

OFFICE OF THE SECRETARY
CORRESPONDENCE CONTROL TICKET

Date Printed: Jan 12, 2007 15:41

PAPER NUMBER:

LTR-07-0026

LOGGING DATE: 01/12/2007

ACTION OFFICE:

EDO

To: Miller, FSME

AUTHOR:

E. Kurt Hackmann

AFFILIATION:

WEC

ADDRESSEE:

Document Control Administrator

SUBJECT:

Additional Information on Westinghouse's comments at December 2006 briefing

ACTION:

Appropriate

DISTRIBUTION:

RF

LETTER DATE:

01/05/2007

ACKNOWLEDGED

No

SPECIAL HANDLING:

Made publicly available in ADAMS via EDO/DPC

NOTES:

EDO...coordinate appropriate action with OIS

FILE LOCATION:

ADAMS

DATE DUE:

DATE SIGNED:

cys:
EDO
DEDMRS
DEDR
DEDIA
AO
OIS



Westinghouse Electric Company
Hematite Former Fuel Cycle Facility
3300 State Road P
Festus, MO 63028
USA

U.S. Nuclear Regulatory Commission
Document Control Administrator
Washington, DC 20555

Date: January 5, 2007

Our ref: HEM-07-3

Subject: Additional Information on Westinghouse's Comments at December 2006 Briefing

Reference:

- 1). NRC Letter from Amy Snyder, "Submittal of Hematite Decommissioning Plan and Supporting Documentation - June 19, 2006", dated August 16, 2006 (ML061880342)

Dear Ms. Vietti-Cook:

During the Commission briefing on the Status of Decommissioning Activities on December 11, 2006, my presentation of Westinghouse's lessons learned at its Hematite, Missouri facility included comments on the difficulties encountered with the electronic submittal of documents to the NRC. These difficulties resulted in the rejection of the June 2006 submittal of a revision of the Hematite Decommissioning Plan. Based on the interest in this discussion expressed by the Commission, I committed to provide additional information on that experience.

Enclosed is an account of Westinghouse's in-house investigation into the basis for the submittal's failure to gain acceptance.

As a result of this investigation, we believe that inconsistencies and ambiguities continue to exist in the NRC's electronic submission guidance including changes that have been made on the NRC web site as recently as December 15, 2006.

I want to thank the Commission for its interest and attention to this matter. Please contact me at 314-810-3368 or our Director of Washington Operations, Charles Brinkman at 301-881-7040 if you wish to discuss these findings with us.

Sincerely,

A handwritten signature in black ink, appearing to read 'E. Kurt Hackmann'.

E. Kurt Hackmann
Director, Decommissioning Project

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Enclosure: "Westinghouse Experience with Submittal of Electronic Documents for the Hematite Decommissioning Project"

cc: Mr. John Hayes, FSME/DWMEP/DURLD
Dr. Gregory Jaczko, Commissioner, NRC
Dr. Dale Klein, Chairman, NRC
Dr. Peter Lyons, Commissioner, NRC
Mr. Keith McConnell, FSME/DWMEP/DURLD
Mr. Edward McGaffigan, Jr., Commissioner, NRC
Mr. Jeffrey Merrifield, Commissioner, NRC
Mr. Luis Reyes, Executive Director of Operations, NRC
Ms. Rebecca Tadesse, Branch Chief, Materials Decommissioning, NRC

**Westinghouse Experience with Submittal of Electronic Documents for
the Hematite Decommissioning Project**

Westinghouse Experience with Submittal of Electronic Documents for the Hematite Decommissioning Project

Executive Summary

During the Commission's public meeting held December 11, 2006, "Briefing on Status of Decommissioning Activities", Westinghouse's presentation included comments on the difficulties encountered with the electronic submittal of documents. Based on the interest in this topic expressed by the Commission, Westinghouse committed to provide additional information of the experience.

