



Guidance for Electronic Submissions to the NRC

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Note: This document will not appear in the *Code of Federal Regulations*.

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1. INTRODUCTION

This guidance is intended for licensees, applicants, external entities (including Federal, State, and local governments), vendors, participants in adjudicatory proceedings, and members of the public who submit documents to the U.S. Nuclear Regulatory Commission (NRC).

The NRC updates this guidance biennially to reflect changes in technology and agency experience. The latest update to this guidance was published in Fiscal Year 2019 with minor revisions added in 2023. The NRC posts the latest version of this document on the NRC's website at <http://www.nrc.gov/site-help/electronic-sub-ref-mat.html>. This version of the guidance supersedes any previous versions of the guidance.

1.1 Scope

This guidance offers direction on how to submit documents electronically to the NRC. After a successful submission, the documents will be imported into the Agencywide Documents Access and Management System (ADAMS) and will be made publicly available at the Web Based ADAMS Public Library, which can be accessed through the NRC's public website at <http://www.nrc.gov/reading-rm/adams.html>. Eventually, documents will be transferred to the National Archives and Records Administration (NARA), in accordance with Title 36 of the *Code of Federal Regulations* (36 C.F.R.) § 1228.270, "Electronic Records."

Documents or other information submitted under oath or affirmation, or other documents where secure transfer is either required or appropriate, should be submitted using the Electronic Information Exchange (EIE) System or submitted on optical storage media (OSM). In adjudicatory proceedings, participants in the proceeding are required to use the EIE system, unless an exemption is granted by the presiding officer pursuant to 10 C.F.R. § 2.302(g)(2) or the filing falls within the scope of 2.302(g)(1), which permits the use of OSM under certain circumstances.

While E-mail and facsimiles are not appropriate for most submissions to the NRC, they may be used for certain correspondence and communications with the NRC, such as:

- Rulemaking petitions and comments
- Communications from States, Tribes, and other Federal agencies
- Requests for enforcement action under 10 C.F.R. § 2.206
- Freedom of Information Act (FOIA) requests and appeals

2. PARAMETERS FOR ELECTRONIC FILES SUBMITTED TO THE NRC

2.1 File Formats

Electronic files submitted to the NRC must be in the portable document format (.pdf or PDF) or PDF/A format and should follow the guidelines below. The NRC accepts PDFs from electronic documents converted directly to PDF or scanned images of physical documents.

Several popular PDF creation solutions, such as the “Create PDF” feature in Microsoft Office 2013 or the “Save as PDF” feature in macOS, do not provide the level of customization that is available in Adobe Acrobat. Nevertheless, these features embed fonts by default and thus should meet the optimization guidelines in this guidance.

For PDFs created using Adobe Acrobat, the NRC has established a custom optimization that balances between print and screen optimization. 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 used for PDFs created with Adobe Acrobat. The settings are specific to Adobe® Acrobat 11.0.X. For electronic documents converted directly to PDF, fonts should be embedded in the PDF to ensure compliance with NARA guidelines.

If a submission created using one of the methods described above is rejected, please contact the Electronic Filing Help Desk at 1-866-672-7640 or MSHD.Resource@nrc.gov for assistance.

Note: See [Appendix—NARA Guidance](#), for links to NARA Guidance.

Note: PDF/A (ISO 19005) is an acceptable file format provided it also meets the specifications contained in this guidance document.

Note: If you are using an Adobe® Acrobat product we recommend that you check Adobe’s website at <http://www.adobe.com/downloads/updates> to get the latest updates prior to preparing documents for submission to the NRC.

Note: Additional guidance on PDF settings, as well as PDF generation, can be found on the NRC’s “Reference Materials for Electronic Submissions” Web page: <http://www.nrc.gov/site-help/electronic-sub-ref-mat.html>. This information is available in PDF document form to assist users in preparing PDFs in compliance with NRC guidelines. Additionally available are pre-configured PDF Adobe Distiller profiles for Adobe Acrobat versions 5–11.

Required settings for PDFs generated from Native Applications using Adobe Acrobat*

Criteria
Optimized for Fast Web View
Embedded Fonts
Searchable Text
Security Method = “No Security”
File size ≤ 1,000 MB (except for single image or data file)

*Adjudicatory documents will not be accepted in native format and must be converted to PDF with the exception of MS Excel spreadsheets.

Required settings for PDFs generated from scanned images

Criteria
Optimized for Fast Web View
Resolution \geq 300 ppi
Searchable Text by Optical Character Recognition (OCR) process (http://www.nrc.gov/docs/ML1014/ML101440354.pdf , “PDF Document Submittal Checklist”)
Lossless Compression
Security Method = “No Security”
File size \leq 1,000MB (except for single image or data file)

2.2 File Naming Convention

Unless otherwise instructed (e.g., by the presiding officer in an adjudicatory proceeding), files submitted to the NRC should be named using the following guidelines:

- File names (not to be confused with Document Titles) have specific requirements based on the type of submission:
 - General submissions cannot exceed 239 characters, including spaces and the three-character file name extension; and
 - EIE Adjudicatory submissions cannot exceed 85 characters, including spaces and the three-character file name extension.
- The first three characters of the file name should always be used to identify the correct sequential order of the submitted files (e.g., 001, 002, 003, etc.).
- The filename should reflect, to the extent possible, the chapter or section number (based on the logical breakpoint used for segmentation of the document), and the title of the file or segment being submitted.
- When segmenting a large file for a multi-part submission, each part must identify the part number and the total number of parts. For example, if the file was segmented into three parts, the name ending of the first part would be Part 1 of 3; the second, Part 2 of 3; and so on (see File Naming Example Table below).
- The file name must retain the default three-character file extension associated with the format.

Example: 001 Estimate of Long-Term Geochemical Behavior Section 1.pdf

Example explanation: **001** belongs to the first document attached to the submission; therefore, the next document attached would begin with 002. **Estimate of Long-Term Geochemical Behavior** is the title of the document. **Section 1** is Section 1 of the document; therefore, the next document attached would be Section 2. **.pdf** is the file extension of portable document format file.

