

LSSA GUIDANCE ON THE FORMAT AND CONTENT
OF LSS PARTICIPANT COMPLIANCE PROGRAM PLANS

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I. INTRODUCTION TO THE LSSA GUIDANCE

A. Background

The Licensing Support System (LSS) will contain the documentary material of all participants, including DOE and NRC, in connection with DOE's application to build a high-level radioactive waste (HLW) repository. It is currently estimated that DOE will submit an application for construction during Fiscal Year 2001. Document discovery for all parties will be accomplished, by agreement of the parties, through access to the LSS. The LSS will allow electronic transmission of filings by the parties during the proceeding, and on-line access to orders and decisions of the Commission and its adjudicatory boards related to the proceeding.

By the time that DOE's license application is submitted, it has been estimated that there will be between 16 and 20 million pages of documentary material in the LSS, submitted by at least seven participants. In order to ensure the integrity of the LSS, the Licensing Support System Administrator (LSSA) has the responsibility to oversee the compliance of all "parties and potential parties" (participants in the HLW licensing proceeding) with the LSS Rule (10 CFR Part 2, Subpart J). The LSSA has the further responsibility to promulgate guidance to assist participants. The LSSA requires the development and submission of an LSS Compliance Program Plan (compliance plan) by each applicant for access to the LSS. Each compliance plan is subject to LSSA review and approval. The compliance plan should demonstrate an applicant's intent and commitment to comply with LSSA guidance and the LSS Rule.

B. Purpose

The primary purpose of this document is to indicate to the applicant the proposed format and data content of the information the applicant is expected to provide to the LSSA in its compliance plan. Use of this format will help ensure that the compliance plan is complete and accurate, and includes all of the elements that are considered by the LSSA in evaluating applicant commitment and ability to comply with the LSS Rule and LSSA guidance. It will facilitate both the development of a compliance plan by each applicant and effective LSSA review of those plans.

The LSSA has developed this document to aid applicants in developing acceptable compliance plans. In that regard it is intended to:

- Provide assistance to applicants in formulating their program approaches in a manner that maintains compliance with the Rule;

- Give the applicants guidelines on the types of data required for inclusion in their plans, and an acceptable format for reporting information;
- Specify the data needed by the LSSA to evaluate each participant's intent and capability to comply with the LSS Rule and LSSA guidance.

C. Uses of the Compliance Plan

The objective of the compliance plan is to:

- Provide the LSSA a reasonable level of assurance that the applicant understands its responsibilities/activities required under the LSS Rule;
- Establish a baseline for LSSA on-site audits of participants;
- Provide data needed by the LSSA for overseeing the LSS program.

The LSSA will evaluate an applicant's proposed operations as indicated by its compliance plan. LSSA "nonapproval" of a compliance plan will require remedial action. A "nonapproved" plan would indicate to the LSSA that the applicant could experience difficulty in achieving compliance.

D. Revisions to Compliance Plans

When changes occur (e.g., the participant discovers an unreported document repository or its authorized LSS program representatives are reassigned), participants must revise their compliance plans as necessary and submit substitute pages with revised areas highlighted. Revised or additional compliance plan pages must show the date of the change(s). Additionally, the applicant must be responsive to LSSA comments on its submitted compliance plan as part of the LSSA's review and approval responsibility.

E. *LSS Participant Compliance Program Plan Certification Document*

In addition to submitting an acceptable compliance plan, the LSSA requires that all applicants certify in writing their intent to comply with the LSS Rule and derivative LSSA guidance. The *LSS Participant Compliance Program Plan Certification Document* contains the certification of understanding and outlines a participant's responsibilities to the LSS program. The applicant must certify its intent to comply with those responsibilities. Appendix A of the above-referenced document, entitled the *LSS Participant Commitments*, describes specific responsibilities to which the applicant must agree to commit.

II. FORMAT AND CONTENT OF PARTICIPANT COMPLIANCE PROGRAM PLAN

The following represents the format and content requirements for the compliance plan. Uniformity in the development of these plans will facilitate a complete and accurate review of each plan by the LSSA. Sample responses are provided for some questions to illustrate the level-of-detail that should be used by an applicant to describe its planned LSS program. The actual level-of-detail appropriate for any given response will vary depending upon the particular applicant's estimated volume of potential documentary material. Processes, procedures, and organizations used to meet LSS requirements may be based on existing, internal capabilities. If procedures needed to meet an LSS submission requirement are reflected in existing documentation, applicants are encouraged to submit existing materials by reference in order to avoid duplication of effort. If an applicant chooses to submit those materials, they should still be referenced where applicable in the compliance plan. Submission of existing procedures is, however, entirely at the applicant's option.

