Licensing Support Network Advisory Review Panel

Public Meeting
September 18-19, 2002

Las Vegas, Nevada

Agenda Day 1

- **Opening Remarks & Introductions**
- **LSN Administrator Progress Report**
- **LSN Project Manager Report: Integration Efforts and Results of System Security Risk Assessment Performed by NSA**
- **Experience of Local Governments (Lincoln & White Pine Counties) in Setting Up Web Site to Make Documents Available to LSN**
- **Participant Training Needs**

- **Summary of Draft Regulatory Guide DG-3022: Proposed Rev 1 of Regulatory Guide 3.69, Topical Guidelines for the LSN**
- **Review of Relevancy (Panel Discussion Introduced by Clark Co.)**
- **Role of a Rural County in the Licensing (Panel Discussion Introduced by White Pine Co.)**
- **Participation in the LSN as a Prerequisite for Participation (Panel Discussion Introduced by White Pine Co.)**
- **Overview of NRC Information Systems Supporting Subpart J Requirements**
- **Summary of June 25-26 NRC/DOE Technical Exchange on "Electronic Submissions"**
- **Open Discussion and Public Comments**

Agenda Day 2

- **Overview of NRC Plans for the Digital Courtroom Environment**
- **Demonstration of Production Version 2.0 of the LSN**
- **Equipment and Software Products for Automating Small Collections**
- **Public Access via NRC & DOE reading rooms and Nevada libraries**

- **Impact of Homeland Security Reviews on Document Access via the LSN**
- **Open Discussion and Public Comments**

LSNARP Remarks & Introductions

- *Convene*
- *Introductions & Identification of Voting Representatives*
- *Schedule*
- *Room/Facility Logistics*
- *FACA Information & Status*
- *Public Participation Information*
- *LSNARP Chairman Report*

LSN Administrator's Report August 2001-September 2002

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LSN Administrator's Report

- *Planning Basis for License Application Announced as December 2004 Results in Life Cycle Extended Duration*

  - *More Years of Operation – Impact on Participants' Duration of Posting Collection?*

  - *Portal will Need Technology Refreshment*

  - *LSNARP Guidance Requested*

- *Post 9/11 Business Case Re-Assessment of Security Measures*

- *Motions Practice – EIE Pilot (Phase 1) Deployed*

- *Electronic Hearing Docket – Large Documents Create Issues*

LSN Administrator Report (cont.)

- *NRC – At Advanced Stage of Integration Testing, Working on Minor Data Formatting Fixes*

- *DOE – Accomplished Extensive Integration Testing, Working on Refinements such as CGI Script for Selecting Image Print Options*

- *White Pine & Lincoln – At Advanced Stage of Integration Testing*

- *Nye – At Advanced Stage of Coordination*

- *Clark – Starting Coordination at Technical Level*

LSN Administrator Report
(cont.)

- ***Participant Interactions - Significant Disruptions Encountered by DOE & NRC after 9/11***
  - **Homeland Security Features**
  - **Potential Impact On LSN Architecture**
  - **Potential Impact On Document Accessibility**
  - **Security Considerations – If clearances are required, lead time could be significant**

LSN Project Manager's Report

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LSN Project Manager's Report

- *September 2001 testing & acceptance*
- *October 18, 2001 accepted V.1 of LSN*
- *January 15, 2002 official close of design phase*
- *Spring/summer 2002 enhancements*
- *Security assessment by National Security Agency (NSA)*
- *Disaster recovery drill at Ashburn VA*
- *AT&T contract year 1 cost & schedule*

LSN Project Manager's Report (cont.)

- **Current and future activities**
  - *Current year (FY 02)*
    - *Enhancements, V.2.0, Security Assessment*
  - *FY 03 & FY 04*
    - *H/W & S/W Re-fresh, Autonomy 4, +Participants*
  - *FY 05 (license application)*
    - *User support*
  - *FY 06 & beyond*
    - *Verisign, M&O*
- **Impacts on parties**

Implementing an LSN Compliant Web Collection

- ***Jason Pitts – Lincoln & White Pine Counties***

Draft Regulatory Guide DG-3022
(Proposed Revision 1 of Regulatory Guide 3.69)
Topical Guidelines for the LSN