FILE NAMING EXAMPLE TABLE	
Document Title	File Name
Multiple-Part (Bundle) File Document Examples	
Chapter 1, Estimate of Long-Term Geo-chemical Behavior	001 Chapter 1 Estimate of Long-Term Geochemical Behavior Part 1 of 3.pdf
Chapter 2, Estimate of Long-Term Geo-chemical Behavior	002 Chapter 2 Estimate of Long-Term Geochemical Behavior Part 2 of 3.pdf
Appendix A Estimate of Long-Term Geo-chemical Behavior	003 Appendix A Estimate of Long-Term Geochemical Behavior Part 3 of 3.pdf
Single File Document Examples	
Attachment II, CAL-EBS-NU-000017 Rev 003 Calculation, Radiolytic Specie Generation from Internal Waste Package Criticality	001 Attachment 2 CAL-EBS-NU-000017 Rev 003 Calculation Radiolytic Specie Generation from Internal Waste Package Criticality.pdf
List and Schedule for Model Validation Reports related to Criticality	001 List and Schedule for Model Validation Reports related to Criticality.pdf

2.3 File Size Limitations for EIE Submissions

Electronic submissions to the NRC, whether a single file or multiple files provided as one submission, cannot exceed 1,000 MB. When submitting files to the NRC, the use of compression techniques (zipped files, downsized files, etc.) is discouraged. Electronic submissions larger than 1,000 MB must be submitted on OSM or through multiple electronic submissions. See [Section 3.2.1](#) for guidance on submissions on OSM.

For specific information on adjudicatory submissions, please see [Section 3.1.3](#).

2.4 Security and Access Settings

Submissions must not contain any security settings, password protections, or any other attributes that would preclude full NRC access to, and use of the files. The NRC’s internal security and archival processes will maintain the integrity of the materials that are submitted.

2.5 Use of Color

Color should be used only in limited circumstances where, for example, the use of color contributes to a reader’s understanding of the material being presented (e.g., maps, graphs, charts, and engineering documents), or does not appreciably increase a file’s size (e.g., company logos). **Excessive or unnecessary use of color can significantly increase file size, which may result in files that exceed the 1,000 MB limit of the EIE system.**

2.6 Hyperlinks (File Links)

Links within a single electronic document or file is acceptable. When dealing with multiple files that contain links between each file, the files should be combined into a single file to ensure links remain operable upon submission to the NRC. Links between multiple documents or any other linking between electronic files are not allowed, as the links will become inoperable upon submission to the NRC.

For adjudicatory documents (pleadings and exhibits), parties are *discouraged* from using hyperlinks because of concerns about the integrity of the hearing record. If an adjudicatory document does include hyperlinks nonetheless, parties must follow 10 CFR § 2.1013(c)(vi) and include an appropriate disclaimer ([Section 2.6.1](#)) to the effect that the hyperlinks are either inoperable or are not essential to using the filing and that any referenced material that is necessary to the completeness of the filing has been included as part of the submission, either in its entirety or as an attachment to the filing.

For non-adjudicatory documents containing hyperlinks to other documents and/or Internet websites, the appropriate disclaimer ([Section 2.6.1](#)) should be included.

2.6.1 Required Disclaimers

For a submission in an adjudicatory proceeding, include the following in the body of the submission if the document contains hyperlinks to other documents or websites:

This submission contains hyperlinks to other documents or to Internet websites. These hyperlinks are either inoperable or are not essential to the use of the filing. Any material referenced by hyperlinks to a document or to Internet websites that is necessary to the completeness of the filing has been included as part of the submission, either in its entirety in the filing or an attachment to the filing.

For a non-adjudicatory submission (including License applications that consists of ***more than one*** document (including License Applications*), include the following in the transmittal memorandum if one or more documents contain hyperlinks to other files or to Internet websites:

This submission contains files, one or more of which contains hyperlinks to other files or to Internet websites. These hyperlinks are either inoperable or are not essential to the use of the filing. Any material referenced by hyperlinks to Internet websites that was essential for use of this filing has been submitted as part of the filing. Any material referenced by a hyperlink to another file that was essential for the use of this filing has either been included by reference or submitted as part of this filing.

For a non-adjudicatory submission (including License applications*) that consists of a **single document**, include the following in the body of the submission if the document contains **hyperlinks to other documents or to Internet websites**:

This file contains hyperlinks to other files or to Internet websites. These hyperlinks are either inoperable or are not essential to the use of the filing. Any material referenced by hyperlinks to Internet websites that was essential for use of this filing has been submitted as part of the filing. Any material referenced by a hyperlink to another file that was essential for the use of this filing has either been included by reference or submitted as part of this filing.

Note:

License Applications only

Disclaimers for hyperlinks contained within a License Application submission must also provide the exact location of the linked file along with all applicable information, such as the revision, chapter, and version number.

See the “Packing Slip Wizard User’s Guide”, which can be found on the NRC’s Electronic Submittals Application Web page (<http://www.nrc.gov/site-help/e-submittals.html>) for more information.

2.7 Viruses

Files received by the NRC will be checked for viruses before acceptance. Any submission marked as having a virus will be rejected and returned to the submitter with an explanation for the rejection.

2.8 Macros

Macros in Microsoft® Excel documents are sometimes detected as viruses. Although macros are accepted, they should be limited.

2.9 Segmentation of Large Documents

Segment large documents at logical breakpoints, such as:

- Chapters
- Sections
- Subsections
- Appendices
- Exhibits or attachments
- Charts, tables, or formulas
- For large transcripts, the end of a witness’s testimony or session recess

Consideration should be given to placing graphics within a document as an appendix or attachment. If a graphic or binary large object (BLOB) cannot logically be divided to meet submission file size limitations, then it must be submitted on OSM.

When submitting OSM, use folders to organize the contents at the chapter level, consistent with the file name guidance. The numeric portion of the file name should be sequential across all folders. Other guidance includes:

- Each chapter should have its own folder, which should then contain all files associated with that chapter including sections, subsections, and graphics (either embedded within those sections or subsections or provided separately).
- The sections and subsections should be placed in logical sequential order within a folder.
- Separate folders may be created for appendices, exhibits, or attachments. Each item should comply with the file name guidance in [Section 2.2](#) and, if possible, have a file name that reflects the folder where it resides.

2.10 Transmittal Letters (Non-Adjudicatory)

For non-adjudicatory submissions, each submission of two or more files (regardless of size) should include a transmittal letter that provides explanatory information that will enable the NRC to ensure the completeness and integrity of the submission.