A. Management and Processes

Each applicant should submit a compliance plan to the LSSA that fully describes how the applicant intends to address:

1. management of the LSS document processing effort;
2. identification of its universe of potentially relevant material (see Figure 1);
3. use of the NRC Regulatory Guide for the LSS Topical Guidelines in making relevancy determinations;
4. development of processes for generating headers, images, and electronic text and performing internal quality control (QC) checks;
5. handling exceptions to the normal processing rules, like access to material not suitable for entry into the LSS; and
6. verification of its submitted material under Section 2.1004 of the LSS Rule, to ensure that its records in the LSS are as submitted.

B. Documentary Material - Estimated Volumes and Submission Schedule.

1. Applicants will submit the information requested by Figures 1 and 2, below. The information will describe the location, type, and estimated volume of an applicant's potential LSS documentary material, as well as a proposed three-year schedule of submission for these materials.
2. This information will be revised annually to include the current year and the next two fiscal years.

3. Submission of backlog material is required to begin within sixty days of gaining access to the LSS.
4. Submissions after gaining access to the LSS are required to be made evenly over the remaining six-month periods prior to license application, to prevent "spiking" of submission volumes.
5. All estimates should be stated in both document and page volumes.

FIGURE 1

VOLUME AND CHARACTERISTICS OF LSS MATERIAL

(The Applicant) certifies the following information concerning its estimated universe of potential LSS documentary material to be accurate and complete at the time of submission, and agrees to update this report in a timely manner, as change occurs. All known types of LSS-relevant material are listed for each repository, along with the estimated volume for each type.

BACKLOG LSS MATERIAL

Physical Location of Material (REPOSITORY)	Type of Material (E.G. HARDCOPY, ELECTRONIC, MICROFORM, ONE-SIDED, TWO-SIDED, OVERSIZED, GRAPHIC)	Estimated Volume

FIGURE 1 (CONTINUED)

(The Applicant) certifies the following information concerning its estimated generation / acquisition of potential LSS documentary material to be accurate and complete at the time of submission, and agrees to update this report in a timely manner, as change occurs. Estimates are for each of the next two fiscal years from the date of this report. This portion of the report will be updated and submitted annually to the LSSA no later than September 1 of each succeeding year.

GENERATED / ACQUIRED LSS MATERIAL

Generation/Acquisition Source	Type of Material	Estimated Volume

FIGURE 2

LSS DOCUMENTARY MATERIAL SUBMISSION SCHEDULE

(The Applicant) proposes the following schedule for the submission of its estimated backlog LSS material holdings. This schedule is only an estimate because the volume of holdings can only be estimated at this time. As the accuracy of the estimate of holdings improves through actual material processing, this schedule will be adjusted to reflect that increased accuracy. This schedule will be revised and submitted annually, covering estimated submissions for the current fiscal year and projections for the following two fiscal years.

ESTIMATED SUBMISSION OF LSS BACKLOG MATERIAL (PAGES/DOCUMENTS)

FISCAL YEAR (Oct-Sept)	1ST QUARTER		2ND QUARTER		3RD QUARTER		4TH QUARTER		TOTAL	
1996										
1997										
1998										

(The Applicant) proposes the following schedule for the submission of LSS-relevant material it estimates it will generate/acquire. This schedule is only an estimate because the volume of such material can only be estimated at this time. This schedule will be revised and submitted annually, covering estimated submissions for the current fiscal year and projections for the following two fiscal years.

**ESTIMATED SUBMISSION OF GENERATED/ACQUIRED LSS MATERIAL
(PAGES/DOCUMENTS)**

FISCAL YEAR (Oct-Sept)	1ST QUARTER		2ND QUARTER		3RD QUARTER		4TH QUARTER		TOTAL	
1996										
1997										
1998										

C. Recommended Information for Completing Section A of the Compliance Plan

The LSSA recommends that the following areas be considered for inclusion by applicants in their compliance plans.

1. Program Management and Organization

Authorized LSS Program Representatives for (The Applicant)

(The Applicant) names the following persons as authorized representatives. These individuals have the authority to speak for the organization and act on its behalf to fulfill the responsibilities of the applicant under the LSS Rule.

