

COMMENTS FROM STARS	RESPONSE
<p>1. Section 2.4 "File Naming Conventions," Section 2.7, "Transmittal Letters," Section 2.12 "File Linkages (Hyperlink)", Section 2.12.1 "Required Disclaimers," Section 2.18 Segmentation of Large Documents," Section 2.22, "Living Document Updates," and Section 4.3, "Where to Submit the OSM in Adjudicatory Proceedings," all have special instructions for Combined License Application (COLA). These special instructions give specific relief in the new Section 8 for COLA submittals which supersedes other guidance provided in the document. These changes have added value to the COLA submittals. These changes allow submittal of files with enhanced features such as bookmarks, linking and indexing. STARS strongly believes that these special instructions should also be optional for current licensees for submittals of Licensing Basis Documents (LBDs) (e.g., certified FSAR updates, Emergency Plan, Fire Protection Report). Licensees that have upgraded their Licensing Basis Documents to include enhanced features such as bookmarks, linking and indexing are unnecessarily forced to spend resources to combine and rename files and remove these enhanced features. Allowing these exceptions for LBDs provides efficiency and value for the NRC. These special instructions should be optional for LBDs (not all LBDs have these enhanced features). Sections 2.4, 2.7, 2.12, 2.12.1, 2.18, 2.22, 4.3, 8, 10.2, 12, and 13 should be updated to reflect that the special instructions for COLA are optional for LBD submissions also.</p>	<p>NOTE: Your observations have been noted. Discussions are currently underway with NRR about including Licensing Basis Documents (LBDs) for existing reactors. The NRC currently does not have procedures in place to extend the special instructions in various chapters in the guidance document (especially Chapter 8) for COLAs to LBDs. We're not there yet but may be at some point in the future.</p>
<p>2. Section 2.6 of the NRC's "Guidance for Electronic Submissions to the NRC" states <i>"Submissions should not contain any security settings, password protections, or any other attributes that will prevent full NRC access to and use of the files. NRC's internal security and archival processes will maintain the integrity of the materials that are submitted "</i> Licensees should be allowed to add certain digital security features currently provided with Adobe Acrobat®. Digital</p>	<p>Disagree: You are certainly free to use digital signatures on your own copy but the NRC recommends that you strip out the signatures in the files that you submit to the NRC. When you use digital signatures in PDFs it may introduce problems such as fonts not embedded resulting in a rejection.</p>

<p>signatures prevent unwanted changes to a PDF document. For example, an individual or organization may not want an approved revision of a document changed. Just as the Electronic Information Exchange (EIE) process allows the NRC to authenticate documents from submitters, digital signatures allow the industry to authenticate documents internally. This is useful for documents such as Licensing Basis Documents. Use of digital signatures should not conflict with the EIE process which signs the electronic submittal, not the document being transmitted. However, use of digital signatures would not comply with the proposed file naming convention. This is another reason exceptions to the file naming convention should be allowed (see comment in item 1 above.) The use of digital signature by submitters does not prevent full NRC access to and use of the file. It actually provides greater assurance that the integrity of the file as submitted has not changed. ADAMS should be structured to allow storage of documents with digital signatures from licensees.</p>	
<p>3. Section 2.9 of the guidance indicates the settings for auto-rotate should be set to "off". The guidance document should be revised to allow auto-rotate settings of "Collectively by File" or "individually." This setting optimizes a PDF file for screen viewing in the case where a file contains text pages oriented in portrait layout and tables pages oriented in landscape layout. The auto-rotate does not impact printing of a PDF document or the integrity of a document.</p>	<p>Disagree. We are keeping the setting for "auto-rotate" to "off." We recommend that users rotate manually in cases with mixed pages.</p>
<p>4. Section 2.10 "Use of Color" should be updated to reflect that logo's (e.g., Company letterhead, NRC emblem) are acceptable uses of color.</p>	<p>Agree. The use of color in a company's logo should not appreciably inflate a file's overall size</p>
<p>Comments from NEI</p>	
<p>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.</p>	<p>Agree.</p>