The first page of the transmittal letter must include:

- Organization or individual name and the address of the author.
- Docket number (if applicable).
- Subject line (a non-sensitive, brief, descriptive narrative of the subject of the submission).
- Any requests for withholding from public disclosure in accordance with applicable NRC regulations.

The last page of the transmittal letter must include:

- The name, mailing and E-mail addresses, and phone number of a point of contact.
- A complete list of the submission's components (electronic files and physical objects), listed in the order in which they are submitted including:
 - Filename (including file extension)
 - Size of the file
 - Sensitivity level (e.g., publicly available, proprietary, classified, etc.)
 - An indication of whether the component is being submitted electronically, on OSM, or by both
 - A file that provides a non-sensitive description of all electronic components characterized as binary large objects (BLOBs) or other physical objects
 - Any special instructions or information necessary to view or use the information, such as using the OSM*, computer operating system, or software requirements for data files, computer models, etc.

* If OSM is used, the component listing should include the total number of OSM submitted.

- A detailed statement describing any deviation among the submitted files from approved formatting.
- A disclaimer statement for any files that may have links to other files or to Internet websites.

3. SUBMISSION METHODS

The following are acceptable methods for submitting documents to the NRC:

- EIE system (see [Section 3.1](#))
- External Hard Drives and OSM (e.g., CD, DVD, etc.) (see [Section 3.2](#))
- E-mail (see [Section 3.3](#))
- Facsimile (see [Section 3.4](#))

Note: Under NRC regulations, submission methods other than the EIE system or OSM (as specified in 10 C.F.R. § 2.302(g)(1)) are not permitted in adjudicatory proceedings unless an exemption is granted by the presiding officer.

3.1 Electronic Submissions through NRC's EIE System

The NRC's EIE system (accessible at <http://www.nrc.gov/site-help/e-submittals.html>) was created to allow NRC stakeholders and participants in adjudicatory proceedings to securely submit and electronically sign electronic data and documents to the agency. The EIE system is the software application behind the Internet forms used to submit information for adjudicatory hearings, the criminal history program, and the general form submission program (which includes fitness for duty submissions).

The EIE system receives submitted documents and forwards them to the NRC's Document Processing Center (DPC) for processing. The EIE system uses a public key infrastructure and digital signature technology to authenticate submissions.

Submissions that are required to be submitted under oath or affirmation (see [Section 3.1.2](#)) may be transmitted using the EIE system.

Each individual who wishes to use the EIE system must obtain a digital ID certificate from the NRC. The digital ID certificate allows the submitter to digitally sign and submit the form used to transmit documents and, in the case of adjudicatory submissions, to retrieve documents. For additional guidance, see the NRC's "Getting Started" page: (<http://www.nrc.gov/site-help/e-submittals/getting-started.html>).

More information on the types of submissions that can be made through the EIE system can be found in the sections listed below:

- Adjudicatory submissions (see [Section 3.1.3](#))
- Criminal history (see [Section 3.1.4](#))
- General submissions (see [Section 3.1.5](#))

- Fitness for Duty submissions (see [Section 3.1.5.1](#))

For additional information, please see the descriptions provided within the Electronic Submission Systems section of the Electronic Submittals Application Web page: (<http://www.nrc.gov/site-help/e-submittals.html>).

3.1.1 Documents that may NOT be submitted via the EIE system

The EIE system may NOT be used for the following types of submissions:

- Documents containing classified information (i.e., national security information and restricted data) or safeguards information, which may only be submitted electronically on OSM.
- “Immediate” or “prompt” notifications required by NRC regulations (e.g., 10 C.F.R. §§ 30.50(c)(1), 30.55(c), 50.36(c)(7), or 50.72).
- Notice of filing of bankruptcy petition, whether voluntary or involuntary (e.g., 10 C.F.R. § 30.34(h)(1)).
- Documents served on the NRC as a participant in Federal court proceedings or in non-NRC administrative proceedings (such as administrative proceedings before the Merit Systems Protection Board).
- NRC contractor proposals or invoices submitted in response to specific contractual requirements. Given statutory and Federal Acquisition Regulation requirements to use electronic commerce in Federal procurements whenever practicable or cost-effective (41 U.S.C. § 2301; 48 C.F.R. (FAR) Subpart 4.5), guidance for electronic submittal of proposals and invoices will be addressed in individual procurements or through standardized NRC contract clauses. Further agency guidance for uniform submission of these documents will be issued at a later date.
- Financial assurance instruments to meet decommissioning cost requirements prescribed by regulation at 10 C.F.R. § 30.35(e) and (f), 10 C.F.R. § 40.36(d) and (e), and 10 C.F.R. § 70.25(e) and (f) (including surety bonds, letters of credit, lines of credit, and insurance).
- Documents with special printing requirements, which may only be submitted electronically on OSM.

3.1.2 Documents submitted under Oath and Affirmation

Some documents filed with the NRC must be submitted under oath and affirmation. Many of these documents may be submitted through the EIE system, as discussed below.

- If the submitter is located in the United States, then to satisfy the provisions of 28 U.S.C. § 1746, they may submit through the EIE system:
 - A single document under oath or affirmation by including in the body of the document (normally at the end), the statement:

“I declare under penalty of perjury that the foregoing is true and correct.
Executed on (date) (Signature).”

When the document is ready to be submitted through the EIE system, the person submitting the document must digitally sign the document by clicking on the Signed by button and then transmit the document through the EIE system by clicking on the Submit Document button.

- For multiple documents requiring individual digital signatures by different persons one of the following methods may be used:
 - Each document may be submitted separately using the process described above for individual documents;
 - Each document may be electronically signed and provided in a single submission provided the electronic signing process has been approved by the NRC; or
 - Each document may be created in hard copy and physically signed in ink.. The original paper copies may then be scanned to create searchable image files of the original signature pages (for additional guidance on creating a searchable image file, see the “Reference Materials for Electronic Submissions” Web page: <http://www.nrc.gov/site-help/electronic-sub-ref-mat.html>). These documents may then be submitted using the EIE system.
- Affidavits filed in adjudicatory proceedings may also be signed with the statement:
 - “Executed in Accord with 10 § C.F.R. § 2.304(d).”

Affidavits can be submitted as single documents or batched with multiple documents according to the above guidance.

