

**CENTER FOR NUCLEAR WASTE
REGULATORY ANALYSES**

ADMINISTRATIVE PROCEDURE

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Records Management


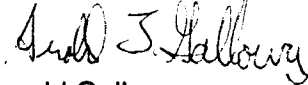

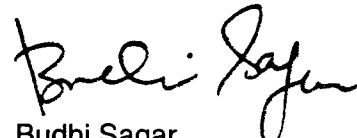
EFFECTIVITY AND APPROVAL

Revision 0 of this procedure became effective on 9/3/03. This procedure consists of the pages and changes listed below.

<u>Page No.</u>	<u>Change</u>	<u>Date Effective</u>
All	0	9/3/03

Supersedes Procedure No.: NA

Approvals

Written By  Pat Mackin	Date 9/3/03	Concurrence Review  Arnold Galloway	Date 9/3/03
Quality Assurance  Robert Brient	Date 9/3/03	Cognizant Director  Budhi Sagar	Date 9/3/03

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AP-019 Records Management

1. PURPOSE

The purpose of this procedure is to provide instructions for assembling and preparing, scanning, processing and filing, shipping, and managing and verifying Center for Nuclear Waste Regulatory Analyses (CNWRA) records for all clients. This procedure will also be used to submit CNWRA documentary material to meet requirements for the Licensing Support Network (LSN) in accordance 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) and for any derivative discovery of records associated with a high-level waste repository licensing proceeding. Additionally, this procedure may provide support to the U.S. Nuclear Regulatory Commission (NRC) in responding to Freedom of Information Act requests. This procedure addresses both legacy records (records from the past) and records that will continue to be generated by the CNWRA.

2. APPLICABILITY

This procedure is to be used for managing all CNWRA records, except those that are classified.

3. RESPONSIBILITIES

3.1 The Technical Director is responsible for resolving any questions related to identifying or categorizing sensitive records.

3.2 The Director of Administration is responsible for implementing and maintaining this procedure including collaborating with U.S. Nuclear Regulatory Commission (NRC) staff to (i) identify profiling data and prepare submission forms and targets for each documentary material category, (ii) prepare electronic files for documentary material in accordance with NRC specifications, and (iii) submit documentary material to the NRC. The Director of Administration is responsible for providing and documenting training for CNWRA staff assigned to records management activities.

3.3 The Director of Quality Assurance is responsible for auditing compliance with this procedure.

3.4 CNWRA directors, element managers, principal investigators, and project managers are responsible for managing records in accordance with this procedure.

3.5 The CNWRA staff is responsible for complying with the records retention policy stated in Section 5 of this procedure.

4. DEFINITIONS

4.1 Classified information—Information (such as a document or correspondence) that is designated national security information, restricted data, or formerly restricted data. This procedure does not address classified information.

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- 4.2 CNWRA legacy records—CNWRA records prepared prior to (date to be determined with concurrence of NRC once processing of legacy documents has begun). CNWRA legacy records will be managed in accordance with Section 4.1 of this procedure. CNWRA records prepared after (date to be determined) will be managed in accordance with Section 4.2 of this procedure.
- 4.3 Document submission forms—Forms that provide information needed to profile CNWRA records in the NRC Agency Wide Documents Access and Management System (ADAMS). Profiling is a term used by the NRC Document Processing Center to describe standardized information required to enter and identify documents in ADAMS.
- 4.4 File set—The group of records or files that will be placed on an individual compact disk (CD-ROM). For example, a file set may be all the procurement records for a fiscal year or the entire set of calibration records. File sets are defined on a case-by-case basis taking into account parameters such as purpose, size, and individual significance of records.
- 4.5 Assembling and preparing—Actions necessary to prepare records for processing and managing. Assembling and preparing includes actions such as removing staples, straightening corners, and repairing page damage.
- 4.6 Sensitive unclassified information—Information that requires a degree of protection because of the risk and magnitude of loss or harm that could result from inadvertent or deliberate disclosure, alteration, or destruction. This term includes proprietary information, unclassified safeguards information, sensitive homeland security information, and other information withheld from public dissemination. Those categories most likely to be used for CNWRA NRC work are predecisional information, safeguards information, official use only information, sensitive homeland security information, and proprietary information. Usually, this information addresses NRC methods, findings, and recommendations concerning regulatory guidance, technical positions, internal surveys, and audits that are not ready for publication or other public release.
- 4.7 Targets—Forms incorporated into scanned records to identify the location and content of items such as CD-ROM, tapes, floppy disks, and sensitive unclassified information that cannot be scanned or practically converted to a scanned record. Targets may include brief abstracts that describe the nature, use, or location of items that are not scanned.

