Records Management
EFFECTIVITY AND APPROVAL

Revision 0 of this procedure became effective on _____09/03/2003_____. This procedure consists of the pages and changes listed below.

Page No.	Change	Date Effective
1–3	2	04/23/2004
4–8	1	02/26/2004
9	0	09/03/2003
10–11	2	04/23/2004
12–16	1	02/26/2004
17	0	09/03/2003
18–20	1	02/26/2004
21–23	0	09/03/2003

Supersedes Procedure No.: Revision 0, Change 1

Approvals

Written By	Date	Concurrence Review	Date
Pat Mackin	04/23/2004	Robert Brient	04/23/2004
Quality Assurance	Date	Cognizant Director	Date
Robert Brient	04/23/2004	Budhi Sagar	04/23/2004

CNWRA Form AP–1–1 (12/92)

AP–019 Records Management

1. <u>PURPOSE</u>

The purpose of this procedure is to provide instructions for assembling and preparing, scanning, processing and filing, shipping, and managing and verifying Center for Nuclear Waste Regulatory Analyses (CNWRA) records for all clients. This procedure will also be used to submit CNWRA documentary material to meet requirements for the Licensing Support Network (LSN) in accordance with 10 CFR Part 2, Subpart J (Procedures Applicable to Proceedings for the Issuance of Licenses for the Receipt of High-Level Radioactive Waste at a Geologic Repository) and for any derivative discovery of records associated with a high-level waste repository licensing proceeding. Additionally, this procedure may provide support to the U.S. Nuclear Regulatory Commission (NRC) in responding to Freedom of Information Act requests. This procedure addresses both legacy records (records from the past) and records that will continue to be generated by the CNWRA.

2. <u>APPLICABILITY</u>

This procedure is to be used for managing all CNWRA records, except those that are classified and those documents identified in 10 CFR 2.1005.

3. <u>RESPONSIBILITIES</u>

3.1   The Director of Administration is responsible for implementing and maintaining this procedure including collaborating with U.S. Nuclear Regulatory Commission (NRC) staff to (i) identify profiling data and prepare submission forms and targets for each documentary material category, (ii) prepare electronic files for documentary material in accordance with NRC specifications, and (iii) submit documentary material to the NRC. The Director of Administration is responsible for providing and documenting training for CNWRA staff assigned to records management activities.

3.2   The Director of Administration is responsible for resolving any questions related to identifying or categorizing sensitive records.

3.3   The Director of Quality Assurance is responsible for auditing compliance with this procedure.

3.4   All CNWRA staff are responsible for managing records in accordance with this procedure including the records retention policy stated in Section 6 of this procedure.

4. <u>DEFINITIONS</u>

4.1 Classified information—Information (such as a document or correspondence) that is designated National Security Information, Restricted Data, or formerly Restricted Data (NRC Management Directive 12, Glossary). This procedure does not address handling classified information.

4.2 CNWRA legacy records—CNWRA records completed prior to the start of LSN document processing on September 16, 2003. CNWRA legacy records will be managed in accordance with Section 5.1 of this procedure. CNWRA records completed after September 16, 2003 will be managed in accordance with Section 5.2 of this procedure.

4.3 Document submission forms—Forms that provide information needed to profile CNWRA records in the NRC Agency Wide Documents Access and Management System (ADAMS). Profiling is a term used by the NRC Document Processing Center to describe standardized information required to enter and identify documents in ADAMS.

4.4 File set—The group of records or files that will be placed on an individual compact disk (CD–ROM). For example, a file set may be all the procurement records for a fiscal year or the entire set of calibration records. File sets are defined on a case-by-case basis taking into account parameters such as purpose, size, and individual significance of records.

4.5 Assembling and preparing—Actions necessary to prepare records for processing and managing. Assembling and preparing includes actions such as removing staples, straightening corners, and repairing page damage.

4.6 Sensitive unclassified information—That data requires a degree of protection because of the risk and magnitude of loss or harm that could result from inadvertent or deliberate disclosure, alteration, or destruction of the data. This term includes proprietary information, unclassified safeguards information, sensitive homeland security information, naval nuclear propulsion information, and other information withheld from public dissemination (NRC Management Directive 12, Glossary). Those categories most likely to be used for CNWRA NRC work are predecisional information, safeguards information, official use only information, and proprietary information. Usually, this information addresses NRC methods, findings, and recommendations concerning regulatory guidance, technical positions, internal surveys, and audits that are not ready for publication or other public release.