<p>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?</p>	<p>Agree. 1) We recommend for COLAs that the file names do not change from one version to the next version. 2) File names should be descriptive not cryptic. 3) If multiple files comprise a particular section and appear in a particular sequence, we recommend that they be prefixed with a sequence number with preceding 0's. The file names should sort in a logical, proper order.</p>
<p>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.</p>	<p>RESPONSE:</p> <p>Question: Guidance would also be helpful on how or if index files should be included in the COLA packing slip?</p> <p>Answer: PDF Search Index Files are optional.</p> <p>PDF Search Index Files (.PDX files) may be included in any Submission Document (please refer to the definition of a Submission Document) in the Top-Level Folder (a Submission Document is represented by a Top-Level Folder on the CD/DVD) or any Sub-Folder of the Submission Document. This approach may commonly be used to provide Search Indexes that apply to only one Submission Document, for example the FSAR.</p> <p>Additionally, PDF Search Index Files (.PDX files) may be included as a separate Submission Document in a Top-Level Folder. This approach may commonly be used to provide Search Indexes that span all Submission Documents in the Submission.</p> <p>Question: Does this go with the associated files being indexed as if they are simply another component of the submission document?</p> <p>Answer: Yes.</p>

<p>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.</p>	<p>Agree. This will be clarified in the Table of Contents and in Chapter 8. by renaming the chapter “New Reactor-related Application Submittals”. The guidance in chapter 8 will remain for COLAs but that also includes Design Control Documents (DCDs) and Early Site Permits (ESPs).</p>
<p>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.</p>	<p>Agree. The content of a document (either a Submission Document or optionally a Reference Document) must reside under a Top-Level Folder.</p>
<p>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.</p>	<p>Agree. This will be added. File names for PDF files are not required to follow a specified format. For COLAs we recommend that the file names be descriptive and if they need to appear in a certain order, they be prefixed with a sequence number with leading zeros.</p>
<p>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.</p>	<p>Agree. Applicants should obtain information about Reference Documents and publicly-available records in ADAMS such as the Document Number and the Accession Number from the NRO project managers.</p>
<p>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.</p>	<p>Agree. We will change the guidance.</p>
<p>9.1 Submittal Example It would be helpful to have a sample for a COLA submittal.</p>	<p>Agree. We will certainly consider inserting a sample in the next revision.</p>

<p>10.2 COLA Submittal Hyperlink Example NRC should make a distinction between actual HTTP links and text-based URL listings.</p>	<p>Disagree. We have reviewed this comment and we feel the explanation is adequate. Submitters are encouraged to use a disclaimer as mentioned in Section 10.2.</p>
<p>From NEI's Cover Letter: 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.</p>	<p>Agree. In future revisions, we may be able to accommodate the future separation of the guidance into complete sections. For now we will see how the merger of the three former guidance documents works out.</p>
<p>COMMENTS FROM DOE</p>	
<p>1 Comment 1: Chapters 1.1, 1.3.1, and 8 The DOE recognizes that consolidation of NRC electronic document submittal guidance documents into one guidance document is generally advantageous. However, an important element of the guidance document previously applicable to the DOE under 10 CFR Part 2, Subpart J, <i>Guidance for Submission of Electronic Docket Materials under 10 CFR Part 2, Subpart J</i>, has been omitted from the combined guidance document. Chapter 1.2 of the superseded <i>Guidance for Submission of Electronic Docket Materials under 10 CFR Part 2, Subpart J</i>, stated that "DOE need not submit its license application via Electronic Information Exchange." This is consistent with 10 CFR 63.22 and 10 CFR 63.4 and has been part of DOE's planning basis for the initial submittal of its license application for the Yucca Mountain repository. The first paragraph of the Federal Register Notice (72 FR 35521), dated June 28, 2007, regarding the availability, the NRC guidance document <i>Guidance for Electronic Submissions to the NRC</i>, states the following: . . <i>T . h</i> is guidance contains a new chapterp</p>	<p>Agree. The language you have pointed out will be reinserted into the guidance for the first part of this comment.</p> <p>For this part the guidance will be modified to read:</p> <p>. . <i>This guidance contains a new chapter providing guidance for Combined License Application (COLA) submittals and provisions for electronic</i></p>

