



**BRIEFING ON RULEMAKING ON ELECTRONIC MAINTENANCE  
AND SUBMISSION OF INFORMATION**

**STEVE CROCKETT  
OFFICE OF THE GENERAL COUNSEL  
(301) 415-1622**

**OCTOBER 3, 2002**

## Requirements of the Government Paperwork Elimination Act (GPEA):

Option of electronic maintenance and submission of information, where “practicable”

Past NRC actions to come into compliance with the GPEA

The aim of the current rulemaking: Provide everyone with the option of electronic submission

- Does not apply to adjudication
- Typical changes to the existing rules
- Technical details almost all in the guidance published for comment.

## The Direct Final Rule Process

- How it works: Parallel publication of proposed and final rule
- Why the NRC adopted this process
- Why the NRC will proceed with the proposed rule



**GUIDELINES FOR ELECTRONIC SUBMISSION TO THE  
NUCLEAR REGULATORY COMMISSION  
PUBLIC MEETING**

**October 3, 2002**

# TOPICS

- Scope of Guidance
- Impact on Current Guidance
- Parameters for Electronic Submission
- How to Make an Electronic Submission via:
  - Electronic Information Exchange (EIE)
  - CD-ROM
  - E-mail
  - Facsimile (Fax)

# PRESENTERS

- Brenda Shelton, Chief  
Records Management Branch  
Office of the Chief Information Officer  
(301) 415-7233  
[BJs1@NRC.GOV](mailto:BJs1@NRC.GOV)
- Arnold E. Levin, Director  
Information Technology Infrastructure  
Division  
Office of the Chief Information Officer  
(301) 415-7458  
[AEL1@NRC.GOV](mailto:AEL1@NRC.GOV)
- John A. Skoczlas, Jr.  
EIE Project Manager  
Office of the Chief Information Officer  
(301) 415-7186  
[JAS1@NRC.GOV](mailto:JAS1@NRC.GOV)

## SCOPE OF GUIDANCE

- Applies to the electronic submission of documents to the NRC via:
  - Electronic Information Exchange (EIE)
  - CD-ROM
  - E-mail
  - Facsimile (fax)
  
- Defines document types that can be voluntarily submitted electronically for each medium

## Exceptions to Electronic Submission

- "Immediate" or "Prompt" notifications to the NRC
- Notice of filing of bankruptcy petitions
- Financial assurance instruments
- Documents served on the NRC as a participant in Federal Court proceedings
- Contractor proposals or invoices submitted in response to specific contractual requirements
- Hearing requests and documents pertaining to hearings or associated appeals except

Rulemaking petitions

Comments filed in rulemaking proceedings (10 CFR Part 2, Subpart H)

Requests for enforcement action under 10 CFR 2.206

Documents under Subpart B, "Procedures for Imposing Requirements by Order, or for Modification, Suspension, or Revocation of a License, or for Imposing Civil Penalties"

*Separate rules and guidance will be issued in the future for public comment. Existing format requirements contained in 10 CFR Part 2, Subpart J, could be superseded by the format standards contained in the guidance document.*

## Communications That Can Be Submitted to the NRC Electronically

### Acceptable EIE or CD-ROM Submittals

- Regulatory Submissions including:
  - Documents or information submitted under oath or affirmation
  - Documents where secure transfer is required or appropriate
  
- Use CD-ROM only for:
  - Classified Information and Sensitive Unclassified Information
  - Electronic files greater than 25MB
  - Documents with special attributes

## IMPACT ON CURRENT GUIDANCE

### Supersedes:

- NRC Regulatory Issue Summary 2001-05, "Guidance on Submitting Documents to the NRC by Electronic Information Exchange or on CD-ROM," dated January 25, 2001

- Instead of 1 CD-ROM or 1 Paper Copy satisfying copy requirements,

Submissions made on paper must include the number of copies required by applicable agency regulations or order

Submissions made on CD-ROM must include the number of copies required by applicable agency regulations or order and be accompanied by 1 paper copy

- August 10, 2001, letter issued to certain fuel cycle facilities extending to them the option of electronic submissions (materials pilot program)
  - Requests for exception would no longer be required.
  - All licensees who choose to make submissions electronically may do so.

