

## SUMMARY OF LICENSING SUPPORT NETWORK ADVISORY REVIEW PANEL MEMBER COMMENTS

The following table summarizes Licensing Support Network (LSN) Advisory Review Panel (LSNARP) member comments made at the February 27-28, 2018 LSNARP meeting,\* as well as those received from LSNARP members after the meeting.

LSNARP Member/Representative(s)	Option 1 Traditional Discovery	Option 2 - Alternative One Use of Existing Public ADAMS LSN Library with Electronic Information Exchange (EIE) System Modification	Option 2 - Alternative Two Use of Existing Public ADAMS LSN Library Semi-Manual Process	Option 3 - Alternative One Move to the Cloud Nuclear Regulatory Commission (NRC)-Maintained Cloud-Based System	Option 3 - Alternative Two (a) Move to the Cloud High-Level Waste (HLW) Participant- Maintained Cloud-Based System With NRC-Maintained Search Index	Option 3 - Alternative Two (b) Move to the Cloud HLW Participant- Maintained Cloud-Based System with Participant- Maintained Search Index	Option 4 Rebuild the Original LSN
Churchill County, NV Loreen Pitchford	Does not support. 2/28/18 Tr. at 125.	<ul style="list-style-type: none"><li>Non-Committal, but notes funding issues. 2/28/18 Tr. at 125.</li><li>Offered an alternative option, “Option 3 C”:<ul style="list-style-type: none"><li>Maintain ADAMS Library (with improvements) for existing collection</li><li>New documents to be added to a cloud-based, NRC-operated system. 2/28/18 Tr. at 59.</li></ul></li></ul>					Does not support. 2/28/18 Tr. at 125.
City Of Caliente, NV Connie Simkins	See Lincoln County Response (however, agrees with Nye County regarding Option 3; 2/28/18 Tr. at 58).						
Clark County, NV Phil Klevorick	Does not support (agreeing with Nevada). 2/28/18 Tr. at 128.	<ul style="list-style-type: none"><li>Very much agrees with Nevada’s assessment of the technical concerns. 2/28/18 Tr. at 128.</li><li>“Needs” expert IT advice. 2/28/18 Tr. at 128, 130.</li></ul>			Operating and maintaining participant systems will be difficult without adequate funding. See generally 2/28/18 Tr. at 51–57.		Not sure why Option 4 an option (LSN too archaic). 2/28/18 Tr. at 129.
Department of Energy (DOE) Tom Poindexter		Generally (across all options), DOE currently has no funding, so cannot really offer any comment. 2/28/18 Tr. at 6-7. However, would lean more towards Option 2. 2/28/18 Tr. at 116.					

\* The February 27 and 28, 2018 meeting transcripts (cited herein as 2/27/18 Tr. and 2/28/18 Tr.) can be found, respectively, at <https://www.nrc.gov/docs/ML1806/ML18067A312.pdf> and <https://www.nrc.gov/docs/ML1806/ML18067A313.pdf>.

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	Post-meeting Comments: <a href="#">ML18085A567</a>  Strongly supports Option 2.						
Esmeralda County, NV	Member not represented at LSNARP meeting and did not provide post-meeting written comments.						
Eureka County, NV Abby Johnson Diane Curran	Written comments to be provided, but level digital access playing field needed, and selected option should be based on a bedrock of “simplicity.” 2/28/18 Tr. at 134.						
	Post-meeting Comments: <a href="#">ML18085A560</a> <ul style="list-style-type: none"> <li>• No further action should be taken on the discovery process until:               <ul style="list-style-type: none"> <li>○ Congress has decided whether and on what terms the proceeding will resume</li> <li>○ Funding has been provided to Affected Units of Local Government (AULGs).</li> </ul> </li> <li>• With respect to the LSN document collection:               <ul style="list-style-type: none"> <li>○ Establish a technical working group (TWG)</li> <li>○ Hold several LSNARP meetings</li> <li>○ Conduct a rulemaking to establish the final parameters of the process.</li> </ul> </li> </ul>						
Inyo County, CA Greg James	<ul style="list-style-type: none"> <li>• Agrees with the State of Nevada that solution should be simple and inexpensive so that rural counties can participate. 2/28/18 Tr. at 133.</li> <li>• Looks forward to working with a TWG. 2/28/18 Tr. at 133.</li> </ul>						
Lander County, NV Loreen Pitchford	Does not support. 2/28/18 Tr. at 125.	<ul style="list-style-type: none"> <li>• Non-Committal, but notes funding issues. 2/28/18 Tr. at 125.</li> <li>• Offered an alternative option, “Option 3 C”:               <ul style="list-style-type: none"> <li>○ Maintain ADAMS Library (with improvements) for existing collection</li> <li>○ New documents to be added to a cloud-based, NRC-operated system. 2/28/18 Tr. at 59.</li> </ul> </li> </ul>					Does not support. 2/28/18 Tr. at 125.