4.7 Targets—Forms incorporated into scanned records to identify the location and content of items such as CD–ROM, tapes, floppy disks, and sensitive unclassified information

that cannot be scanned or practically converted to a scanned record. Targets may include brief abstracts that describe the nature, use, or location of items that are not scanned.

5.   PROCEDURE

This section provides instructions for record maintenance. Section 5.1 is applicable to CNWRA legacy records. Continued processing of follow-on CNWRA records will be performed in accordance with Section 5.2. Where necessary, this procedure provides instructions unique to specific categories of records.

The records management process covered by this procedure addresses actions subsequent to document development. CNWRA document development falls under the broad direction provided by Southwest Research Institute® (SwRI®) Operating Policies and Procedures, the CNWRA Quality Assurance Manual, and the CNWRA Management Plan. Specific CNWRA procedures governing document development include QAP–001: Scientific Notebook Control; QAP–002: Review of CNWRA Documents, Reports, and Papers; QAP–008: Document Control; QAP–012: Quality Assurance Records Control; QAP–017: Drawing Control; AP–002: Correspondence and Document Control; and TOP–018: Development and Control of Scientific and Engineering Software.

This procedure addresses records management actions in phases. The phases differ in Sections 5.1 and 5.2.

Classified material will be handled, stored, and otherwise controlled in accordance with the National Industrial Security Program Operating Manual, DOD–5220.22–M, which is accepted by NRC and has been implemented by SwRI. Nothing in this procedure is intended to conflict with the requirements of NRC Acquisition Regulation 2052.204.70 regarding handling of classified material. If any such conflict or difference occurs, the terms of the current CNWRA charter contract with NRC take precedence.

Sensitive records shall be stored in the CNWRA Quality Assurance Room or the Electronic Library Facility (ELF) electronic database, but may not be disclosed to foreign nationals. The CNWRA will not distribute predecisional information without government approval.

5.1   Managing CNWRA Legacy Records

Figure 1—Processing and Managing CNWRA Legacy Records depicts the process that is described in this section. Actions required in each phase of records management are discussed in the following subsections.

5.1.1   Assembling and Preparing

5.1.1.1   General Assembling and Preparing Procedure

(a)   In the assembling and preparing phase, records will be prepared for further processing and managing. Assigned CNWRA support staff shall complete the following types of actions, as necessary, during this phase.

- Remove staples.

- Straighten bent corners.

- Correct page damage, such as tears, that might interfere with scanning.

- Assign a unique document identifier and file name in the CNWRA ELF system as described in Appendix A.

- Identify and correct any other problems that might interfere with scanning.

- Prepare a document submission form (Figure 2) and targets (Figure 3), as required.

    — Document submission forms have been concurred in by NRC staff for each document category and are generated automatically by ELF.

- Separate any potential sensitive material and provide it to the Director of Administration for evaluation.

- Record any special scanning requirements such as processing multiple-level overlays.

- Document completion of assembling and preparing the document submission form in ELF.

- Provide a copy of the document submission form to SwRI Media Production Services.

- Identify any material subject to copyright protection.

5.1.1.2   Specific Assembling and Preparing Instructions for Document Categories

These steps are to be performed in addition to those in Section 5.1.1.1, as applicable.

(a)   The procedural steps defined in Section 5.1.1.1 are adequate for most quality assurance programmatic records, procurement records, and sample logs.

(b)   Scientific and field notebooks shall be assembled and prepared by assigned CNWRA staff as follows.

•   Review each notebook for completeness (cognizant CNWRA manager).

•   Provide additional identifying information for data tapes, floppy disks, or other media, as required by the document submission form or target sheets.

•   Identify any potentially sensitive or copyrighted information (cognizant CNWRA manager) and provide it to the Director of Administration along with a complete reference cite for such information.

—   Two CNWRA staff independent of the author or cognizant manager will verify that any copyright protected material has been identified.

—   Obtain NRC concurrence in assigning any sensitivity category. The CNWRA Director of Administration is responsible for resolving with NRC staff any questions related to record sensitivity or copyright.

—   Complete the appropriate sensitive information identifier in ELF, and prepare the appropriate targets and associated descriptive information.

•   Convert media (e.g., Bernoulli disks, 5 ¼" floppy disks) to CD–ROM and complete and attach CD–ROM labels, if possible.

