



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555

OFFICE OF THE
SECRETARY

March 3, 1995

MEMORANDUM TO: Karen Cyr, General Counsel
B. Paul Cotter, Jr., ASLBP
Robert M. Bernero, Director, NMSS
Eric Beckjord, Director, RES

FROM: John C. Hoyle, NRC Member, LSS Advisory
Review Panel

SUBJECT: LSS PARTICIPANT COMMITMENTS

Attached for your review and comment is a draft document prepared by the LSS Administrator (LSSA) which describes the commitments placed on all LSS participants, including the NRC, with regard to identification and submission of documents to the LSS. These commitments are a combination of those placed on participants by the LSS Rule (10 CFR Part 2, Subpart J) and derivative commitments that the LSSA believes are necessary for the LSS program control and administration. The other members of the LSS Advisory Review Panel have also been asked to provide their comments.

Your comments should be sent directly to Mr. Arnold E. Levin, LSS Administrator, TWFN 6 C14, by March 17, 1995. Please let me know whether there is interest in holding an Internal Steering Committee meeting on this subject. I have blocked some time on the morning of March 16 for this purpose, if needed.

For your information, the next meeting of the LSS Advisory Review Panel will be held on March 22 and 23. The agenda for the meeting is shown in the second attachment.

Attachments:

1. LSS Participant Commitments document
2. Agenda for March 22-23, 1995 LSSARP meeting

cc: K. Stablein, OEDO
F. Cameron, OGC
M. Knapp, NMSS
J. Greeves, NMSS
J. Randall, RES
P. Bollwerk, ASLBP
A. Levin, LSSA

LSS PARTICIPANT COMMITMENTS

LSS PARTICIPANT COMMITMENTS

The proposed LSSA Compliance Assessment Program (CAP) is based on the commitments placed on participants by the LSS Rule (10 CFR Part 2, Subpart J) and derivative commitments that the LSSA believes are necessary for LSS program control and administration. This document contains all of these commitments. Those commitments that derive directly from the LSS Rule contain an appropriate citation.

The commitments on the following pages have been subdivided into four groups. The commitments in each of these groups are treated differently within the proposed CAP. These groupings are:

- GROUP 1:** These commitments address the proper identification of the document universe, the proper screening of this universe for relevant, non-duplicative LSS materials, and the timely submission of this material to the LSS. Specific compliance processing standards and non-compliance reporting thresholds have been established by the LSSA for each of these commitments. Participants exceeding established thresholds will be cited for non-compliance by the LSSA. If cited for non-compliance, sanctions may be imposed by the Presiding Officer (PO) or the Commission.
- GROUP 2:** These commitments address the physical condition of the material submitted to the LSS and its proper preparation. Specific processing standards and rejection/resubmission thresholds have been established by the LSSA for these commitments. Participants exceeding established thresholds will, in most cases, be required to correct and resubmit substandard material. The quality of submitted material will be evaluated at the LSSA's Quality Assurance (QA) Facility and during the LSSA's compliance audits. Performance related to these commitments will not be addressed in LSSA's periodic compliance evaluation reports to the Commission. However, failure to correct and resubmit returned material in a timely manner could result in reported non-compliance, if the submission volumes/rates addressed in Group 1 (above) are not met.
- GROUP 3:** These commitments do not have quantitative standards and rejection thresholds. They address participant program management requirements and describe conditions for gaining and retaining access to the LSS. Deviations from these commitments will become evident through specific actions taken (or not taken) by participants. The LSSA or the PO, as appropriate, will make judgements about the nature and seriousness of any non-compliance with these commitments. If considered serious enough, participants may be cited for non-compliance by the LSSA. If cited for non-compliance, sanctions may be considered and imposed by the PO or the Commission.

GROUP 4: These commitments do not have quantitative standards or rejection thresholds. They address DOE responsibilities in the design, development, operation, and maintenance of the LSS. Deviations from these commitments will become evident through specific actions taken (or not taken) by DOE. The LSSA or the PO, as appropriate, will make judgements about the nature and seriousness of any non-compliance with these commitments. If considered serious enough, DOE may be cited for non-compliance by the LSSA. If cited for non-compliance, sanctions may be considered and imposed by the PO or the Commission.

GROUP 1 -- COMMITMENTS WITH SPECIFIC PROCESSING STANDARDS
AND NON-COMPLIANCE REPORTING THRESHOLDS

1.A	<p>Commitment -- Document Universe Identification</p> <p>All LSS participants will report to the LSSA, concerning their holdings of potential LSS material, the location and content of each backlog repository and each generation/acquisition source (those that exist at the time <u>Compliance Program Plans</u>* are submitted and any that arise thereafter) and do so promptly and in accordance with LSSA guidance. These will constitute all the sources of material to be screened for Topical Guidelines relevancy.</p>
Processing Standard	
<p>Standard: DLOs must report all existing sources of potential LSS material at the time they submit their Compliance Program Plans and subsequently report any new potential sources in a timely manner.</p> <p>Rationale: To either not be aware of, or not disclose, even a single potential source could prevent significant volumes of relevant LSS material from being entered into the LSS.</p>	
Non-Compliance Reporting Threshold	
<p>Threshold: Non-compliance will be reported if, after the initial report of backlog and existing sources is finalized in the participant's Compliance Program Plan, any valid source of potential LSS material that reasonably should have been reported is identified by someone other than the responsible DLO.</p> <p>Rationale: Since it is not difficult for a DLO to either identify existing sources or establish procedures to stay abreast of new potential sources of LSS material, and given the importance of full disclosure to the discovery objective of the LSS, non-compliance should be reported if any valid source of potential LSS material is overlooked or not disclosed by a DLO.</p>	
Compliance Assessment Method	
<p>After becoming aware of an undisclosed potential source of LSS material from someone other than the responsible DLO, the LSSA will ask the responsible DLO to investigate this potential source and certify to the LSSA as to whether or not it is a valid potential source of LSS material. The LSSA will perform on-site audits when deemed necessary to validate this certification. Also, as deemed appropriate, the LSSA audit staff may proactively sample other related participant document collections/sources for possible LSS materials.</p>	

* See Commitment 3.C and LSSA guidance document entitled *Format and Content of LSS Participant Compliance Program Plans*.

GROUP 1 -- COMMITMENTS WITH SPECIFIC PROCESSING STANDARDS AND NON-COMPLIANCE REPORTING THRESHOLDS

1.B	<p>Commitment -- Material Submission Plans</p> <p>All LSS participants will develop and maintain accurate Material Submission Plans in accordance with LSSA guidance. The Plans will be submitted at least four years before the LSS is scheduled to be available. The Plans will contain a thorough analysis of all parameters affecting the eventual volume and type of material to be submitted to the LSS and a long range schedule for the submission of this material that supports the timely and efficient loading of the LSS database. The Material Submission Plan will be furnished as an appendix to the participant Compliance Program Plan.</p>
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Processing Standard
<p>Standard: The original Material Submission Plans and any revisions should show:</p> <ul style="list-style-type: none"> - a 10 year projection of the number of pages of material (with backlog and "contemporaneous" separately identified) that will be eventually submitted to the LSS in the first and second half of each fiscal year, starting with FY ____; - that all backlog will be submitted to the LSS at least 12 months before DOE's planned license application submission date; - that, for DOE and NRC only, at least 5% of their total backlog estimates will be submitted in each six-month period starting with the second half of FY ____ and ending with the six-month period before the LSS is to be available for loading, mid-FY ____; - that LSS participants, other than DOE and NRC, will begin to submit their backlog within 60 days of gaining access to the LSS (but no later than 36 months before DOE's planned license application submission date), and do so evenly over the remaining six-month periods; - DOE will have processed at least enough backlog to allow the LSS to load at full capacity during the first 12 months the LSS is available for loading; and, - that the amount of DOE and NRC backlog to be processed after the first 12 months the LSS is available for loading, is divided reasonably evenly over the remaining six-month periods. <p>[NOTE: This standard does not address the possible need to load the LSS database with highest priority backlog documents early in the loading process. A standard for highest priority backlog will be set later if priority loading becomes an LSS requirement.]</p>

