

## 14. CHANGED, REVISED, AND REDACTED DOCUMENTS

Under the LSN program, participants control their own websites containing their documentary material. They are responsible for the completeness and correctness of the documentary material presented there. Because all other participants must be able to rely on the integrity of the documentary materials presented on participant LSN websites, the LSNA has determined that guidance concerning changed documents is appropriate. Because there is no way of knowing who has viewed or used a document and intends to rely on it or subsequently proffer it as an exhibit, the potential submitter of the exhibit and the PO must have a means to determine if a corrected, revised, or redacted version has been made available by the originator. In addition, the LSNA must be notified in order for the change to be posted on the central LSN web site (see Guideline 2, LSN Roles and Responsibilities). Guidance is also provided on the use of cross references to identify that a document has been changed, as well as to identify other relationships between documents.

### 14.1 General Responsibilities for Changed Documents

A participant is allowed to correct or revise documents already made available on their website, as long as:

- A corrected or updated document is noted as superseding a previously provided document;
- The previous version is not removed; and
- Other parties or potential parties are notified of the change.

**Correcting or revising a document can be summed up in three examples.** The first is the correction of any errors discovered in a previously-entered document. In this case, the incorrect document remains on the system with its own bibliographic header, and the corrected version of the document is entered as a separate document with its own bibliographic header. The bibliographic headers for each document must include references to the other document in the "Related Record Code" and "Related Record Number" fields (see Section 14.2). The LSNA must be notified that the incorrect document was corrected.

The second instance is the entry of updated pages to a document that already is on the system and is not being issued as a new, revised "stand-alone" document. In this case, the updated pages (i.e., the supplement) must be entered as a separate document with a separate bibliographic header. The bibliographic header of the original document and the bibliographic header of the updated pages each must reference the other document (see Section 14.2). The LSNA must be notified that the original document was supplemented.

The third circumstance is a new "stand-alone" revision to an entire document (e.g., a "Rev. 1" document). The revised document is entered as a separate document with its own bibliographic header that notes that it is a revision of another document that is on the system (e.g., enter the revision in the "Version" field of the bibliographic header). There is no need to notify the LSNA, nor to amend the header of the original document to indicate the existence of

the new “stand-alone” revision because the revision would be identified through the routine full text search process.

**NOTE A:** Changing the bibliographic header does not change a document. Therefore, a participant does not need to notify the LSNA when correcting, supplementing, or otherwise changing a bibliographic header, as long as the change in the header has no impact on the document or image.

**NOTE B:** Redacting a document is not a “change” to the original document; it is a different document. See Section 14.5 on guidance for handling redacted documents.

## 14.2 Cross-Referencing Documents in Bibliographic Headers

As noted in Section 14.1, if a change is required to a document that involves its being superseded or supplemented, the bibliographic header of the original document and the bibliographic header of the new document must cross-reference each other. This is accomplished by entering information into the “Related Record Code” bibliographic header field and the “Related Record Number” bibliographic header field of the two related documents.

The “Related Record Code” identifies instances when there is a relationship between documents. Examples of relationships captured in this field include:

- parent/child (a document and its attachments);
- whole/part (a book and its chapters, a journal and its articles);
- an information package and the cataloging units it contains; or
- original/subsequent (a document and a later version, comments, corrections, or errata).

The “Related Record Number” field contains the Participant Accession Number(s) of a document that has a particular relationship to that document. The type of relationship is captured in the “Related Record Code” field. Each entry in the “Related Record Number” field will be linked to a corresponding entry in the “Related Record Code” field by a reciprocal code, for example, the reciprocal for Document A that has attachment Document B is Document B is an attachment to Document A.

The participant should accomplish this cross-referencing by completing the following:

First, determine whether a document has a relationship to another document. The following relationships should be considered:

- Documents that are attached to, or a part of, other documents (the LSNA does not require notification); and
- Documents that correct, supplement, or supersede other documents (the LSNA requires notification).

Once it has been determined that a document has a relationship to another document, then determine and record the correct relationship between the two documents. In the “Related

Record Code” field of the first document, enter the relationship to the second document and in the “Related Record Number” field, enter the Participant Accession Number of the second document.

