TIFF, etc.*



Web Hosting

- *Services and Packages*
 - *FTP and HTTP*
 - *Access to log files*
 - *Backup and restore*
 - *Reliable networks*



Web Hosting Provider

vs.

Do It Yourself

- *Monthly fees*
 - *Data transfer, disk space, etc.*
- *One time setup fees*
- *Infrastructure included*
- *Backup & recovery included*
- *Free web hosting*

- *Server cost*
- *Software licenses*
- *Communication lines*

“Do It Yourself” may be economical if you already have infrastructure in place



Cost Scenario of a Small Doc. Collection (100 docs.)

■ *Recurring costs*

- *Web hosting provider monthly fee - \$35*
- *System administration - 10 hrs/mo*

■ *Non-recurring costs*

- *Web hosting provider setup fee - \$50*
- *Generate header files for 100 documents – 4 hrs*
- *System Administrator to connect to LSN – 50 hrs*



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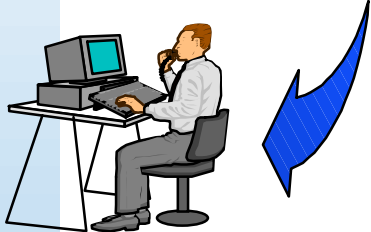
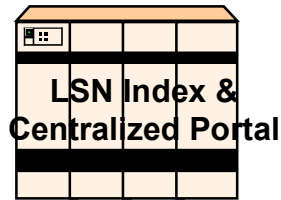
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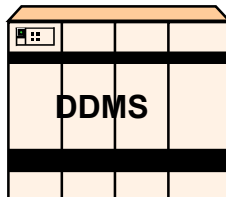
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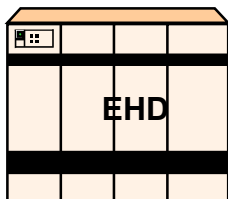
Participant Submits
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Use DDMS to Work With Data in
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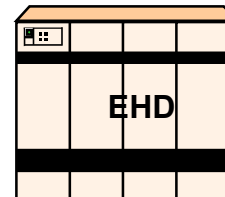
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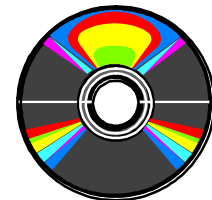
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Digital Document
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(DDMS)

Upload DDMS
Output to EHD



Generate a Case Record





EIE

Electronic Information Exchange

John Skoczlas
EIE Project Officer



Current EIE System

- *Certificate-based PKI system*
- *Internet-based*
- *Provides*
 - *Authentication*
 - *Certification*
 - *Digital signatures*
- *Submittal to NRC only*



Current System

- *Currently only applicable to Part 50 submittals*
- *Proposed Rule change in the works*
- *Not applicable for Adjudicatory (and other) documents*



Adjudicatory Pilot System

- *Will address adjudicatory submittals*
- *Will include following requirements not applicable to current EIE system:*
 - *Distribution to multiple addressees*
 - *Document level security*
 - *More than two signatures if necessary*
 - *Workflow*
 - *Drop downs for many required fields*



Adjudicatory Pilot System

- *Customized form with different or additional fielded information*
- *Save form features*
- *Dispatch capability*
 - *Multiple addressees*
 - *Individual addressees*



Adjudicatory Pilot System

- *Pilot will begin on or about Sept. 1, 2001, and run for approximately 6 months*
- *Pilot will become Adjudicatory EIE System and will be moved to production*



Contact Information

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- *Patty Nibert*
301-415-6030
PGN1@NRC.GOV



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