GROUP 1 -- COMMITMENTS WITH SPECIFIC PROCESSING STANDARDS AND NON-COMPLIANCE REPORTING THRESHOLDS

Commitment 1.B, continued

Processing Standard (Continued)
<p>Rationale: By the time the LSS is available, it is estimated that there will be about 13 million pages of backlog, with most of it belonging to DOE. It is also estimated that another 7 to 8 million pages of "contemporaneous" material will be created between the time the LSS is available and the time DOE will submit its license application. The LSSA's QA Facility and the LSS itself must be properly sized to accommodate this workload and a predictable input volume from LSS participants is needed to have reasonably stable and efficient LSS operations that will pose little risk to the timely loading of the LSS database. [There will be constraints on how much material can be indexed and loaded into the LSS by DOE and reviewed for compliance with standards by the QA Facility each day.] During the first 12 months of availability, the LSS will have only a limited number of users and will be dedicated almost exclusively to a high volume of backlog loading. Thereafter, the number of users will be significantly expanded, large volumes of new material will be loaded, and the capacity to load backlog will decline. It is prudent to plan for full loading of the backlog 12 months before the license application submission date to reduce the risk that unexpected loading difficulties/requirements would endanger full loading of the backlog by the point six months before the license application submission date (as required by the LSS Rule). Unless LSS participants develop Material Submission Plans that are consistent with LSSA plans/constraints, the quality assurance review and loading of material into the LSS could be on the critical path to DOE submitting its license application. LSSA will provide LSS participants with LSS loading plans and constraints as an input to the development of their Material Submission Plans.</p>
Non-Compliance Reporting Threshold
<p>Threshold: Non-compliance will be reported if an LSS participant does not provide a Material Submission Plan that is consistent with all the prescribed standards.</p> <p>Rationale: If an LSS participant will not commit to submit its LSS material in a way that can be accommodated by the LSS and will not endanger the timeliness of loading and will not unnecessarily add to the cost of LSS operations, then the Commission should be informed.</p>
Compliance Assessment Method
<p>The LSSA will review each Material Submission Plan and compare it with the standards. LSSA may also audit backlog repositories and acquisition/generation sources to confirm the accuracy of projected material submission volumes.</p>

GROUP 1 -- COMMITMENTS WITH SPECIFIC PROCESSING STANDARDS AND NON-COMPLIANCE REPORTING THRESHOLDS

1.C	Commitment -- Document Universe Screening LSS participants will properly screen all their potential LSS material. Proper screening means making accurate relevancy decisions vis-a-vis the Topical Guidelines and accurate decisions as to what relevant materials are duplicative of previous submissions, or are authorized exclusions. If sufficient erroneous screening decisions are found during an LSSA audit, the LSS participant will re-screen all material withheld from the LSS since the previous LSSA audit, identify all errors, and, when necessary submit incorrectly withheld material to the LSSA in accordance with Commitment 1.F (Timely Submission/Resubmission). LSS participant re-screening will be confined to only the withholding category or categories (not relevant, duplicative, or excludable) in which the LSSA audit found errors. [§2.1003]
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Processing Standard
<p>Standard: All relevant or potentially relevant material should be submitted to the LSS.</p> <p>Rationale: The rule says LSS participants must submit any information that is relevant to or might lead to the discovery of information that is relevant to the licensing proceeding. This means that LSS participants must err on the side of submitting material to the LSS if there is any doubt about its relevancy. Screened material that is withheld from the LSS should be clearly not relevant, duplicative, or excludable.</p>

Non-Compliance Reporting Threshold
<p>Threshold: Non-compliance will be reported if there is a deviation from the standard of more than 2% of the material screened during a six-month evaluation period.</p> <p>Rationale: With the tremendous volumes of LSS material to be screened, some mistakes will be made even with the best procedures and training. However, given the guidance to err on the side of submitting marginally relevant material, and the fact that relevancy, duplicate and exclusion determinations are not difficult, there should be very few instances where material is incorrectly withheld from the LSS. Quantities exceeding the threshold would represent a level of incorrect withholding that should be reported as non-compliance.</p>

**GROUP 1 -- COMMITMENTS WITH SPECIFIC PROCESSING STANDARDS
AND NON-COMPLIANCE REPORTING THRESHOLDS**

Commitment 1.C, continued

Compliance Assessment Method
During on-site audits, the LSSA will examine a representative sample of materials from the evaluation period that are deemed by an LSS participant to be either not relevant, duplicative, or excludable. Number of errors found in these categories will be summed and divided by the total number of units inspected in these categories.

GROUP 1 -- COMMITMENTS WITH SPECIFIC PROCESSING STANDARDS AND NON-COMPLIANCE REPORTING THRESHOLDS

1.D	<p>Commitment -- Accountability for Screened Materials</p> <p>All LSS participants will maintain an accurate audit trail of their document processing activities. This audit trail will identify the processing status of each unit of material at any point from the time it enters the LSS participant's relevancy screening process until it passes the LSSA's quality acceptance review. For all material screened and classified as not relevant to the LSS, the audit trail will include: a) a sufficient description of this material so that the material itself can be readily identified; and, b) documentation as to why it falls outside the Topical Guidelines. The audit trail will also account for the disposition of material screened as relevant, including material withheld from the LSS because it was deemed to be either duplicative or excludable. If, during an LSSA audit, any material is found to be missing or mis-designated as having been submitted to the LSS, the participant will perform a complete review of its audit trail documentation since the previous LSSA audit, identify all discrepancies, and when necessary, submit missing or mis-designated material to the LSSA in accordance with Commitment 1.F (Timely Submission/ Resubmission). The LSS participant reviews of audit trail documentation will be limited to the area containing discrepancies (missing and/or mis-designated).</p>
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Processing Standard
<p>Standard: Once material has been screened, no material should be missing or mis-designated.</p> <p>Rationale: Accurate accounting for units of LSS material by LSS participants is the only way the LSSA can have confidence that all material that is supposed to be entered into the LSS is actually being received for entry into the system. If material has entered an LSS participant's processing system, but cannot be accounted for within that system, it is missing. If material is mis-designated as having been submitted to the LSS when it was not, then it is also "missing" from the perspective of the LSS. Either situation threatens the integrity of the LSS as a discovery database.</p>

Non-Compliance Reporting Threshold
<p>Threshold: Non-compliance will be reported if there is a deviation from the standard of more than 0.1% of all materials screened during a six month evaluation period.</p> <p>Rationale: With the tremendous volumes of LSS material to track, some mistakes will be made even with the best procedures and training. However, anything greater than a 0.1% error rate for missing documents and 0.1% for mis-designated documents would indicate weak quality assurance and would delay significant amounts of material from being entered into the LSS in a timely manner. Quantities exceeding the threshold would represent sufficiently poor accounting to be reported as non-compliance.</p>