Note: For a single document submission, when clicking the “Sign” button on the EIE system submission form, the submitter is actually digitally signing the document. In this case, signing the submission form meets the current requirements for submission.

For a multiple document submission, when clicking the “Sign” button on the EIE system submission form, the submitter is digitally signing the transmission only, so all documents should be signed before submission. This likewise satisfies requirements for submission.

- If the submitter is located outside the United States, then to satisfy the provisions of 28 U.S.C. § 1746 a single document that must be submitted under oath or affirmation may be submitted through the EIE system by including the statement.

“I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on (date)
(Signature).”

3.1.3 Electronic Submissions in Adjudicatory Proceedings

Nuclear Regulatory Commission (NRC) regulations require participants in adjudicatory proceedings to use the EIE system, or OSM in certain circumstances, to transmit submissions in the agency's hearings, consistent with the requirements and specifications set forth in 10 C.F.R. Part 2. Persons wishing to submit adjudicatory documents using other methods (e.g., paper) must obtain an exemption pursuant to 10 C.F.R. § 2.302(g).

The NRC's regulations in 10 C.F.R. Part 2 provide specific requirements governing the submission of documents through the EIE system. For example, under 10 C.F.R. § 2.304(g), each exhibit or piece of written testimony must be submitted as an individual electronic file. Participants in the NRC's adjudicatory proceedings are, among other things, expected to review and comply with the E-Filing requirements in 10 C.F.R. Part 2.

See [Section 2](#) for guidance on the parameters for electronic files submitted to the NRC.

Note: Most documents submitted in adjudicatory proceedings will appear in the NRC's Electronic Hearing Docket (<https://adams.nrc.gov/ehd/>), which is available to the public. Therefore, hearing participants should not include personal privacy information, such as social security numbers, private telephone numbers, or home addresses, in their filings unless such information is required by agency regulations (see, for example, 10 C.F.R. § 2.309(d)(1)(i)) or other legal requirements.

Further, several types of documents are (1) required to be withheld from public disclosure or (2) may contain information that is exempt from disclosure and thus the documents may be withheld in whole or in part under the procedures in 10 C.F.R. § 2.390.

As discussed in [Section 4.2](#) and [4.3](#), classified and SGI information may not be submitted using the EIE.

3.1.4 Criminal History Submissions

The Criminal History form is used to transmit licensee personnel information to conduct criminal history record checks to obtain unescorted access to nuclear power facilities, non-power reactor facilities, category 1 or category 2 quantities of radioactive material, or access to SGI. It is used for transmitting Criminal History applications to the NRC. This process supports enhanced security requirements and improves information flow between licensees subject to criminal background check requirements under 10 C.F.R. Part 37, "Physical Protection of Category 1 and Category 2 Quantities of Radioactive Material," or 10 C.F.R. Part 73, "Physical Protection of Plants and Materials," and the NRC.

Note: Refer to the "Criminal History User's Guide", which can be found on the NRC's Electronic Submittals Application Web page: <http://www.nrc.gov/docs/ML1518/ML15182A294.pdf>.

3.1.5 General Electronic Submissions

The general submission form is used for transmitting reports or other electronic filings to the NRC.

Note: Submissions intended for a specific Region should have the Region listed in the “Comment” field contained on the General submission form.

See [Section 2](#) for guidance on the parameters for electronic files submitted to the NRC.

3.1.5.1 Fitness for Duty Submissions

Licenses who wish to use electronic submissions to satisfy 10 C.F.R. Part 26, “Fitness for Duty Programs” reporting requirements should use the general submissions form found at: <http://www.nrc.gov/site-help/e-submittals.html>.

Note: Before submitting Fitness for Duty (FFD) reports, please read the FFD reporting information at: <http://www.nrc.gov/reactors/operating/ops-experience/fitness-for-duty-programs/submit-ffd-reports.html>.

3.1.6 Electronic Submissions for License Applications

The process of submitting license applications including Combined Operating License Applications (COLAs), Design Control Documents (DCDs), and Early Site Permits (ESPs), was streamlined by implementing the Packing Slip Wizard tool. To use this tool, the Applicant should closely coordinate their actions with their internal NRC Project Manager or Point of Contact.

Note: Refer to the “Packing Slip Wizard User’s Guide”, which can be found on the NRC’s Electronic Submittals Application Web page <http://www.nrc.gov/site-help/e-submittals/packing-slip-wizard-user-guide-v1.1.pdf>.

3.1.7 Electronic Forms and Payments

Payments required by NRC regulations can be submitted electronically. To obtain the authorization to do so, please complete NRC Form 629, Authorization for Payment by Credit Card. This form can be found at: <http://www.nrc.gov/reading-rm/doc-collections/forms/>.

Payments by credit card of civil penalties, Part 170 licensing and inspection fees, Part 171 annual fees, and other fees, may be done after completing NRC Form 629 (Authorization for Payment by Credit Card) included with the invoice or civil penalty.

3.2 External Hard Drive and Optical Storage Media (OSM) Submissions

There are a number of external hard drives and OSM to choose from, including tapes, compact discs read-only memory (CD-ROM), Digital Versatile Discs or Digital Video Discs (DVD), or external hard drives.

It is recommended that large documents made up of multiple files, folders, etc., be transmitted on OSM. Oversize drawings and other files with special printing requirements, regardless of the file size, should be provided on OSM.

Software used to produce the OSM should be configured to ensure that OSM submitted to the NRC is “read only” before its delivery to the NRC. This requirement does not apply to external hard drives submitted to the NRC.

Note: There are a number of external hard drives and OSM* to choose from. The NRC will accept compact discs read-only memory (CD-ROM), or Digital Versatile Discs or Digital Video Discs (DVD).

The NRC will also accept external hard drives* as long as they are USB 2.0-compatible.

*External hard drives and OSM should NOT be encrypted or submitted with any sort of security protection. If they are, the submitter must provide the password or encryption key to the NRC or it will be rejected.

3.2.1 Optical Storage Media Submission Criteria

3.2.1.1 Adjudicatory Filings on OSM

When an adjudicatory filing contains information or files that cannot be transmitted through the EIE system, the filing must be submitted in accordance with the requirements in 10 C.F.R. § 2.302(g)(1). Under this section, any files that can be submitted through the system must be sent using EIE. Then, separately, the participant must submit OSM containing the *entire* filing, i.e., the material submitted via the EIE system, and any additional material that could not be filed electronically. **Service of the filing will be considered complete only after both the transmission of documents using the EIE system and the OSM is deposited with the delivery service provider.** See 10 C.F.R. § 2.302.