This paper presents the results of reviews conducted by Westinghouse regarding the technical rejection of its June 2006 electronic submittal of a revision to the Hematite Decommissioning Plan. Those reviews confirmed that NRC guidelines for the preparation of electronic documents are confusing and lead to difficulties in making acceptable submittals and that some of these problems continue to exist even in the new NRC website posted December 15, 2006. The primary reasons for the confusion and difficulties are:

1. At the time Westinghouse prepared the documents for submittal, the only available guidance was Appendix A, "United States Nuclear Regulatory Commission (NRC) Guidance for Electronic Submissions to the Commission." Westinghouse believes that Appendix A did not provide sufficient information to prepare documents in a manner that would pass the NRC's screening tests.
2. Just prior to the June 2006 submittal, the NRC modified the electronic submission guidance posted on their website. However, we were not aware of any general notification by the NRC that the guidance and acceptance standards had changed, and apparently there was no grace period for implementing them.
3. The primary NRC guidance document (Appendix A) does not provide cross reference to other documents that are necessary in acceptance of electronic submittals.
4. The guidance in Appendix A as well as the December 15, 2006 web site update link titled "How to Prepare a Document or File for Submission" are not consistent with the other recently added guidance documentation.
5. The reference guidance does not provide clear and consistent guidance to assure acceptance.

Background

The Hematite Facility submitted Revision 3 to the Decommissioning Plan (DP) along with supporting and reference documents by letter dated June 19, 2006. The documents were submitted in electronic format on two CDs as follows:

- CD#1 contained the DP and certain key support documents that would require NRC review and approval.
- CD#2 contained reference documents that were provided for the convenience of the NRC reviewers as background documents.

By letter dated August 16, 2006 (Attachment 1), Westinghouse was notified that the electronic media was not acceptable. Included was an internal NRC memo which provided the basis for the rejection. Westinghouse and the vendor who created the electronic submittal conducted a review of the rejection document and concluded we did not agree with the NRC comments. Westinghouse resubmitted the entire set of documents in hard copy format in order to save time. This is an acceptable alternate for submittal of documents to the NRC.

Previous Submittals

In August and September of 2005, Westinghouse had submitted electronically on CD-ROM the earlier revision of the DP and the supporting documents. No issues were identified and the documents were accepted for NRC acceptance review. A number of the supporting documents submitted in 2005 were resubmitted unchanged in June 2006 but were no longer deemed acceptable.

NRC Basis for Rejection

NRC listed the following reasons as the basis for the rejection of the June 2006 CDs:

1. CDs contained files that were scanned at less than 300dpi
2. Files do not contain hidden text
3. Files are not optimized for fast web view
4. Some files are greater than 50MB
5. Image with JPEG filter found
6. Some fonts not embedded

Westinghouse Review of NRC Comments

Based on the NRC internal memo, Westinghouse and the vendor who created the electronic submittal conducted a review of the issues. This included a review of the NRC guidance that was available at the time the documents were prepared along with subsequent guidance that was provided on the NRC website. At the time the CDs were prepared, the NRC guidance provided Appendix A, "Guidance for Electronic Submissions to the Commission" to be used as the basis for the settings used in Adobe Acrobat to generate the files. Attachment #2 provides the table of comments that resulted from that review.

It should be noted that on December 15, 2006 (following the December 11th meeting with the Commissioners), the NRC website that provides guidance for preparation of documents was revised including new information regarding the submission of electronic documentation. This new information has been reviewed and is included in this evaluation. The following are the results of our evaluation categorized by the specific reasons cited for rejection:

1. CDs contained files that were scanned at less than 300dpi

The Westinghouse DP documents were converted to PDF format using the setting "Resolution: 300 dots per inch" in accordance with the Appendix A guidelines for

settings. The NRC notes state that the Enfocus program was used to test the documents as submitted. This program provides two columns of results for resolution. In all cases the documents passed the “Physical Resolution” value by being greater than 300 dpi. In some cases the “Effective Resolution” result in the Enfocus report is less than 300 dpi and these instances are noted by the NRC as the reasons for rejection on this issue. **It is not clear what is meant by “Effective Resolution” and NRC guidance does not address this issue.** However, as noted above, the documents were generated using the settings provided in Appendix A.