Then, in the “Related Record Code” field of the second document, enter the reciprocal relationship code to the first document and in the “Related Record Number” field, enter the Participant Accession Number of the first document.

Be careful to ensure that the correct version of the code is entered in each “Related Record Code” field. Remember there must be a one-to-one correspondence between entries in each of these fields, i.e., there must be a Related Record Number if there is a Related Record Code, as well as a Related Record Code and Related Record Number for the reciprocal document. Specific examples are set forth below.

Examples of reciprocal codes that a participant can use include:<sup>14-1</sup>

ATT	has attachment(s)	ATT-TO	is attached to
PARTS	has part(s)	PART-OF	is part of
COR	corrects	COR-BY	is corrected by
SUPL	supplements	SUPL-BY	is supplemented by
SUPR	superseded	SUPR-BY	is superseded by

#### 14.2.1 Attachments to Documents

Documents often contain attachments, for instance a cover memo transmitting a report. The cover memo is the document and the transmitted report is the attachment. It may be important to maintain that relationship in order to know who received the report and when.

In the bibliographic header of the cover memo, enter ATT in the “Related Record Code” field and the Participant Accession Number of the attachment in the “Related Record Number” field. In the bibliographic header of the attached report, enter ATT-TO in the “Related Record Code” field and the Participant Accession Number of the cover memo in the “Related Record Number” field.

EXAMPLE: Memo transmits Report.

The bibliographic header of Memo will contain:

Related Record Code = ATT

Related Record Number = Participant Accession Number of Report

The bibliographic header of Report will contain:

Related Record Code = ATT-TO

Related Record Number = Participant Accession Number of Memo

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<sup>14-1</sup>Other codes used by participants are acceptable and should be communicated to the LSNA at the time the initial connection is established.

NOTE: The LSNA does not need to be notified if a document contains attachments, as long as the relationships of the document and its attachments are identified through use of the Related Record Code and Number fields at the time the participant makes the document available to the LSN.

### 14.2.2 Documents That are Parts of Other Documents

Documents can be divided into parts (e.g., due to their large size). In addition, a portion of one document can be included as supporting material (an attachment) to another document. In these cases, the “Related Record Number” field of the part contains the **Participant Accession Number** of the whole document, and the “Related Record Number” field of the whole document contains the **Participant Accession Number** of the part(s). In the bibliographic header of the part of the document, enter PART-OF in the “Related Record Code” field and the **Participant Accession Number** of the whole document in the “Related Record Number” field. In the bibliographic header of the whole document, enter PARTS in the “Related Record Code” field and the **Participant Accession Number** of the part in the “Related Record Number” field.

EXAMPLE: Part 1 and Part 2 are portions of Whole Document.

The bibliographic header of Whole Document will contain:

Related Record Code = PARTS

Related Record Number = **Participant Accession Number** of Part 1

Related Record Number = **Participant Accession Number** of Part 2

The bibliographic header of Part 1 will contain:

Related Record Code = PART-OF

Related Record Number = **Participant Accession Number** of Whole Document

The bibliographic header of Part 2 will contain:

Related Record Code = PART-OF

Related Record Number = **Participant Accession Number** of Whole Document

NOTE: The LSNA does not need to be notified if a document contains parts, as long as the relationships of the parts and the whole are identified through use of the Related Record Code and Number fields at the time the participant makes the document available to the LSN.

### 14.2.3 Corrected Documents

Occasionally corrections are made to an existing document. These corrections may be labeled as Correction Sheets on the document. In the bibliographic header of the original document, enter COR-BY in the “Related Record Code” field and the **Participant Accession Number** of the corrected document in the “Related Record Number” field. In the bibliographic header of the corrected document, enter COR in the “Related Record Code” field and the **Participant Accession Number** of the original document in the “Related Record Number” field.

EXAMPLE: Errata Sheet corrects Report.

The bibliographic header of Report will contain:

Related Record Code = COR-BY

Related Record Number = **Participant Accession Number** of Errata Sheet

The bibliographic header of Errata Sheet will contain:

Related Record Code = COR

Related Record Number = Participant Accession Number of Report

NOTE: The LSNA must be notified if a document is corrected.