**GROUP 1 -- COMMITMENTS WITH SPECIFIC PROCESSING STANDARDS
AND NON-COMPLIANCE REPORTING THRESHOLDS**

Commitment 1.D, continued

Compliance Assessment Method
<p>The LSSA will conduct periodic on-site audits to examine the integrity of each LSS participant's audit trail within its document processing system. Any missing material will be found by tracking the disposition of a sampling of screened materials through the processing system to ensure that the units within the sample have been fully accounted for in one of four categories -- relevant, not relevant, duplicative, or excludable. In addition, any materials mis-designated as having been sent to the LSS will be found by comparing all units coded as sent to the LSS in the LSS participant's system with what should be corresponding data from the LSSA's QA Facility. The number of missing units in the four categories (above) will be aggregated and divided by the total number of units of material in the sample. The number of mis-designations will be divided by the total number of designations that should have been made during the evaluation period.</p>

GROUP 1 -- COMMITMENTS WITH SPECIFIC PROCESSING STANDARDS AND NON-COMPLIANCE REPORTING THRESHOLDS

1.E	Commitment -- Backlog Submission
	LSS participants will submit all their LSS material created prior to the availability of the LSS (for NRC and DOE) or the granting of LSS access (for all other participants) in accordance with LSSA guidance and their LSSA-approved Material Submission Plans. All backlog materials will be submitted 12 months prior to DOE's planned license application submission date. [§2.1003]

Processing Standard
<p>Standard: LSS participant's should submit all their backlog in accordance with their approved Material Submission Plans.</p> <p>Rationale: Backlog processing is a very large undertaking. By the time the LSS is available, it is estimated that there will be about 13 million pages of backlog, with most of it belonging to DOE. There are constraints on how much material can be indexed and loaded into the LSS, and reviewed for compliance with quality standards daily. If LSS participants, particularly DOE, do not closely adhere to their Material Submission Plans, the backlog might not be loaded six months before DOE's planned license application submission date, as required by the LSS Rule.</p>

Non-Compliance Reporting Threshold

Threshold: Non-compliance will be reported if a) the cumulative amount of backlog submitted by any LSS participant is behind its Material Submission Plan by more than:

<u>Variance</u>	<u>Years Before DOE's Planned License Submission Date</u>
20%	5.5
16%	5.0
12%	4.5
8%	4.0
4%	3.5
1%	each six-month period beginning 3 years and ending 1 year before planned license application submission date; and

b) if any LSS participant has not submitted all its backlog by the start of FY ____.

Rationale: Strict adherence to the standard is not necessary until the license application submission date is close. The Material Submission Plans are only estimates and deviations can be expected due to either estimate errors or a lack of experience early in the process or other factors which might affect production rates over time. However, backlog submission volumes falling below these thresholds have a potential impact on the ability to have all the backlog processed and loaded into the LSS six months before DOE submits its license application.

**GROUP 1 -- COMMITMENTS WITH SPECIFIC PROCESSING STANDARDS
AND NON-COMPLIANCE REPORTING THRESHOLDS**

Commitment 1.E. continued

Compliance Assessment Method
The LSSA will compare actual pages submitted to the LSS for each six month period, with each LSS participant's Material Submission Plan.

**GROUP 1 -- COMMITMENTS WITH SPECIFIC PROCESSING STANDARDS
AND NON-COMPLIANCE REPORTING THRESHOLDS**

1.F	Commitment -- Timely Submission/Resubmission
	Participants will submit all LSS documentary material created subsequent to the availability of the LSS (for NRC and DOE) or the granting of access (for all other participants), so it is available through the LSS in a timeframe "reasonably contemporaneous" with its creation or acquisition, and will do so in accordance with LSSA guidance. Participants will promptly correct and resubmit any substandard materials. Participants will promptly prepare and submit any materials which were found to be incorrectly/inadvertently excluded. [§2.1003 & §2.1004]

Processing Standard			
Standard:			
FOR ALL LSS PARTICIPANTS:			
Type of Submissions	Workdays*	Clock Starts	Clock Stops
Initial submission of "Contemporaneous" materials	10	Date of the cover or primary document for material generated by LSS participant. For materials acquired by LSS participant, the date of acquisition.	Date accepted by LSSA QA Facility.
Initial submission of any materials excluded incorrectly/inadvertently	10	Date submitter is made aware of such materials by LSSA	Date accepted by LSSA QA Facility.
Resubmission of any backlog materials rejected by LSSA QA Facility	10	Date participant notified of rejection by LSSA QA Facility	Date accepted by LSSA QA Facility.
* Not counting workdays in the LSSA QA Facility prior to acceptance.			

GROUP 1 -- COMMITMENTS WITH SPECIFIC PROCESSING STANDARDS AND NON-COMPLIANCE REPORTING THRESHOLDS

Commitment 1.F, continued

Processing Standard (Continued)			
Standard:			
ALL PARTICIPANTS:			
Type of Submissions	Workdays*	Clock Starts	Clock Stops
Resubmission of materials already in LSS found to be substandard by LSS participants or LSSA	10	Date submitter is made aware of such errors by LSSA	Date accepted by LSSA QA Facility.
FOR DOE ONLY:			
Type of Submissions	Workdays*	Clock Starts	Clock Stops
Initial submission of non-DOE materials converted to LSS standards	10	Date logged out to DOE at participant capture station	Date accepted by LSSA QA Facility.
* Not counting workdays in the LSSA QA Facility prior to acceptance.			
<p>[NOTE: This standard does not yet cover the timely submission of headers and images for adjudicatory filings during the hearing process. The standard for submission of these materials will be set later in coordination with ASLBP. This standard also does not cover the timely submission of Technical Investigation Package "segments". A standard for "segments" will be set later if the submission of "segments" becomes an LSS requirement. This standard also does not cover the timely submission of highest priority backlog materials. A standard for highest priority backlog submissions will be set later if priority loading becomes an LSS requirement.]</p> <p>Rationale: For the LSS to be cost-effective, it must be up-to-date and accurate. The "reasonably contemporaneous" requirement in the LSS Rule was established to ensure that LSS material is submitted promptly after it is created/acquired. Other categories of submissions/resubmissions, other than the initial submission of backlog materials which are covered under Commitment 1.E (Backlog Submission), should also be processed so that errors or omissions are corrected as soon as possible. There is no way to compute a "standard" time for processing and submitting material given the many variations in individual units (e.g., complexity of unitization/indexing and size/quality of images to be processed), individual processing operations/locations and other factors. Therefore, 10 working days is proposed as a readily achievable standard, in the belief that if the 10 day standard is met, LSS participants will be able to make full and effective use of the LSS.</p>			