<p><i>rovidingg uidencef or Combined License Application (COLA) submittals. Its provisions pertaining to electronic filings in adjudications (other than the high level waste repositoty licensing proceeding and the Vogtle early site permit proceeding) are not to be used until the Commission issues its final rule on the subject.</i> To clarify that the License Application for a repository at Yucca Mountain need not be submitted via the EIE and to be consistent with prior guidance and Part 63, DOE requests that the title of Chapter 8 be changed to read:</p> <p><i>Special Guidance for Combined License Applications (COLA) and High Level Waste Repository Licensing Proceeding Submittals</i></p>	<p><i>filings in adjudications.</i></p> <p>Disagree: Currently, Chapter 8 is for new reactor-related submissions only. The title will change to reflect this.</p>
<p>Comment 2: Chapter 2.23 The Office of Management and Budget (OMB) has issued guidance to all federal agencies recommending the encryption of all "sensitive information". However, this OMB guidance is not currently reflected in the EIE Guidance. Due to this inconsistency between the NRC and OMB guidance concerning the handling of sensitive data on removable media, DOE requests the NRC consider allowing federal agencies to encrypt sensitive information placed on removable media for delivery to the NRC. DOE recommends that the second paragraph of Chapter 2.23 be revised to state: <i>"The NRC may reject any submittal if any inconsistencies are found and will inform. the submitter of the rejection. The following issues will result in a submittal rejection: Encrypted files"</i> (unless previously approved)</p>	<p>Disagree. To date, the NRC has not received encrypted files from licensees. Currently, the NRC does not have the infrastructure to handle encrypted data.</p>
<p>Comment 3: Chanter 2.3 The <i>Acceptable Spreadsheet File Format Table</i> in Chapter 2.3 identifies guidance to provide active spreadsheets or data files in a software version that is either current or is within two release levels of current. Given the time span over which the Yucca Mountain Project (YMP) activities and</p>	<p>Disagree. Our policy remains as is and the guidance document will not be altered. It the submitter's responsibility to provide the NRC with data that's readable. We have to be able to read what is submitted. You are welcome to submit legacy data but it must be readable with a current version</p>

<p>NRC licensing proceedings have occurred, following this guidance would result in the modification of original data files in order to meet these specifications. This would seem inconsistent with NRC requests to provide original, unaltered data. In addition, attempting to bring older spreadsheet data into compliance using this guidance has the potential to result in the following issues:</p> <ul style="list-style-type: none"> * Content, formulas, etc., might be inadvertently modified when upgrading the software. * The software and the data developed may have been certified or qualified based on a specific revision of the software. Changing the revision could void the pedigree of the developed data. * The cost and time involved in any effort to ensure accuracy in any such conversion could negatively impact DOE's ability to respond to NRC's requests in a timely and accurate manner. DOE recommends that the NRC allow the submittal of legacy data in older software versions and that Chapter 2.3 should be modified to clarify such expectations. 	<p>of the software.</p>
<p>Comment 4: Chapter 2.5 The third paragraph of Chapter 2.5 states: <i>"The maximum size of the file(s) submitted to the NRC governs the acceptable method of transmission. For example, submitters may use a single transmission to electronically submit one or more PDF files and/or accepted spreadsheet files so that the total size of the submitted file(s) does not exceed 50 MB, including all attachments. Submitters should use the OSM transmission method in all other cases unless e-mail or facsimile is a more appropriate option."</i> The last sentence suggests that all submittals with a total file size of greater than 50 megabytes (MB) (i.e., "in all other cases" besides the single transmission of <50 MB) must use the optical storage media (OSM) transmission method. This requirement is inconsistent with the guidance for Large Document (bundle) submittals in Chapter 2.2 as well as the subsequent table in Chapter 2.5. DOE recommends deleting the last sentence in the third paragraph of Chapter 2.5.</p>	<p>Agree. The NRC has changed it's guidance in Revision 1 to remove specific references to bundles.</p>
<p>Comment 5: Chapter 2.7 The fourth bullet in the third paragraph in Chapter 2.7 says: <i>"A disclaimer statement for each</i></p>	<p>Agree. The NRC will modify its guidance document to add this statement.</p>

