

NRCREP - Industry Comments on NRC Electronic Submissions Guidance

From: "KASS, Leslie" <lck@nei.org>  
To: <nrcprep@nrc.gov>  
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Subject: Industry Comments on NRC Electronic Submissions Guidance

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9

September 27, 2007

Rulemaking, Directives, and Editing Branch  
Office of Administration  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555-0001

Subject: Industry Comments on NRC Electronic Submissions Guidance

Project Number: 689

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The industry subgroup working on combined license applications (COLA) and design certifications (DCD) appreciates the consolidation of previous guidance for electronic submittals. In many areas, the document provides some very good content, such as the example letters.

We did note that the document can be difficult to follow in some places because the guidance is different for various types of submissions. The enclosure provides some clarifications to address specific areas of concern for COLAs and DCDs. However, in future revisions, it might be helpful to consider further separation of different types of submissions into complete sections rather than addressing some areas by exception.

We appreciate your time in reviewing these comments. If you have any questions regarding this letter, please do not hesitate to contact me at (202) 739-8115; [lck@nei.org](mailto:lck@nei.org).

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Sincerely,

A handwritten signature in cursive script that reads 'Leslie C. Kass'.

Leslie C. Kass

c: Mr. William D. Reckley, NRC  
Mr. K.G. Golshan, NRC  
Mr. Thomas E. Smith, NRC  
NRC Document Control Desk

# INDUSTRY COMMENTS ON NRC ELECTRONIC SUBMISSIONS GUIDANCE

## **Section 2.9 Settings for Creating PDF Formatted Text and Graphic Files**

The setting sample table gives resolution in dpi. This should be updated to ppi. NARA and most software now specifies resolution in ppi.

## **Section 2.23 Rejection of Submissions**

Should item 7 in the checklist have special instructions for COLAs and DCDs since the naming conventions are up to the applicant?

## **Sections 4.2.1 OSM Content and 8.1 COLA Submission Media and Format**

The status of indices as OSM content is unclear. Please provide guidance on how index files will be handled as they pertain to the guidance in 4.2.1 and 8.1. Guidance would also be helpful on how or if index files should be included in the COLA packing slip? Does this go with the associated files being indexed as if they are simply another component of the submission document? The statement at 4.2.2 in Rev. 1 to label the OSM with a Transfer Media Configuration (drive transfer rate) is not understood. Read rates are commonly associated with the OSM hardware, but if such a rate can be associated with OSM, more information on this matter is needed.

## **Section 8 Special Guidance for COLAs**

Should this section be renamed to include that the guidance is applicable for Design Certifications and Early Site Permits? Westinghouse used the packing slip software for its most recent submittal and now GE has indicated that it will use that software for Rev. 4 of the ESBWR DCD.

## **Section 8.2 Folder Specifications**

The paragraph following the bullet list states that the contents of a document "can" reside in a separate folder. It was understood that within the packing slip software each document "must" reside in a separate folder.

## **Section 8.3.1 Naming Conventions**

This section states that PDF file names are not required to follow a specified format. Even so, the example names that appear in the submittal examples in Section 9 uniformly have a three-numeral prefix as specified for non-COLA submittal documents. NRC should develop and include a submittal sample letter for COLAs.

## **Section 8.3.2 File Linkages**

The second check-mark item in the last bullet item refers to a "list of allowable reference documents within ADAMS." Please provide guidance on how applicants should obtain this list.

## **8.3.4 Composition of OSM Submission**

The second bullet does not make clear that this only works if the reference document was submitted by means of a packing slip.

## **9.1 Submittal Example**

It would be helpful to have a sample for a COLA submittal.

## **10.2 COLA Submittal Hyperlink Example**

NRC should make a distinction between actual HTTP links and text-based URL listings.