GROUP 1 -- COMMITMENTS WITH SPECIFIC PROCESSING STANDARDS AND NON-COMPLIANCE REPORTING THRESHOLDS

Commitment 1.F, continued

Non-Compliance Reporting Threshold	
<p>Threshold: Non-compliance will be reported if too many of an LSS participant's submissions/resubmissions (addressed above) are not accepted by the LSSA's QA Facility within the 10 day standard. The following table defines the volume of material that can exceed the 10 day standard, and by how many days before non-compliance will be reported:</p>	
<u>Volume</u>	<u>Workdays* to acceptance</u>
up to 5%	11-20
up to 1%	21-30
0%	>30
<p>Rationale: Given the large volume of material to be processed, some material will encounter processing problems and some will have to be reworked due to substandard quality. These situations should not occur frequently if good quality assurance is performed within LSS participants' processing operations. The threshold of not greater than 30 days for any unit of LSS material is designed to prevent an LSS participant from withholding, for an extended time period, material they would prefer not disclosing to other LSS participants. Quantities exceeding these thresholds would indicate poor QA and delay a significant quantity of material from entering the LSS database on a timely basis and should be reported as non-compliance.</p>	
<p>* Not counting workdays in the LSSA QA Facility prior to acceptance.</p>	

Compliance Assessment Method
<p>The LSSA will calculate elapsed workdays using LSS header data (that will include the participant's audit trail data) and the LSSA QA Facility's quality review and acceptance data. "Clock start" and "clock stop" points are those enumerated in the above standard with all workdays that the material is in the LSSA's QA Facility prior to acceptance subtracted. Individual submissions and their processing times will be cumulated over the evaluation period, compared to standard and percentage deviations computed.</p>

GROUP 1 -- COMMITMENTS WITH SPECIFIC PROCESSING STANDARDS AND NON-COMPLIANCE REPORTING THRESHOLDS

1.G	Commitment -- Use of E-Mail
	<p>All parties to the high-level waste repository licensing proceeding shall transmit all their filings electronically to the PO, all other parties, the LSSA and SECY using the E-mail capability of the LSS. Note: This electronic filing does not negate LSS participants' responsibility to prepare and submit headers and images, as applicable, for these filings in accordance with LSSA guidance and to provide properly executed paper copies to SECY for docketing. [§2.1013]</p>

Processing Standard
<p>Standard: E-mail should be used for all filings.</p> <p>Rationale: The use of E-mail will help expedite the hearing.</p>

Non-Compliance Reporting Threshold
<p>Threshold: Non-compliance will be reported any time the PO concludes that a participant's non-use of E-mail has interfered with the conduct of an efficient licensing process.</p> <p>Rationale: If E-mail is not used in a particular instance, the PO can require refile using E-mail. If the process of refile does not cause any problems, there would be no purpose in reporting non-compliance. However, if the PO concludes that the licensing process is adversely affected in any way by the non-use of E-mail, then non-compliance should be reported.</p>

Compliance Assessment Method
<p>The PO will determine if the non-use of E-mail adversely impacts the licensing process and so notify the LSSA.</p>

GROUP 1 -- COMMITMENTS WITH SPECIFIC PROCESSING STANDARDS AND NON-COMPLIANCE REPORTING THRESHOLDS

1.H	Commitment -- Hearing Exhibits All parties to the HLW repository licensing proceeding, absent good cause, will make timely submission of all exhibits to be tendered during a hearing, so that they may be entered into the LSS before the commencement of that portion of the hearing in which the exhibit will be offered. [§2.1013]
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Processing Standard
<p>Standard: All exhibits must be received by LSSA at least 7 workdays prior to the date of the hearing for which they are being tendered.</p> <p>Rationale: LSSA has estimated that LSS participants should have a minimum of 5 workdays to analyze exhibits before any hearing and LSSA will need 2 workdays to process these exhibits and ensure that they are correctly entered/identified in the LSS.</p>

Non-Compliance Reporting Threshold
<p>Threshold: Non-compliance will be reported if there is any deviation from the standard, unless the PO has determined there was good cause for a particular exhibit being late.</p> <p>Rationale: Since the standard is set at the very minimum and since there may be "good cause" exceptions allowed by the PO, no deviation is considered appropriate.</p>

Compliance Assessment Method
LSSA will compare the LSSA QA Facility exhibit log-in date with the start date of that portion of the hearing for which the exhibit(s) are being tendered. If the log-in date is not seven workdays prior to the hearing date, the LSSA will contact the PO for a "good cause" ruling.

GROUP 1 -- COMMITMENTS WITH SPECIFIC PROCESSING STANDARDS AND NON-COMPLIANCE REPORTING THRESHOLDS

1.I	Commitment -- Good Faith Discovery
	All LSS participants will comply with the scope and intent of the LSS Rule (10 CFR Part 2, Subpart J, §2.1000 and §2.1003) to provide for document discovery in the HLW repository licensing proceeding.

Processing Standard
<p>Standard: There should be no instances where an LSS participant has willfully withheld or altered LSS documentary materials, has willfully provided inaccurate header data about its materials, or has willfully altered any LSS records for the purpose of denying or delaying access to relevant LSS documentary materials.</p> <p>Rationale: Having relevant documentary material withheld from the LSS or having erroneous material in the LSS would seriously undermine the integrity of the system as a discovery database.</p>

Non-Compliance Reporting Threshold
<p>Threshold: Non-compliance will be reported if there is any deviation from the standard.</p> <p>Rationale: Any willful acts to thwart the effective use of the LSS as a discovery database are sufficiently serious to be reported as non-compliance.</p>

Compliance Assessment Method
If, through any means, the LSSA becomes aware of an apparent willful act to thwart the use of the LSS as an effective discovery database, an investigation will be conducted by an appropriate authority.

GROUP 2 -- COMMITMENTS WITH SPECIFIC PROCESSING STANDARD AND REJECTION/RESUBMISSION THRESHOLDS

2.A	Commitment -- Unitization
	All LSS participants will unitize their LSS material in accordance with LSSA guidance.

Processing Standard
<p>Standard: All material in the LSS should be properly unitized.</p> <p>Rationale: If LSS material is not properly unitized by the submitter, significant access points provided within the LSS header records will be lost to searchers, e.g., document types, authors and dates. LSS users would not find or learn about the existence of improperly unitized material when looking for them using these access points.</p>

Rejection/Resubmission Threshold
<p>Threshold: Material will be rejected if there is any deviation from the standard.</p> <p>Rationale: The concept of unitization is a very important design feature of the LSS. Having any units "hidden" within others would create too much doubt about the completeness of search results. Moreover, incorrect unitization may mean a completely new header is required, which is an LSS participant's responsibility.</p>

Compliance Assessment Method
<p>The LSSA will examine submitted units at its QA Facility. Those that are incorrectly unitized will be rejected and the submitter will be required to correct unitization problems and resubmit the unit(s). Batches of submissions will be examined first on a sample basis. If any units within the sample are incorrectly unitized, the entire batch will be rejected and the participant will be required to review the entire batch, correct unitization problems throughout the batch and resubmit the batch.</p>

GROUP 2 -- COMMITMENTS WITH SPECIFIC PROCESSING STANDARD AND REJECTION/RESUBMISSION THRESHOLDS

2.B	<p>Commitment -- Header Preparation</p> <p>All LSS participants will compose header fields for each unit of LSS material, including privileged material and any material not suitable for entry into the LSS in accordance with LSSA guidance. Non-DOE LSS participants are only required to prepare bibliographic fields, but may do more, and are not required to submit their LSS material electronically, but they may opt to do so. DOE must prepare a full electronic header for its LSS material. DOE must also augment the headers of non-DOE participants forwarded from the participants and ensure that these headers are converted into the proper electronic format. Whenever LSS material that is not suitable for entry into the LSS is transferred to a new media, a new header will be prepared and submitted to the LSS. [§2.1003]</p>
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Processing Standard

Standard: All header fields should be correct and complete and all electronic links between header records, digital images or ASCII text should be present and correct.

