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Secretary, U. S. Nuclear Regulatory Commission  
Attention: Rule Making and Adjudications Staff  
Washington D. C. 20555-0001

OFFICE OF SECRETARY  
RULEMAKINGS AND  
ADJUDICATIONS STAFF

**SUSQUEHANNA STEAM ELECTRIC STATION  
COMMENTS ON RULE MAKING  
REGARDING ELECTRONIC MAINTENANCE  
AND SUBMISSION OF INFORMATION  
PLA-5544**

Docket Nos. 50-387  
and 50-388

This letter provides PPL Susquehanna, LLC's (PPL) comments on the Commission's Direct Rulemaking on Electronic Maintenance and Submission of Information which was published in the September 6, 2002 Federal Register.

**General Comments**

PPL is concerned with the requirement to provide one signed paper copy of material regardless of the purpose or type of document submitted, when the mode of submittal chosen is CD-ROM.

PPL has expended significant resources to take advantage of electronic submittal of licensing documents. We have reduced our staffing levels based upon the elimination of the requirement for submission of paper copies of documents and the use of electronic media. The rule making cites a lack of technology that allows the NRC staff to produce paper copies of CDs or view drawings on a large enough screen as a reason for requiring a paper copy of submissions on CD-ROM. We believe that the technology exists in the industry and is available.

The Commission states in the rule making that it "believes that having the submitter supply a paper copy is cost effective because a paper copy can be generated at minimal expense when the document is created, but the paper copy can be generated only at considerable expense when it is produced from another medium through a conversion process." The rule making further states that this "slight increase in costs for the

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submitter is at least partially offset by avoiding the increase in the NRC's overhead costs, and thus in the fees charged to licensees and applicants, that would result if the NRC produced paper copies from CD-ROM."

The cost effectiveness of requiring the submitter to supply paper copies is not believed to exist as the rule making presupposes. There is no reason to assume every submittal would require reproduction in a paper medium. This is particularly true when a document the size of the FSAR must be reproduced in its entirety with each submittal. To require a submitter to produce paper that may or may not be used for reproduction is costly. We do not agree that having a submitter of material provide a paper copy is a cost reduction of government as a whole.

### **Specific Technical Comments**

#### 1. Section III. Action

##### A. Electronic Submission on CD-ROM Requiring Multiple Copies of CD-ROM and a Paper Copy

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 difference between the requirements for files submitted in this standard format on CD-ROM and those files submitted to the NRC by Electronic Information Exchange (EIE).

In the body of the rulemaking and in the attached guidance, an EIE submitted file does not require multiple copies or submission of a paper copy, while the same file submitted on CD-ROM does. Providing the CD-ROM files meet specific file type, format and size requirements, there is no technical difference between a file submitted via CD-ROM and one submitted by EIE, relative to processing options once it is entered into an NRC computer system.

FileNet technology forms the basis for the NRC ADAMS system. FileNet's Panagon Capture software includes the capability to import collections of files (PDF and TIF) from external sources directly into FileNet with automatic indexing of the files. This is accomplished by providing a small file of specified format indexing information along with each file that is to be imported into the system.

For example, the NRC could specify that the CD-ROM includes a standard-format (Excel spreadsheet or comma-separated value) file containing file names and indexing information in a specified order. Upon receipt of the CD-ROM, the NRC processing unit could read this file with a program that could add accession

numbers and other NRC-required additional indexing data, and produce the required index information files. Copying the contents of the CD-ROM and the indexing files to the Panagon Capture import directory could be done in a short time, and then the rest of the import process would be automated within the Panagon product.

#### B. Statements on Printing

Most of the problems identified for the NRC with printing could be eliminated by two actions: (1) specifying a format for organizing CD submittals (see above) that includes identification and/or separation of files with larger than 8.5 x11 pages, and (2) the NRC obtaining appropriate printers to meet the requirements for to-scale printing.

For example, the Xerox 8830 Engineering printer is capable of containing three different sizes of paper rolls, and producing A, C and E-size pages on one printer. There are other similar units on the market.

PPL is implementing electronic workflow for documents to minimize the interim and final generation of paper. The reason is that the cost of handling paper in a process is one of the largest cost generators in the process. Under electronic processes, documents can be created, reviewed, approved, archived and sent to the NRC without any paper copy ever being generated.

#### C. "Special Attributes" and 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.

The low acceptance rate of the EIE process by licensees should also be a matter of concern to the NRC. If the EIE process were easy to use, able to deal with large documents and efficient for the licensees, it might be used more than the CD-ROM process.

#### D. Page Replacement Files

According to this rulemaking and guidance, a licensee can submit a stack of replacement pages, together with a 'roadmap' to replacing the pages in the original

paper document. However, a licensee is not allowed to scan the same pages on to a CD-ROM and send just the CD-ROM. A licensee is also not allowed to just submit a CD-ROM of the entire revised document. A licensee has to create a CD-ROM of the entire revised document, then create several more CD-ROMs, and then send along with those CD-ROMs a paper copy of the entire document.

Using the FSAR as an example: Under the proposed direct rule making, if a 5 page change is made to the FSAR, instead of expecting the NRC to be able to print five changed pages from a CD, the submitter is expected to send in 10 copies of the CD and 18 volumes of paper literally thousands of times greater in size than the actual change.

## 2. Appendix A

- A. Section 2.0: The version of Adobe product is not synonymous with the version type of the PDF file format. The specification should more clearly identify the PDF version.
- B. Section 2.2(3): Specifying filenames with numeric prefixes may make it easier for the NRC to determine the 'correct order' on a single CD-ROM manually or visually. However, this action generally complicates production of documents for licensees because systems used in production do not accommodate file-naming conventions of this type without major software or process changes. A spreadsheet or data file with correlation between file names and order is more effective for process automation.
- C. Section 2.5: There is no frame of reference for notes a and b under the resolution table. Some of the wording appears to contradict the acceptable format table under Section 2.0. The context of these notes needs to be clarified.
- D. The terms "special attributes" and "special equipment" as used in the Rule are not consistent with industry definitions. Just because a drawing is large does not mean it has any 'special attributes', such as might be expected in a CAD system drawing file. It is just a larger file requiring larger paper to display to scale. Similarly, although the term 'plotter' is still used to describe some larger scale printers, because of historical precedence, they are simply large-format printers, and are not 'special equipment'.
- E. Sections 2.12 and 4.3: As previously discussed, the NRC should have the capability to reproduce paper copies of submissions.

F. Section 4.3.3: The combination of this requirement together with the requirements for CD-ROM submittal with paper copies, and the file limitations on EIE transmittals make efficient and paperless submittals of FSAR updates impractical.

### Conclusions

Based upon the above comments, it is our desire that the subject direct final rule making be withdrawn. Further, should the direct final rule be withdrawn, we do not support the Commission's contingency position to address all public comments received under the direct final rule action in a proposed rule action and then make the proposed rule final without a second comment period. The contingent proposed rule making has the same failing as the direct rule making.

Sincerely,



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cc: NRC Region I  
Mr. S. L. Hansell, NRC Senior Resident Inspector  
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