OSM should be used for adjudicatory filings in the following circumstances:

- The documentary material cannot be transmitted via the EIE system (e.g., due to file size or the complexity of the document).
- A document segment cannot be submitted via the EIE system although the remaining document portions can be transmitted electronically.
- The document contains safeguards information or classified information (i.e., national security information or restricted data).

3.2.1.2 General Submissions via OSM

General submission documents may be submitted on OSM except as noted in [Section 3.2.1.3](#). There are also documents that should only be submitted using OSM, such as documents that contain special printing requirements.

Documents containing classified information (i.e., national security information and restricted data) and safeguards information may only be submitted electronically on OSM.

3.2.1.3 Information that may not be submitted on OSM

The following type of information may not be submitted to the NRC on OSM:

- “Immediate” or “prompt” notifications required by NRC regulations (e.g., 10 C.F.R. § 30.50(c)(1), § 30.55(c), § 50.36(c)(7), or § 50.72).
- Notice of filing of bankruptcy petition, whether voluntary or involuntary (e.g., 10 C.F.R. § 30.34(h)(1)).
- NRC contractor proposals or invoices submitted in response to specific contractual requirements. Given statutory and Federal Acquisition Regulation requirements to use electronic commerce in Federal procurement whenever practicable or cost-effective (41 U.S.C. § 2301; 48 C.F.R. (FAR) Subpart 4.5), guidance for electronic submittal of proposals and invoices will be addressed in individual procurements or through a standardized NRC contract clauses. Further agency guidance for uniform submission of these documents will be issued at a later date.
- Financial assurance instruments to meet decommissioning cost requirements and prescribed by regulation at 10 C.F.R. §§ 30.35(e) and (f), 10 C.F.R. §§ 40.36(d) and (e), and 10 C.F.R. §§ 70.25(e) and (f) (including surety bonds, letters of credit, lines of credit, and insurance).

3.2.1.4 Documents submitted on OSM under Oath or Affirmation

If executed **within** the United States, the OSM submitter’s signed original paper transmittal letter should, to satisfy the provisions of 28 U.S.C. § 1746, contain the oath and the signature of the person swearing to or affirming the accuracy of the information submitted. Specifically, the letter should include the following statement:

“I declare under penalty of perjury that the foregoing is true and correct.
Executed on (date) (Signature).”

If executed **outside** of the United States, the OSM submitter’s signed original paper transmittal letter should contain the oath and the signature of the person swearing to or affirming the accuracy of the information submitted. Specifically, the letter should include the following statement:

“I declare under penalty of perjury under the law of the United States of America that the foregoing is true and correct. Executed on (date)
(Signature).”

3.2.2 How to Submit the OSM

OSM submitted to the NRC should be accompanied by a signed paper transmittal letter that provides a detailed list of what is contained on the OSM. It is recommended that the letter and OSM be sent to the NRC by expedited delivery service. Given the importance of submission and document integrity and fidelity, expedited delivery of the OSM is strongly encouraged to ensure coordinated processing if any companion documents are transmitted through the EIE system.

For adjudicatory submissions, service of the submission is considered “complete” when the participant has complied with the requirements in 10 C.F.R. § 2.302(d)—**for documents submitted by mail or expedited delivery service, service is complete when the document is deposited with the delivery service provider. When a participant uses multiple submission methods, service is considered complete when service by each method is complete.** See 10 C.F.R. § 2.302(d).

For non-adjudicatory submissions, the submission is considered complete when the entire package is received by the NRC mail room.

Note: Incoming mail addressed to the Federal government may be irradiated before delivery. Irradiation of OSM may result in damage to the media and its contents. Therefore, packages containing OSM submission should be clearly marked “CONTENTS CONTAIN OPTICAL STORAGE MEDIA—DO NOT IRRADIATE!”

Note: Due to security measures, any mailed submissions will be delayed by at least one week.

For electronic submissions on OSM that contain classified information (i.e., national security information and restricted data), Sensitive Unclassified Non-Safeguards Information (SUNSI), safeguards information, or non-public documents, additional requirements apply as described in [Sections 4.2](#) (Classified Information) and [4.3](#) (Safeguards or Sensitive Information).

3.2.3 Files with Special Printing Requirements

The following should only be submitted on OSM as separate files:

- Documents that contain electronic files with special printing requirements (e.g., oversize drawings or graphics that require a paper size larger than 11 inches by 17 inches, etc.).
- Documents that require using a plotter or other special equipment to print.
- Documents that contain other enhancements (e.g., 3D images, etc.).

If special software components (e.g., printer drivers) are necessary, include those components, their configuration parameters, and any hardware configuration requirements on the same OSM.

3.2.4 Packaging and Labeling

The OSM should be labeled with the transfer media configuration (e.g., drive transfer rate) as well as any numbering, exterior marking, or labeling used to reference the submission as it is provided through the EIE system. If appropriate, the document's version number should also be included.

The mailing package containing the OSM with documents comprising proprietary, personal privacy, or Official Use Only information should be an opaque envelope with no external markings describing the presence of SUNSI, in accordance with the recommendations for handling documents set forth in Attachment 1 of the NRC's RIS-2005-31, "Control of Security-Related Sensitive Unclassified Non-safeguards Information Handled by Individuals, Firms, and Entities Subject to NRC Regulation of the Use of Source, Byproduct, and Special Nuclear Material": <http://www.nrc.gov/reading-rm/doc-collections/gen-comm/reg-issues/2005/ri200531.pdf>.

Packages containing safeguards information must comply with the requirements of 10 C.F.R. § 73.22(e), (g), and (h), as appropriate.

OSM containing classified information (i.e., national security information or restricted data) must be packaged and submitted to the NRC in accordance with the requirements contained in 10 C.F.R. §§ 95.37, 95.39, and 95.41.