<p><i>submitted file that may have links to another file(s) or to the Internet (see Chapters 2.12.1 and 10.]for examples)."</i> 3</p> <p>This statement suggests that a submittal of multiple files is required to have multiple disclaimer statements. However, Chapter 2.12.1 provides that a single-disclaimer statement is appropriate for submittals of multiple files. To clarify the requirements in Chapter 2.7, DOE recommends revising the fourth bullet as follows:</p> <p><i>A disclaimer statement for any submittal offile(s) that may have links to another file(s) or to the Internet (see Chapters 2.12.1 and 10.1 for examples).</i></p>	
<p>Comment 6: Chapter 2.9.</p> <p>Many of these portable document format (PDF) specifications should be characterized as typical default settings that may be modified as appropriate depending on local organizational workflow and product requirements that do not conflict with EIE and electronic hearing docket (EHD) requirements.</p> <p>For example:</p> <ul style="list-style-type: none"> 0 Color management specifications are irrelevant to EIE and EHD requirements, and should be allowed to be modified as appropriate to match the submitter's print intent. * Auto-rotation of pages is another non-critical specification that is an issue of print intent and is something usually modified after initial PDF creation for printer specifications for paper copies or for electronic versions. * Saving the PDF settings file inside the PDF represents a best-practice process setting, but should not be considered a requirement for all files submitted. When PDF files must be split to meet the 50 MB file size limit, these attached settings files are lost. * The guidance to allow PostScript to override job options will allow all settings given in this guidance to be replaced by others potentially placed in the postscript file. It is a process-oriented specification that undermines the intended results of the guidance. <p>In addition, the PDF specifications in Chapter 2.9 include ZIP image compression, but Chapter 2.3 allows the use of JPEG2000, which DOE plans to utilize in the preparation of its electronic documents.</p> <p>DOE recommends clarifying this information by</p>	<p>Disagree. The NRC will leave its guidance as is.</p>

<p>changing the first paragraph of Chapter 2.9, <i>Settings for Creating PDF Formatted Text and Graphic Files</i>, (underlined), to state the following: <i>The NRC has established a custom optimization that strikes a balance between print and screen optimizations. This custom optimization provides adequate retrieval response time for online viewing while providing sufficient clarity and resolution for printing. The settings established for this custom optimization are listed below and should be considered as typical settings recommended for use on all submittals to the NRC. The settings may be modified provided that the resulting files meet the requirements and expectations provided elsewhere in this guidance, such as Chapter 2.3. The settings are specific to Adobe® Acrobat 8.0. However, when PDF creation software other than Adobe® Acrobat 8.0 is used, the PDF creation software should be configured with values equivalent to those listed below. All fonts should be embedded in the PDF file to ensure compliance with National Archives and Records Administration (NARA) guidelines.</i></p>	
<p>Comment 7: Chapter 2.16 The first paragraph of Chapter 2.16 says: <i>"Those submitting documents electronically do not need to send hard copies of the electronic documents. In instances where the NRC requires a paper copy for accessibility or other reasons, the NRC will make every effort to produce the copy using NRC resources; DOE supports this general approach. However, DOE is required under 10 CFR Part 2 and 63.22 to submit numerous hard copies of its Yucca Mountain license application (LA) in addition to submitting the LA on optical OSM. DOE intends to submit the paper copies of the LA and to submit the LA on OSM, consistent with these regulatory requirements.</i></p>	<p>Agree.</p>
<p>Comment 8: Chapter 2.18 The last paragraph of Chapter 2.18 says, <i>"If multiple OSMs are submitted, place the table of contents for the entire submission on each OSM in the multi-set submission. "</i> It is not clear what "table of contents" means in this context. It could indicate a document table of contents with document page numbers, or it could be understood as a readme file listing the OSM file contents. In either case, it appears to contradict requirements in Chapter 8.1 prohibiting readme files or "any other instructional information on how to access or</p>	<p>Agree. This will be deleted from the guidance. Also, please note that chapter 8 is currently only for new reactor-related application submittals.</p>