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Agenda

- ■ *Background*

- ■ *Purpose of Regulatory Guide 3.69 Revisions*

- ■ *Scope of Revisions*

- ■ *Details of Changes*

- ■ *Conclusions and Status*

Development of the Topical Guidelines

- *August 1987: Formation of High-Level Waste Licensing Support Advisory Committee (i.e. "negotiating committee")*

- *November 1988: Proposed Rule, New Subpart J, and Topical Guidelines*

- *April 1989: Final Rule; and Interim Topical Guidelines for Use Until More Precise Set Issued as a Regulatory Guide*

- *July 1993: Interim Topical DG-3009 for Public Comment*

- *September 1996: Regulatory Guide 3.69 Topical Guidelines for the Licensing Support System*

- *August 2001: Proposed Revising the Topical Guidelines*

- *July 2002: Draft Regulatory Guide DG-3022 (Proposed Revision 1 of Regulatory Guide 3.69) Topical Guidelines for the Licensing Support Network (Public Comment Period Expires 9/30/02)*

- *September 30, 2002: Close of DG-3022 Public Comment Period*

- *Staff Expects to Publish Revision 1 of Regulatory Guide 3.69 in Early 2003*

Purpose Of Regulatory Guide 3.69 Revisions

- *Ensure Consistency with 10 CFR Part 2, Subpart J (Procedures Applicable to Proceedings for the Issuance of Licenses for the Receipt of High-Level Radioactive Waste at a Geologic Repository)*

- *Revise Topical Guidelines for Consistency with 10 CFR Part 63 (Disposal of High-Level Radioactive Wastes in a Geologic Repository at Yucca Mountain, Nevada), Section 63.21 (Content of Application)*

- *Revise Topical Guidelines for Consistency with NUREG–1804 (Yucca Mountain Review Plan, Revision 2, Draft Report for Comment)*

- *Incorporate Refined Guidelines for Environmental Assessment Information*

Changes to 10 CFR Part 2, Subpart J Related to Regulatory Guide

- *Changed Licensing Support System to Licensing Support Network (LSN)*

- *Incorporated Requirements Appropriate for a Web-Based System*

- *Clarified Definition of Documentary Material*

- *Added Concept of Electronic Docket*

- *Clarified Requirements for Availability of Documentary Material*

- *Simplified Access Requirements*

- *Defined Specific Requirements for Management of Electronic Information in a Web-Based System*

Requirements of 10 CFR Part 63 That Affect Regulatory Guide

- **Implemented U.S. Environmental Protection Agency Health-Based Radiation Protection Standards at 40 CFR Part 197 (Public Health and Environmental Radiation Protection Standards for Yucca Mountain, Nevada**
  - *Radiation protection standards for disposal, groundwater protection, and human intrusion*
  - *Use of reasonably maximally exposed individual rather than the average member of the critical group*
  - *Definitions of unlikely features, events, and processes*
  - *Use of total effective dose equivalent*
- **Added Requirements for Preclosure Safety Analysis and Postclosure Performance Assessment**
- **Revised Requirements for Multiple Barriers**
- **Changed Content of License Application**

Aspects of Yucca Mountain Review Plan That Affect Regulatory Guide

- *Restructured for Consistency with 10 CFR Part 63*

- *Added Topical Guidelines for Model Abstractions in the Assessment of Post-closure Performance*

- *Added Topical Guidelines Related to Pre-closure and Post-closure Performance Objectives*

Summary of Proposed Changes to Regulatory Guide 3.69

- *Added Reference to 10 CFR Part 63 and the Yucca Mountain Review Plan*

- *Added Clarification to Definition of Documentary Material Consistent with 10 CFR Part 2, Subpart J*

- *Defined the Purposes and Uses of Regulatory Guides*

- *Stated that the Regulatory Guide Provides the Detailed Topical Index for the LSN*

- *Revised the Topical Guidelines for Consistency with 10 CFR 63.21 (Content of Application) and the Table of Contents for the Yucca Mountain Review Plan*

- *Expanded Topical Guidelines for Environmental Assessment to be Consistent with National Environmental Policy Act and NUREG–1748 (Draft for Interim Use and Comment), Environmental Review Guidance for Licensing Actions Associated with NMSS Programs*

LSN Training Program

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Identifying Participant Needs

- *How to Most Effectively Use this Software*
  - *Precision, Recall, Concept Searching, Response Ranking*

- *Priority Users*
  - *Subgroup Setups with Varying Rights*
  - *Canned Queries*