3.2.5 Where to Submit the OSM in Adjudicatory Proceedings

In accordance with 10 C.F.R. § 2.302, use either of the following two addresses for delivering OSM (along with the signed paper copy transmittal letter) to the NRC via:

First Class Mail

Office of the Secretary
U. S. Nuclear Regulatory Commission
Washington, DC 20555-0001
Attention: Rulemakings and Adjudications
Staff

Courier, express mail, and
expedited delivery services

Office of the Secretary, Sixteenth Floor
One White Flint North
11555 Rockville Pike
Rockville, MD 20852-2738
Attention: Rulemakings and Adjudications
Staff

Participants making OSM filings should also serve copies of the OSM on the other Service List parties in accordance with any protective order or other directions from the presiding officer governing the submission.

3.2.6 Where to Submit OSM for General Submittals

Use the following address for delivering OSM (along with the signed paper copy transmittal letter) to the NRC by courier, express mail, and expedited delivery services:

U.S. Nuclear Regulatory Commission
Attention: Document Control Desk
11545 Rockville Pike
One White Flint North
Rockville, MD 20852-2746

3.3 E-mail

Files sent by E-mail should be sent as an attachment to the E-mail message to retain the original formatting of the documents. Multiple document E-mail attachments are acceptable but the E-mail cannot exceed 10MB. For non-adjudicatory E-mail submissions, the message should include:

- Name of a contact person who can respond to questions about the submission.
- Contact person's daytime phone number, physical mailing address, and E-mail address.
- A list describing each document attached to the E-mail message.
- A list describing the formats used to generate each of the attached file.

3.3.1 What Can Be Submitted via E-mail

Documents submitted by E-mail, including the text of the E-mail, should contain only information that could be made available to the public. E-mail submissions should not include personal privacy information, such as social security numbers, home addresses, or home or personal mobile phone number(s), unless an NRC regulation or other law requires submission of such information. The following types of submittals may be made by E-mail:

- Rulemaking petitions and comments in rulemaking proceedings, which will be made publicly available at <https://regulations.gov> as well as Public ADAMS, as stated in the "Privacy Considerations" section of the EIE Adjudicatory Submissions Web page: <http://www.nrc.gov/site-help/e-submittals/adjudicatory-sub.html>.

Note: NRC does not remove identifying or contact information from rulemaking documents before public release.

- Requests for enforcement action under 10 C.F.R. § 2.206 may be sent to: Petition.Resource@nrc.gov.
- All FOIA and Privacy Act requests and appeals may be submitted electronically by E-mail.
- Responses to *Federal Register* notices or other agency communications where the NRC has provided a specific E-mail address.
- Information from export and import license applicants and licensees.

3.3.2 Where to Submit E-mail

E-mail may be addressed to:

- Specific individuals named as contacts or to the office specified in the regulation or communication specific to the documents being submitted.
- E-mail addresses listed on the NRC's website (<http://www.nrc.gov/>) within the Contact Us link (located at the top of the screen).
- The Office of Public Affairs: opa.resource@nrc.gov.
- The Office of the Secretary of the Commission
 - For rulemaking comments: RulemakingComments.Resource@nrc.gov.
 - For adjudicatory (hearing) matters: hearingdocket@nrc.gov
- The Office of the Executive Director for Operations for petitions under 10 C.F.R. § 2.206: Petition.Resource@nrc.gov.

3.4 Facsimile Submittals

Facsimiles should include the name of a contact person who can respond to questions about the submission, along with the contact person's daytime phone number and physical mailing address or E-mail address.

3.4.1 What Can Be Submitted by Facsimile

Documents submitted by facsimile should contain only information that could be made available to the public and may be used for:

- Rulemaking petitions and comments in rulemaking proceedings.
- Requests for enforcement action under 10 § C.F.R. 2.206.
- FOIA and Privacy Act requests and appeals (requests submitted by facsimile may not reveal personal privacy information).
- Responses to *Federal Register* notices or other agency communications where NRC has provided for response by facsimile.
- Information from export or import license applicants and licensees.

3.4.2 Where to Submit Facsimiles

The NRC has established centralized receipt points for official submissions transmitted by facsimile to NRC headquarters and each of the regional offices. All official transmissions should be sent to one of these official receipt points to ensure they are captured as official records of the agency.

FACSIMILE LOCATIONS AND USER ASSISTANCE		
LOCATION:	FAX NUMBER:	USER ASSISTANCE and VERIFICATION
Headquarters (24-Hour Operation)	301-415-7010	301-415-7000
Office of International Programs	301-415-2395	301-287-9056
Office of the Secretary	301-415-1101	301-415-1977
Freedom of Information Act and Privacy Act Officer	301-415-5130	301-415-7169
Region 1	610-337-6941	800-432-1156
Region 2	404-997-4900	800-577-8510
Region 3	630-515-1078	800-522-3025
Region 4	817-200-1210	800-952-9677

4. OTHER SUBMISSION CONSIDERATIONS

4.1 Other 10 C.F.R. Part 2 Submissions

Rulemaking comments filed in rulemaking proceedings may be submitted by e-mail, delivery service, or in person, but NOT through the EIE system.

Requests for enforcement action under 10 C.F.R. § 2.206 may be submitted by e-mail, FAX, EIE system (as a General Submission or OSM), delivery service, or in person.

4.2 Classified Information

Documents containing classified information may **not** be submitted via the EIE process; OSM is the only acceptable means for the electronic submission of classified information.

OSM containing classified information must be processed and produced on systems approved under the provisions of 10 C.F.R. § 95.49, "Security of Automatic Data Processing Systems." Each OSM must be clearly labeled as containing classified information. OSM containing classified information (i.e., national security information or restricted data) shall be packaged and submitted to the NRC in accordance with the requirements contained in 10 C.F.R. § 95.37, "Classification and Preparation of Documents"; § 95.39, "External Transmission of Documents and Material"; and § 95.41, "External Receipt and Dispatch Records."

Note: If OSM contains both classified and unclassified information, two separate OSM submissions must be filed. One OSM filing should include both the unclassified and classified/Safeguards Information (SGI). The second OSM filing should include only the unclassified or publicly available information (the information in this filing may be made publicly available in ADAMS).

Classified documents submitted as part of an adjudicatory proceeding must be processed and submitted in accordance with the procedures in 10 C.F.R. Part 2, Subpart I, "Special Procedures Applicable to Adjudicatory Proceedings Involving Restricted Data and/or National Security Information."

4.3 Safeguards or Sensitive Information

Documents containing safeguards information may not be submitted via the EIE process.

