

COMBINED LICENSE APPLICATIONS ELECTRONIC FORMATTING ISSUES

1. File Links between Combined License (COL) FSAR, Early Site Permit documentation and Design Certification documentation are needed to allow ease of use of the COL Application. NRC Guidance for electronic submission prohibits file linkages.

Electronic Submission is allowed by various regulations, e.g. §50.4, §51.55. The NRC guidance applicable to this issue is as follows:

“Guidance for Electronic Submissions to the Commission

2.9 File Linkages

Files containing objects (e.g., pictures, tables, spreadsheets, and images of text) using link protocols such as Object Linking and Embedding (OLE), Dynamic Data Exchange (DDE), or any other object linking between electronic files are not practicable for the NRC to accept because the relationships among links in multiple file submissions are lost when captured in ADAMS or other agency electronic recordkeeping systems. However, links with a single electronic PDF file are acceptable.”

2. NRC Guidance is conflicting. NRC Guidance for Electronic Submissions (section 2.3) limits file sizes to 50 MB each. Section 2.14 “Segmentation of Large Documents” warns against submitting large volumes of smaller files. NRC Guidance for Web Compatibility limits file size to 5MB (see attached).
3. Occasionally, the NRC staff has specifically requested *.tiff files (i.e. original format) be docketed (e.g. Early Site Permit Requests for Additional Information). This is contrary to NRC Guidance for Electronic Submissions section 2.1 and has caused Public Document Room rejection of submittals. However the NRC reviewer requested/wanted to review the original format files before they were combined into a single *.pdf file/page.

OCIO Instructions to ensure CDs are web compatible
(License Renewal Preferences are Italicized)

1. The CD should be cleanly formatted. The use of executables and index files to improve stand-alone CD capabilities should be minimized to facilitate adaptation to the web. Additional directories or files (such as those that Adobe places on the CD with executables or sample files) should be clearly identified and will not be posted to the web.
 - a. No auto-run on CD for Web
 - b. Suggested PDFs broken down as application, environmental report, and groupings of environmental report appendices (to help stay within the 5MB range)
 - c. *Bookmarks also cleanly formatted and include both the section number and title*
2. Typical file size should not exceed 5 MB to improve availability of the files. For those in excess of 5 MB, OCIO will determine whether the NRC would need to divide the files into smaller components prior to posting on the web. *(To help keep file sizes down, try not to include extraneous pictures that do not add value to the application. Also see No.8 below concerning graphics.)*
3. If the CD includes more than one PDF file, and the files need to be linked together, the following requirements apply:
 - a. The links within the PDF files must be formatted as standard html links, not generated using the Acrobat catalog feature, which generates proprietary links that will not work with a non-Adobe Webserver. There should be limited PDF index files (only as needed to support stand-alone functionality) on the CD.
 - b. The file names, directory names, and corresponding links on the CD must not include the space character (ASCII code 32) or other characters beyond the alphanumeric portion of the ASCII character set. Underscores (ASCII 95) and hyphens (ASCII 45) are permitted.
 - c. Filename nomenclature is to use lowercase for all alphabetical characters in file names and directory names.
(Links in documents and bookmarks are fine as long as you follow these three guidelines above, otherwise the links will be deleted from the PDFs for the web.)
2. The files on the CD should not be locked or password protected in any way.
3. The files should be saved in Acrobat 3.0-compatible format (an option in Acrobat 4.0). *(The NRC is currently using Acrobat 5.0.)*
4. The embedded font option should be set to 100% - - all fonts should be stored in the file.

5. Be sure to optimize the PDF in Acrobat application if you make changes in Acrobat after the initial PDF is created. This will ensure that old information is removed and the file is as small as possible.
6. Graphic compression depends on intended purpose. If you set the pixel resolution for print quality (usually about 300 dpi), the file can get quite large if it has many graphics. As an alternative, set the sampling to 72 dpi, which will appear OK on a PC monitor but may not print as cleanly.