(c)   Software control documentation and technical report review documentation shall be assembled and prepared by assigned CNWRA staff as follows.

•   Combine any associated QAP–002 review documentation with the associated technical report or software control documentation for concurrent scanning. The review documentation and the report or software control documentation shall be discriminated by having a capital "C" added to the ELF identifier and file name as described in Appendix A.

—   Near the end of the legacy document processing period, the NRC staff directed that CNWRA review documentation not be provided for inclusion in ADAMS.

•   Identify any potentially sensitive information (cognizant CNWRA manager) and provide it to the Director of Administration.

—   Obtain NRC concurrence in assigning any sensitivity category.

— The CNWRA Director of Administration is responsible for resolving any questions related to record sensitivity.

— Complete the appropriate sensitive information identifier in ELF, and prepare the appropriate targets and associated descriptive information.

(d) Calibration records shall be assembled and prepared by assigned CNWRA staff as follows.

• Consolidate information in calibration records from the SwRI Calibration Laboratory with information from CNWRA laboratory files.

• Prepare a separate folder for each calibrated device with the included material in chronological, ascending order, from earliest to latest.

(e) Corrective action reports, surveillance reports, and nonconformance reports shall be assigned a unique document identifier for each item.

5.1.2   Scanning

5.1.2.1   General Instructions for Scanning

In the scanning phase, the following actions will be completed.

• Record the date a document is sent for scanning in ELF.

• Scan, quality check, verify, and process the record for optical character recognition (OCR), as appropriate, using the instructions in Appendix B.

• Establish file sets and file separation in accordance with 10 CFR Part 2, Subpart J.

• Complete text source information on the document submission form, as required.

• Produce three electronic versions of all documents being submitted.

— One version will be the complete document for retention in CNWRA files.

— Two versions will omit any sensitive, copyright protected, proprietary, or irrelevant information and will be provided to NRC, as directed. The CNWRA shall also retain a copy of this version.

• Generate two compact disks of up to approximately 600 megabytes of information for each file set.

- Receive original documents and records of scanning and OCR from SwRI Media Production Services and document this action in ELF.

5.1.2.2   Specific Scanning Instructions for Document Categories

These steps are to be performed in addition to those in Section 5.1.2.1, as applicable.

The procedural steps defined in Section 5.1.2.1 are adequate for software control documentation, technical report documentation, quality assurance programmatic records, calibration records, sample logs, and procurement records.

(a)   Scientific and field notebooks shall be scanned in accordance with any special scanning instructions provided by CNWRA staff.

- Any copyright protected material shall be redacted, and the redacted material will be replaced by a reference cite before the image file of the notebook is sent to NRC for entry into ADAMS.

(b)   Procurement records shall be scanned as follows.

- Send an entire file set of procurement records to SwRI Media Production Services.

    — For records generated prior to fiscal year 1999, each year's combined procurement records shall be scanned as a single file set.

    — For years subsequent to fiscal year 1999, procurement records for each project number will be scanned as a separate file. Several projects may be combined for a single file set.

- Produce three electronic versions of procurement records.

    — One version will be the complete set of procurement records for retention in CNWRA files.

    — Two versions will contain only quality affecting procurement files and will be provided to NRC, as directed.

5.1.3   Process Documentation and Filing

CNWRA records process documentation and filing will be supported by the capabilities of ELF and by a dedicated server that will store an image of each scanned document.

5.1.3.1   Instructions for Process Documentation and Filing

There are no unique process documentation and filing requirements for specific document categories, and the instructions in this section are to be used for all CNWRA records.

Process documentation and filing are to be completed as follows.

(a)   Completion of the following document processing steps will be recorded with a date entry in ELF. These steps are depicted in Figure 1, Processing and Managing CNWRA Legacy Records.

•   Completion of the document submission form (all assembly and preparation actions have been completed). Completing a document submission form will require that the following information has been entered in ELF.

—   Document category

—   ELF identifier (Q number)

—   Title

—   Date

—   Author(s)

—   Sensitivity or classification flag and category (to be used for any category of sensitive or classified information)

•   Sending a document for scanning

•   Return of a document from scanning

•   Completion of filing (original and CD–ROM)

—   For each document, ELF shall identify the CD–ROM containing the document

•   Sending a document to NRC

•   Receiving acknowledgment of document receipt from NRC

5.1.4   Shipping

Some CNWRA records are shipped or delivered to NRC or other clients, while other records are retained at CNWRA. This phase of records management provides the means to determine whether records have been provided to the client. For some records prepared to support the NRC high-level waste program, regulatory requirements dictate that the records be entered in the ADAMS system for further transfer to the LSN, if required. The process documentation and filing detailed in Section 5.1.3 will provide confirmation that records have been shipped and, as appropriate, entered in ADAMS.