Participant should list its Designated LSS Official (DLO), alternate DLO, and any other authorized contacts, and describe their roles/authorities to speak for the organization and their responsibilities. Also include the name(s) of person(s) responsible for sending and receiving E-Mail submissions, if different than the DLO.

(The Applicant) will notify the LSSA and the Hearing Board of the need to replace any of the listed individuals, and will appoint a successor within 30 days.

a. Designated LSS Official

- Name

- Title within their organization and who they report to

- Address

- Telephone number(____)____-_____

- Fax number(____)____-_____

- Email address _____

b. Alternate Designated LSS Official

- Name

- Title within their organization and who they report to

- Address

- Telephone number(____)____-____

- Fax number(____)____-____

- Email address _____

c. Designated contact person(s) for _____

- Name

- Title within their organization and who they report to

- Address

- Telephone number(____)____-____

- Fax number(____)____-____

- Email address _____

d. Who should the LSSA call within your organization to correct errors identified by the LSSA QA Facility?

- Name

- Title within their organization

- Address

- Telephone number(____)____ - _____

- Fax number(____)____ - _____

- Email address _____

e. Who is the designated individual responsible for verifying the correctness of submitted material as loaded into the LSS?

- Name

- Title within their organization

- Address

- Telephone number(____)____ - _____

- Fax number(____)____ - _____

- Email address _____

Staffing Plan

An essential component in the successful management of a project as complex as participating in the LSS program is a staffing plan. An effective staffing plan should include all planned activities, and should detail:

- number, level and type of staff;
 - production estimates;
 - training plans; and
 - budgetary constraints.
- a. Staff Planning
- Describe your staffing plan, including each process activity, number of staff, supervisor/worker ratio and production estimates.
 - How are you estimating your productivity rate?
 - How will productivity be tracked against your compliance plan and be made available for the LSSA audit team?
- b. Training Plan
- Describe your training plan for each process activity (relevancy screening, header preparation, QA/QC, etc.) including who will be trained, the subjects covered and the training schedule.
 - Describe your plan for certifying that participant personnel and contractors have been scheduled for and have attended training sessions.
- c. Use of contractors
- List all contractors that will be used in document processing activities, including their specific task activities.
 - How do you plan to manage your contractors to ensure that they comply with the requirements of the LSS Rule?

2. Identification and Description of Applicant's Universe of Potential LSS Material

The Applicant must provide the LSSA with an accurate description of its universe of potentially relevant LSS material, including the types of material it possesses (e.g., hardcopy, electronic, microform, letter size, legal size, oversize, graphic) and the estimated volume of each type of material. This information should be furnished using a format similar to Figure 1, above. This information should be refined and updated as the participant proceeds with actual document processing, and in any event no less frequently than annually.

3. Identification of Relevant Documentary Material

Participant identification of material that is itself relevant to, or that is likely to lead to the discovery of information relevant to, the licensing of the candidate site for a geologic repository is governed by the *NRC Regulatory Guide on the LSS Topical Guidelines*¹, based on the Topical Guidelines, Federal Register, Vol 54, No.71, April 14, 1989, pp.14940-14943. In determining which documents must be submitted for entry into the LSS, the participant must determine both that a document contains information within the applicable topical guidelines, and that it also has a relationship/link to the proposed geologic repository.

The Commission expects all participants to make a good faith effort to identify the documentary material in their possession in accordance with Section 2.1003. Although the accuracy of participant relevancy determinations will be reviewed by the LSSA during compliance audits, the LSSA will rely on each participant to notify the LSSA if it has reason to believe that another participant is not submitting all of its LSS-relevant material.

This section should describe the applicant's plan for the identification of relevant documentary material for submission to the LSS. This information is needed to ensure that the applicant has a reasonable plan for identifying all potentially relevant material in accordance with the *NRC Regulatory Guide on the LSS Topical Guidelines*. Other areas covered in this section are the applicant's plan for processing updates, circulated drafts, copyright material and for the elimination of duplicate material.

¹ This document is in final review by the NRC and the LSSARP.

- a. How will you ensure that all potentially relevant material is identified for screening?
- b. What is your plan for ensuring that all relevant material is identified in accordance with the LSS Topical Guidelines Regulatory Guide?
- c. What is your plan for identifying copyright material and ensuring that it is not submitted for entry into the LSS, except as provided by LSSA guidance?
- d. What is your plan for ensuring that updated versions of documents are identified, linked with previous submissions and not entered into the LSS as separate documents.
- e. How will you ensure that circulated drafts, as defined by the LSS Rule, are submitted for entry into the LSS and that preliminary and non-final drafts are not submitted for entry?
- f. What is your plan for duplicate checking and eliminating true duplicates while ensuring documents with marginalia are not excluded?