2. Files do not contain hidden text

The NRC Enfocus report does not provide any detailed explanation for this statement. The issue apparently arises from scanned documents not having searchable text (or hidden text) included as recommended in the footnote to the Table in Section 2.1 of Appendix A. **The guidance indicates that searchable text is not always required but does not provide specifics as to when searchable text must be provided.** It appears that some attachments to the submitted documents, including computer code output reports, borings logs, copies of handwritten burial pit logs, etc. resulted in this issue. Westinghouse confirmed that certain documents or portions of documents do not have searchable text.

3. Files are not optimized for fast web view

The submitted documents were generated using the Appendix A guidance settings in which the Adobe Acrobat box titled “Optimize for Fast Web” was checked. **However, during our evaluation, Westinghouse confirmed that the submitted files, for reasons not yet understood, were not optimized for fast web view.** This finding is being pursued through the Westinghouse Corrective Action Program.

4. Some files are greater than 50MB

NRC guidance urges submitters to limit files to 50 MB but allows for larger files when it is not appropriate to break the files into smaller segments. Three files on CD#2 (reference documents) were greater than 50MB in size. These documents were historic reference reports that were available to Westinghouse only in hard copy format that were scanned in and provided for the convenience of the NRC reviewers. The largest file was nearly 200MB in size due to the inclusions of color plates that are necessary to understand the information provided. These documents were supporting in nature and not required as part of the NRC approval. The decision was made by Westinghouse to provide these documents as single files because it felt this was best for reader comprehension. **The guidance is advisory in nature and allows for files greater than 50MB.**

5. & 6. Image with JPEG filter found and some fonts not embedded

Westinghouse’s vendor who created the electronic submittal, recreated some of the 2006 submittal documents using the settings specified in the current Desk Reference Guide (noted on the NRC website), it found the “JPEG filter found” and the “Fonts not embedded” issues, identified in the NRC comments, were corrected based on Preflight testing. Please note that these documents were originally created using “Appendix A”

guidance. **This suggests that “Appendix A” guidance is not correct with respect to these items.**

As a specific example of inconsistent guidance, Appendix A and the new web link titled “How to Prepare a Document or File for Submission” does not indicate that the box titled “Subset embedded fonts when percent of characters used is less than 100 percent” should be checked for Acrobat 5.0. The new Desk Reference Guide and the “joboptions” file indicate that this box should be checked. Unfortunately, the Desk Reference Guide settings do not exactly match the “Appendix A” guidance, and the joboptions file settings do not exactly match either the “Appendix A” guidance or the Desk Reference Guide.

General Comments on NRC Guidance

With the possible exception of Item #3 above, the failures identified in the Enfocus report associated with documents submitted June 2006 are apparently attributable to following the NRC Guideline “Appendix A, United States Nuclear Regulatory Commission (NRC) Guidance for Electronic Submissions to the Commission, (Appendix A)” which was the appropriate guidance at the time the electronic document was created. The settings used were those given in Section 2.6 of “Appendix A” (See Attachment 2), and the file size and naming convention were those given in Sections 2.2 and 2.3 of “Appendix A”.

Subsequent to the preparation of the two CDs and just prior to the June 2006 submittal, Westinghouse was not aware or notified of the changes to the NRC website. Unfortunately, if Westinghouse had been aware of the new guidance, revising the documents to reflect the new guidance would have injected more delay time and expense into the process. The following additions were made to the website:

- The Desk Reference Guide for PDF Document Generation (June 1, 2006)
- The “joboptions” file (settings file)
- Preflight Error Test Software (intended to serve the same function as the Enfocus Software used by NRC for testing electronic documents)

Each of these items is intended to aid in the preparation of electronic submittals. However, using the new Desk Reference Guide settings did not correct the “Resolution <300 dpi” issue. Westinghouse’s vendor who created the electronic submittal downloaded the “joboptions” file from the NRC website, and recreated some of the submitted documents. These documents failed the Preflight test in much the same manner as the original documents failed the Enfocus test.