- *Is POC Going to be Same Person as Internal Trainer?*
  - *Need Names for Both if Different*

- *Numbers of Users Planned per Participant – Count of Materials Needed*

Participant Training Planning

- **■ *LSN Assumptions During Design:***
  - *LSNA Would Train-the-Trainers*
  - *Participant Point of Contact (POC) then Trains Internal Users*
  - *Tutorial CD as a Leave-Behind*
  - *Quick Start Guide (1 pager)*
  - *Participant POC is First Line for Internal Users*
  - *Phone Contact from POC to LSNA Staff*
  - *Webmaster e-mail for Help*

- **■ *Other Systems (EIE, EHD, Digital Courtroom) Have Separate Approaches***

Training Issues Working Group

- *Is a Training Issues Working Group Needed ?*
  - *Review Training Products for Adequacy*
  - *Act as a Test Group for Determining Train-the Trainer Approach*
- *Identify Strategies for Outreach to Informally Structured Organizations who may be Participants*
- *Suggest that the Working Group Lead be External to LSNA*
  - *Convene Where and When ?*
  - *How and When to Report Back to ARP, Get Consensus, then Task the LSNA ?*

Panel Discussion Topics

- *Relevancy (Clark County)*

- *Roles in the Licensing Process (White Pine)*

- *Participation in the LSN as Prerequisite (White Pine)*

Overview of NRC Information Systems Supporting Subpart J Requirements

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Overview of NRC Systems

■ *HLW Information Architecture*

- *Conceptual overview of the various information collections that will be used to support the HLW proceedings.*
- *Major components include:*
  - *Electronic Information Exchange (EIE)*
  - *Electronic Hearing Docket (EHD)*
  - *Digital Data Management System (DDMS)*
  - *Licensing Support Network (LSN)*

Glossary of Terms

- *ADAMS - Agency-wide Documents Access and Management System*
  The Agency wide Documents Access and Management System (ADAMS) is an electronic information system that maintains NRC's unclassified official program and administrative records in a centralized electronic document repository.

- *DDMS - Digital Data Management System*
  The DDMS is a hearing room with digital information retrieval, utilization, and display capabilities to conduct a major portion of the HLW repository licensing proceeding. It permits the creation and use of an integrated, comprehensive digital record for the proceeding.

- *DPC - Document Processing Center*
  The Document Processing Center is the focal point for entry of hard copy and electronic documents and related materials that originate outside the Agency into ADAMS.

- *EHD - Electronic Hearing Docket*
  The Electronic Hearing Docket (EHD) is the official hearing docket of the Nuclear Regulatory Commission for the proceeding on the application of the Department of Energy (DOE) to store high level radioactive waste at a designated storage facility.