4. Preparation of Headers, Images and Electronic Text

The applicant is advised to furnish information in this section that gives the LSSA a clear description of its documentary material processing program. Information should be detailed, and indicate a solid understanding of the requirements of the LSS Rule. This section describes the applicants' plan for the preparation of headers, images and electronic text for documentary material, in accordance with Section 2.1003 of the LSS Rule. It includes the applicant's plans for completing each header field, ensuring that only the best available copies are processed and, if applicable, includes plans for producing electronic text files. Areas recommended for inclusion are as follows.

- a. What is your plan for completing bibliographic header fields for each unit of LSS documentary material, including privileged material?

- b. How will you ensure that the best available copies (images) of your documentary material are prepared for subsequent electronic processing?
- c. Describe your procedures for producing electronic text for textual documentary material and reviewing it for accuracy.
- d. What are your procedures for handling required corrections to your submitted material after QA Facility review?

5. Exception Processing Plans

This section should include plans for submission of material that is other than the normal letter-size stand-alone document unit.

- a. What is your plan for preparing LSS documentary material qualifying as record packages?
- b. Describe how you plan to comply with the LSS Rule in your procedures for submitting bibliographic headers for graphic-oriented material such as raw data, computer runs, and field notes.
- c. Describe how you plan to establish procedures for capturing graphic-oriented or oversize material in an electronic image, if possible, by using a digital scanning device.
- d. Describe your procedure for granting access to LSS material which is not suitable for entry into the LSS.

6. Verification of Material Loaded to the LSS

This section should provide information on the applicant's proposed process to verify that the material it submitted to the LSSA was accurately and completely loaded to the LSS. Section 2.1004 of the LSS Rule prescribes the requirement for and the timeframes involved in participant verification of their respective documentary material on the LSS. The applicant's plan must comply with those requirements.

- a. How will you verify the accuracy and completeness of your LSS documentary material after it has been loaded into the LSS?

D. Quality Assurance / Quality Control

As part of a participant's responsibility to submit relevant documentary material for entry into the LSS under Section 2.1003 of the LSS Rule, the participant should establish an effective internal quality assurance (QA)/quality control (QC) program to help ensure that the participant is submitting material that meets the standards set by the LSS Rule and derivative guidance. The LSSA recommends that each participant establish a QA/QC program. This section should describe the applicant's plan for ensuring that it is submitting documentary material that has passed through such a system of review.

1. Quality Program for Document Processing
 - a. Describe your QA goals.
 - b. Define your quality control plan and procedures for each process activity.
 - c. How will you ensure that work performed is reviewed and errors corrected prior to the actual submission of the material to the LSS.
 - d. What is your plan for tracking the processing flow of documentary material and related productivity through the various stages of each process?
2. Internal audits of document processing activities
 - a. What is your plan for auditing each of the processing activities?
 - b. How will you document audit results?
 - c. Describe your plan to cooperate with the LSSA Audit Program, including accommodating LSSA observation of your internal audits.

E. Record-keeping Requirements

The LSSA recommends that participants maintain or establish record-keeping systems adequate to permit the tracking of material through the various stages of document processing and submission to the LSS, including rework/resubmission. The record-keeping systems should allow its post-audit teams to remediate all work performed prior to a preceding LSSA audit, should

problems be found by the LSSA audit team. The Applicant should describe in this section the record-keeping system it intends to maintain/implement for these purposes.

F. Participant Reporting Requirements

All LSS participants will be required to submit periodic reports and data to the LSSA pertaining to their documentary processing plans and activities. The periodic reporting requirement will be satisfied by the filing of a semi-annual report in the format of Figure 3, below. Participants will submit this report every six months, on a schedule to be established by the LSSA. The participants will be expected to respond to occasional requests for specific data considered necessary by the LSSA in their management of the LSS program.

FIGURE 3

PARTICIPANT SEMI-ANNUAL PROGRESS REPORT

This report describes LSS-related activities for the six-month period beginning _____ and ending _____. Cumulative totals, where appropriate, are also provided from the inception of LSS material processing.

