



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D. C. 20555

MEMORANDUM FOR: DHLWM Staff

FROM: Robert E. Browning, Director  
Division of High-Level Waste Management

SUBJECT: DOCUMENT PROCESSING PROCEDURES (PRELIMINARY)

The Division of High-Level Waste Management is revising its document processing procedures. These new procedures are intended to facilitate the creation of the Transitional Licensing Support System (TLSS) database and to improve our internal document management operations.

All final documents which are circulated, regardless of the organizational level at which they are prepared, shall be designated to go into the TLSS. Effective April 21, 1988, all circulated draft High-Level Waste documents (such as memorandums or notes) signed or distributed by a Branch Chief or higher, which communicate programmatic activities related to the Commission's mandate for licensing a High-Level geologic repository, shall be designated to go into the TLSS.

All final documents which the staff considers to be predecisional (e.g. advice, opinions, recommendations, including circulated drafts considered as part of the agency's deliberative process before a final decision is made (as defined in NRC Bulletin No. 3203-25 dated February 9, 1988) shall be identified in the TLSS on a bibliographic header but the text will not go into the TLSS.

The agency NUDOCS system shall file a copy of all documents designated as predecisional or for which other claim of withholding applies in the Central Files. The TLSS administrator shall release all draft documents signed by the Branch Chief or higher after the final document is issued. All other documents for which the Division of High-Level Waste Management claims a privilege shall not be released until the privilege is rescinded.

The following instructions for document preparation and distribution should be used by the staff:

1. Each HLWM document shall be prepared, edited and assembled in accordance with NMSS document processing procedures and designated to go into the TLSS or be classified as a predecisional document not to be entered into the TLSS. The "Document Preparation Checklist" shall be used by DHLWM staff for designation and be attached to each document.

2. The original and concurrence copies shall be sent to the IRM Document Control Center at 4C-20. An ARM staff person will be available at this location from 7:30 a.m. until 5:00 p.m. DO NOT make any copies of the documents for distribution. DO insure that all enclosures along with the WM checklist (sample copy enclosed), typed labels to addressees not listed on Standard Distribution and a distribution list is included in the package.
3. The electronic copy of the document on the 5520 system shall be sent electronically to the 5520 [NODE: INRC0304; USER ID: IRMTLSS]. All hard copy documents which are received by the Docket Control Center without an exact corresponding electronic copy shall be returned to the originator. It is imperative that the exact version of the document is sent electronically at the same time the hard copy is released to the Docket Center. Documents prepared in DW3 shall be uploaded to the 5520 and sent as a 5520 document.
4. The Docket Control Center shall perform all the duplication and distribution services within 24 hours after the document is received.

#### Personal Notes, Working Papers and Other Records

The formulation of ideas, positions and their communication is often accomplished on an informal basis as part of the normal work day process. This may include telephone conversations, writing notes, using electronic mail, "red-lining" draft documents or simply outlining thoughts and concepts.

Your personal notes, working papers and similar records fall under the broad category of "records" and may under certain circumstances become publicly available through either Discovery in the High-Level Waste Proceeding or Freedom of Information (FOIA) Act requests. Such records invariably lose their significance with time as specific decisions and work products are implemented or when a shift in programmatic direction takes place. On the other hand they can also serve to identify dissenting viewpoints. In such cases, the agency has standard procedures for voicing differing professional opinions (NUREG 1290).

To the extent that such personal notes, working documents and other records contain relevant information to the high-level waste licensing process which is not reflected in any documents present either as predecisional or final in the TLSS, these records should be formalized and submitted for inclusion into the TLSS. Otherwise, such records should be disposed of when no longer of value as a working document. Any prior distribution and proliferation of such records will be subject to FOIA and Discovery and would, at that time become part of the public record.

Avi Bender of ARM will brief the secretaries and other interested staff on these procedures and the DCS operations on Thursday, April 21 at 9:00 a.m. in Conference Room 4-B-11. Avi will answer any questions you have at that time.

*Robert E. Browning*  
Robert E. Browning, Director  
Division of High-Level Waste Management

Enclosure:  
As stated

cc: ~~B.~~ Shelburne, PDR  
J. Skozclas, ARM