- *EIE - Electronic Information Exchange*
  NRC's Electronic Information Exchange (EIE) allows NRC to exchange material related to official agency business with its customers and other Federal agencies across the Internet. The EIE system uses public key infrastructure and digital signaturing technology to authenticate documents and validate the person submitting the information.
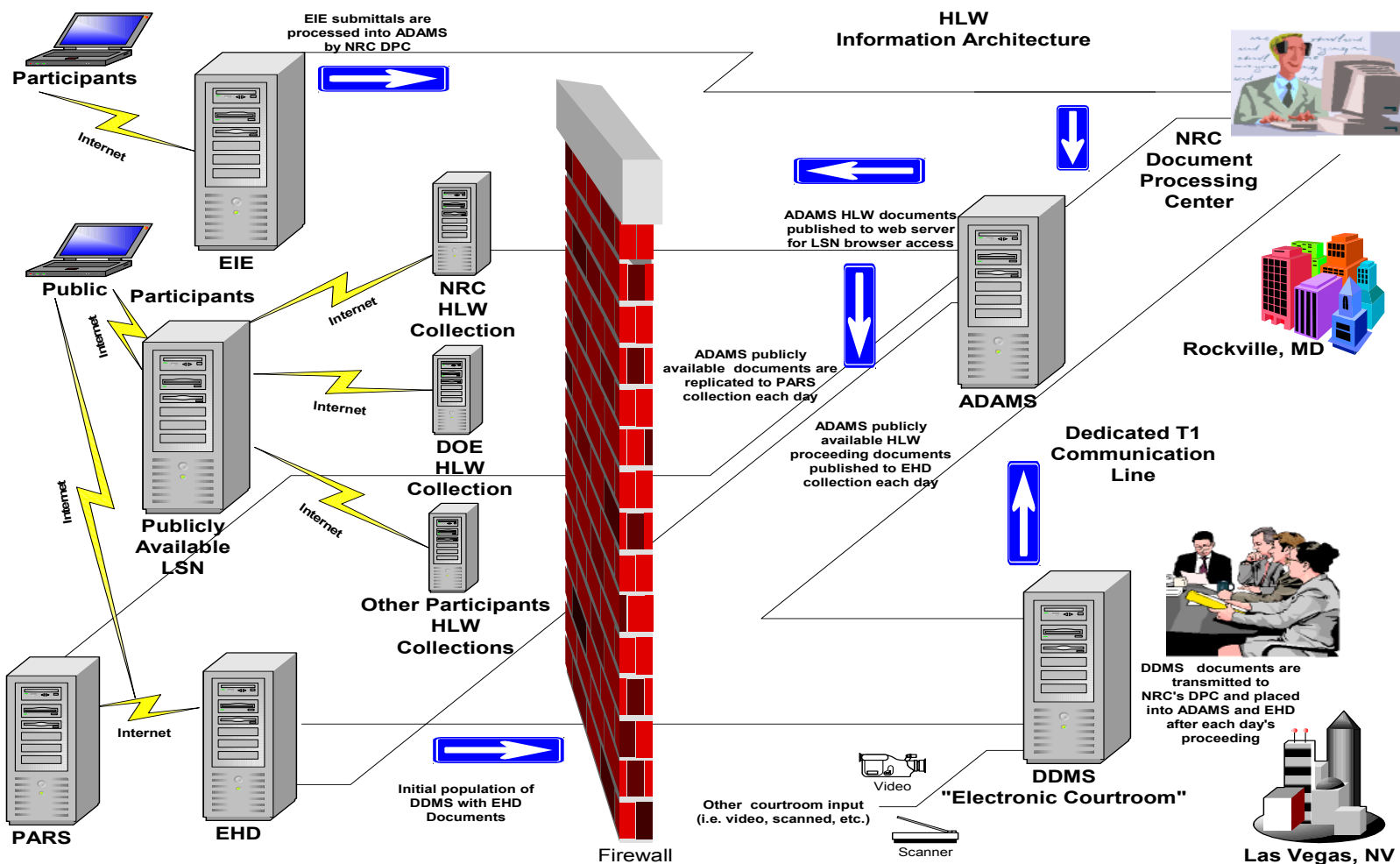
Glossary of Terms (Cont.)

- *HLW - High Level Waste*
  High-level radioactive waste is the highly radioactive material produced as a byproduct of the reactions that occur inside nuclear reactors.

- *LSN - Licensing Support Network*
  The LSN provides a single place where the parties and potential parties to the licensing hearing can search for documents from any/all of participant collections in a uniform way.

- *PARS - Publicly Available Records System*
  The Publicly Available Records System is the public's version of ADAMS, an information system that provides access to all documents made public by the NRC since November 1, 1999. Several hundred new documents are added daily. Permits full text searching and the ability to view document images,download files, and print locally.

NRC Systems

Participants

EIE submittals are processed into ADAMS by NRC DPC

EIE

Internet

Public   Participants

Internet

Internet

Internet

Publicly Available LSN

Internet

Internet

PARS

EHD

Initial population of DDMS with EHD Documents

NRC HLW Collection

DOE HLW Collection

Other Participants HLW Collections

Firewall

HLW Information Architecture

ADAMS HLW documents published to web server for LSN browser access

ADAMS publicly available documents are replicated to PARS collection each day

ADAMS publicly available HLW proceeding documents published to EHD collection each day

ADAMS

NRC Document Processing Center

Rockville, MD

Dedicated T1 Communication Line

DDMS "Electronic Courtroom"

Video

Other courtroom input (i.e. video, scanned, etc.)

