

Electronic Submittal Guidance – Industry Proposal – 7/26/2005

Several compatibility problems have been encountered during various attempts to address the different needs of different groups within the NRC. The industry would like to settle on a single set of files that can meet the needs of all groups within the NRC. Multiple file sets ultimately lead to unintended differences within the files and these differences must be avoided.

(1) One problem is conflicting guidance on File Size. ADAMS guidance limits files to 50 MB and strongly suggests that numerous small files are to be avoided. The WEB publishers want files no larger than 5 MB. The Industry proposes to provide as few files as practical with each file less than 50 MB in size. The applicant would not provide different versions of the application (e.g. with 5 MB files). If the NRC chooses to place the application on its website by changing the application to 5MB files, it would also post a disclaimer that the file does not represent the as-submitted application (and potentially how the public can request an official copy).

(2) Another problem is that ADAMS does not accept files containing objects using link protocols such as OLE or DDE. This has led to a mistaken belief that all links are lost in ADAMS. However, links between \*.pdf files (such as bookmarks and cross-references) are retained if the files are loaded directly into ADAMS, i.e., if NRC ADAMS personnel do not tinker with the file size or name, or scan the printed documents. The industry proposes to provide the entire application in \*.pdf format with files named according to the NRC guidance such that they can be loaded directly to ADAMS. Such files can provide the links useful to reviewers and these files can also be loaded to the WEB and into ADAMS.

{The Industry would note that the Exelon ESP application (docket no. 05200007 dated 9-25-2003) was provided electronically with a single set of \*.pdf files (containing links) that were used by the reviewers, loaded to the WEB, and loaded directly onto ADAMS. These files were recently downloaded from ADAMS and placed on a CD; the links between the \*.pdf files were found to work just as intended.}

(3) Finally, NRC staff has occasionally requested specific file types that do not meet the ADAMS formats. We understand that internal NRC documents do exist to allow for the requested submittals. The Industry recommends the internal guidance be made available to the Project Managers and to the industry such that these requests can be honored with a minimum of difficulty.