#### **14.2.4 Supplementary Material**

A document may supplement a previous document (e.g., something may have been added to make up for a deficiency in the original document). In the bibliographic header of the original document, enter SUPL-BY in the “Related Record Code” field and the Participant Accession Number of the document which supplements it in the “Related Record Number” field. In the bibliographic header of the document that supplements the original, enter SUPL in the “Related Record Code” field and the Participant Accession Number of the original document in the “Related Record Number” field.

EXAMPLE: Addition supplements Original.

The bibliographic header of Original will contain:

Related Record Code = SUPL-BY

Related Record Number = Participant Accession Number of Addition

The bibliographic header of Addition will contain:

Related Record Code = SUPL

Related Record Number = Participant Accession Number of Original

NOTE: The LSNA must be notified if a document is supplemented.

#### **14.2.5 Superseded Documents**

Occasionally a document becomes obsolete and is superseded by a new document, but it is important to maintain the relationship with the old document (as opposed to a stand-alone revision). In the bibliographic header of the original document, enter SUPR-BY in the “Related Record Code” field and the Participant Accession Number of the document that supersedes it in the “Related Record Number” field. In the bibliographic header of the document that supersedes the original, enter SUPR in the “Related Record Code” field and the Participant Accession Number of the original document in the “Related Record Number” field.

EXAMPLE: Better supersedes Original.

The bibliographic header of Original will contain:

Related Record Code = SUPR-BY

Related Record Number = Participant Accession Number of Better

The bibliographic header of Better will contain:

Related Record Code = SUPR

Related Record Number = Participant Accession Number of Original

NOTE: The LSNA must be notified if a document is superseded.

### 14.3 Specific Guidance Regarding Documents Revised Using Updated Pages

As noted in Section 14.1 above, a participant may choose to revise or correct a document using updated pages rather than issuing a new, revised “stand-alone” document. These updated pages must be entered into the LSN as a separate document with a separate bibliographic header from the original document. The bibliographic header of the original document and the bibliographic header of the updated pages must reference each other (see Section 14.2).

Documents submitted as evidence must be transmitted electronically to the EHD, as well as to other parties. If a party wishes to submit as evidence a document that has been revised, the party must submit one complete electronic file containing the revised document. SECY is not responsible for incorporating the electronic file of the updated pages into the electronic file of the original document to create an electronic file of the revised document, nor will the EHD accept links from the original document to the updated pages.

Consequently, notwithstanding the fact that it may exist in the LSN as two files, if a participant requests a copy of a document that was revised or corrected using updated pages, the authoring participant must supply the entire revised document in one file to the requesting participant, not two files consisting of the original document and the uncollated updated pages. In other words, if a document that was revised using updated pages is requested by another party, the participant must give the requestor the complete document, including the updated pages incorporated into (rather than pasted onto the end of) the document.

### 14.4 Notification by Participants of Changes to Documents

If a participant corrects, supplements, or supersedes a document, the participant is not required to notify separately all the other parties or potential parties. The participant must, however, notify the LSN Administrator, who will post notification on the central LSN site to inform users of the updated information. The central LSN site will contain a listing of changes, if any, to each participant’s collection, identified by LSN accession number, with a description of what the change was, the date of the change, and why it was necessary. In addition, the participant may post a notice on its LSN website if desired.

A participant does not need to notify the LSNA if a document contains an attachment or parts, because the attachment or parts are identified in the Related Record Code and Number fields at the time the participant makes the document available to the LSN.

### 14.5 Redacted Documents

Standard practice for identifying sensitive documents in the LSN is to create a bibliographic record and withhold the text and/or image (also known as a “header-only”) of the sensitive document. Parties may choose to make a redacted, or sanitized, version of a sensitive document available to other parties via the LSN; however, the process of redaction creates a new item of documentary material that is distinct from the original, sensitive document. Therefore, the documents must be clearly distinguishable should both the sensitive and redacted item be introduced into the proceeding with requests that they be marked as

evidence<sup>14-1</sup>. This can be accomplished by each such item having a unique Participant Accession Number and ensuring that references link the two related documents.