Scanner

DDMS documents are transmitted to NRC's DPC and placed into ADAMS and EHD after each day's proceeding

Las Vegas, NV

Summary of June 25-26 NRC/DOE Electronic Submissions Technical Exchange

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Agenda

- ***Technical Exchange Objective***

- ***Information Architecture***

- ***Electronic Information Exchange (EIE) Process and Pilots***

- ***Electronic Hearing Docket***

- ***Electronic Courtroom***

- ***Large Document Technical Issues***

- ***U.S. Department of Energy (DOE) Licensing Support Network (LSN) Document Status***

- ***Evaluation of DOE Document Conversion System***

- ***Status of NRC LSN Test Server***

- ***Meeting Summary and Path Forward***

Technical Exchange Objective

- *Discuss Issues and Potential Challenges of Electronic Submission of Documents*
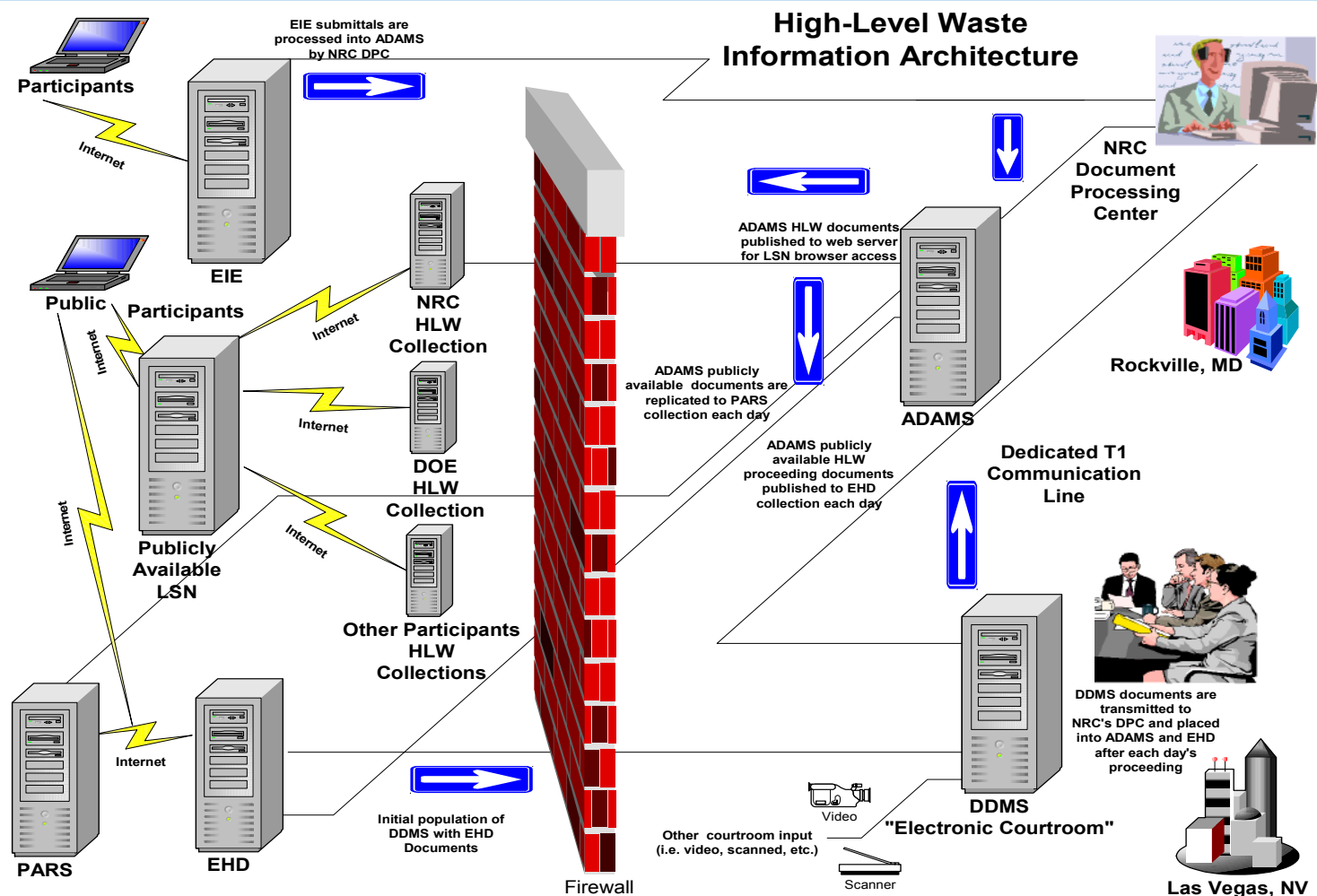
High-Level Waste (HLW) Information Architecture