Rationale: Coding and linkage errors can either prevent users from finding material when searching headers or prevent them from viewing material after locating it through a header search.

Rejection/Resubmission Threshold

Threshold: If any errors are found in headers during LSSA QA review, the associated unit(s) could be rejected. If rejected, the participant would be required to correct the errors and resubmit the complete header(s). However, the LSSA believes that it is most efficient/effective for LSSA to correct errors within the QA Facility if the participant's error rate is low. If the level of errors found by sampling submissions is considered to be too high for rework within the QA Facility, the LSSA will reject either individual units or entire batches and require the participant to review, correct and resubmit the headers. The LSSA will maintain performance data in this area and an LSS participant's track record will be taken into account when deciding whether to require the rework and resubmission of headers containing errors. Individual errors and cumulative error statistics will be reviewed with LSS participants so that they are cognizant of their performance and, therefore, the requirement for resubmission will not come as a surprise.

Rationale: Setting standards and computing error rates in this area would be complicated and burdensome. There are many fields/linkages involved, different fields vary widely in importance and some of the indexing is subjective, thereby precluding a clean "correct/incorrect" determination. Also, requiring resubmission for a few minor errors is more costly and time consuming than if they were simply fixed in LSSA's QA Facility. Any corrections needed will be coordinated with submitters before they are made and submitters will be notified of the corrections made.

GROUP 2 -- COMMITMENTS WITH SPECIFIC PROCESSING STANDARD AND REJECTION/RESUBMISSION THRESHOLDS

Commitment 2.B, continued

Compliance Assessment Method
<p><u>Format</u> -- DOE will perform an automated validation of each submitted header.</p> <p><u>Critical Access Points</u> -- The LSSA QA Facility will examine each critical field for all submitted headers. Also, during periodic on-site audits, the LSSA will check the accuracy of critical header field entries for those materials that are referenced in LSS by header only, such as privileged or non-imageable materials, by comparing a sample of these materials against the header entries.</p> <p><u>Non-critical Header Fields and Linkages</u> -- The LSSA QA Facility will examine header fields within representative samples drawn from batches of participant-processed material that has been loaded to the LSS.</p>

GROUP 2 -- COMMITMENTS WITH SPECIFIC PROCESSING STANDARD
AND REJECTION/RESUBMISSION THRESHOLDS

2.C	Commitment -- Image Preparation All LSS participants will prepare and submit legible (or best available) images of their LSS material for entry into the LSS in accordance with LSSA guidance. Non-DOE participants may submit a paper copy of their LSS material, but DOE must prepare a properly formatted digital image for all LSS material processed through its information management system. [§2.1003]
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Processing Standard
<p>Standard: Format (example only) -- Digital images must have 300 DPI resolution, be submitted on 5.25 inch WORM disks using CCITT Group IV compression. Legibility -- all submitted images must be complete, readable representations of the originals, unless marked "best available copy".</p> <p>Rationale: If there are an unacceptable number of submitted images that do not meet legibility and/or digital image format standards prescribed by the LSSA, LSS users would either retrieve on-line images that could not be interpreted or the LSSA would encounter difficulties in loading the LSS database.</p>

Rejection/Resubmission Threshold
<p>Threshold: Images will be rejected if there is any deviation from the digital image format standards or if there is a deviation from the legibility standard of more than 1% of the images in an individual unit or a sample drawn from a batch of participant-submitted material loaded to the LSS.</p> <p>Rationale: Format problems are simple to avoid and should rarely, if ever, occur. It would be very costly to have every image meet the established legibility standard. Accepting no more than 1% substandard images is a reasonable standard. Pages in the LSS with substandard images that cause problems for LSS users will be corrected to standard, where possible.</p>

Compliance Assessment Method
<p>At its QA Facility, the LSSA will perform an automated validation of digital image formats. LSSA will also examine representative samples of digital images drawn from batches of participant-processed material that has been loaded to the LSS.</p>

GROUP 2 -- COMMITMENTS WITH SPECIFIC PROCESSING STANDARD
AND REJECTION/RESUBMISSION THRESHOLDS

2.D	Commitment -- ASCII Text Preparation
	DOE will produce ASCII text for the textual portion of nearly all LSS material (privileged material and some text imbedded in graphics will not be converted to ASCII text) in accordance with LSSA guidance. [§2.1003]

Processing Standard
<p>Standard: The ASCII text for each page of submitted LSS material should have no more than two errors per thousand convertible characters (99.8% accurate) when compared to the text in the corresponding digital image.</p> <p>Rationale: If there are an unacceptable number of wrong or missing ASCII characters in the processed text, then LSS users could miss some material when performing word searches against the ASCII and thereby call into question the integrity/usefulness of the LSS. Also, errors could impact a user's ability to navigate through text and from text to images.</p>

Rejection/Resubmission Threshold
<p>Threshold: ASCII will be rejected if more than 1% of the sampled pages either do not meet the standard or do not conform to LSSA's text conversion/format guidance, e.g., conversion of figure titles, insertion of "see image" flags, etc.</p> <p>Rationale: Given the tremendous volume of LSS material to be processed and the relatively high cost of editing converted ASCII to a high standard, it would be very costly to require that every page of ASCII meets the established standard. LSSA proposes to accept units/batches of material that have no more than 1% substandard pages. However, no page will be accepted if the text accuracy is below 90%. Pages in the LSS with substandard ASCII that cause problems for LSS users will be corrected to standard.</p>

Compliance Assessment Method
Text characters from representative samples drawn from batches of material loaded to the LSS will be compared to the corresponding digital image characters at the LSSA QA Facility.

GROUP 2 -- COMMITMENTS WITH SPECIFIC PROCESSING STANDARD AND REJECTION/RESUBMISSION THRESHOLDS

2.E	Commitment -- Technical Investigation Packages (Raw Data) Preparation All LSS participants will assemble and prepare their LSS documentary material qualifying as Technical Investigation Packages in accordance with LSSA guidance. If necessary, DOE will "electronically assemble" Technical Investigation Packages within the LSS in accordance with LSSA guidance. [§2.1003]
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Processing Standard
<p>Standard: <u>All participants</u> -- all packages should have a proper Table of Contents and otherwise conform to LSSA guidance; <u>DOE only</u> -- any required electronic links from the package components to the Table of Contents should be present and correct.</p> <p>Rationale: If the material supporting a technical investigation is not properly submitted as a "package", then LSS users will be unable to identify and/or examine all material supporting a particular investigation.</p>

Rejection/Resubmission Threshold
<p>Threshold: Technical Investigation Packages will be rejected if there is any deviation from the standard.</p> <p>Rationale: Tables of Contents and linkages are critical LSS features that permit effective use of the system. Package components that cannot be located or associated with a specific investigation would raise questions about the integrity of the LSS database.</p>

Compliance Assessment Method
The LSSA will examine all individual Technical Data Package submissions that have been loaded to the LSS at its QA Facility.