NRC will reconsider the need for these requirements as part of addressing public comments

## PARAMETERS FOR ELECTRONIC SUBMISSIONS TO THE NRC

- File Formats
- File Size Limitations
- Resolution
- Naming Conventions

**File Formats:** (Highlighted areas represent changes since rule was issued for comment.)

File Format	Version	Filename Extension	Preferred Use
Adobe® Portable Document Format (PDF) Formatted Text and Graphics (Formerly known as PDF Normal) * , **	Files must be created using Adobe® or Adobe compatible products and must be readable with Adobe® Acrobat Reader 4.0	pdf	Text-oriented documents converted from native applications
Adobe® PDF Searchable Image (Exact) (formerly known as PDF Original Image with Hidden Text) *	Files must be created using Adobe® or Adobe compatible products and must be readable with Adobe® Acrobat Reader 4.0	pdf	Text-oriented documents converted from scanned documents
PDF Image Only	Files must be created using Adobe® or Adobe compatible products and must be readable with Adobe® Acrobat Reader 4.0	pdf	Preferred format for graphic/image-oriented documents
Multi-page TIFF	CCITT T.6 Group 4 or CCITT T.5 Group 4	tif	Alternate format for graphic/image-oriented documents

\* Preferred formats generated using Adobe® or Adobe compatible products.

\*\* Not acceptable for conversion of scanned documents.

Note: Adobe has recently established a fourth PDF format (PDF Searchable Image (Compact)) that uses compression techniques to reduce file sizes of images. This is not an acceptable format for submission to the NRC.

## Acceptable Spreadsheet File Formats

<b>File Format</b>	<b>Version</b>	<b>Filename Extension</b>	<b>Preferred Use</b>
Microsoft® Excel®	97 or earlier	xls	Spread Sheet calculations
Corel® QuattroPro	8 or earlier	wb3	Spread Sheet calculations
Lotus® 1-2-3	9 or earlier	wk3/wk4	Spread Sheet calculations

## File Size Limitations

<b>Method of Transmission</b>	<b>File Size Limitations</b>
Electronic Information Exchange (EIE)	Less than or equal to 25MB <sup>+</sup>
CD-ROM	20MB or less per individual file on CD <sup>++</sup>
E-mail	Less than or equal to 10MB <sup>+</sup>

<sup>+</sup> Total, combined size of message and attachments.

<sup>++</sup> The total CD capacity may be used but submitters are urged to limit individual files to 20MB or less.

## Resolution

Tagged Image File Format (TIFF) or PDF documents must be created using the following resolution guidelines:

<b><i>TIFF formatted documents</i></b>	<b><i>PDF formatted documents</i></b> <sup>a, b</sup>
<ul style="list-style-type: none"><li>• Bi-tonal (black and white) TIFF resolution, 300 dpi</li><li>• Color TIFF resolution, 200 dpi</li><li>• Grayscale TIFF resolution, 200 dpi</li></ul>	<ul style="list-style-type: none"><li>• Bi-tonal (black and white) PDF resolution, 300 dpi</li><li>• Color PDF resolution, 200 dpi</li><li>• Grayscale PDF resolution, 200 dpi</li></ul>

<sup>a</sup> PDF files containing scanned images of text, in PDF Original Image with Hidden Text format, or PDF Normal files containing images of text are unrecognized by the Optical Character Recognition (OCR) conversion process because they represent non-textual information. Documents containing integrated images of text inserted in textual documents will not be accepted.

<sup>b</sup> Adobe<sup>®</sup> Acrobat<sup>®</sup> “downsampling” may result in images with resolutions less than acceptable for submission to the NRC. Therefore, its use is not permitted.

## Naming Conventions

Documents submitted to the NRC using CD-ROM or e-mail:

- Must limit file names to 116 characters (including the period (.) and the three-character filename extension)
- Must conform to Microsoft Windows file naming conventions but file name cannot contain more than one period, (.) that being the symbol preceding the filename extension.
- Retain the default three-character file extension associated with the format in which the document was created (Example: for files created to conform to Adobe's Portable Document Format, ".pdf"; for files created to conform to the Tagged Image Format, ".tif").
- Include a three-digit numeric prefix (e.g., 001, 002, 003) in the filename that designates the correct order of the files contained in the submission, followed by the name of the file (Example: "001document name of first document.pdf").

## EIE SUBMISSIONS

### EIE Features:

- Formalized process for making regulatory submittals via the Internet
- Allows for Digital Signatures, if required
- Provides secure document transmission, certification, and authentication
- Provides the sender with a notification of receipt

## How to Make an EIE Submission

### Who Can Participate

- Applicants, licensees, external entities (including Federal, State, and Local governments), and vendors who are required to submit documents to the NRC

### What Can be Submitted:

- Regulatory Submissions including:
  - Documents or information submitted under oath or affirmation
  - Documents where secure transfer is required or appropriate
  - Documents under 25 megabytes

### How to Submit

- 
- 

### Where to Submit

- Documents submitted using EIE are automatically sent to the NRC Document Processing Center for processing into ADAMS

## CD-ROM SUBMISSIONS

### Who Can Participate

- licensees, applicants, external entities (including Federal, State, and Local governments), vendors, and members of the public who submit documents to the NRC

### What Can Be Submitted:

- Documents that can be submitted electronically only via CD-ROM

Large documents with file sizes in excess of 25 megabytes

Documents containing Classified Information and Sensitive Unclassified Information

Documents containing special attributes

- Living Documents

(Large documents that have historically been maintained using page replacement/pen and ink change strategy.)