■ **Conceptual Overview of Information Collection for HLW Proceedings**

■ **Relevant Terminology**

- **Agencywide Documents Access and Management System (ADAMS)**
- **Publicly Available Records System (PARS)**
- **Digital Data Management System (DDMS)**
- **Document Processing Center (DPC)**
- **Electronic Hearing Docket (EHD)**
- **Electronic Information Exchange (EIE)**
- **Licensing Support Network (LSN)**

High-Level Waste Information Architecture

**High-Level Waste
Information Architecture**

Participants

EIE submittals are
processed into ADAMS
by NRC DPC

Internet

EIE

Public   Participants

Internet

NRC
HLW
Collection

Internet

DOE
HLW
Collection

Internet

Internet

Publicly
Available
LSN

Internet

Other Participants
HLW
Collections

Internet

PARS   EHD

Initial population of
DDMS with EHD
Documents

Firewall

ADAMS HLW documents
published to web server
for LSN browser access

ADAMS publicly
available documents are
replicated to PARS
collection each day

ADAMS publicly
available HLW
proceeding documents
published to EHD
collection each day

ADAMS

NRC
Document
Processing
Center

Rockville, MD

Dedicated T1
Communication
Line

DDMS documents are
transmitted to
NRC's DPC and placed
into ADAMS and EHD
after each day's
proceeding

DDMS
"Electronic Courtroom"

Video

Other courtroom input
(i.e. video, scanned, etc.)

Scanner

Las Vegas, NV

EIE Process and Pilots

- **Regulatory Issue Summary 2001–05 Implements EIE**

- **Addresses Accepted and Preferred EIE Formats**

- **Includes EIE Parameters**

  - **Maximum 15 Mb file size**

  - **No classified or sensitive material**

  - **Only Netscape/Internet Explorer currently accepted**

- **EIE Pilot Projects (Adjudicatory and Criminal History File)**
- **Use of Digital Certificates**
- **Use of Digital Signatures**

Electronic Hearing Docket

- *10 CFR Part 2, Subpart J, Docket Requirements*
  - *Use an electronic docket*
  - *Be able to access the application through the docket*
  - *Use docket for pre-application filings on document availability*
  - *Follow document submission and content guidelines in 10 CFR 2.1013 (Use of the Electronic Docket during the proceeding)*
- *Features, such as Search capabilities, Content folders, & Web location*
- *Electronic Service of Documents*
  - *Authentication and security for protective order documents*
- *Intention to Use Portable Document Format*
- *Plans for Further Filing Guidance After EIE Pilot Studies and Resolution of Large File Size Problems*
- *Terminology*
- *Web Page Demonstration*

Electronic Courtroom

- **Graphic Illustration of Electronic Courtroom Functions**
- **Document Sources, Entry Procedures, and Flow Paths**
- **Electronic Courtroom Objective**
  - **Provide integrated licensing environment through effective and efficient information management**
- **Operational Approach**
  - **Download pre-filed material from the Electronic Hearing Docket as it is introduced**
  - **Update courtroom database and Electronic Hearing Docket daily**
- **System Features**
- **Electronic Media Issues**
- **Training Requirements**

Large Document Technical Issues

- **Format and Resolution Standards**
  - *Portable Document Files*
  - *Minimum 200 dpi*
- **Problems With Segmented Files**
  - *Integrity, fidelity, currency*
  - *Records management*
  - *Retrieval, search, and navigation*
  - *File types*
  - *Inability to support external hyperlinks*
- **Ongoing Staff Evaluations for Large Files**
  - *Number of documents*
  - *Document characteristics*
  - *Timing of submission*
  - *Technology limitations*
  - *Plans for additional guidance*

DOE LSN Document Status

■ *Schedule and Approach*

- *Hardware Procurement and Installation Complete by March 2003*

- *Content Management System Complete by August 2003*

- *Document Identification and Processing to Begin October 2002*

- *Operational Readiness Review and Certification by June 2004*

NRC LSN Document Status

- ■ *Identification of NRC and Contractor Documents is Ongoing*

- ■ *Homeland Security Screening is in Progress*

- ■ *Majority of NRC Existing Collection is Expected to be Publicly Available*

Evaluation of DOE Document Conversion System

- **University of Nevada Las Vegas (UNLV) Presented Results of Studies on Document Retrievability**
  - *Information Science Research Institute (ISRI)*
- **ISRI Recommendations**
  - *Retrievability is a better performance metric than character accuracy*
  - *Automatic document zoning produces retrievability equivalent to manual zoning*