GROUP 2 -- COMMITMENTS WITH SPECIFIC PROCESSING STANDARD AND REJECTION/RESUBMISSION THRESHOLDS

2.F	Commitment -- Amendments After Verification Period
	After the verification period in Commitment 3.M has expired, all LSS participants needing to amend a submission due to missing or incorrect pages will submit a complete new header and corrected images to the LSSA in accordance with Commitments 1.F, 2.B and 2.C. [§2.1004]

Processing Standard
<p>Standard: Same as for Commitments 1.F, 2.B and 2.C.</p> <p>Rationale: If errors found by participants are not corrected and resubmitted in a proper and timely manner, users may either be relying on incorrect material or be unable to locate or know of the existence of certain material. Without the timely submission of new updated headers with the correct pages, LSS users will not be aware of the changes and updates to the LSS database. This will lead to a degradation in user confidence of the usefulness of the LSS as a discovery database.</p>

Rejection/Resubmission Threshold
<p>Threshold: Same as for Commitments 1.F, 2.B and 2.C.</p> <p>Rationale: Same as for Commitments 1.F, 2.B and 2.C.</p>

Compliance Assessment Method
See Compliance Assessment Methods for Commitments 1.F, 2.B and 2.C.

GROUP 3 -- COMMITMENTS WITHOUT SPECIFIC PROCESSING STANDARDS AND COMPLIANCE THRESHOLDS

3.A	Commitment -- Designated LSS Official
	All potential LSS participants will identify a DLO who will be responsible for the administration of their LSS responsibilities in accordance with LSSA guidance. [§2.1009]

3.B	Commitment -- Petitions for Access
	All potential LSS participants will petition the PAPO for access to the LSS in accordance with the LSS Rule and LSSA guidance. [§2.1008]

3.C	Commitment -- Compliance Program Plan
	As a condition for gaining access to the LSS, all potential LSS participants will develop and submit to the LSSA for review and approval a Compliance Program Plan in accordance with LSSA guidance.

3.D	Commitment -- Complying with Orders
	All LSS participants will comply with orders of either the PAPO, the PO, or the Commission as a condition to retaining access to the LSS. [§2.1012]

3.E	Commitment -- Cooperation with Advisory Review Process
	All LSS participants will cooperate with the advisory review process. [§2.1009]

3.F	Commitment -- LSS Audits
	LSS participants will cooperate with LSSA's audits of their document processing activities and agree to LSSA observation of any audits the LSS participant may conduct.

GROUP 3 -- COMMITMENTS WITHOUT SPECIFIC PROCESSING STANDARDS AND COMPLIANCE THRESHOLDS

3.G	Commitment -- Access to Material Not Suitable for Entry
	All LSS participants will provide access to their non-privileged LSS documentary material that is not suitable for entry into the LSS in accordance with required LSS access protocols or through entry upon land for inspection or for other purposes pursuant to §2.1020. [§2.1003]
3.H	Commitment -- DLO Certifications
	DLOs will accurately certify compliance with all LSS commitments every six months in accordance with LSSA guidance and on a schedule specified by the LSSA. [§2.1009]
3.I	Commitment -- Participants' Written Procedures
	All LSS participants will establish written procedures to implement their responsibilities under the LSS Rule. [§2.1009]
3.J	Commitment -- Participants' Training
	All LSS participants will provide adequate training for their staff and their contractors' staff producing and/or processing LSS material. [§2.1009] Participants and their contractors who will use the LSS must receive LSSA-required training before using the system.
3.K	Commitment -- Reporting Requirements
	All LSS participants will submit to the LSSA: a) complete and accurate periodic reports/data pertaining to their document processing plans and activities in accordance with LSSA guidance; and, b) paper copies of any screened documentary material needed by LSSA for either quality assurance or other verification purposes. Participants will issue, to other LSS participant organizations and to the LSSA, periodic listings of all documents screened out of the universe as not relevant. These listings shall include supporting rationale as reflected in their audit trail documentation, (see Commitment 1.D -- Accountability for Screened Material).

**GROUP 3 -- COMMITMENTS WITHOUT SPECIFIC PROCESSING
STANDARDS AND COMPLIANCE THRESHOLDS**

3.L	Commitment -- Duplicate Elimination
	All LSS participants will make a reasonable effort to minimize the submission of duplicates of their LSS material previously submitted to the LSS. DOE, through the LSS, will also identify duplicates that will occur within and among various LSS participants' submissions.
3.M	Commitment -- Amendments Within Verification Period
	Within the LSS Rule's prescribed verification periods, all LSS participants will make a reasonable effort (as specified in the LSSA guidance) to verify the accuracy of their LSS documentary material entered into the LSS and notify LSSA of any errors. [§2.1004]
3.N	Commitment -- Contractor Compliance with LSS Rule
	All LSS participants will ensure that their contractors, consultants, grantees, or other agents, comply with the applicable requirements of the LSS Rule and derivative LSSA guidance.
3.O	Commitment -- LSS Access Privileges
	No LSS participant will abuse its LSS access privileges in ways that purposefully interfere with the ability of other users to have full and ready access to the LSS database or otherwise purposefully place unnecessary burden on the system.
3.P	Commitment -- Participants' Costs
	All LSS participants will pay for their own LSS computer facilities, to include workstations (hardware and software) and any local area networks. Participants will also pay for the telephone connect charges they incur to access the LSS database. Participants will also pay for paper copies ordered on line through the LSS, unless a fee waiver for the paper copies has been approved by the LSSA. [§2.1007]

**GROUP 3 -- COMMITMENTS WITHOUT SPECIFIC PROCESSING
STANDARDS AND COMPLIANCE THRESHOLDS**

3.Q	Commitment -- FOIA Responsibilities
	Federal Government LSS participants will respond to any FOIA requests for the LSS documentary material they have submitted to the LSS. [§2.1007]

3.R	Commitment -- Public Access Terminals
	NRC and DOE will provide terminals for public access to the LSS. [§2.1007]

**GROUP 4 -- DOE COMMITMENTS REGARDING DESIGN, DEVELOPMENT,
OPERATION, AND MAINTENANCE OF THE LSS**

BUDGET

4.A	Commitment -- Fund System-related LSS Activities
	DOE will fund all expenses related to the design, development, operation, and maintenance of the LSS. DOE will report to the LSSA any information that comes to DOE's attention, at the time it comes to DOE's attention, regarding potential losses of or reductions in funding for system-related LSS activities. DOE will maintain a budget that specifically identifies tasks, man hours, time frames and sources of funding for all system-related LSS activities funded by DOE.

ADMINISTRATIVE

4.B	Commitment -- Database Administration
	DOE will be responsible for administering the LSS.

4.B.1	Commitment -- Maintain Schedule for System-related LSS Activities
	DOE will develop and maintain a schedule showing specific tasks and deadlines for activities relating to the design, development, installation, loading, operation and maintenance of the LSS, and for the capture of LSS materials. DOE will obtain LSSA input.

4.B.2	Commitment -- Performance Data
	As part of its operation of the LSS, DOE will collect and maintain performance data on LSS operations. Performance data will include response time for system operation, and throughput on data capture, ASCII and image creation. DOE will collect performance data at the LSS location and at the remote capture stations.

4.B.3	Commitment -- LSSA Information
	DOE will provide to the LSSA information that LSSA requires in its oversight of LSS operations and maintenance and in its compliance determination and reporting activities. DOE will cooperate fully with LSSA's compliance-related activities.