5. PROCEDURE

This section provides instructions for record maintenance. Section 4.1 is applicable to CNWRA legacy records. Continued processing of follow-on CNWRA records will be performed in accordance with Section 4.2. Where necessary, this procedure provides instructions unique to specific categories of records.

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The records management process covered by this procedure addresses actions subsequent to document development. CNWRA document development falls under the broad direction provided by Southwest Research Institute® (SwRI®) Operating Policies and Procedures, the CNWRA Quality Assurance Manual, and the CNWRA Management Plan. Specific CNWRA procedures governing document development include QAP-001: Scientific Notebook Control; QAP-002: Review of CNWRA Documents, Reports, and Papers; QAP-008: Document Control; QAP-012: Quality Assurance Records Control; QAP-017: Drawing Control; AP-002: Correspondence and Document Control; and TOP-018: Development and Control of Scientific and Engineering Software.

This procedure places records management actions in five phases: (i) assembling and preparing, (ii) scanning, (iii) process documentation and filing, (iv) shipping, and (v) records management and verification.

In accordance with 10 CFR Part 2, Subpart J, confidential financial or commercial information, or information that constitutes safeguards information, requires only an electronic bibliographic header for entry into the LSN. Classified material will be handled, stored, and otherwise controlled in accordance with the National Industrial Security Program Operating Manual, DOD-5220.22-M, which is accepted by NRC and has been implemented by SwRI. Nothing in this procedure is intended to conflict with the requirements of NRC Acquisition Regulation 2052.204.70 regarding handling of classified material. If any such conflict or difference occurs, the terms of the current CNWRA charter contract with the NRC take precedence.

Sensitive records shall be stored in the CNWRA library or the Electronic Library Facility (ELF) electronic database, but may not be disclosed to foreign nationals. The CNWRA will not distribute predecisional information without government approval.

5.1 Managing CNWRA Legacy Records

Figure 1—Processing and Managing CNWRA Legacy Records depicts the process that is described in this section. Actions required in each phase of records management are discussed in the following subsections.

5.1.1 Assembling and Preparing

5.1.1.1 General Assembling and Preparing Procedure

(a) In the assembling and preparing phase, records will be prepared for further processing and managing. Assigned CNWRA support staff shall complete the following types of actions, as necessary, during this phase.

- Remove staples.
- Straighten bent corners.
- Correct page damage, such as tears, that might interfere with scanning.

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- Assign a unique document identifier and file name in the CNWRA ELF system as described in Appendix A.
- Identify and correct any other problems that might interfere with scanning.
- Prepare document submission form (Figure 2) and targets (Figure 3), as required.
 - Document submission forms have been concurred in by NRC staff for each document category and are generated automatically by ELF
- Separate any potential sensitive material and provide it to the Director of Administration for evaluation.
- Record any special scanning requirements such as processing multiple-level overlays.
- Document completion of assembling and preparing of the document submission form in ELF.
- A copy of the document submission form will be provided to SwRI Publication Services.

5.1.1.2 Specific Assembling and Preparing Instructions for Document Categories

These steps are to be performed in addition to those in Section 4.1.1.1, as applicable.

- (a) The procedural steps defined in Section 4.1.1.1 are adequate for most quality assurance programmatic records, procurement records, and sample logs.
- (b) Scientific and field notebooks shall be assembled and prepared by assigned CNWRA staff as follows.
 - Review each notebook for completeness (cognizant CNWRA manager).
 - Provide additional identifying information for data tapes, floppy disks, or other media, as required by the document submission form or target sheets.
 - Identify any potentially sensitive or copyrighted information (cognizant CNWRA manager) and provide it to the Director of Administration.
 - Obtain NRC concurrence in assigning any sensitivity category. The CNWRA Technical Director is responsible for resolving with NRC staff any questions related to record sensitivity or copyright.
 - Complete the appropriate sensitive information identifier in ELF, and prepare the appropriate target and associated descriptive information.
 - Convert media (e.g., Bernoulli disks, 5 ¼" floppy disks) to CD-ROM and complete and attach CD-ROM labels.

