

DOCKET NUMBER**PROPOSED RULE****Chapter 1****(67FR 57084)**DOCKETED
USNRC

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OFFICE OF SECRETARY
RULEMAKINGS AND
ADJUDICATIONS STAFF

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Secretary
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001
Attention: Rulemakings and Adjudications Staff

Adverse Comments on Electronic Maintenance and Submission of Information
(RIN3150-AF61)

The CD-ROM and paper copies requirements for electronic documents submitted to the NRC via the CD-ROM format are not justified by the arguments the agency is advancing to support this rulemaking.

The NRC should specify a standard format for submission of documents by CD-ROM that would allow for upload of the documents into NRC systems such as ADAMS. There should be no different requirements for files submitted in this standard format on CD-ROM than there are for files submitted to the NRC by EIE.

The NRC should specify a standard format for CD-ROM submittals that is an analogue of the EIE process, develop internal programming and processes to accept these standard submittals, and provide adequate training, and equipment to its staff to do the work associated with electronic document submittals.

As formulated, this rulemaking is unnecessarily burdensome and costly to licensees, and is not technically justified.

The NRC has established rules based solely on the type of media used for the document submittal, without regard to the type of document or its use.

There may be justification for requiring a paper copy of a document that the NRC must reproduce for internal distribution (such as a proposed Technical Specification change), and this type of submittal would always meet the less than 15MB file size restriction that would allow it to be submitted via EIE.

However, submittals like the Final Safety Analysis Report and the Fire Protection Review Report require no NRC action. They are submitted as information copies for the NRC libraries and require no copying by the NRC. These documents, as electronic files, are too large to be submitted via EIE, and a paper copy is costly and in many cases will result in shipping more than a dozen boxes of paper to the NRC. While providing multiple CD's is simple enough, I question what the NRC would do with 10-12 boxes containing a paper copy of the entire FSAR.

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