Status of NRC LSN Test Server

- ***LSN Version 2.0 Software Updated April 2002***

- ***Version 2.0 Acceptance Testing***

- ***Server Acceptance Testing to be Completed in September 2002***

Meeting Summary and Path Forward

- *First Technical Exchange on Electronic Submissions Issues*

  - *Raised level of awareness*

  - *Slides and meeting summary publicly available*

- *NRC Goals for the Technical Exchange Were Met*

  - *Share information*

  - *Provide guidance*

  - *Increase level of understanding*

- *Plan to Continue Semiannual Technical Exchange*

- *Planning for Next Technical Exchange in Mid-December, 2002*

Overview of NRC Plans for the Digital Courtroom

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NRC Plans for Digital Courtroom

- *Provide Information Technology (IT) and Audio/Visual (A/V) capabilities in at least two hearing rooms:*
  - *one in the Las Vegas area near the Yucca Mountain site,*
  - *a second at the NRC in Rockville, Maryland.*

- *Enable the creation and use of an integrated, comprehensive digital record for the HLW repository licensing proceeding.*

- *Record, store, and display the text and image of documents presented in the hearing using pre-filed electronic documents from the Electronic Hearing Docket (EHD).*

- *Permit access and retrieval of the entire record:*
  - *documentary*
  - *audio*
  - *video presentations, exhibits, simulation models*
  - *recording of proceedings in an electronic format.*

Model for Implementation

- *Vision Based on Existing Courtroom 21 (Law School of the College of William & Mary) & National Judicial College Operational Models*

- *Current Audio/Visual Technologies Installed in Courtrooms Across U.S.*

- *Vendor Team Includes "Best of Breed" in Case Management, Hearing Support and Document Management Software*

Summary of Current Status of DDMS Project

- *Request for Quotes Issued March 2002*

- *Contract Awarded to PEC Solutions, Inc. August 2002*

- *Contractor Currently Working on Validating the Requirements*

- *Information Technology Component Completed Summer 2003*

Future Components

- *Audio Visual Component – Fall, 2003*

- *Rockville Hearing Room Operational – 2004*
  - *Possibly Available for Pre-Hearings*

- *Apply "Lessons Learned" to Las Vegas Hearing Room Implementation*

- *Las Vegas Hearing Room Operational – early 2005*

- *Training for Parties Early 2005*

DDMS Vision: A Fully Automated Hearing Room

With Permission, Faculty of NJC

Demonstration of Production Version 2.0 of the LSN

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Small Collection Automation

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Participants Getting Connected to the LSN

- ■ Technical QuickStart
  - *XML Header Generator*
  - *Setup Web Server and Web Site*
  - *Create Server Directories*
  - *Configure Firewall*
  - *Verify Access to Web Site*
  - *Experience Up to This Point*

Participants Getting Connected to the LSN (cont.)

■ *Technical Information for Coordination Available on LSN Webpage*

- *Point of Contacts*

- *Change Documents List*

- *System Hours of Availability and Scheduled Outages*

- *Mechanism for Users to Acquire Authenticated Image Copies*

Audit Program

- *Objectives:*
  - *Verify Integrity of Collections*
  - *Identify & Notify of Changes in Documents*
  - *Monitor LSN Server Performance*
  - *Monitor Participant Server Performance*
- *Page on LSN Website with Statistics*
- *Interact with POC to Resolve Performance Issues*

Public Access via NRC & DOE Public Document Rooms and Nevada Libraries

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Outreach Program to Nevada Librarians

- *Rural Libraries All Provide Publicly Accessible Computers*

- *Present Workshop at Nevada Library Association Conference*

  - *Constituents can employ state library-provided Internet access to use LSN*

- *Presentations at Cooperative Libraries Automated Network (CLAN) Meetings*

  - *Personnel from Nevada colleges and universities and Nevada Supreme Court Library*

NRC's Public Document Room (PDR)

- *Mission is to help public find and obtain NRC information in the agency's extensive electronic, paper, and microfiche collections*

- *Staffed by technical information and documentation specialists*

- *Holdings focused on unclassified documents related to the NRC's licensing and rulemaking activities, as well as documents from the regulatory activities of the former Atomic Energy Commission*