BACKLOG LSS MATERIAL

ACTIVITY	CURRENT PERIOD		CUMULATIVE		REMAINING	
RELEVANCY SCREENING BY REPOSITORY*: (PAGES AND DOCUMENTS)						
1.						
2.						
3.						
PAGES AND DOCUMENTS DETERMINED RELEVANT						
NUMBER OF BATCHES SUBMITTED: 1. HEADER ONLY 2. HEADER AND IMAGE ONLY 3. HEADER AND TEXT ONLY 4. HEADER, IMAGE AND TEXT 5. DOCUMENT PACKAGES						
TOTAL HEADERS SUBMITTED						
TOTAL PAGES (IMAGES) SUBMITTED						
BATCHES REJECTED						
BATCHES REWORKED/RESUBMITTED						

PROBLEMS ENCOUNTERED

* The relevancy screening is reported by repository to correlate to those estimated volumes of material reported by repository in the **VOLUME AND CHARACTERISTICS OF LSS MATERIAL** report.

GENERATED / ACQUIRED LSS MATERIAL

ACTIVITY	CURRENT PERIOD		CUMULATIVE	
RELEVANCY SCREENING: (PAGES AND DOCUMENTS)				
PAGES AND DOCUMENTS DETERMINED RELEVANT				
NUMBER OF BATCHES SUBMITTED: 1. HEADER ONLY 2. HEADER AND IMAGE ONLY 3. HEADER AND TEXT ONLY 4. HEADER, IMAGE AND TEXT 5. DOCUMENT PACKAGES				
TOTAL HEADERS SUBMITTED				
TOTAL PAGES (IMAGES) SUBMITTED				
BATCHES REJECTED				
BATCHES REWORKED/RESUBMITTED				
PROBLEMS ENCOUNTERED				

INTERNAL QUALITY AUDITS
CONDUCTED

RESULTS OF AUDITS

III. LSSA COMPLIANCE AUDITS OF PARTICIPANTS

The LSSA intends to audit participants on the results of output from the processes described in Sections II.A.3, II.A.4, and II.A.5, above. If the audit process reveals unacceptable performance on the part of the participant, the LSSA will investigate to determine the causes of the below-standard results. As part of that investigation, the LSSA will want to review the documentation related to Sections II.C, II.D, and II.E, above. A participant whose documentation is effectively implemented in these areas is more likely to retain access to the LSS than one whose documentation is inadequate.

DEFINITION OF TERMS

The following definitions are used during the licensing process. Participants must consider these definitions in all communications with the LSSA concerning the LSS process. Participants are encouraged to suggest other words and phrases to be added to the list of definitions.

ASCII file:	a computerized text file conforming to the American Standard Code for Information Interchange which represent characters and symbols.
Backlog:	all LSS material generated by, or at the direction of, or acquired by an LSS participant on or before the date the LSS is available (DOE and NRC) or the date on which participant was given access to the LSS (all other participants). (See 10 CFR 2.1003)
Backlog Repository:	a collection of records under the control of an LSS participant or its contractors that is known to contain LSS material. The records in these collections will be screened to identify LSS material that should be processed for submission to the LSS or referenced in the LSS by header only. These repositories could be paper, microform, digital or other forms of HLW documentary material.
Bibliographic header:	the minimum series of descriptive fields that a potential party, interested governmental participant, or party must submit with a document or other material. The bibliographic header fields are a subset of the fields in the full header.
Circulated draft:	a nonfinal document circulated for supervisory concurrence or signature in which the original author or others in the concurrence process have non-concurred. A circulated draft meeting the above criterion includes a draft of a document that eventually becomes a final document, and a draft of a document that does not become a final document due to either a decision not to finalize the document or the passage of a substantial period of time in which no action has been taken on the document.
Compliance Evaluations:	audits, quality assurance checks and other evaluations performed by the LSSA and/or PAPO/PO to determine if LSS participants are in compliance with LSS commitments.
Compliance Program Plan:	a plan prepared by each LSS participant describing its program for complying with LSS commitments.