CD–ROM prepared using this procedure for shipment to NRC will be mailed to NRC routinely and consistent with Document Processing Center needs. The mailing address will be:

U.S. Nuclear Regulatory Commission
Attn.: Document Control Desk
High-Level Waste (Yucca Mountain) Project, Docket WM–00011
11555 Rockville Pike
Rockville, MD 20852

5.1.5   Records Management Verification Checks

Implementation of the CNWRA records management process is subject to the CNWRA Quality Assurance Manual. In addition, this procedure requires the following quality control checks.

•   Verify the quality of each scanned image.

•   Perform a daily operational test of scanner performance whenever scanning is conducted in accordance with this procedure.

•   Document operator proficiency in implementing this procedure in personnel training records.

•   Establish preventive maintenance programs for each scanning device used in implementing this procedure.

5.2   Continuing Management of CNWRA Records

Actions required in each phase of records management are discussed in the following subsections. Table 1 presents the categories, sources, and processing schedule for records being managed under Section 5.2 of this instruction.

Table 1. Records Categories, Sources, and Processing Schedules		
Category	**Sources**	**Processing Schedule**
Quality Assurance Programmatic Records	Quality assurance program actions such as surveillances, inspections, corrective action requests, nonconformance reports, and audits	As generated or received
Procurement Records	Procurement actions	Monthly
Sample Logs	Laboratory and field activities	Monthly
Scientific Notebooks and Supplementary Material	Engineering, technical, laboratory, and field activities and analyses	As notebooks are closed
Software Control Documentation	Software purchase and development activities	When a code, or version of a code, has been validated
Technical Reports, Presentations, and Assorted Review Documentation	Contract activities	As generated
Calibration Records	Calibration actions	As generated

5.2.1   Assembling and Preparing

5.2.1.1   General Assembling and Preparing Procedure

(a)   In the assembling and preparing phase, records will be prepared for further processing and managing. Assigned CNWRA support staff shall complete the following types of actions, as necessary, during this phase.

•   Remove staples.

•   Straighten bent corners.

•   Correct page damage, such as tears, that might interfere with scanning.

•   Assign a unique document identifier and file name in the CNWRA ELF system as described in Appendix A.

- Identify and correct any other problems that might interfere with scanning.

- Prepare a document submission form (Figure 2) and targets (Figure 3), as required.

  — Document submission forms have been concurred in by NRC staff for each document category and are generated automatically by ELF. These forms are required only for records that will be entered in ADAMS.

- Separate any potential sensitive material and provide it to the Director of Administration for evaluation.

- Record any special scanning requirements such as processing multiple-level overlays.

- Document completion of assembling and preparing of a document submission form in ELF for those records that will be forwarded for inclusion in ADAMS.

- Identify any material subject to copyright protection.

5.2.1.2   Specific Assembling and Preparing Instructions for Document Categories

These steps are to be performed in addition to those in Section 5.2.1.1, as applicable.

(a)   The procedural steps defined in Section 5.2.1.1 are adequate for most quality assurance programmatic records, procurement records, and sample logs.

(b)   Scientific and field notebooks shall be assembled and prepared by assigned CNWRA staff as follows.

- Review each notebook for completeness (cognizant CNWRA manager).

- Provide additional identifying information for data tapes, floppy disks, or other media, as required by the document submission form or target sheets.

- Identify any potentially sensitive or copyrighted information (cognizant CNWRA manager) and provide it to the Director of Administration along with a complete reference cite for such information.

  — Two CNWRA staff independent of the author or cognizant manager will verify that any copyright protected material has been identified.

  — Obtain concurrence from the Director of Administration in assigning any sensitivity category. The CNWRA Director of Administration is responsible for resolving any questions related to record sensitivity or copyright.

— Complete the appropriate sensitive information identifier in ELF, and prepare the appropriate targets and associated descriptive information.

• Convert media (e.g., Bernoulli disks, 5 ¼" floppy disks) to CD–ROM and complete and attach CD–ROM labels, if possible.