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(c) Software control documentation and technical report/presentation review documentation shall be assembled and prepared by assigned CNWRA staff as follows.

- Provide additional identifying information for tapes, floppy disks, or other media, as required.
- Combine any associated QAP-002 review documentation with the associated technical report or software control documentation for concurrent scanning. The review documentation and the report or software control documentation shall be discriminated by having a capital "C" added to the ELF identifier and file name as described in Appendix A.
- Identify any potentially sensitive information (cognizant CNWRA manager) and provide it to the Director of Administration.
 - Obtain NRC concurrence in assigning any sensitivity category.
 - The CNWRA Technical Director is responsible for resolving with NRC staff any questions related to record sensitivity.
 - Complete the appropriate sensitive information identifier in ELF, and prepare the appropriate target and associated descriptive information.
- Convert media (e.g., Bernoulli disks, 5 ¼" floppy disks) to CD-ROM and complete and attach CD-ROM labels.

(d) Calibration records shall be assembled and prepared by assigned CNWRA staff as follows.

- Consolidate information in calibration records from the SwRI Calibration Laboratory with information from CNWRA laboratory files.
- Prepare a separate folder for each calibrated device with the included material in chronological, ascending order, from earliest to latest.

(e) Quality assurance audit reports, surveillance reports, nonconformance reports, and corrective action requests shall be assigned a unique document identifier for each item.

5.1.2 Scanning

5.1.2.1 General Instructions for Scanning

In the scanning phase, the following actions will be completed.

- Record the date a document is sent for scanning in ELF. Publications Services staff must sign for receipt of documents.

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- Establish file sets and file separation.
 - The maximum allowable file size is 50 MB
- Scan, quality check, verify, and process the record for optical character recognition (OCR), as appropriate, using the procedures in Appendix B.
- Complete text source information on the document submission form, as required.
- Produce two electronic versions of any document that has sensitive or proprietary material or material that is not relevant to a high-level waste licensing proceeding.
 - One version will be the complete document for retention in CNWRA files.
 - One version will omit any sensitive, proprietary, or irrelevant information and will be provided to NRC, as directed.
- Generate two compact disks of up to approximately 600 megabytes of information for each file set.
- Receive original documents and records of scanning and OCR from SwRI Publications Services and document in ELF.

5.1.2.2 Specific Scanning Instructions for Document Categories

These steps are to be performed in addition to those in Section 4.1.2.1, as applicable.

The procedural steps defined in Section 4.1.2.1 are adequate for software control documentation, technical report/presentation documentation, quality assurance programmatic records, calibration records, sample logs, and procurement records.

(a) Scientific and field notebooks shall be scanned in accordance with any special scanning instructions provided by CNWRA staff.

(b) Procurement records shall be scanned as follows.

- Send an entire file set of procurement records to SwRI Publications Services.
 - For records generated prior to fiscal year 1999, each year's combined procurement records shall be scanned as a single file set.
 - For years subsequent to fiscal year 1999, procurement records for each project number will be scanned as a separate file. Several projects may be combined for a single file set.
- Produce two electronic versions of procurement records.

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- One version will be the complete set of procurement records for retention in CNWRA files.
- One version will contain only quality affecting procurement files and will be provided to NRC, as directed.

5.1.3 Process Documentation and Filing

CNWRA records process documentation and filing will be supported by the capabilities of ELF and by a dedicated server that will store an image of each scanned document.

5.1.3.1 Instructions for Process Documentation and Filing

There are no unique process documentation and filing requirements for specific document categories, and the instructions in this section are to be used for all CNWRA records.

Process documentation and filing are to be completed as follows.

(a) Completion of the following document processing steps will be recorded with a date entry in ELF. These steps are depicted in Figure-1, Processing and Managing CNWRA Legacy Records.