DLO:	an official designated by each LSS participant who will be responsible for administering its LSS responsibilities and for certifying compliance with LSS commitments. (See 10 CFR 2.1009)
Document:	any written, printed, recorded, magnetic, graphic matter, or other documentary material, regardless of form or characteristic.
Documentary material:	any material or other information that is relevant to, or likely to lead to the discovery of information that is relevant to, the licensing of the likely candidate site for a geologic repository. The scope of documentary material shall be guided by the topical guidelines in the applicable NRC Regulatory Guide.
Document Processing:	LSS participants' identification, preparation, and submission of LSS material to the LSSA.
DOE:	the U.S. Department of Energy or its duly authorized representatives.
Exclusions:	relevant LSS material that will not be entered into the LSS, such as reference books, text books and other material, such as junk mail. (See 10 CFR 2.1005)
Full header:	the series of descriptive fields and subject terms given to a document or other material.
Full searchable text:	the electronic indexed entry of a document in ASCII into the Licensing Support System that allows the identification of specific words or groups of words within a text file.
Generation/ Acquisition Source:	all of a DLO's organizational units (offices, branches, departments, etc) that have program responsibility to either create or acquire potentially relevant LSS material and any of their contractors' organizational units that may produce or acquire potentially relevant LSS material.
Image:	a visual likeness of a document, presented on a paper copy, microform, or a bit-map on optical or magnetic media.
LSS Administrator:	The person within the U.S. Nuclear Regulatory Commission responsible for administration, management, and operation of the Licensing Support System. The LSS Administrator shall not be in any organizational unit that either represents the U.S. Nuclear Regulatory Commission staff as a party to the high-level waste licensing proceeding or is a part of the management chain reporting to the Director of the Office of Nuclear Material Safety and Safeguards. The organizational unit within the NRC selected to be the LSS Administrator shall not be considered to be a party to the proceeding.

LSS Commitments:	requirements imposed by 10 CFR 2, Subpart J, and the LSSA as conditions for gaining and retaining access to the LSS.
LSS Material:	all LSS documentary material meeting the Commission's Topical Guidelines. (See 10 CFR 2.1002)
LSS Participant:	Any person or organization who has been granted access to the LSS by consenting to comply with LSS commitments.
Marginalia:	handwritten, printed, or other types of notations added to a document excluding underlining and highlighting.
Material Submission Plan:	A plan prepared by each LSS participant describing the volume of material to be submitted to the LSS and a schedule for the submission of the material.
Non-Compliance Reporting Threshold:	the amount of deviation from LSS material processing standards that will be allowed by the LSSA before an LSS participant is reported to the Commission as being in non-compliance.
NRC:	the U.S. Nuclear Regulatory Commission or its duly authorized representatives.
PAPO:	one or more members of the Commission, or an Atomic Safety and Licensing Board, or a named officer who has been delegated final authority in the pre-license application phase of the HLW proceeding.
Party:	the DOE, the NRC staff, the host State and any affected Indian Tribe or person admitted to the proceeding on an application for a license to receive and possess high-level radioactive waste at a geologic repository operations area, provided that a host State or affected Indian Tribe shall file a list of contentions in accordance with the provisions of Sec. 2.1014(a)(2) (ii), (iii), and (iv).
Personal record:	a document in the possession of an individual associated with a party, interested governmental participant, or potential party that was not required to be created or retained by the party, interested governmental participant, or potential party, and can be retained or discarded at the possessor's sole discretion, or documents of a personal nature that are not associated with any business of the party, interested governmental participant, or potential party.
Presiding Officer:	one or more members of the Commission, or an Atomic Safety and Licensing Board, or a named officer who has been delegated final authority in the HLW proceeding after DOE's license application has been docketed.

Potential party:	any person who, during the period before the issuance of the first pre-hearing conference order under Sec. 2.1021(d), is granted access to the Licensing Support System and who consents to comply with the regulations set forth in the Rule, including the authority of the Pre-License Application Licensing Board established pursuant to Sec. 2.1010.
Pre-license application phase:	the time period before the license application to receive and possess high-level radioactive waste at a geologic repository operations area is docketed under section 2.101(f)(3).
Preliminary draft:	any nonfinal document that is not a circulated draft.
Sanction:	a penalty that the Commission may impose on LSS participants for non-compliance with LSS commitments.
Topical Guidelines:	guidelines specifying categories and topics to be used for identifying the LSS material that is to be submitted by LSS participants for entry into the LSS. (See 10 CFR Part 2, Subpart J, Supplementary Information)
Unitization:	the process of evaluating the makeup of an LSS document to determine if it is a homogeneous "unit" or if it needs to be subdivided into two or more "units." For example, sections/chapters of a report having different authors and/or on different major topics; or attachments/enclosures to correspondence having different dates or authors. Each unit should have unique and critical values that should be captured in an LSS header. Unitization is done to maximize the likelihood that a searcher will retrieve the desired information in the smallest number of units, each of which contains the least amount of irrelevant information. Each unit will consist of image(s) (if any), ASCII text (if any), and a header when it is submitted to the LSS.