## CD-ROM SUBMISSIONS (CONTINUED)

### How to Submit

Each submission must be transmitted by a signed letter in paper format and must include:

- Regulatory citation that requires submission noted in subject line or first paragraph of transmittal letter
- Sensitivity level of submission noted on first page
- Description and identity of each document contained on CD-ROM when multiple documents are transmitted as single submission
- Name, phone number, and mailing and e-mail address of person knowledgeable about submission
- Any special instructions regarding the use of the CD-ROM (e.g., how to open the files, access the publication, etc.)
- Oath and signature of person swearing to accuracy of submissions that must be made under oath or affirmation

## CD-ROM SUBMISSIONS (CONTINUED)

If the CD-ROM contains non-public information

- Submit the complete material (public and non-public) in the number of copies required by the regulation
  - Submit one CD-ROM containing only the public information
  - Clearly label each CD-ROM “Public” or Non-public,” as appropriate

Where to Submit

Send CD-ROM with transmittal letter to mailing address specified in the regulation, order, or other document governing the submission of that particular application, report, or correspondence

## E-mail and Facsimile Correspondence and Communications with the NRC:

### Who Can Participate

- Licensees, applicants, external entities (including Federal, State, and Local governments), vendors, and members of the public who submit documents to the NRC

### What Can be Submitted

- Documents (except for collaborative communications with States and other Federal agencies) submitted by e-mail, including the text of the e-mail, or fax should contain only information that could be made publicly available and may be used for:
  - Rulemaking petitions and comments in rulemaking proceedings
  - Requests for enforcement actions under 10 CFR 2.206, which may be sent to [2206PETITIONS@NRC.GOV](mailto:2206PETITIONS@NRC.GOV)
  - Freedom of Information Act (FOIA) requests and appeals (unless Privacy Act information is sought)
  - Responses to Federal Register Notices or other agency communications where NRC has provided a specific e-mail address
  - Responses to NRC licensing related questions (Fax only)
  - Information from export/import license applicants and licensees (Fax only)

## How to Make E-mail Submissions

- Identify/describe each attachment in the e-mail message, including format used to generate each attached file
- Submit files as attachments to e-mail message to retain original format of document.
- Include in the e-mail message the name, daytime phone number, and mailing or e-mail address of person knowledgeable about submission.

## Where to Send E-mail Submissions

- Specific individual listed as contact in regulation or communication
- Office specified in the regulation or communication
- Addresses the NRC Web site provides for individual program offices, specific agency functions or services, or to the Office of Public Affairs, [OPA@NRC.GOV](mailto:OPA@NRC.GOV)

## How to Submit Facsimile (FAX)

- Fax cover sheet must include name, daytime phone number, and mailing or e-mail address of person knowledgeable about submission.

### Where to Submit

<u>LOCATION</u>	<u>FAX NUMBER</u>	<u>USER ASSISTANCE &amp; VERIFICATION</u>
Headquarters (24-Hour Operation)	301-415-7010 OR 301-415-7020	301-415-7000
Office of International Programs	301-415-2395	301-415-1787
Office of the Secretary	301-415-1101	301-415-1966
Freedom of Information Act and Privacy Act Officer	301-415-5130	301-415-7169
Region 1	610-337-5324	610-337-5270
Region 2	404-562-4900	404-562-4827
Region 3	630-829-9886	630-810-4376
Region 4	817-860-8210	817-860-8100

## SUMMARY E-RULE SUBMISSION

<b>How to Submit</b>	<b>Who Can Submit</b>	<b>What to Submit</b>	<b>Number of Copies to Submit</b>	<b>Where to Submit</b>
<b>EIE</b>	Mainly regulated community with limited public participation	Non-Classified Regulatory documents under 15MB	1 electronic copy	Web server
<b>CD-ROM</b>	Mainly regulated community with limited public participation	Mainly Regulatory documents up to 20MB per file	Number specified in regulation plus 1 paper copy	Location(s) specified in regulation
<b>E-mail</b>	Mainly public & non-regulated community	Mainly Non-regulatory documents	1 electronic copy	Addresses provided by regulation/ guidance or listed on NRC Web site
<b>Fax</b>	Mainly public & non-regulated community	Mainly Non-regulatory documents	1 electronic copy	Headquarters communications center or regional locations specified in guidance document
<b>Paper (only)</b>	Everyone	Everything	Number specified in regulation	Location(s) specified in regulation
<b>Doc's w/special attributes</b>	Mainly regulated community with limited public participation	Mainly Regulatory documents containing files that require special attention (e.g., special printing requirements.)	Number specified in regulation plus 1 paper copy if submitted on CD-ROM	Location(s) specified in regulation