(c) Software control documentation and technical report/presentation review documentation shall be assembled and prepared by assigned CNWRA staff as follows.

• Combine any associated QAP–002 review documentation with the associated technical report or software control documentation for concurrent scanning. The review documentation and the report or software control documentation shall be discriminated by having a capital "C" added to the ELF identifier and file name as described in Appendix A.

• Identify any potentially sensitive information (cognizant CNWRA manager) and provide it to the Director of Administration.

— Obtain client concurrence in assigning any sensitivity category.

— The CNWRA Director of Administration is responsible for resolving any questions related to record sensitivity.

— Complete the appropriate sensitive information identifier in ELF, and prepare the appropriate targets and associated descriptive information.

(d) Calibration records shall be assembled and prepared by assigned CNWRA staff by

• Preparing a separate folder for each calibrated device with the included material in chronological, ascending order, from earliest to latest.

(e) Quality assurance audit reports, surveillance reports, nonconformance reports, and corrective action requests shall be assigned a unique document identifier for each item.

5.2.2 Scanning

5.2.2.1 General Instructions for Scanning

In the scanning phase, the following actions will be completed.

• Scan, quality check, verify, and process the record for optical character recognition (OCR), as appropriate, consistent with guidance for submission of electronic docket materials under 10 CFR Part 2, Subpart J.

- Limit the file size in accordance with 10 CFR Part 2, Subpart J.

- Complete text source information on the document submission form, as required.

- Produce two electronic versions of any document that has sensitive, copyright protected, or proprietary material and that will be sent to NRC for inclusion in the ADAMS system.

  — One version will be the complete document for retention in CNWRA files.

  — One version will omit any sensitive, copyright protected, proprietary, or irrelevant information and will be provided to NRC, as directed. The CNWRA shall also retain a copy of this version.

- For documents that will be forwarded to NRC, generate two compact discs of the scanned document. For all other documents, generate a single compact disc.

- Document completion of scanning in ELF.

5.2.2.2   Specific Scanning Instructions for Document Categories

These steps are to be performed in addition to those in Section 5.2.2.1, as applicable.

The procedural steps defined in Section 5.2.2.1 are adequate for software control documentation, technical report/presentation documentation, quality assurance programmatic records, calibration records, sample logs, and procurement records.

(a)   Scientific and field notebooks shall be scanned in accordance with any special scanning instructions provided by CNWRA staff.

- Any copyright protected material in notebooks to be included in ADAMS shall be redacted, and the redacted material will be replaced by a reference cite before the image file of the notebook is sent to NRC.

(b)   Procurement records shall be scanned as follows.

- Procurement records for each project number will be scanned as a separate file. Several projects may be combined for a single file set.

- Produce two electronic versions of procurement records.

  — One version will be the complete set of procurement records for retention in CNWRA files.

— One version will contain only quality affecting procurement files and will be provided to the client, as directed.

5.2.3   Process Documentation and Filing

CNWRA records process documentation and filing will be supported by the capabilities of ELF and by a dedicated server that will store an image of each scanned document.

5.2.3.1   Instructions for Process Documentation and Filing

There are no unique process documentation and filing requirements for specific document categories, and the instructions in this section are to be used for all CNWRA records.

Process documentation and filing are to be completed as follows.

(a)   Completion of the following document processing steps will be recorded with a date entry in ELF.

•   Completion of assembly and preparation actions and entry of the following information in ELF.

— Document category

— ELF identifier (Q number)

— Title

— Date

— Author(s)

— Sensitivity or classification flag and category (to be used for any category of sensitive or classified information)

•   Completion of scanning

•   Completion of filing (original and CD–ROM)

— For each document, ELF shall identify the CD–ROM containing the document

•   Sending a document to NRC, if required

•   Receiving acknowledgment of document receipt from NRC

5.2.4   Shipping

Some CNWRA records are shipped or delivered to NRC or other clients, while other records are retained at CNWRA. This phase of records management provides the means to determine whether records have been provided to the client. For some records prepared to support the NRC high-level waste program, regulatory requirements dictate that the records be entered in the ADAMS system for further transfer to the LSN, if required. The process documentation and filing detailed in Section 5.2.3 will provide confirmation that records have been shipped and, as appropriate, entered in ADAMS.

