FOR DISCUSSION AT 1/31/02 MEETINGS ON THE JANUARY 25, 2002 SRM ON COMSECY-01-0030

I.   **Schedule**

Does the 3/1 Suspense date pertain to submittal of revised criteria to the Commission or does it also pertain to other items in the SRM?

II   **Assignment of Responsibilities**

Revised Criteria Definition   OEDO/OGC/Security

SRM Item #6 says: **"The staff should also develop a process for licensees to use to identify and submit documents that contain information that the staff would not release to the public under the guidelines."**   Who will be responsible for development of this new process?

Process to review NRC-generated and incoming documents?

III.   **Decisions that must be made before a new process implementing Commission guidance can be designed**

●   **SRM Item #2: "The NRC should not withhold information that is already "currently widely available" to the public. ....."**

Interpretation?   This direction divides NRC documents into three parts and provides direction on releasability decisions:

1	Documents that were on NRC Web and/or PARS but were withdrawn in response to 9/11 events	These **should not** be thought of as "currently widely available" and should be reviewed against any new criteria before being re-released. What is the plan/process for this review?
2	Documents that are now on NRC Web and/or PARS	These **should** be thought of as "currently widely available". They do not have to be systematically reviewed against new criteria. If, however, documents now in PARS are found that meet the new criteria, they should be reviewed.
3	Documents from day forward	Documents currently not publicly available and all new documents should be reviewed against the new criteria.

1

- **Scope Issues -- What Has to be Reviewed?**

  ▸ What is the **scope of external and internal documents that** need to undergo enhanced review?

  ▸ Can there be categories of internally generated documents or external documents that are exempt for this review because they rarely, if ever, would can contain sensitive information?

  ▸ Must the NRC review every external document received or are there certain documents sources, such as licensees, upon which we can place the burden and responsibility to mark documents appropriately? Can we abdicate this responsibility?

- **Who Does the Review? --**

  ▸ Will there be a review team in NRR and NMSS? What about review of Commission level documents? What about Regional document? How will this team operate given the SRM guidance?

  ▸ What does the following sentence in Item #6 mean? **"The staff should develop a process that will involve management review of withholding decisions so as to ensure that the principles are applied in a uniform manner."** Does this mean management review (A) of each document prior to the document being made public **or** (B) of the process, such as a periodic audit of release decisions and processes to assure adherence to policy and guidance.

  ▸ SRM Item #6 says: **"The staff should identify a final decision maker if there is a difference of opinion as to whether something should be released to the public."** Does this mean one position within the agency? Or does this mean that within each concurrence chain or office there should be a management level defined where any differing opinions are sent for resolution?

IV   Resource Implications and Approach for Process Development

- OCIO would assign 1 individual full-time to develop the process, with several other professional staff participating part-time

- OCIO will require the participation of the ADAMS Working Group and management representatives of the review team in several half day working sessions to develop the process, including defining alternative approaches where appropriate

- The Working Group will bring recommended changes in the process to the ADAMS Steering Group, who will need to meet one or more times within the next month. It will then be presented to the EDO for concurrence.