On December 15, 2006, the NRC website was updated to provide a “new look” that is intended to feature a less cluttered, public-friendly look. Westinghouse and our vendor reviewed the guidance for submission of Electronic Documents and it appears that the same ambiguities exist. Under the link titled “How to Prepare a Document or File for Submission” the guidance continues to be based on essentially the former Appendix A guidance, including the settings table which Westinghouse used and which appears to be at least in part the source of some of the problems.

It should be noted that this link document does not provide any cross reference to other available documents. However, the links to the additional and necessary documents can be found further down on the opening web page, under the title "Related Documents". It should also be noted that many documents are not dated. Therefore, it is not easy for the user to know when changes have been made.

Conclusions

Westinghouse believes that 1) our concern that the guidance provided by the NRC regarding the preparation of electronic documents is confusing and inconsistent is justified and 2) as a result of this situation, parties are choosing to submit paper documents.

Westinghouse would be pleased to provide further explanation of the above information and work with the NRC staff in achieving clear guidance for electronic submissions. Please contact Charles Brinkman at 301-881-7040 to arrange for further discussions.

Attachments:

1. NRC letter to Westinghouse dated August 16, 2006 with attached "Technical Reason to Reject CD Submittal of Hematite Decommissioning"
2. Westinghouse Comment Response Summary

Attachment 1 to Westinghouse Experience with Submittal of Electronic Documents for the Hematite Decommissioning Project

NRC letter to Westinghouse Dated August 16, 2006, "Submittal of Hematite Decommissioning Plan and Supporting Documentation." This package has ADAMS accession number ML061880342

2 Documents contained in the ML061880342 package: Submittal of Hematite Decommissioning Plan and Supporting Documentation - June 19, 2006

Image File	Title	Accession Number	Document Date	Estimated Page Count
 	1. <u>Submittal Of Hematite Decommissioning Plan And Supporting Documentation - June 19, 2006.</u>	<u>ML061860537</u>	<u>2006-08-16</u>	6
	07000036 SNM-0033 2006-08-16 2006-08-17 ML061880342+ August 16, 2006 E. Kurt Hackmann Site Manager Westinghouse Electric Company LLC 3300 State Road P Festus, MO 63028 SUBJECT: SUBMITTAL OF HEMATITE DECOMMISSIONING PLAN AND SUPPORTING DOCUMENTATION, JUNE 1			
	2. <u>Enclosure 1 - Technical Reason to Reject CD, Submittal of Hematite Decommissioning.</u>	<u>ML061910071</u>	<u>2006-06-27</u>	43
	07000036 2006-06-27 2006-07-10 June 27, 2006 NOTE TO: Amy Snyder FROM: Mike King, Document Control Desk SUBJECT: Document Control Desk Cannot Process Document on CD-ROM DOCKET NUMBER: 70-36 DOCUMENT DATE: June 19, 2006 TITLE: Submittal of Hematite Decommis			

**Attachment 2
Comment Response Summary**

File Name	PDF Provided By:	Issue Identified	Agree with Findings (Y or N):	Basis	Comment
001_DecomPlan.pdf	Enercon	image with jpeg filter found	N	C	
		not optimized for page by page viewing	N	A	
		resolution <300 dpi	Y	B	
		font not embedded	N	A	
002_Appendix A.pdf	Enercon and Westinghouse	image with jpeg filter found	N	C	
		not optimized for page by page viewing	N	A	
		resolution <300 dpi	Y	D	
		font not embedded	N	A	
003_Appendix B thru J.pdf	Enercon and Westinghouse	image with jpeg filter found	N	C	
		not optimized for page by page viewing	N	A	
		resolution <300 dpi	Y	D	
		font not embedded	N	A	
004_Key Support Documents.pdf	Enercon and Westinghouse	image with jpeg filter found	N	C	
		not optimized for page by page viewing	N	A	
		resolution <300 dpi (color)	Y	D	
		resolution <300 dpi (B&W)	Y	D	
		font not embedded	N	A	
SD01_KdReport_Determination of Distribution Coefficients.pdf	Westinghouse				
		not optimized for page by page viewing	NA	D	
		resolution <300 dpi (color)	NA	D	Logos
SD02_Gamma Survey Data Evaluation.pdf	Westinghouse	image with jpeg filter found	NA	D	
		not optimized for page by page viewing	NA	D	
		resolution <300 dpi (color)	NA	D	