Documents with Safeguards Information (SGI) may be transmitted on OSM. The mailing package containing OSM with documents containing safeguards information must be processed, marked and transmitted in accordance with the requirements set forth in 10 C.F.R. § 73.22(e), (g), (h), and (f), as appropriate.

If a document contains information that is deemed SUNSI, it may be electronically submitted through the EIE process or on OSM. Transmittal documents used to transmit one or more documents containing SUNSI must be marked to show SUNSI is contained in the documents being transmitted. A header marking must be placed on each page of the transmittal document showing the type of SUNSI (i.e., "Security-Related Information—Withhold under 10 C.F.R. § 2.390," or "Proprietary Information—Withhold under 10 C.F.R. § 2.390.") Note that the 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.

If it is not practical to submit a large document containing SUNSI through the EIE system, submit the document on OSM. Submissions made on OSM should be accompanied by a transmittal letter that contains information regarding the sensitivity level of the transmitted documents. The transmittal letter should not have a SUNSI header unless SUNSI is contained in it.

When submitting documents on OSM that contain both publicly and non-publicly available files, two copies of the OSM should be provided. One copy should contain both the non-public and public files. The second copy, provided on separate OSM, should contain only the publicly available files. Each OSM should be clearly labeled showing the information it contains ("Publicly Available," SGI, or SUNSI). Files contained on OSM labeled as "Publicly Available" will be released to the public.

For more information on the procedures for marking and control of SUNSI, the following documents are available on the NRC public website:

- <http://www.nrc.gov/reading-rm/doc-collections/gen-comm/reg-issues/2005/>:
 - NRC Regulatory Issue Summary 2005-26, "Control of Sensitive Unclassified Non-Safeguards Information Related to Nuclear Power Reactors," dated November 7, 2005;

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- NRC Regulatory Issue Summary 2005-31, “Control of Security-Related Sensitive Unclassified Non-Safeguards Information Handled by Individuals, Firms, and Entities subject to NRC Regulation of the Use of Source, Byproduct and Special Nuclear Material,” dated December 22, 2005;and
- <http://www.nrc.gov/reading-rm/doc-collections/gen-comm/reg-issues/2007/>:
 - NRC Regulatory Issue Summary 2007-04, “Personally Identifiable Information Submitted to the U.S. Nuclear Regulatory Commission,” dated March 9, 2007.

In addition to the above guidance, other Government agencies may designate, mark, and control information according to their own procedures. Such information, if not safeguards information or classified information, will be handled by the NRC as SUNSI or per 10 C.F.R. Part 1017, when submitted to the NRC without requiring additional markings.

4.4 Accessibility

Section 508 of the Rehabilitation Act and the accessibility standards in the implementing regulations require Federal agencies to provide people with disabilities meaningful and equal access to electronic and information technology. In support these standards, the NRC strives to implement tools and plug-ins in its electronic and information technology systems. Authors of documents submitted to the NRC should consider accessibility issues during document authoring. To improve the NRC’s ability to make electronic submissions comply with Section 508, authors should use simple layouts, consistent styles, accessible table formats, alternate text for images, and English (U.S.) language selection. For more information, please go to <https://www.access-board.gov/guidelines-and-standards/communications-and-it>. The NRC will not reject electronic submissions based on Section 508.

4.5 Copyright Information

Submitting information to the NRC constitutes authority for the NRC to reproduce and distribute sufficient copies internally to carry out its official responsibilities. NRC use of the information specified herein does not constitute authority for others to use the information outside the applicable requirements of copyright law.

Submitters are expected to identify, as part of the submission process, copyright information. Copyrighted information will not be placed on the NRC public access database without a release from the copyright holder or a statement by the submitter that the information may be publicly released under applicable requirements of copyright law. Even with a copyright release, the NRC reserves the right to withhold information from public disclosure based on content if it presents a security or safety risk, or until it can verify a submitter’s statement that such information may be publicly released.

4.6 Copies

Paper copies of documents do not need to be provided when the documents are submitted electronically. When the NRC requires a paper copy for accessibility or other reasons, the NRC will make every effort to produce the copy using the electronic version of the document.

However, in those instances where the agency is unable to generate an accurate paper copy from the electronic submission, the NRC may request a paper copy from the submitter. This will be handled on a case-by-case basis.

Many NRC regulations require submission of copies of documents to multiple NRC locations (e.g., headquarters, regional offices). Electronic submission through the EIE system does **NOT** require submission to multiple locations. However, OSM submissions require that the licensee or vendor submit a single copy to each location that requires the information, as specified by your NRC Point of Contact.

4.7 Living Document Updates

Historically, many large documents submitted to the NRC have been maintained as living documents and have used a page-replacement approach when updated, such as an Updated Final Safety Analysis Report (UFSAR), or Technical Specifications. Paper submissions can still use this approach for providing updates to living documents.

However, revised sections of a document will not be accepted when the document is only submitted electronically. If changes to the submitted document are necessary:

- The submission (including all of the electronic files and electronic objects that comprise the submission) may be re-submitted through the EIE system if the total file size does not exceed the 500MB limit; otherwise, the submission should be re-submitted on OSM.
- The transmittal letter accompanying the submission should describe the revised parts (e.g., chapter, section, or graphic) as well as the general scope of the change.
- The document should be identified as a new version with conforming file identification information.
- Each changed page should include the following:
 - A change indicator (track changes) for the area changed (for example, a bold line vertically drawn in the margin adjacent to the portion actually changed).
 - A page change identification including either: (1) the date of change, (2) a change number, or (3) both.

4.8 Rejection of Submissions

Per the guidance provided within [Section 2—Parameters for Electronic Files Submitted to the NRC](#)—when electronically submitting documents to the NRC via any method, failure to follow the guidance outlined in this document may result in rejection of the submission. Rejected submissions must be resubmitted to the NRC.

The following issues may result in rejection:

- Inconsistencies between the description of the submitted files or physical objects in the transmittal letter and the files or physical objects received.
- Failure to apply additional sensitive information requirements to a submission in which the OSM contains classified information (i.e., national security information and restricted data), SGI, SUNSI, or non-public documents.