- Completion of the document submission form (all grooming actions have been completed). Completing a document submission form will require that the following information has been entered in ELF.
 - Document category
 - ELF identifier (Q number)
 - Title
 - Date
 - Author(s)
 - Sensitivity or classification flag and category (to be used for any category of sensitive or classified information)
- Sending a document for scanning
- Return of a document from scanning
- Completion of filing (original and CD-ROM)
 - For each document, ELF shall identify the CD-ROM containing the document

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- Sending a document to NRC
- Receiving acknowledgment of document receipt from NRC

5.1.4 Shipping

Some CNWRA records are shipped or delivered to NRC or other clients, while other records are retained at CNWRA. This phase of records management provides the means to determine whether records have been provided to the client. For some records prepared to support the NRC high-level waste program, regulatory requirements dictate that the records be entered in the ADAMS system for further transfer to the LSN, if required. The process documentation and filing detailed in Section 4.1.3 will provide confirmation that records have been shipped and, as appropriate, entered in ADAMS.

CD-ROM prepared using this procedure will be mailed to NRC routinely and consistent with Document Processing Center needs. The mailing address will be:

U.S. Nuclear Regulatory Commission
Attn.: Document Control Desk
11555 Rockville Pike
Rockville, MD 20852

5.1.5 Records Management Verification Checks

Implementation of the CNWRA records management process is subject to the CNWRA Quality Assurance Manual. In addition, this procedure requires the following quality control checks.

- Verify the quality of each scanned image.
- Perform a daily operational test of scanner performance whenever scanning is conducted in accordance with this procedure.
- Document operator proficiency in implementing this procedure in personnel training records.
- Establish preventive maintenance programs for each scanning device used in implementing this procedure.
- Confirm once each month that CNWRA software is consistent with the version being used in the NRC Document Processing Center.

5.2 Continuing Management of CNWRA Records

To be developed.

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6. RECORD RETENTION POLICY

Each CNWRA staff member is responsible for implementing the following record retention policy.

- Minimize retention of individual copies of documents that have already been archived in the quality assurance or ELF records.
- Routinely delete administrative electronic mail (e.g., global postings, meeting announcements, inputs to weekly meetings, etc.) from inbox, sent items, and deleted items folders. Maintain electronic or hard copies of email that is an official record (e.g., documentation of a deliverable acceptance or delivery date change).
- Routinely delete or dispose of files that are fully captured in another document that is retained (e.g., inputs to Program Manager's Periodic Reports, or other composite documents).
- Routinely delete unneeded files from "temp" directories that are maintained on desktop computers.

7. RECORDS

All items identified as documentation within this procedure shall be maintained in accordance with the requirements of the CNWRA Quality Assurance Manual and related implementing procedures.

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Appendix A

Assignment of Electronic Library Facility (ELF) Identifiers and File Names

The CNWRA ELF automatically assigns a unique document identifier with the following format. The ELF identifier will also be the basis for the scanned document file name.

Q (Identifies the document as CNWRA record)Date (YYYYMMDD) Three digit unique number for that date (XXX).

As an example, the ELF record Q20030227001 would be the first record entered into ELF on February 27, 2003.

A suffix will be added to the ELF identifier to denote section numbers, if the document must be separated into sections to meet minimum size requirements. An "X" suffix would denote the last section of the document. A suffix will also be used if the item is something other than a regular document, such as a drawing, a target, or the review documentation for the associated technical report or software development records.

Acceptable suffixes are:

D = Drawing

C = Review comment documentation

Examples of unique file names follow.

Q200302270011-01 First section of ELF document Q200302270011

Q200302270011-02 Second section of ELF document Q200302270011

Q200302270011-03X Last section of ELF document Q200302270011

Q200302270011C Review documentation for ELF document Q200302270011

For large or oversized images, a target will be inserted in the document, and the image will be scanned as a separate file. A suffix of the form -D01 will be added to the document file name to identify the oversize image.

CD-ROM will be numbered sequentially in the format LSNn.

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Appendix B

Scanning and Optical Character Recognition of CNWRA Records

B.1 Scanner Settings and Calibration

B.1.1 Settings

For each type of document identified, specific scanner settings and processes will be utilized

The following is an example of the settings used for the Fujitsu fi 4990C high speed black and white or color duplex scanner scanning normal black and white laser printed text .

Resolution:	300 dots per inch (dpi) (400dpi available)
Mode:	Black and white (Halftone, Grayscale, or Color available)
Brightness:	Setting determined for particular scanner
Threshold:	112 (Setting determined for particular scanner, image vs background color)
Contrast:	104 (Setting determined for particular scanner)
Gamma:	Sharp
White Level Follower:	Sets background color of paper to be white in scanned image
Dropout Color:	Green, Red, or Blue (Green is default)
Image Filter:	Normal
Deskew:	Automatic

B.1.2 Calibration

An input test target that allows a color scanner to be calibrated with any photographic medium dye set, the IT8 target, was designed by the American National Standards Institute IT8 subcommittee to be used for both calibration by visual comparison and as a numerical data target.