CD–ROM prepared using this procedure for shipment to the NRC, will be mailed to NRC routinely and consistent with Document Processing Center needs. The mailing address will be:

U.S. Nuclear Regulatory Commission
Attn.: Document Control Desk
11555 Rockville Pike
Rockville, MD 20852

5.2.5   Records Management Verification Checks

Implementation of the CNWRA records management process is subject to the CNWRA Quality Assurance Manual. In addition, this procedure requires the following quality control checks.

- Verify the quality of each scanned image.

- Document operator proficiency in implementing this procedure in personnel training records.

6.   RECORD RETENTION POLICY

Each CNWRA staff member is responsible for implementing the following record retention policy.

- Minimize retention of individual copies of documents that have already been archived in the quality assurance or ELF records.

- Routinely delete or dispose of files that are fully captured in another document that is retained (e.g., inputs to Program Manager's Periodic Reports, or other composite documents).

- Routinely delete unneeded files from "temp" directories that are maintained on desktop computers.

- Keep retained records as hard copies. Do not leave these records in your email or in a computer directory.

- Once you are involved in a legal proceeding, keep all relevant material. Additionally, if you know a topic you are involved in is subject to imminent or foreseeable legal action, all relevant documentation should be kept.

- Routinely delete administrative email (e.g., global postings, meeting announcements, inputs to weekly meetings, etc.) from inbox, sent items, and deleted items folders. Maintain electronic or hard copies of email that is an official record or that records a business transaction (e.g., documentation of deliverable acceptance or delivery date change). If you would save the email as a paper document, save it. If you would not save it as a paper document, delete it.

7. RECORDS

All items identified as documentation within this procedure shall be maintained in accordance with the requirements of the CNWRA Quality Assurance Manual and related implementing procedures.

Appendix A

Assignment of Electronic Library Facility (ELF) Identifiers and File Names

The CNWRA ELF automatically assigns a unique document identifier with the following format. The ELF identifier will also be the basis for the scanned document file name.

Q (Identifies the document as CNWRA record) Date (YYYYMMDD) Four digit unique number for that date (XXXX).

As an example, the ELF record Q20030227001 would be the first record entered into ELF on February 27, 2003.

A suffix will be added to the ELF identifier to denote section numbers, if the document must be separated into sections to meet minimum size requirements. An "X" suffix would denote the last section of the document. A suffix will also be used if the item is something other then a regular document, such as a drawing, a target, or the review documentation for the associated technical report or software development records.

Acceptable suffixes are:

D = Drawing
C = Review comment documentation

Examples of unique file names follow.

Q200302270011-01   First section of ELF document Q200302270011

Q200302270011-02   Second section of ELF document Q200302270011

Q200302270011-03X   Last section of ELF document Q200302270011

Q200302270011C   Review documentation for ELF document Q200302270011

For large or oversized images, a target will be inserted in the document, and the image will be scanned as a separate file. A suffix of the form -D01 will be added to the document file name to identify the oversize image.

For LSN documents, CD–ROM will be numbered sequentially in the format LSN_n.

Appendix B

Scanning and Optical Character Recognition of CNWRA Records

B.1 Scanner Settings and Calibration

B.1.1 Settings

For each type of document identified, specific scanner settings and processes will be utilized.

The following is an example of the settings used for the Fujitsu fi 4990C high speed black and white or color duplex scanner scanning normal black and white laser printed text .

Resolution:	300 dots per inch (dpi) (400dpi available)
Mode:	Black and white (Halftone, Grayscale, or Color available)
Brightness:	Setting determined for particular scanner
Threshold:	112 (Setting determined for particular scanner, image vs. background color)
Contrast:	104 (Setting determined for particular scanner)
Gamma:	Sharp
White Level Follower:	Sets background color of paper to be white in scanned image
Dropout Color:	Green, Red, or Blue (Green is default)
Image Filter:	Normal
Deskew:	Automatic

B.1.2 Calibration

Scanner and other hardware will be calibrated as required by operating manuals.

B.1.3 Scanning Procedure

Scanning will be conducted using the following steps.

(1)   Enter the record into a "work in progress" log file.

(2)   Name the file in accordance with Appendix A.

(3)   Scan the record following any special scanning instructions provided by the CNWRA staff.

(4)   Perform a quality check on each scanned page to assure completeness and a level of quality sufficient for further processing or for submittal to the U.S. Nuclear Regulatory Commission (NRC) Agency-Wide Documents Management System (ADAMS). Ensure any special scanning instructions have been complied with.