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- Portable document format (PDF) documents created using the PDF Portfolio feature.
- Virus-infected files.
- Compressed files.
- Encrypted files.
- Unknown file formats.
- Corrupt or unreadable files.
- Disabled fast Web view.
- Macros that are marked as potential viruses.
- File formats other than those listed in [Section 2.1](#).
- OSMs that contain both publicly and non-publicly available files on a single OSM, unless a second OSM with only publicly available information is also provided.
- OSMs containing object linking and embedding (OLE), dynamic data exchange (DDE), or any other object linking.
- Fonts not embedded (originated by Native Applications such as Microsoft® Word, PowerPoint, not from a scanned source).
- Non-searchable text.
- Scan source PDF files created at less than 300 dots per inch.
- Incorrect file naming conventions.
- Individual files that exceed 500MB, or E-mails with attachments that exceed 10MB, with the exception of single page files.

The NRC may reject any submission if any inconsistencies are found and will inform the submitter of the rejection.

5. ADDITIONAL RESOURCES

5.1 User Assistance

To obtain instructional information, navigate to the following NRC's Web pages:

- "Electronic Submittals Application" Web page: <http://www.nrc.gov/site-help/e-submittals.html>
- "Getting Started" Web page: <http://www.nrc.gov/site-help/e-submittals/getting-started.html>
- "Reference Materials for Electronic Submissions" Web page: <http://www.nrc.gov/site-help/electronic-sub-ref-mat.html>
- "Adjudicatory Submissions" Web page: <http://www.nrc.gov/site-help/e-submittals/adjudicatory-sub.html>
- "Obtain a Digital ID Certificate" Web page: <https://pki.nrc.gov/rudimentary/>

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- “Fitness for Duty” Web page: <http://www.nrc.gov/reactors/operating/ops-experience/fitness-for-duty.html> and Fitness for Duty reporting information at: <http://www.nrc.gov/reactors/operating/ops-experience/fitness-for-duty-programs/submit-ffd-reports.html>

To obtain general information or discuss problems concerning making an electronic adjudicatory filing or a general submission; accessing documents filed electronically (viewing, printing, and downloading); or formatting a document, contact the Electronic Filing Help Desk during the operating hours specified below by any of the following means:

Telephone: 1-866-672-7640
E-mail: MSHD.Resource@nrc.gov

Operating Hours of the Electronic Filing Help Desk:

9:00 a.m. to 6:00 p.m. ET, Monday thru Friday; closed on Federal holidays

Additional contact information:

- For general help in finding the correct NRC point of contact, contact the Office of Public Affairs: OPA.Resource@nrc.gov
- For digital ID certificate assistance: DigitalID.RequestResource@nrc.gov
- For Criminal History program specific assistance: CrimHist.Resource@nrc.gov
- Individual program offices may be contacted through the NRC website at www.nrc.gov by selecting specific contact programs from the [Contact Us](#) link at the top of the home page.
- For assistance with ADAMS, contact the Public Document Room (PDR):
Telephone: 1-800-397-4209 or 301-415-4737
TTY (hearing impaired): 1-800-635-4512
Facsimile: 301-415-3548
E-mail: PDR.Resource@nrc.gov

U.S. Mail: Public Document Room, (O1F21)
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001
Onsite at the PDR: One White Flint North
11555 Rockville Pike (First Floor)
Rockville MD

5.2 Freedom of Information Act (FOIA) and Privacy Act Requests

All FOIA and Privacy Act requests and appeals may be submitted, as follows:

- Facsimile: 301-415-5130.
- E-mail: FOIA.Resource@nrc.gov

5.3 References

- NRC, “Electronic Submittals Application” Web page: <http://www.nrc.gov/site-help/e-submittals.html>
- National Archives, Records Manager’s Web page: <http://www.archives.gov/records-mgmt/>
- *Code of Federal Regulations*, Title 10 (10 C.F.R.), Energy, which can be found at: <http://www.nrc.gov/reading-rm/doc-collections/cfr/>
- Freedom of Information Act, 5 U.S.C 552.
- Privacy Act, 5 U.S.C 552a.
- 10 C.F.R. Chapter I, RIN 3150-AH33, “Electronic Maintenance and Submission of Information”, which can be found at: <http://www.nrc.gov/site-help/e-submittals/10cfr1.pdf>
- NRC Fitness for Duty: <https://www.nrc.gov/reactors/operating/ops-experience/fitness-for-duty.html>
- Section 508 of the Rehabilitation Act, <https://www.section508.gov/content/learn/laws-and-policies>

6. APPENDIX—NARA GUIDANCE

Subject	Website URL
NARA 2014-04: Appendix A, Revised Format Guidance for the Transfer of Permanent Electronic Records – Tables of File Formats	https://www.archives.gov/records-mgmt/bulletins/2014/2014-04.html
NARA Information and FAQs on Electronic Media Storage This guidance is provided to Federal agencies to assist them in meeting their records management responsibilities under 44 U.S.C. Chapter 31	http://www.archives.gov/frc/flyers/erv-faq.pdf
Textual, Micrographic and Cartographic Records, Posters and Illustrated Materials	https://www.archives.gov/preservation/products/reformatting/text-carto.html
Technical Information Paper No. 12, Digital-Imaging and Optical Digital Data Disk Storage Systems: Long-Term Access Strategies for Federal Agencies July 1994	http://www.archives.gov/preservation/technical/imaging-storage-appendix.html
Transfer of Electronic Records This overview on the transfer of electronic records is taken from NARA's regulations in the Code of Federal Regulations (36 C.F.R. §§ 1235.44/.46/.48/.50). For more specific details, see Part 1235.	http://www.archives.gov/records-mgmt/initiatives/transfer-records-to-nara.html
NARA Technical Guidelines for Digitizing Archival Materials for Electronic Access: Creation of Production Master Files – Raster Images	http://www.archives.gov/preservation/technical/guidelines.html

Subject	Website URL
<p>For the Following Record Types- Textual, Graphic Illustrations/Artwork/Originals, Maps, Plans, Oversized, Photographs, Aerial Photographs, and Objects/Artifacts June 2004</p>	
<p>Expanding Transfer Options for Electronic Records [<i>Federal Register</i>: December 30, 2002 (Volume 67, Number 250)] [Rules and Regulations] [Page 79517-79520] From the <i>Federal Register</i> online through GPO Access [wais.access.gpo.gov] [DOCID:fr30de02-3]</p>	<p>http://www.archives.gov/records-mgmt/initiatives/transfer-regulation.html</p>