

Fishman, Lisa

From: Ziebell, Krista
Sent: Thursday, February 11, 2016 4:34 PM
To: Fishman, Lisa
Subject: FW: Re: NRC 790 request

Good Afternoon Lisa,

Please see below...

Regards,

Krista M. Ziebell
Information Security Specialist
Office of Nuclear Security and Incident Response U.S. Nuclear Regulatory Commission
Office: (301) 415-7121
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-----Original Message-----

From: Wegert, Dan (GE Power & Water) [mailto:Dan.Wegert@ge.com]
Sent: Friday, October 30, 2015 8:52 PM
To: Ziebell, Krista <Krista.Ziebell@nrc.gov>
Subject: [External_Sender] Re: NRC 790 request

Krista,

Sorry these are late. I was out of the office last week and had military work this week. Here are our comments.
Thanks, Dan

1. Is the proposed collection of information necessary for the NRC to properly perform its functions?

Response: Collection of titles is not necessary for some licensees and should be optional. Storing a list of classified document titles on an unclassified system poses a compilation or association risk. Also, if compromised, this list would pose a risk relating to business progress & potentially IP.

Does the information have practical utility?

Response: Over the course of 5 NRC inspections, one licensee was asked only once for specific documents by title via this process of submission. Additionally, licensees are not required to maintain these documents. Rather, identifying another method such as serialized numerical value or Document ID# would be a better proposition.

2. Is the burden estimate accurate?

Response: If this requirement were to apply to electronic markings of emails or other electronic files, this number would be over 500 hours yearly for a small office of 20-30 personnel.

3. Is there a way to enhance the quality, utility, and clarity of the information to be collected?

Response: Electronic files such as Excel allow for the population of rows and columns which could simplify this process. If the NRC would accept a comma separated value (CSV) type file which could then be loaded into a program sufficient to compile the data this would prove much more feasible. Filling out forms via paper and then scanning these forms takes time. Using an electronic submission process is also feasible, however, this still requires the filing and submitting of individual electronic files rather than one single file monthly or quarterly.

4. How can the burden of the information collection be minimized, including the use of automated collection techniques or other forms of information technology?

Response: Some licensees may prefer to keep the paper or electronic pdf copy. It would be great to have an alternative though which was also sufficient. Using some processing tool such as Microsoft Access or another text processing software which could incorporate CSV type files would allow licensees to compile their own data and then submit this monthly to the NRC via a single file which could easily be edited or corrected.

From: "Ziebell, Krista" <Krista.Ziebell@nrc.gov<mailto:Krista.Ziebell@nrc.gov>>
Date: Thursday, October 15, 2015 at 3:24 PM
To: Dan Wegert <dan.wegert@ge.com<mailto:dan.wegert@ge.com>>
Subject: RE: NRC 790 request

Good Afternoon Dan,

Thank you for the heads up. I look forward to receiving your comments.

Regards,

Krista Ziebell

From: Wegert, Dan (GE Power & Water) [mailto:Dan.Wegert@ge.com]
Sent: Thursday, October 15, 2015 1:52 PM
To: Ziebell, Krista <Krista.Ziebell@nrc.gov<mailto:Krista.Ziebell@nrc.gov>>
Subject: [External_Sender] NRC 790 request

Good Afternoon Krista,

Hope you are having some great weather up there! We are enjoying some sun here today. Pat wanted me to write you and let you know we are going to have some comments for the NRC 790 questions you asked for. Should have them to you next week before the deadline.

Thanks,
Dan Wegert
Classification Rep
GE Hitachi, GLE

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