File Name	PDF Provided By:	Issue Identified	Agree with Findings (Y or N):	Basis	Comment
SD03_Historic Site Assessment.pdf	Westinghouse	None	NA	D	
SD04_Surrogate Evaluation Report.pdf	Westinghouse	None	NA	D	
SD05_Site Specific Soil Parameters.pdf	Westinghouse	None	NA	D	
SD06_Evaluating Methods for Performing Final Status Surveys for Land Areas.pdf	Westinghouse	image with jpeg filter found	NA	D	
		not optimized for page by page viewing	NA	D	
		resolution <300 dpi (color)	NA	D	
SD07_Evaluation of a 2x2 inch NAI-Ti Fidler Detector. pdf	Westinghouse	image with jpeg filter found	NA	D	
		not optimized for page by page viewing	NA	D	
SD08_Task Specific Work Plan – Burial Pits.pdf	Westinghouse	image with jpeg filter found	NA	D	
		not optimized for page by page viewing	NA	D	
		resolution <300 dpi (color)	NA	D	
SD09_Geophysical Survey – Feb 2005.pdf	Westinghouse	image with jpeg filter found	NA	D	
		not optimized for page by page viewing	NA	D	
		resolution <300 dpi (color)	NA	D	

Basis A: Files created using Adobe Acrobat and Adobe Acrobat Distiller settings as specified in “Appendix A”

Basis B: Image <300 dpi, however, Adobe PDF files created from native Microsoft Word Documents as specified in “Appendix A”

Basis C: No information regarding this setting is given in “Appendix A” guidance provided the NRC. Default settings were used.

Basis D: PDF files provided by Westinghouse; Enercon cannot explain deficiencies since ENERCON cannot confirm settings used in file creation.

Attachment 2

"Appendix A" Settings

Category	Option	Recommendation Optimal on 5.0
General Options		
	Compatibility	5.0
	Optimize for Fast Web	X
	Embed Thumbnails	
	Auto-Rotate	
	Binding	Left
	Resolution (dpi)	300
Compression		
	Color Images	Bicubic Downsampling (NOT SELECTED)
	For images above 300 dpi	
	Compression	Zip
	Quality	8-bit
	Monochrome	Bicubic Downsampling (NOT SELECTED)
	For images above 450 dpi	
	Compression	CCITT Group 4
	Anti-Alias to Gray	Not Selected
	Compress Text & Line Art	Selected
Font		
	Embed All Fonts ¹	X
	Subset embedded fonts when percent of characters used is less than 100 percent	
	When Embedding Fails	Warn & Continue
Color		
	Setting File	None
	Color Management Policy	Tag Everything for Color Management
	Intent:	Default
	Gray	None
	RGB	SRGB IEC61966-2.1
	CMYK	US Web Coated (SWOP)v2
	Preserve Overprint Settings	X
	Preserve Under Color Removal	X
	Transfer Function	Preserve
	Preserve Halftone	
Advanced Options		
	Prologue.ps & Epilogue.ps	
	Allow PS to Override Job Options	X
	Preserve Level 2 Semantics	X

	Save Job Ticket	X
	Illustrator Mode	X
	Gradients to Smooth Shades	X
	ASCII Format	
	Process DSC Comments	X
	Log DSC Warnings	
	Resize for EPS	X
	Preserve EPS Info	X
	OPI Comments	X
	Preserve Doc Info from DSC	X

¹You must check the license(s) for any font(s) you intend to embed to verify that embedding is allowed. In some cases, the program will warn you if a font is not licensed for embedding, but this varies by vendor. Fonts must be embedded to comply with NARA guidelines