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Lincoln County, NV Connie Simkins	Advantage for non-technical participants. 2/28/18 Tr. at 133.	Will best serve Lincoln County, 2/28/18 Tr. at 132, but would also like to see Option 1 available for those without the technical knowledge to participate under Option 2. 2/28/18 Tr. at 132–33.			Agreed with Nye County in that it does not want to maintain its own collection. 2/28/18 Tr. at 58.		
Mineral County, NV	Member not represented at LSNARP meeting and did not provide post-meeting written comments.						
National Congress Of American Indians	Member not represented at LSNARP meeting and did not provide post-meeting written comments.						
Native Community Action Council Ian Zabarte	No preference given, but notes a lack of available funding. 2/28/18 Tr. at 130–32.						
Nevada Nuclear Waste Task Force Judy Treichel	<ul style="list-style-type: none"><li>Any option requires further study, assessment, and review by an LSNARP TWG. <u>See</u> 2/27/18 Tr. at 154–57.</li><li>Values a distributed system. 2/28/18 Tr. at 65.</li><li>Prefers the NRC to have little, if any, responsibility for the participant collections. 2/28/18 Tr. at 65.</li></ul>						
	Post-meeting Comments: <a href="#">ML18074A371</a>  Moving forward is premature for two reasons: <ul style="list-style-type: none"><li>1. NRC move to the cloud - would trigger a re-evaluation</li><li>2. Lack of funding and uncertainty of proceeding resumption.</li></ul>						

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NRC Staff Jessica Bielecki	Potentially burdensome. 2/28/18 Tr. at 115.	Options 2 and potentially 3 would be of interest to the NRC staff due to these options being more automated, although unknowns still exist with Option 3. 2/28/18 Tr. at 115.					Going backwards. 2/28/18 Tr. at 115.
	Post-meeting Comments: <a href="#">ML18081A880</a>						
	No additional comments.						
Nuclear Energy Institute (NEI) Rod McCullum Anne Cottingham	<ul style="list-style-type: none"><li>Does not support. 2/27/18 Tr. at 114–15; 2/28/18 Tr. at 122.</li><li>Tremendous burden on all parties. 2/28/18 Tr. at 123.</li></ul>	<ul style="list-style-type: none"><li>Preferred choice with improvements. 2/27/18 Tr. at 178; 2/28/18 Tr. at 123–24.</li><li>Only option with absolutely no cost to NEI. 2/28/18 Tr. at 123.</li></ul>		Likely will be not be a viable option as licensing costs and the risks associated with the various alternatives are evaluated further. 2/28/18 Tr. at 122–23.			Does not support. 2/28/18 Tr. at 122.
	Post-meeting Comments: <a href="#">ML18085A573</a> <ul style="list-style-type: none"><li>Reiterated Option 2, Alternative One is preferred choice and encourages NRC to move forward.</li><li>Indicated Option 2, Alternative Two is viable option if Alternative One cannot be implemented.</li></ul>						

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Nye County, NV Darrell Lacy	Does not support. 2/27/18 Tr. at 114; 2/28/18 Tr. at 126.	<ul style="list-style-type: none"><li>Preferred with improvements. <u>See</u> 2/27/18 Tr. at 88; 114; <u>see also</u> 2/28/18 Tr. at 126.</li><li>Option 2 or 3 “is pretty much transparent” regarding using servers or the cloud; county “would probably be okay submitting new documents through the [EIE].” 2/28/18 Tr. at 126.</li></ul>		Option 2 or 3 “is pretty much transparent” whether using servers or cloud. 2/28/18 Tr. at 126.	No interest in maintaining its own collection/system. 2/28/18 Tr. at 57–58.		Does not support. 2/28/18 Tr. at 126.
Prairie Island Indian Community Heather Westra <a href="#">ML18107A809</a>	Attended meeting but did not offer any comments.						

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State of Nevada Bob Halstead Laurie Borski (presenter) Martin G. Malsch (presenter)	May not be a viable option depending on the number of new documents. 2/28/18 Tr. at 118–19.  Option screened out by lack of interest expressed at meeting. 2/28/18 Tr. at 121.	Needs further improvements, options need to be better defined. 2/28/18 Tr. at 68–69; 119.  Need more time and cost information on Options 2 and 3 sub-options. 2/28/18 Tr. at 121.		<ul style="list-style-type: none"> <li>• “Impossible to evaluate” because specifics are lacking. 2/28/18 Tr. at 119.</li> <li>• Cloud-based system must have capability to <ul style="list-style-type: none"> <li>○ Find documents</li> <li>○ Search the contents of those documents.</li> </ul> </li> </ul> 2/28/18 Tr. at 41–42.		Participant- maintained search indices are problematic. 2/28/18 Tr. at 68.	Does not support; option likely screened out by lack of interest expressed at meeting, 2/28/18 Tr. at 121, and federal cloud policy. 2/28/18 Tr. at 119.
	Going forward, further evaluation and review by a LSNARP TWG needed, but funding is lacking. 2/28/18 Tr. at 120.						
	Post-meeting Comments: <a href="#">ML18081A939</a> <ul style="list-style-type: none"> <li>• No decision should be made until: <ul style="list-style-type: none"> <li>○ Multiple meetings of the LSNARP are held</li> <li>○ Sufficient funding provided to litigants</li> <li>○ Creation of a TWG.</li> </ul> </li> <li>• LSNARP to make a fully informed recommendation.</li> <li>• Provided a list of functional requirements. (<i>LSN Working Group Note: These appear to be system characteristics or attributes rather than functional requirements.</i>)</li> <li>• Deliverable from meeting should be a path forward rather than a replacement/reconstitution recommendation.</li> <li>• Supports the formation of a TWG.</li> <li>• Supports evaluation of cloud-based options by the TWG.</li> <li>• Significant legal question may be raised if the Commission proceeds without a rulemaking.</li> </ul>						

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Timbisha Shoshone Tribe	Member not represented at LSNARP meeting and did not provide post-meeting written comments.						
White Pine County, NV Bryan Pyle <a href="#">ML18107A810</a>	Attended meeting but did not have any options comments.						