

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*

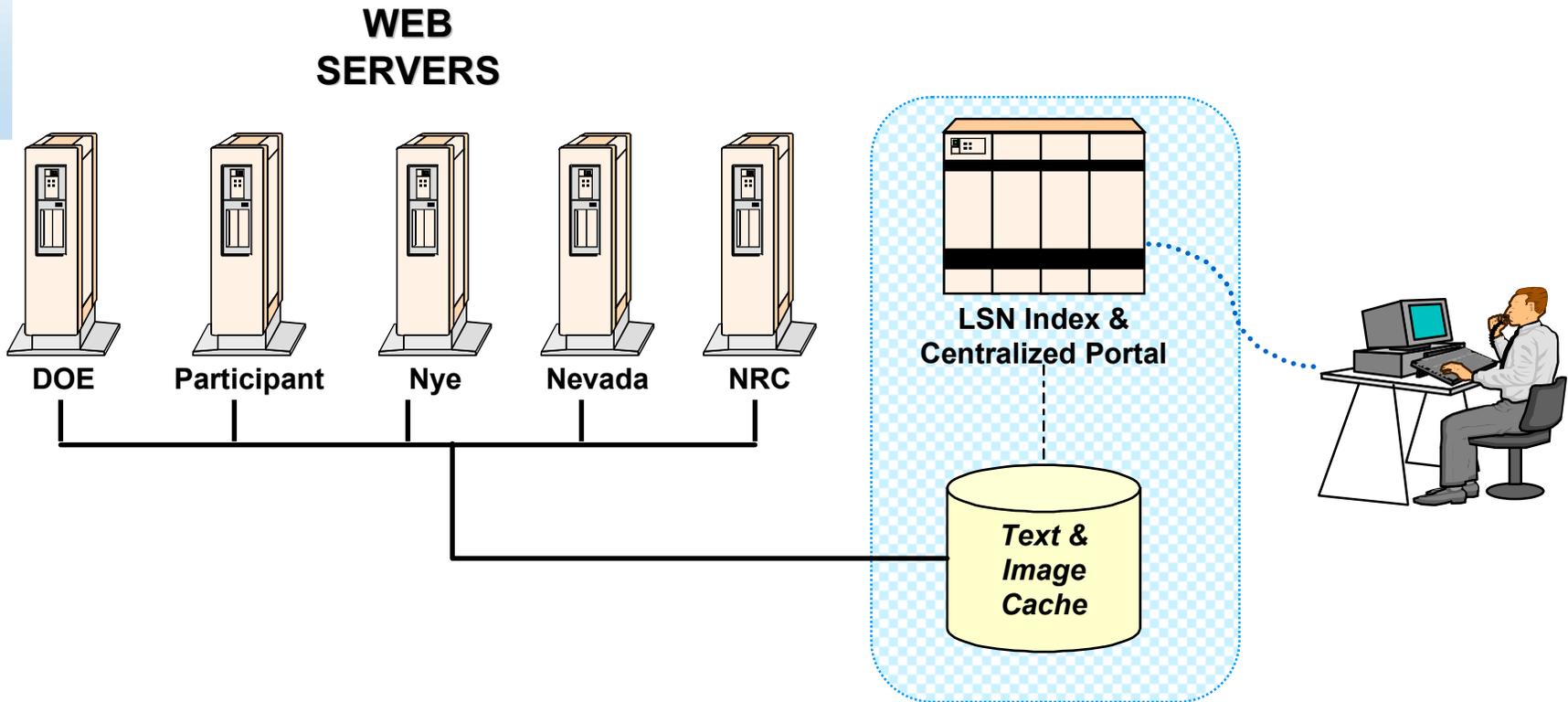


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System Presented to ARP in February 2000





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*



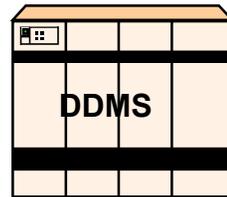
Digital Proceeding From Start to Finish

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

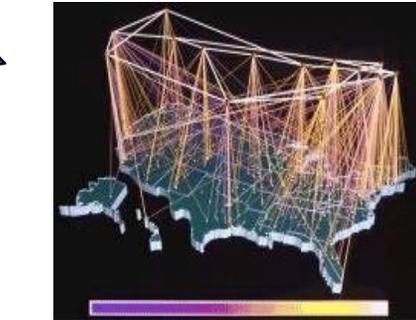
Licensing Support Network (LSN) Provides
Access to Repositories of
Discovery Documents



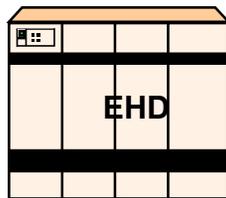
Participant Submits
Images, Header &
Text via Electronic
Information Exchange
(EIE)



Use DDMS to Work With Data in
the Courtroom



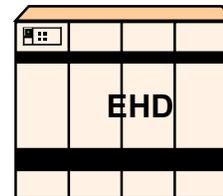
Output Proceedings to
Videoconferencing, Videostreaming,
or Broadcast



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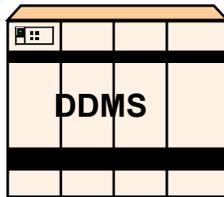
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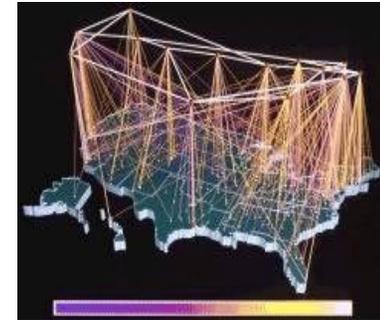
Licensing Support Network (LSN) Provides Access to Repositories of Discovery Documents



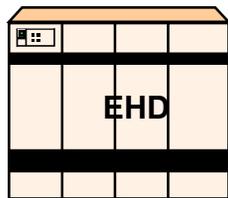
Participant Submits Images, Header & Text via Electronic Information Exchange (EIE)



Use DDMS to Work With Data in the Courtroom



Output Proceedings to Videoconferencing, Videostreaming, or Broadcast

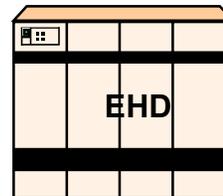


Documents Loaded to Electronic Hearing Docket (EHD) in ADAMS

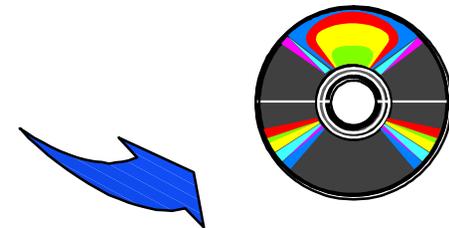
Documents Downloaded to Digital Document Management System (DDMS)



Upload DDMS Output to EHD



Generate a Case Record





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*
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