Where a bibliographic header-only record has previously been added to the LSN, no changes need be made to the existing record, nor does it need to be deleted, should a party choose to subsequently make the redacted version of a document available. However, when a redacted version is going to be added to the LSN when a “header-only” record already exists in the system, the bibliographic header of the redacted document must:

- a) have a Participant Accession Number that is different from a Participant Accession Number used for the sensitive version;
- b) state in either the Title or Comments field that it represents a redacted version of a document;
- c) state the reason/justification for the redaction in the Comments field; and
- d) provide the Participant Accession Number and its corresponding LSN Accession Number for the sensitive version in the Comment field.

EXAMPLE: Redacted is a redacted version of Sensitive which is on the LSN

The bibliographic header of Sensitive will contain:

Title = Assessment of Nevada Test Site Borehole Findings

LSN Accession Number = DEN9999999998

Participant Accession Number = AAA.YYYYMMDD.9998

The bibliographic header of Redacted will contain:

Title = Assessment of Nevada Test Site Borehole Findings (Redacted)

LSN Accession Number = DEN9999999999

Participant Accession Number = AAA.999999999.9999

Comments = This document is a redacted version of LSN Accession Number DEN9999999999, Participant Accession Number AAA.YYYYMMDD.9999, due to Homeland Security sensitivity

When a participant is entering a redacted document to the LSN and no previous “header-only” record exists in the system for the sensitive version of the document, the bibliographic header of the redacted document must follow the above noted instruction except that a Participant Accession Number for a sensitive version of the document as referenced in the Comments field will not have a corresponding LSN Accession Number (having not previously been made available as “header-only”).

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<sup>14-1</sup>In accordance with §2.1006, the PAPO or the PO may deny in whole or in part a claim of privilege for a document which exists on the LSN. This could result in PAPO/PO direction that a sensitive document be produced to another party under a protective order and, in consequence, that the document may ultimately be submitted as a prefiled exhibit by a party other than the originator.

EXAMPLE: Redacted is a redacted version of Sensitive which is not on the LSN

The bibliographic header of Redacted will contain:

Title = Assessment of Nevada Test Site Borehole Findings (Redacted)

LSN Accession Number = DEN999999999

Participant Accession Number = AAA.99999999.9999

Comments = This document is a redacted version of Participant Accession Number AAA.YYYYMMDD.9999 AAA.YYYYMMDD.9999, due to Homeland security sensitivity

In the event that another participant challenges the originator's claim of privilege, prevails before the PAPO/PO, and is granted access to the sensitive version of the document, the originator must then create a bibliographic "header-only" entry (if one does not exist) for the sensitive version of the document that has been produced, so that an LSN Accession Number can be assigned and be available for use in submitting the document via NRC's EIE.

NOTE: The LSNA does not need to be notified if a redacted version of a restricted access document exists.

#### 14.6 Additional Participant Responsibilities

Participants should be aware of the following additional items:

- If a participant experiences technical difficulties during or after a bulk load that it concludes will affect the loading of documents into the LSN, and the LSN has not crawled the participant's LSN website (see crawler schedule), the participant may remove the documents included in the bulk load and reload them. The participant must notify the LSNA of the technical problem contemporaneously with reloading of the documents.
- If a change is required to a document that has been crawled (i.e., the document has been assigned an LSN Accession Number), the responsible participant must add the corrected document (and its corresponding bibliographic header) as a new document on its LSN website. The header of the original incorrect document and the header of the newer correct document must cross reference each other (see Section 14.2). Contemporaneous with the addition of the corrected document, the participant also must notify the LSNA of the specific change(s), including LSN Accession Number, a description of what the change was, the date of the change, and why it was necessary. The LSNA will post a notice of the change on the central LSN site (see Section 14.4).
- If a participant determines that a document needs to be removed from its website, the participant must notify the LSNA by communicating the LSN Accession Number of the affected document and a description of why the document needs to be removed from its website. *The participant should provide a file [preferably a spreadsheet (such as Microsoft Excel) or text] that lists the old LSN Accession Number and a description of why the document needs to be removed.* The document will be queued up for a special deletion run. After successful deletion, the LSNA will post a PDF file containing the LSN

**Accession** Number and reason why the document was deleted on the central LSN website.