(5)   Rescan any missing or unacceptable pages until an adequate image is obtained.

(6)   Store "image only" files in unique folders on an assigned server.

(7)   Process files designated for text conversion using an OCR program to produce an "image plus hidden text" version of a Portable Document Format (PDF) file and store them in unique folders on an assigned server.

(8)   Perform a verification of each page processed by OCR that does not meet an assigned threshold of accuracy.

(9)   Process verified documents as PDF files.

B.1.4   Scanning Format and OCR Requirements by Document Category

•   Technical Reports
— pdf image*
— Text searchable†
— OCR correction not required

•   Sample Logs
— pdf image*

•   Software‡
— pdf image*
— Text searchable†
— OCR correction not required

•   Procurement
— pdf image*

•   Scientific Notebook
— pdf image* (exception: existing electronic files)

•   Qualify Assurance Programmatic Records‡
— pdf image*
— Text searchable†
— OCR correction not required

*All documents will have a pdf image.
†Perform OCR correction as necessary.
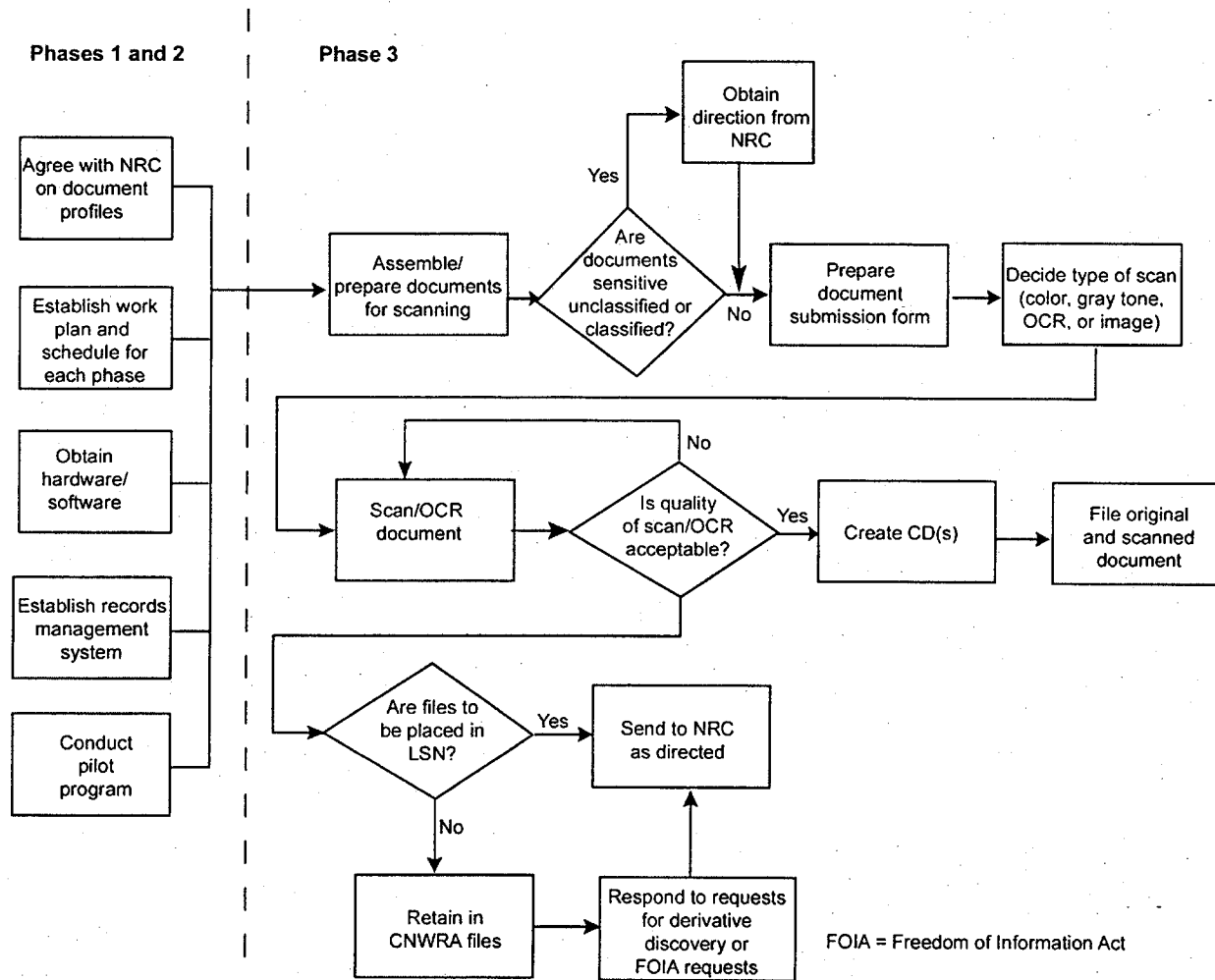‡No text search for handwritten items.

