

-NRR

From: Christopher Grimes
To: Chester Poslusny; Mindy Landau; Patricia Norry; William Reckley
Date: 12/3/01 3:06PM
Subject: Redact Impact

As discussed at the meeting with Bill Kane on Friday, attached is an updated assessment of the impact of redacting sensitive information on the license renewal program. This version incorporates improvements suggested to me by the NRR and OGC staff. Bill Kane wanted this impact assessment, along with the expanded criteria that Chet & Bill are developing to be provided to Mindy in preparation for a meeting tomorrow (or was it by tomorrow for a meeting on Wed?). While we (NRR) are relying on Bill Reckley to support the process development, we also need him to be redacting packages - Bill will need to inform us when he needs additional resources to support these efforts.

CC: Brian Sheron; David Skeen; Francine Goldberg; Frank Gillespie; Janice Moore; John Craig; John Zwolinski; Jon Johnson; Joseph Shea; Lawrence Chandler; Leslie Barnett; Lynn Scattolini; Michael Case; Richard Borchardt; Robert Perch; Samuel Collins; Stephen Burns; Stephen Hoffman; Stewart Magruder; William Kane

NH-24

Impact Summary
Review and Redaction of "Sensitive Information"
Focus on the Power Reactor License Renewal Program

- Additional effort and time are needed to review NRC products (SER, FES and related correspondence), redact sensitive information, and link redacted information to the evaluation record. A substantial amount of potentially sensitive information is contained in the license renewal environmental reports, submitted by applicants as part of their license renewal applications, which include site layout, maps, and plant vulnerabilities detailed in severe accident mitigation alternative (SAMA) analyses.
- Additional effort is needed to respond to routine external requests (industry, public and media) for information that was previously available on the License Renewal Web Page, including schedules, improved guidance and renewal application information.
- Additional effort is needed for NRR and OGC to coordinate, gather, review and distribute information needed to support the ASLB process. Processing requests for withheld information can delay the ASLB milestones. Additional effort is needed to determine how sensitive information should be provided to the parties, to prepare arguments for withholding the information where the legal basis has not yet been clearly established, to package and process information to be disclosed to the parties under some form of non-disclosure agreement, and to establish the terms of such non-disclosure agreements.
- Additional effort, and possibly additional time, is needed to process the receipt of license renewal applications. Upon receipt of the St Lucie renewal application on 11/30/01, the staff is reviewing the application for potentially sensitive information, establish a means to redact sensitive information, and make a redacted version of the application available in ADAMS and in a local facility like a library, along with a non-redacted version of the application that will be accessible to the staff.
- Public credibility of the NRC licensing processes is suffering because of the lack of public access to the UFSAR and other reference materials and the availability of some of the withheld information in other public forms, like that described in a recent email from Dave Lochbaum related to the information needs for petitioners in the Duke renewal application.
- Additional effort is needed to coordinate with applicants on the handling of renewal applications and related correspondence. Licensees are establishing new practices for withholding potential sensitive information in accordance with security advisories. Additional effort is needed to respond to questions about the release of potentially sensitive information in the normal course of their document distribution and access (for example, to local officials and others on their normal service lists).

① sensitive info/redaction

② respond to requests

③ ASLB process

④ receipt of records for info



Public credibility of the NRC licensing processes is suffering because of the lack of public access to the UFSAR and other reference materials and the availability of some of the withheld information in other public forms, like that described in a recent email from Dave Lochbaum related to the information needs for petitioners in the Duke renewal application.