Each ColorReference consists of 288 patches and has been designed to represent the color space from full saturation to near neutrals for highlight, midtone, and shadows. Hues falling at regular intervals through the color space represent a full spectrum. A linear perception neutral density scale, and CMY and RGB color dye scales provide basic reference points to check for gray balance, tone reproduction, and color correction. Finally, a vendor-optional area containing flesh colors based on the colorimetric measurements of various skin tones plus the colors of nature completes the ColorReference. Scanners will be calibrated monthly using an IT8 scanner target.

A master set of "calibration or settings" pages will be created consisting of samples of various types of copy on various papers. This master set will be scanned and OCR processed at the start of each day. The accuracy of the scanning and OCR process will be verified by examining the file created and comparing it with an accepted standard. This will ensure that the scanner and associated software are operating within acceptable ranges.

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B.1.3 Scanning Procedure

Scanning will be conducted using the following steps.

- (1) Enter the record into a "work in progress" log file.
- (2) Name the file in accordance with Appendix A.
- (3) Scan the record following any special scanning instructions provided by the CNWRA staff.
- (4) Perform a quality check on each scanned page to assure completeness and a level of quality sufficient for further processing or for submittal to the U.S. Nuclear Regulatory Commission (NRC) Agency-Wide Documents Management System (ADAMS). Ensure any special scanning instructions have been complied with.
- (5) Rescan any missing or unacceptable pages until an adequate image is obtained.
- (6) Store "image only" files in unique folders on an assigned server.
- (7) Release files designated for text conversion using the Prime Recognition OCR program to produce an "image plus hidden text" version of a Portable Document Format (PDF) file and store them in unique folders on an assigned server.
- (8) Perform a verification of each page processed by OCR that does not meet the assigned threshold of accuracy using Prime Verify software.
- (9) Release verified documents for processing as Portable Document Format files.

B.1.4 Scanning Format and OCR Requirements by Document Category

- Technical Reports
 - pdf image*
 - Text searchable†
 - OCR correction not required
- Sample Logs
 - pdf image*
 - Text searchable†
 - OCR correction not required
- Software
 - pdf image*
 - Text searchable†
 - OCR correction as required

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- Procurement
 - pdf image*
- Scientific Notebook
 - pdf image* (exception: existing electronic files)
- Qualify Assurance Programmatic Records
 - pdf image*
 - Text searchable†
 - OCR correction not required

* Perform OCR correction as necessary.

† All documents will have a pdf image.