<p>use the submission." It may also be redundant to the requirement in Chapter 2.7 to include in the submittal letter a listing of files comprised by the submittal. The guidance in Chapter 2.7 is clear and sufficient to ensure that contents of the submittal are communicated effectively. DOE recommends that this paragraph in Chapter 2.18 be deleted.</p>	
<p>Comment 9: Chapter 2.19 Chapter 2.19 on sensitive unclassified non-safeguards information (SUNSI) should add a bullet to the 5th paragraph to address submittals of information designated as official use only (OUO) by another government agency, such as DOE. The referenced guidance, such as NRC's RIS-2005-31, focuses on marking and control procedures developed to apply to licensees and applicants who are part of the private sector and who may use 10 CFR 2.390(d) as justification to protect security-related information. Other government agencies such as DOE have established procedures for designating, marking, and controlling similar security-related information as OUO and do not use the 10 CFR 2.390 designation. DOE recommends adding a bullet to address this issue in general: <i>In addition to the above guidance, other government agencies may designate, imark, and control information according to their procedures. Such information, if not safeguards information or classified information, will be handled by NRC as SUNSI when submitted to NRC without requiring additional markings.</i></p>	<p>Agree.</p> <p>A paragraph will be rewritten to read:</p> <p>Transmittal documents used to transmit one or more documents containing SUNSI, must be marked to indicate the fact that SUNSI is contained in the documents being transmitted. A header marking must be placed on each page of the transmittal document indicating the type of SUNSI (i.e., "Security-Related Information – Withhold Under 10 CFR 2.390", or "Proprietary Information – Withhold Under 10 CFR 2.390.") Note that NRC's internal procedure for these documents is to mark them as "Official Use Only – Security-Related Information," or "Official Use Only – Proprietary Information." Additionally, if the transmittal document does not contain SUNSI and only the enclosures contain SUNSI, the following marking must be placed at the bottom of the first page: "Enclosure(s) transmitted herewith contain(s) SUNSI. When separated from enclosure(s), this transmittal document is decontrolled." Other Federal agencies submitting documents should follow the above guidance regarding transmittal documents, however, they should use their markings for designating sensitive information.</p>
<p>Comment 10: Chapter 2.20 Chapter 2.20 on safeguards information and classified information contains the sentence: <i>"The mailing package containing OSM [optical storage media] with documents comprised of safeguards, proprietamy, or Privacy Act information should be processed, marked and transmitted in accordance with the requirements set forth in 10 CFR 2.390(b), 73.21(e), 73.21(g), and 73.21(h), as appropriate."</i> However, this Chapter should not address proprietary or Privacy Act information, since that information is addressed in Chapter 2.19. DOE recommends revising the sentence as follows: <i>The mailing package containing OSM with documents comprised of safeguards information should be processed,</i></p>	<p>Agree.</p>

<p><i>marked and transmitted in accordance with the requirements set forth in 73.21(e), 73.21(g), and 73.21(h), as appropriate.</i></p>	
<p>Comment 11: Chapter 4.1 Chapter 4.1, 1st paragraph, 4th bullet states that OSM should be used when: <i>"The document contains sensitive unclassified information (e.g. Safeguards information) or classified information (e.g., National Security information or Restricted Data)."</i> This phrase implies that all types of sensitive unclassified information should be submitted on OSM. However, Chapter 2.19 states that one type of sensitive unclassified information (i.e., sensitive unclassified non-safeguards information), but not safeguards information or classified information may be submitted via EIE or, if that is not practical, on OSM. DOE recommends for clarity and consistency, changing the quoted phrase in the 4th bullet to: <i>The document contains safeguards information or classified information.</i></p>	<p>Agree.</p>
<p>Comment 12: Chapter 4.2 Chapter 4.2, 2nd paragraph refers to additional requirements for classified information, SUNSI information, or non-public documents. These additional requirements also address safeguards information. DOE recommends adding safeguards information to the list.</p>	<p>Agree.</p>
<p>Comment 13: Chapter 4.2.2 Chapter 4.2.2, 2nd paragraph refers to marking and transmittal requirements in 10 CFR 2.390(b) for mailing packages, that contain proprietary, personal privacy, and OUO information. However, 10 CFR 2.390(b) contains no marking and transmittal requirements for mailing packages. DOE recommends substituting language based on Attachment 1 in NRC's RIS-2005-31 (a document referenced in Chapter 2.19): <i>The mailing package should be an opaque envelope with no external markings to indicate the presence of sensitive unclassified non-safeguards information.</i></p>	<p>Agree.</p>
<p>Comment 14: Chapter 8.3 Section 8.3 seems to assume that "OSM</p>	<p>RESPONSE: If a Submission contains Multiple Volumes, a separate Packing Slip</p>

submission" and "OSM" (e.g., a CD) are synonymous. For example, 8.3.5 directs an extensible markup language (XML) "packing slip" to be included in the "root folder". If an OSM submission is composed of more than one CD, then there will be more than one root folder for each submission. In cases where an OSM submission includes a document (or documents) on more than one CD, the guidance should clarify whether the packing slip on a given CD should reflect the contents of that single CD or the contents of the entire submission (and therefore be identical on each CD in the submission). The implications of multi-CD OSM submissions may also affect how a submitter prepares path-relative hyperlinks (described in Section 8.3.2). In addition, the format and content requirements for the "packing slip" are outlined generally in Section 8.3.5, but it states that the "tool for generating packing slips" will be provided by the NRC. The availability of that tool is critical to having an unambiguous understanding of the submittal content requirements. **DOE** recommends that this guidance be clarified to include requirements for an **OSM** submission consisting of multiple CDs or DVDs. In such a circumstance, the submitter should be expected to include a description of how component files must be arranged in folders in order to ensure path-relative links function as intended. To the same end, **DOE** recommends that packing slips be prepared on a per-submission basis and a copy included on each **OSM** comprised by that submission. Lastly, **DOE** requests that the tool for generating packing slips be demonstrated and available soon.

