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PSEG Nuclear LLC

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USNRC

October 29, 2002 (11:37AM)

OFFICE OF SECRETARY
RULEMAKINGS AND
ADJUDICATIONS STAFF

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

Gentlemen:

Subject: Electronic Maintenance and Submission of Information

References: Proposed Rule, Federal Register: September 6, 2002 (Volume 67, Number 173), Page 57120.
Direct Final Rule, Federal Register: September 6, 2002 (Volume 67, Number 173), Pages 57083-57119

The Nuclear Regulatory Commission (NRC) proposes to amend its rules to clarify when and how licensees and other members of the public may use electronic means such as CD-ROM and e-mail to communicate with the agency. These amendments are seen to be necessary in order to implement the Government Paperwork Elimination Act (GPEA).

PSEG Nuclear LLC (PSEG) has evaluated the proposed changes and offers the following comments for your consideration (Section Numbers refer to Appendix A of the proposed 171.9):

Section 2.2 Naming Conventions - A logical file structure (i.e. folders by section, subsection, text/table/figure) should be permitted. This would preclude the use of numeric prefixes.

Section 2.3 File Size Limitations - There is no basis given for individual file limits on CD-ROM (20MB). It is noted that EIE permits 25MB.

Section 2.5 Resolution - PSEG has been imaging since the early nineties at a resolution of 200 dpi for Bi-tonal TIFF with very few problems. The files are always reviewed prior to archive. We believe this resolution to be sufficient for the stated purpose.

Section 2.7 Files With Special Attributes - The section does not contain sufficient detail on special attributes. Does a file that has the original dimensions of the image embedded in the header constitute a special attribute, even though it prints clearly and legibly in letter size on a laser printer?

Template = SECY-067

SECY-02

NRC-2168 REV 7/99

Section 2.12 Copies - If files with no special attributes are being submitted on CD-ROM, what is the basis for the requirement to submit the same number of CDs as required by the license? This requirement seems excessive since standard CD-ROM duplication equipment can be utilized to make additional copies.

Section 4.3 How To Submit CD-ROMs to the NRC - If a transmittal letter is required, why is there a need for the naming conventions specified in Section 2.2.3, particularly if file structure or naming conventions are also included as "special instructions"?

Section 4.3.3 Living Documents - If the entire document is being replaced, shouldn't a list of the current pages identifying revision level of each page be sufficient, as long as the pages are clearly labeled?

Section 4.3 How To Submit CD-ROMs to the NRC - RIS 2001-05, "Guidance for Submitting Documents to the NRC by Electronic Information Exchange or on CD-ROM," in January of 2001. This RIS specifically stated, "Electronic submittals need not be accompanied by a paper copy." Like many utilities, PSEG has submitted our UFSAR using this guidance. It is entirely possible that a complete, up to date, paper copy of the document no longer exists and reconstitution of the same constitutes an undue expense.

PSEG further notes that Nuclear Information and Records Management Association (NIRMA), of which we are a member, has provided comments in a letter dated October 18,2002. PSEG wishes to endorse their comments in their entirety.

If you have any questions or require additional information, please contact Mr. Ed Springer (856) 339-2048.

Sincerely,

G. Salamon
Manager - Nuclear Safety and Licensing