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DUKE COGEMA  
STONE & WEBSTER

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OFFICE OF SECRETARY  
RULEMAKINGS AND  
ADJUDICATIONS STAFF

Secretary, U.S. Nuclear Regulatory Commission  
Washington, DC 20555-0001

21 October 2002  
DCS-NRC-000112

Attention: Rulemakings and Adjudications Staff

Subject: Duke Cogema Stone & Webster Comments on Direct Final Rule,  
*Electronic Maintenance and Submission of Records*

Duke Cogema Stone & Webster, LLC (DCS) is pleased to submit the enclosed comments on the subject direct final rule published in the Federal Register on 6 September 2002 [67 FR 57084]. In general, DCS supports the rule but has some comments on the accompanying guidance.

DCS understands, on the basis of minutes from an 03 October 2002 meeting between the NRC Staff and industry representatives, that the direct final rule will be withdrawn and reformulated as a proposed rule change. Assuming no substantive changes between the direct final rule and any subsequent proposed rule change, the attached comments apply to either.

If you have any questions, please contact me at (704) 373-7820.

Sincerely,

Peter S. Hastings, P.E.  
Manager, Licensing and Safety Analysis

Enclosures: as stated

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## Enclosure 1 DCS Comments on Direct Final Rule

DCS provides the following comments on the direct final rule concerning Electronic Maintenance and Submission of Records published in the Federal Register on 6 September 2002 [67 FR 57084]:

1. The Appendix A guidance in the Federal Register Notice limits the version of software formats submitted, specifying in some cases significantly out-of-date software versions than currently in use. Printed format differences, unsupported software features or file incompatibilities can be problematic when converting from newer to older software file versions. The NRC should make reasonable efforts to keep up with the latest technology and software versions and not limit licensee submittals to older software versions, particularly in the case of software such as Acrobat Reader, which is available free of charge.
2. In the *Guidance for Electronic Submissions to the Commission* accompanying the SECY paper, under §2.4, *Security/Access Settings*, the NRC Staff states that “submissions should not contain any security settings, password protections, or any other attributes that will exclude full NRC access to and use of the files” [emphasis added]. The guidance goes on to explain that “NRC’s internal security and archival processes will maintain the integrity of the materials that are submitted,” but provides no guidance on production or control of redacted files.

The Appendix A guidance in the Federal Register Notice should include advice on how to prepare files containing redacted non-proprietary information compared to accompanying proprietary versions of those files. The redacted non-proprietary version publicly available in ADAMS should not be text searchable for the proprietary text.

As an example, one obvious approach to producing redacted text while maintaining consistency in pagination is to convert proprietary information to “white text” before converting to PDF format. In this example, however, the proprietary information would still be text searchable, thereby defeating the purpose of producing the redacted document.) Given that the NRC Staff will likely place non-proprietary electronic submittals directly into ADAMS, the applicant/licensee may need some additional guidance to guard against inadvertent release of proprietary information (such that control of such information would not constitute violation of the NRC's guidance on not using any “special controls”).

Guidance could include scanning individual redacted pages as “image” files; an alternative would be an allowance for pagination or text spacing to vary between proprietary and non-proprietary versions of the same file.

3. DCS strongly encourages the consideration of larger file sizes than those indicated (i.e., 25 MB for EIE, 20 MB for CD). Based on DCS experience, substantially larger pdf files are not cumbersome to open using relatively modest computers.