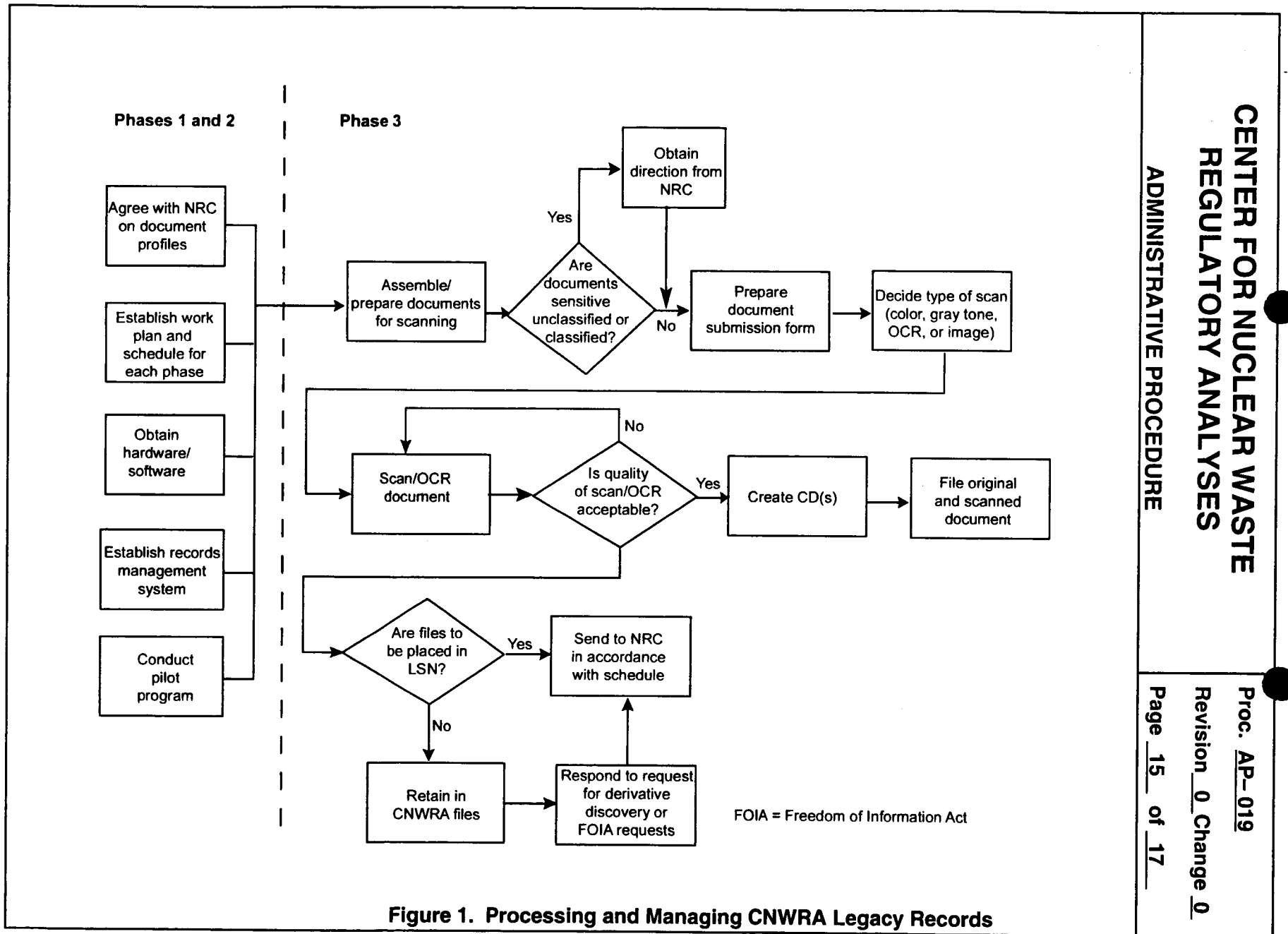


Figure 1. Processing and Managing CNWRA Legacy Records

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Document Date:	
Document Type:	
Availability:	<input type="checkbox"/> Publicly Available <input type="checkbox"/> Non-Publicly Available
Title:	
Author Name:	
Author Affiliation:	Center for Nuclear Waste Regulatory Analyses
Docket Number:	WM-00011
License Number:	Pre
Case/Reference Number:	
Document/Report Number:	Q#
Keyword:	
Comment:	
Document Sensitivity:	<input type="checkbox"/> "Non-Sensitive" <input type="checkbox"/> Sensitive <input type="checkbox"/> "Non-Sensitive - Copyright" <input type="checkbox"/> Sensitive - Copyright
Text Source:	<input type="checkbox"/> "No Text Source" <input type="checkbox"/> "OCR'd from scanned image - no corrections made" <input type="checkbox"/> "OCR'd from scanned image - corrections made"

Figure 2. Example Document Submission Form

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Document Date:	
Availability:	Southwest Research Institute® Center for Nuclear Waste Regulatory Analyses 6220 Culebra Road San Antonio, Texas 78228
Contact:	Southwest Research Institute® Center for Nuclear Waste Regulatory Analyses 6220 Culebra Road San Antonio, TX 78228-5166 Attn.: Director of Administration 210.522.5054
Data Sensitivity:	<input type="checkbox"/> "Non-Sensitive" <input type="checkbox"/> Sensitive <input type="checkbox"/> "Non-Sensitive - Copyright" <input type="checkbox"/> Sensitive - Copyright
Date Generated:	
Operating System: (including version number)	
Application Used: (including version number)	
Media Type: (CDs, 3 1/2, 5 1/4 disks, etc.)	
File Types: (.exe, .bat, .zip, etc.)	
Remarks: (computer runs, etc.)	Media contains:
<p>Figure 3. Example Target Sheet</p>	