**GROUP 4 -- DOE COMMITMENTS REGARDING DESIGN, DEVELOPMENT,
OPERATION, AND MAINTENANCE OF THE LSS**

4.B.4	Commitment -- Contractor Management
	DOE will ensure that all contractors, consultants, grantees, or other agents of DOE, are aware of and agree to honor DOE's commitments, and its agreement that the LSSA will act as Contracting Officer Technical Representative for all LSS-related activities under appropriate DOE contracts.

LSS REQUIREMENTS

4.C.1	Commitment -- LSS System Requirements
	<p>DOE will develop system requirements for the LSS with input from the LSSARP and concurrence of the LSSA. These will include requirements for:</p> <ul style="list-style-type: none">- hardware capabilities, capacity and performance- software functionality- scalability- user interface- searching and reporting- communication/access- system security- system documentation

**GROUP 4 -- DOE COMMITMENTS REGARDING DESIGN, DEVELOPMENT,
OPERATION, AND MAINTENANCE OF THE LSS**

4.C.2	Commitment -- Facilities Requirements
	<p>DOE will develop facilities requirements for LSS-related operations, including:</p> <ul style="list-style-type: none">- facility size(s) and location(s)- workflow requirements- office space (including space for administrative activities and training)- equipment installation requirements (cabling, plumbing, platforms, etc.)- equipment operation requirements (including floor space, HVAC)- equipment power requirements (including surge protection)- physical storage (on- and off-site)- safety, physical security and site protection- human factors, ergonomics, lighting, decoration <p>DOE will develop facilities requirements with input from the LSSARP and concurrence of the LSSA.</p>

**GROUP 4 -- DOE COMMITMENTS REGARDING DESIGN, DEVELOPMENT,
OPERATION, AND MAINTENANCE OF THE LSS**

4.C.3	Commitment -- Requirements for Operation and Maintenance of the LSS
	<p>DOE will develop requirements for operation and maintenance of the LSS with input from the LSSARP and concurrence of the LSSA. Maintenance requirements will include:</p> <ul style="list-style-type: none"> - hardware maintenance - software maintenance - telecommunications maintenance - upgrades to hardware, software and other equipment - maintenance of facilities for LSS-related activities (including off-site storage) <p>Operation requirements will include specifications for :</p> <ul style="list-style-type: none"> - document processing - authority file maintenance - submitter verification and change processing - system testing - technical support services - configuration management - facility management - documentation - internal controls - E-mail submission and adjudicatory document handling

**GROUP 4 -- DOE COMMITMENTS REGARDING DESIGN, DEVELOPMENT,
OPERATION, AND MAINTENANCE OF THE LSS**

4.C.4	Commitment -- QA Facility Processing Requirements
	<p>DOE will consult with the LSSA regarding the requirements of the QA Facility for:</p> <ul style="list-style-type: none"> - access to the LSS - segregating incoming submissions for QA review - segregating failed and reworked submissions - validating submitted data - detecting and correcting errors <p>DOE will consider QA facility requirements in its design and implementation of the LSS.</p>

4.C.5	Commitment -- Requirements for Document Capture at the Capture Stations
	<p>DOE will consult with the LSSA regarding the requirements for document capture at the remote capture stations. DOE will consider capture station requirements in its design and implementation of the LSS.</p>

LSS PLANNING AND DESIGN

4.D	Commitment -- LSS Design
	<p>DOE will design and develop the LSS with input from the LSSARP and concurrence of the LSSA. Design will include hardware and software selection and development, sizing system storage capabilities (on- and off-line) and security. DOE will actively involve LSSA and the LSSARP in the design of the LSS.</p>

**GROUP 4 -- DOE COMMITMENTS REGARDING DESIGN, DEVELOPMENT,
OPERATION, AND MAINTENANCE OF THE LSS**

4.D.1	Commitment -- System Configuration
	<p>DOE will develop and maintain a system configuration that includes:</p> <ul style="list-style-type: none"> - LSS operation and maintenance - capture stations interface - QA Facility interface <p>DOE will manage the system configuration according to the requirements set forth in the requirements documents, and changes to the requirements, where applicable.</p>
4.D.2	Commitment -- Telecommunications Design
	<p>DOE will design sufficient telecommunications facilities to enable LSS access by multiple capture stations, search stations, and the QA Facility. DOE will involve LSSA in its telecommunications planning.</p>
4.D.3	Commitment -- Facilities Design
	<p>DOE will design facilities according to facilities requirements. DOE will involve LSSA in this process.</p>
4.D.4	Commitment -- Develop Operations and Maintenance Plan
	<p>DOE will develop a strategy and plan for operation and maintenance of the LSS in accordance with the requirements. The plan will include accommodation of planned growth in the LSS and planned upgrades of hardware, software and other equipment.</p>
4.D.5	Commitment -- Develop Contingency Plan
	<p>DOE will develop a contingency plan for LSS operation and maintenance. The contingency plan will take into account system performance requirements and document capture and loading schedules. It will include archive, backup and disaster recovery provisions.</p>

**GROUP 4 -- DOE COMMITMENTS REGARDING DESIGN, DEVELOPMENT,
OPERATION, AND MAINTENANCE OF THE LSS**

LSS IMPLEMENTATION

4.E.1	Commitment -- System Test Plan
	DOE will develop a system test plan to test the operation and performance of the LSS, the operation of the capture stations, and the QA Facility hook-up. The test plan will address all system, operations and maintenance requirements.
4.E.2	Commitment -- Acquisition
	DOE will acquire/develop/install the hardware, software, facilities and systems necessary to load and operate the LSS as a separate capability within DOC MNMGT SYSTEM , and provide access to the capture stations, search stations, and QA Facility, according to its commitments.
4.E.3	Commitment -- Install and Test Pilot System
	Prior to installing the LSS, DOE will create a pilot system with all of the functionality of the LSS. DOE will install the pilot system, and load it with a sample of documentary materials identified from DOE's backlog. The sample must consist of at least 200,000 pages. DOE will test the pilot system against the system test plan, and make changes necessary to pass in all categories.
4.E.4	Commitment -- Install LSS
	DOE will install the LSS as a capability within DOC MNMGT SYSTEM .
4.E.5	Commitment -- Install Capture Stations
	DOE will install a separate capture station at each agreed-upon participant location.

**GROUP 4 -- DOE COMMITMENTS REGARDING DESIGN, DEVELOPMENT,
OPERATION, AND MAINTENANCE OF THE LSS**

4.E.6	Commitment -- Install QA Facility Hook-up
	DOE will install the QA Facility hook-up.

4.E.7	Commitment -- Test and Accept LSS
	DOE will test the LSS, capture stations and QA Facility hook-up against the system test plan, and make changes necessary to pass in all categories.

LSS OPERATIONS

4.F	Commitment -- Operate the LSS
	DOE will operate the LSS according to all requirements developed by or with the concurrence of the LSSA. DOE will plan adequate resources to assure that the LSS is operational at all times, and that system failures are corrected within four hours of their occurrence.

4.F.1	Commitment -- ASCII Text and Linkages
	DOE will create ASCII text and linkages (between images, headers and ASCII) for all submissions. ASCII text will be created for the textual portion of all images that are submitted.

4.F.2	Commitment -- Technical Investigation Packages
	DOE will provide the facility to "electronically assemble" Technical Investigation Packages.

4.F.3	Commitment -- Amendments and Additions
	DOE will provide the facility for participants to submit amendments and/or corrections to previously submitted materials (as required during and after the verification process).

4.F.4	Commitment -- Duplicates
	DOE will provide duplicate checking of submissions.