Performing Searches

- *Public May Access the LSN and EHD from Terminals in the PDR, Without Charge*

- *PDR Staff Can Perform Searches & Generate Printouts upon Request*
  - *Printouts of limited size can be printed and held for pickup or be sent by mail*
  - *Searches can be downloaded and sent as ASCII text files by e-mail*
  - *Regulars encouraged to learn to search and retrieve from the databases independently*

Document Requests Using NRC Participant Accession Number

- *Off-site Users May Place Orders for Documents with the Reference Staff*

- *Staff will Verify the Citations and Give PDR Copy Service Contractor Order for Copying Documents*

- *On-site Users May Place Orders Directly with the Copy Service*

Copy Service

- *Copy Service Available at PDR*

- *Self-service Copier Available*

- *Copyrighted Documents Available for Viewing, but Restrictions on Copying Apply*

Copy Fees

Media of Copy	Cost	Turnaround Time
Paper	· $0.15 per page up to 11"x14" · $0.30 per page for 11"x17" · Pages larger than 11"x17" and engineering drawings are $2.50 per square foot · $2.00 for color drawings 8 ½" x11" · Color pages larger than 8 ½" x 11" are $12.00 per square foot	4 hrs for 1-3,000 pgs 24 hrs for >3,000 pgs
Diskette	$3.00 per diskette (1-10 diskettes)	4 hrs
CD-ROM	$10.00 1st document $5.00 ea add'l on same CD	48 hrs
Fiche to Paper Aperture to Paper	· $0.15 per page per page · Aperture cards are $2.50 per square foot	

Plus sales tax and postage as of 8/29/01.   *Full fee schedule at 10 C.F.R. 9.35*

Rush Copy Fees

Media of Copy	Cost	Turnaround Time
Paper	$0.20 per page (1-1,000 pages)	1 hr
Diskette	$5.00 per diskette (1-10 diskettes)	1 hr
CD-ROM	$15.00 1st document $7.50 ea add'l on same CD	6 hrs

Plus sales tax and postage as of 8/29/01.   Full fee schedule at 10 C.F.R. 9.35

Payment

- *Made Directly to Contractor*

- *Cash, VISA, MasterCard, Discover, or Check*

  - *Orders mailed upon receipt of check*

- *Repeat Customers Encouraged to Establish Deposit Account*

  - *Invoices issued with each order*

Contact PDR Staff

- *Location: One White Flint North, 11555 Rockville Pike (first floor), Rockville, MD (opposite White Flint Metro Station on the Red Line)*
  - *7:45 a.m. – 4:15 p.m. ET*
- *Phone: 1-800-397-4209 or 301-415-4737*
  - *8:30 a.m. – 4:15 p.m. ET*
- *TDD: 1-800-635-4512*
- *Fax: 301-415-3548*
- *Mailing address: U.S. NRC, PDR, O-1 F13, Washington, DC 20555-0001*
- *Online: www.nrc.gov/reading-rm/contact-pdr.html*

DOE Public Document Rooms

Impact of Homeland Security Reviews on Document Access via the LSN

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Homeland Security

- *Federal Participants Affected post-9/11/01*

- *Required to Develop Plans for Review of Publicly Available Information*

- *Office of Homeland Security to Provide Guidance on "Sensitive but Unclassified"*

- *NRC Guidance:*

  - *Continue to Follow Established Guidance & Procedures for Proprietary, Privacy, Safeguards or Classified*

  - *Limit Release of Information that Could be Used to Assess Facility Vulnerabilities*

Potential Approaches to Handling of Homeland Sensitive in LSN
Depending on How Office of Homeland Security Categorizes

- *Rule Addresses Similar Classes of Sensitive Information via "Bibliographic Header Only" Approach*
- *If Federal Participants Use a Two Version Approach:*
  - *Redacted Version with Header plus Text &/or Image*
  - *Non-Redacted Version Would Have Bibliographic Header Only*
  - *Pre-License Application Presiding Officer Addresses Documents Withheld*
- *Cautions and Considerations:*
  - *If a Redacted Version is Created, it is a Different Document Requiring Second Bibliographic Header*
  - *Headers for Each (the Redacted and Non-Redacted) Should Cross-Reference the Other*
  - *If Redacted, Text/Image Would Have to Indicate Everywhere the Redactions Occurred (Can't Just Close up the Space and Renumber Everything)*
  - *Version Field in Header Would Indicate "Redacted Version"*
  - *Users Would See Two Almost Identical Headers and Almost Identical Text/Image (minus redacted items)*