

April 16, 2004

TO: Members of the Licensing Support Network Advisory Review Panel

FROM: Daniel J. Graser **IRA**
Licensing Support Network Administrator

RE: Licensing Support Network (LSN) Guideline on Setting Up a System

LSN Guideline 22, Setting Up a Licensing Support Network Participant Repository, was issued on February 11, 2004 for review and comment by members of the LSN Advisory Review Panel (LSNARP). A March 17, 2004 comment from the Department of Energy (DOE) takes issue with the fact that the guideline identifies a maximum number of documents that a participant can load on its web server each day or each week. Claiming without further explanation that this guideline would be "prejudicial" to DOE and "burdensome" to the LSN process, DOE states that the only basis for these "restrictions" appears to be the speed at which the LSN computer equipment and software can conduct its spidering activities using the work schedule established by the NRC.

The DOE comments regarding the guideline suggest some additional explanation is appropriate. It is true that the amount of time needed for spidering is a function of the LSN hardware and software, the telecommunications pipeline, and, additionally, the speed of the hardware hosting the participants' collections. The LSN hardware, software, and indexing software have all been essentially re-designed since September 2003 to accommodate the projected volume of DOE materials. Our review of the redesigned system's operations indicated that if the indexing software encountered a problem in a very large volume of documents that caused the spidering process to terminate, when the software process restarts, it does not retain the information indexed from that volume of documents up to that point in time. The revision to Guideline 22 attempted to address that situation by documenting one approach to preventing such a delay-causing problem with indexing. In large part, our basis for including that recommendation was our understanding that this solution was consistent with DOE's proposed directory structure and was within DOE's technical capabilities, as had been successfully demonstrated by DOE to the LSN staff during preliminary testing activities.

The LSN is an NRC system that has been designed, implemented, and operated consistent with NRC regulations. NRC regulations (10 C.F.R. § 2.1011(c)(6)) give the LSN Administrator the authority and responsibility to "provide for individual variances from the design standards to accommodate changes in technology or problems identified during initial operability testing of the individual documentary collection websites or the 'central LSN site.'" The clarifications provided in Guideline 22 are consistent with the LSN Administrator's authority and responsibility as outlined in Subpart J, given the recently enhanced operational environment. Similarly, Subpart J (10 C.F.R. § 2.1011(a)(2)(i)) contains a clearly identified regulatory requirement of

making “documents available on a web accessible server which is able to be canvassed by web indexing software . . . ,” which is the unambiguous foundation for the technical solution NRC has implemented.

The LSN guidelines are intended to document hardware, software, and procedural issues and technical solutions known by the LSN staff to work given the existing technical environment of the LSN. The guidelines are not regulatory requirements. Consequently, the solutions reflected in the guidelines are not exclusive, proscriptive, prescriptive, or static, and they have been revised in the past to accommodate developments in technology. All parties and potential parties are welcome to suggest alternative technical solutions.

It is in this vein that, as a result of an additional DOE suggestion provided subsequent to its March 17, 2004 comments, the guideline has been further revised in an attempt to clarify the recommended technical solution. Specifically, the guideline accommodates the use of preloaded “hidden” directories containing up to 30,000 documents that would be revealed to the LSN spider by a participant only after the crawler completes its indexing of a previous day’s “exposed” directory.

An additional substantive change is introduced in this revision on the subject of maintaining log files on a participant server. In a continuing effort to simplify system operations for the parties and LSN operations staff, the LSNA is eliminating the need for parties to make log files accessible to the LSN spider. In redesigning the LSN, we have replaced our previous approach that utilized WebTrends™ with a simple application that determines participant server availability by periodically connecting to participant servers (both FTP and HTTP) and logging the results in the LSN database. As a result, log files no longer need to be made available and no additional effort in this regard is requested of the participants.

NRC requests your comments on this revised version of Guideline 22 by May 3, 2004. Comments may be forwarded to me either electronically via e-mail at DJG2@NRC.GOV or via hardcopy to:

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