**GROUP 4 -- DOE COMMITMENTS REGARDING DESIGN, DEVELOPMENT,
OPERATION, AND MAINTENANCE OF THE LSS**

4.F.5	Commitment -- Automated Validation
	DOE will electronically validate submissions. DOE will involve LSSA in determining validation protocols.
4.F.6	Commitment -- Thesaurus and Authority Files
	DOE will develop and maintain header coding requirements, thesaurus and authority files with input from LSSA as to authority file content.
4.F.7	Commitment -- Change Control
	DOE will have procedures in place for change control.
4.F.8	Commitment -- Public Access Terminals
	DOE will provide terminals for public access to the LSS.
4.F.9	Commitment -- Maintain LSS Access Criteria
	DOE will maintain access criteria (based on requirements for obtaining access which are set by the LSSA) and grant or deny access based on the access criteria.

**GROUP 4 -- DOE COMMITMENTS REGARDING DESIGN, DEVELOPMENT,
OPERATION, AND MAINTENANCE OF THE LSS**

LSS MAINTENANCE

4.G	Commitment -- Maintain LSS
	DOE will maintain the LSS in good operating condition, including access ports into the LSS. DOE will plan adequate resources to accommodate growth and assure that the LSS is operational at all times, and that equipment failures are routinely corrected within four hours of their occurrence.
4.G.1	Commitment -- Maintain the Capture Stations
	DOE will maintain the capture stations. DOE will plan adequate resources to assure that the capture stations are operational at all times, and that equipment failures are routinely corrected within four hours of their occurrence.
4.G.2	Commitment -- Maintain QA Facility Hook-up
	DOE will maintain the QA Facility hook-up. DOE will plan adequate resources to assure that the QA Facility has continuous and sufficient access for its operations, and that equipment failures are routinely corrected within four hours of their occurrence.
4.G.3	Commitment -- Telecommunications
	DOE will maintain adequate telecommunications facilities to accommodate access to the LSS by the capture stations, search stations, and by the LSSA QA Facility.
4.G.4	Commitment -- Maintain Security of the LSS
	DOE will assign user password security codes and otherwise maintain the security of the LSS according to the security requirements established by the LSSA.

**GROUP 4 -- DOE COMMITMENTS REGARDING DESIGN, DEVELOPMENT,
OPERATION, AND MAINTENANCE OF THE LSS**

4.G.5	Commitment -- Maintain System Performance
	DOE will maintain the system to meet performance specifications. Should performance fall below the required levels, DOE will provide enhancements to the system to meet performance requirements.

4.G.6	Commitment -- System Support
	DOE will maintain sufficient system support staff and replacement equipment to assure continuous operation of the LSS and capture stations.

4.G.7	Commitment -- Maintain Storage Capacity
	DOE will provide sufficient on and off-line storage capacity to meet the LSS system requirements.

4.G.8	Commitment -- Backup
	DOE will develop and implement procedures to assure that off-site backups of the LSS are available in case of disaster. Backups will include current data, through close of business of the prior day.

TRAINING AND ASSISTANCE

4.H.1	Commitment -- Guidance in LSS Access and Technical Operation
	DOE will develop and maintain guidance for new participants in areas relating to LSS access and technical operation.

**GROUP 4 -- DOE COMMITMENTS REGARDING DESIGN, DEVELOPMENT,
OPERATION, AND MAINTENANCE OF THE LSS**

4.H.2	<p>Commitment -- Provide Database Searcher Training</p> <p>DOE will develop a training program for LSS searcher training, according to requirements established by the LSSA. DOE will provide training in:</p> <ul style="list-style-type: none"> - header field structure - gaining LSS access through the capture station - document capture using the capture station - use of the search program and search terms - use of help features - comparison access to thesaurus and authority files
4.H.3	<p>Commitment -- Submitter Technical Assistance</p> <p>DOE will develop a submitter technical assistance program and provide submitter technical assistance in:</p> <ul style="list-style-type: none"> - indexing and cataloging - header record database access - authority file maintenance - ASCII and image file creation and maintenance
4.H.4	<p>Commitment -- Database Searcher Technical Support</p> <p>DOE will develop a program to provide technical assistance to database searchers. DOE will provide technical assistance including:</p> <ul style="list-style-type: none"> - on-line help - telephone response to system or program failure

**GROUP 4 -- DOE COMMITMENTS REGARDING DESIGN, DEVELOPMENT,
OPERATION, AND MAINTENANCE OF THE LSS**

USE OF LSS DURING ADJUDICATORY HEARING

4.I.1	Commitment -- Courtroom Access
	DOE will make the LSS available to all parties to the adjudicatory proceeding, including the Pre-License Application Licensing Board and NRC.
4.I.2	Commitment -- E-Mail
	DOE will enable the capture stations and other LSS terminal locations with E-Mail capabilities sufficient to comply with Section 2.1013 of the Rule.

7500

NUCLEAR REGULATORY COMMISSION
Licensing Support System
Advisory Review Panel

AGENCY: Nuclear Regulatory Commission.

ACTION: Notice of Public Meeting.

SUMMARY: The Licensing Support System Advisory Review Panel (LSSARP) will hold its next meeting on March 22 and 23, 1995, at the Department of Energy's Yucca Mountain Site Characterization Project Office, Room 450, Bank of America Building, 101 Convention Center Drive, Las Vegas, Nevada. The entire meeting will be open to the public pursuant to the Federal Advisory Committee Act (Pub. L. 94-463, 86 Stat. 770-776).

AGENDA: The meeting will be held from 1:00 p.m. to 5:00 p.m. on Wednesday, March 22 and from 9:00 a.m. to 4:30 p.m. on Thursday, March 23, 1995. The agenda will consist of briefings and discussions on the following topics:

1. Header Working Group Update
2. Technical Working Group Report on Review of LSS Requirements Document
3. Current LSS Activity at DOE
4. Inclusion/Exclusion Criteria for DOE's Records Management System

5. Location of the LSS Facility
6. Topic Selection for Use of LSS on Pilot Project Basis
7. Progress Toward Development of an NRC/DOE Memorandum of Agreement
8. Comments Received on Draft Participant Compliance Document
9. Future Meeting Schedule

SUPPLEMENTARY INFORMATION: The Nuclear Regulatory Commission (NRC) established the LSSARP in 1989 to provide advice and recommendations to the NRC and to the Department of Energy (DOE) on topics, issues, and activities related to the design, development and operation of an electronic information management system known as the Licensing Support System (LSS). This system will contain information relevant to the Commission's future licensing proceeding for a geologic repository for the disposal of high-level radioactive waste. Membership on the Panel consists of representatives of the State of Nevada, Nye County, Nevada, a coalition of effected units of local Government in Nevada, the National Congress of American Indians, a coalition of organizations representing the nuclear industry, DOE, NRC and other agencies of the Federal government which have experience with large electronic information management systems.

FOR FURTHER INFORMATION CONTACT: John C. Hoyle, Office of the Secretary, U.S. Nuclear Regulatory Commission, Washington, DC 20555: telephone 301-415-1969.

PUBLIC PARTICIPATION: Interested persons may make oral presentations to the Panel or file written statements. Requests for oral presentations should be made to the contact person listed below as far in advance as practicable so that appropriate arrangements can be made.

Dated: February 27, 1995

Andrew L. Bates
Andrew L. Bates
Advisory Committee Management
Officer