must be created for each Volume.

The tool (Packing Slip Wizard) is available now, and can be obtained from NRC.

A unique and specific Packing Slip must be included on each CD.

There is no support for using the same Packing Slip across all CDs.

The Packing Slip included on each CD Requires a unique Volume Number and must precisely identify the contents of that CD and only that CD.

When generating the Packing Slip for multi-volume submission, please ensure that you set the Total Volumes and Volume Number correctly for each Volume. The Wizard does not validate across multiple Packing Slips in a Multi-Volume Submission.

The Wizard supports spanning a Submission Document across multiple CDs and also supports including a separate Submission Document on each CD.

Multi-Volume Submissions support the following common scenarios.

1) **A Submission Document that spans multiple CDs**

In this case, it is imperative that the Top-Level Folder is the same on all CDs containing files for the Submission Document. Within the Top-Level Folder, files will be filed into Sub-Folders by Sub-Folder Name. So if a Sub-Folder spans multiple CDs, the same Sub-Folder should have the same name on both CDs. Not all Sub-Folders must be included on each CD, but it may be easiest to include the entire Sub-Folder structure on every CD and only place files in certain branches of the Sub-Folder hierarchy on each CD.

Let's use an FSAR as example, an FSAR may need to span multiple

CDs. In the example, the FSAR is stored in a Top-Level Folder named “\FSAR”. The Top-Level Folder “\FSAR” may appear on multiple CDs.

The Sub-Folders for the FSAR may be split amongst, or duplicated across, the CDs as necessary and appropriate.

So one approach is to simply include all Sub-Folders on all CDs and only have files in some of the Sub-Folders. In this case, many of the Sub-Folders may be empty on a particular CD, but all the Sub-Folders are included on every CD.

Another approach is to include only a subset of the Sub-Folders on one CD and then the remaining Sub-Folders on another CD.

For example, using the approach that all Sub-Folders will be included on all CDs

CD 1 may include:

Folder on CD	Folder Contents on This CD
\FSAR\01 Introduction	Contains PDF Files
\FSAR\02 Site Characteristics	Contains PDF Files
\FSAR\03 Design of Structure	Empty
\FSAR\04 Reactor	Empty

And CD 2 may include

Folder on CD	Folder Contents on This CD
\FSAR\01 Introduction	Empty
\FSAR\02 Site Characteristics	Empty

\FSAR\03 Design of Structure	Contains PDF Files
\FSAR\04 Reactor	Contains PDF Files

For example, using the approach that specific Sub-Folders will be included on each CD

CD 1 may include:

Folder on CD	Folder Contents on This CD
\FSAR\01 Introduction	Contains PDF Files
\FSAR\02 Site Characteristics	Contains PDF Files

And CD 2 may include

Folder on CD	Folder Contents on This CD
\FSAR\03 Design of Structure	Contains PDF Files
\FSAR\04 Reactor	Contains PDF Files

2) A Separate Submission Document on each CD

It is permissible to place each Submission Document on a separate CD. So in this example, one may put an FSAR on CD 1 and an Environmental Report on CD 2. In this case, there is no spanning a Submission Document across CDs.

CD 1 may include:

Folder on CD	Folder Contents on This CD
\FSAR\01 Introduction	Contains PDF Files
\FSAR\02 Site	Contains PDF

Characteristics	Files
\FSAR\03 Design of Structure	Contains PDF Files
\FSAR\04 Reactor	Contains PDF Files

And CD 2 may include:

Folder on CD	Folder Contents on This CD
\Environmental Report\Chapter 01	Contains PDF Files
\Environmental Report\Chapter 02	Contains PDF Files
\Environmental Report\Chapter 03	Contains PDF Files
\Environmental Report\Chapter 04	Contains PDF Files