CENTER FOR NUCLEAR WASTE
REGULATORY ANALYSES

QUALITY ASSURANCE PROCEDURE

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Phases 1 and 2

Phase 3

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┌──────────────┐
│ Agree with NRC│
│ on document   │
│ profiles      │
└──────────────┘

┌──────────────┐
│ Establish work│        ┌──────────────┐         ┌────────────┐         Yes    ┌──────────────┐
│ plan and      │        │ Assemble/    │        ╱ Are          ╲               │ Obtain        │
│ schedule for  │───────▶│ prepare      │───────▶│ documents     │─────────────▶│ direction from│
│ each phase    │        │ documents    │        ╲ sensitive    ╱               │ NRC           │
└──────────────┘        │ for scanning │        ╱ unclassified  ╲              └──────────────┘
                        └──────────────┘        ╲ or classified? ╱
┌──────────────┐                                  ╲   No  ╱
│ Obtain        │                                           ┌──────────────┐   ┌──────────────┐
│ hardware/     │                                           │ Prepare       │   │ Decide type of│
│ software      │                                           │ document      │──▶│ scan (color,  │
└──────────────┘                                           │ submission    │   │ gray tone,    │
                                                           │ form          │   │ OCR, or image)│
┌──────────────┐                                           └──────────────┘   └──────────────┘
│ Establish     │
│ records       │
│ management    │
│ system        │
└──────────────┘

┌──────────────┐
│ Conduct       │
│ pilot         │
│ program       │
└──────────────┘
```

Figure flow (Phase 3 continued):

- Assemble/prepare documents for scanning → Are documents sensitive unclassified or classified?
  - Yes → Obtain direction from NRC → Prepare document submission form
  - No → Prepare document submission form → Decide type of scan (color, gray tone, OCR, or image)
- Scan/OCR document → Is quality of scan/OCR acceptable?
  - No → Scan/OCR document
  - Yes → Create CD(s) → File original and scanned document
- Are files to be placed in LSN?
  - Yes → Send to NRC as directed
  - No → Retain in CNWRA files → Respond to requests for derivative discovery or FOIA requests → Send to NRC as directed

FOIA = Freedom of Information Act

Figure 1. Processing and Managing CNWRA Legacy Records

Document Date:	
Document Type:	
Availability:	☐ Publicly Available ☐ Non-Publicly Available
Title:	
Author Name:	
Author Affiliation:	Center for Nuclear Waste Regulatory Analyses
Docket Number:	WM-00011
License Number:	Pre
Case/Reference Number:	
Document/Report Number:	Q#
Keyword:	
Document Sensitivity:	☐ "Non-Sensitive" ☐ Sensitive ☐ "Non-Sensitive - Copyright" ☐ Sensitive - Copyright
Text Source:	☐ "No Text Source" ☐ "OCRed from scanned image - no corrections made" ☐ "OCRed from scanned image - corrections made"

Figure 2. Example Document Submission Form

Document Date:	
Availability:	Southwest Research Institute® Center for Nuclear Waste Regulatory Analyses 6220 Culebra Road San Antonio, Texas 78228
Contact:	Southwest Research Institute® Center for Nuclear Waste Regulatory Analyses 6220 Culebra Road San Antonio, TX 78228-5166 Attn.: Director of Administration 210.522.5054
Data Sensitivity:	☐ "Non-Sensitive" ☐ Sensitive ☐ "Non-Sensitive - Copyright" ☐ Sensitive - Copyright
Date Generated:	
Operating System: (including version number)	
Application Used: (including version number)	
Media Type: (CDs, 3 1/2, 5 1/4 disks, etc.)	
File Types: (.exe, .bat, .zip, etc.)	
Remarks: (computer runs, etc.)	Media contains:

Figure 3. Example Target Sheet