

POLICY ISSUE INFORMATION

September 24, 2002

SECY-02-0171

FOR: The Commissioners

THROUGH: G. Paul Bollwerk, III
Chief Administrative Judge

FROM: Daniel J. Graser
Licensing Support Network Administrator

SUBJECT: LICENSING SUPPORT NETWORK PROGRAM ADMINISTRATION -
SEMIANNUAL REPORT

PURPOSE:

In accordance with 10 C.F.R. § 2.1011(c)(5), to inform the Commission of the status of the Licensing Support Network (LSN) and the activities of the LSN Administrator (LSNA) for the six-month period ending June 30, 2002.

BACKGROUND:

The Commission's Staff Requirements Memorandum (SRM) dated January 31, 1992, directed the submission of a semiannual report on the activities of the LSNA (formerly the Licensing Support System (LSS) Administrator).

The scope of this semiannual report includes LSN program activities from January 1, 2002, through June 30, 2002.

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DISCUSSION:

I. Activities

A. Licensing Support Network Administrator and Staff

No changes have been made to the staffing profile for LSN and Digital Data Management System (DDMS) project activities since the last report.

B. Federal Advisory Committee Act (FACA)-Related Activities

No changes in LSN Advisory Review Panel (LSNARP) composition have occurred since the previous report and there have been no changes in the charter. Dr. Andrew Bates of the Office of the Secretary (SECY) continues to serve as the LSNARP Chair.

The LSNA, together with representatives from other affected offices, attended a meeting with the Office of the General Counsel (OGC) and SECY representatives on May 15, 2002, to discuss revisions to the Nuclear Regulatory Commission's (NRC) implementation of new guidance on Federal Advisory Committee Act (FACA) chartered advisory committees. OGC and SECY provided clarification on how the changes might affect the operation of subcommittees and working groups, such as are used by the LSNARP. No changes to the LSNARP charter were identified as being necessary.

C. LSN Advisory Review Panel Activities

On January 29, 2002, LSNARP Chairman Dr. Andrew Bates issued a memorandum to LSNARP members detailing progress to-date and providing preliminary responses to questions raised at the August 2001 LSNARP meeting. Those responses were incorporated into the draft version of LSN Guidelines that have been in place since June 2001 and the updated materials were circulated to SECY, OGC, the Office of the Chief Information Officer (OCIO), the Office of the Chief Financial Officer (OCFO), and the Office of Nuclear Material Safety and Safeguards (NMSS) for comment. The LSN Guidelines, documenting technical decisions and describing viable approaches to all aspects of the participants' system implementation, were finalized on April 25, 2002, and distributed via e-mail by Dr. Bates to LSNARP members and LSNARP Technical Working Group (TWG) participants. The Final Guidelines are available on NRC's Agencywide Documents Access and Management System (ADAMS) (ML021160199), the Publicly Available Records Systems (PARS), and on the LSN website.

An LSNARP meeting is scheduled for September 18-19, 2002, in Las Vegas. Potential agenda items are detailed in section III.A of this report.

D. Interactions with Other NRC Offices and Entities

1. Commission

Briefings for individual Commissioners are provided upon request. Two informational briefings were presented to members of the Commission and staff during February and April of 2002. The April 11, 2002 briefing on planning for the high-level waste (HLW) repository licensing proceeding hearings, including the LSN, was made to the Commissioners' assistants by Chief Administrative Judge Bollwerk.

2. Office of the Chief Information Officer

Members of the LSN staff attended an OCIO demonstration of the web version of the Electronic Hearing Docket (EHD), which is one of the HLW adjudicatory proceeding automation tools required by 10 C.F.R. Part 2, Subpart J. The product developed by OCIO in response to SECY management guidance seems to be of high quality and suggests that the final delivered product, when accepted by SECY, will meet Subpart J expectations.

On April 1, 2002, LSN staff provided OCIO with Government Information Security Reform Act (GISRA) information needed to obtain system certification for the LSN as required by Management Directive 12.5. A memorandum to the CIO was subsequently prepared designating LSN Project Manager Matthew Schmit as the Information System Security Officer (ISSO) for the LSN, completing the documentation needed by OCIO for certification. As of the end of this reporting period, the LSN is awaiting system certification by the CIO. Certification is expected before the end of the current fiscal year in order to report the system as compliant with Government Information Security Reform Act (GISRA) reporting requirements.

3. Information Technology Business Council (ITBC)

The LSNA participated in two working sessions conducted under ITBC auspices to consider changes to agency guidance on development and operation of the agency's Capital Planning and Investment Control (CPIC) program. The LSNA was invited because of his involvement with three major projects that have been subjected to a CPIC analysis: ADAMS, LSN, and the DDMS. The LSNA offered insights on the expected outcomes, along with commentary on the possible impacts on IT project managers' effectiveness that could be anticipated from the OCIO's initial draft governing principles.

4. LSN Internal Working Group and the HLW Licensing Program Executive Steering Committee (HLWESC)

Acting at the request of the HLWESC, the LSNA drafted a white paper on several issues, such as technical standards applicable to documentary materials going into the EHD, that are associated with utilizing electronic materials in the HLW repository licensing proceeding. The draft was reviewed and revised by representatives from OCIO and SECY to include options for formatting very large documents, such as the DOE electronic License Application (LA), that are to be

submitted through Electronic Information Exchange (EIE) and ADAMS intake. It was presented to the members of the HLWESC on May 15, 2002. As a result of HLWESC discussions regarding the paper, OCIO proposed an OCIO/SECY-sponsored team to identify gaps in NRC's ability to accept and process electronic submissions for the high-level waste proceeding. This team will focus on solutions to (1) allow EIE transmission of large documents; (2) allow the agency's official records repository (ADAMS) to intake such large documents without fragmenting them into so many pieces as to make research, search and retrieval, and usage difficult; and (3) facilitate large document availability in a publicly accessible EHD so as to ensure they can be quickly and effectively downloaded by the public using the Internet. Since the ADAMS and EHD repositories define the technical file structures and document organization approaches for materials that will be downloaded into the hearing room for use in the proceedings, the decisions made to solve these problems have significant implications for the successful use of large documents in the hearing room via the proposed DDMS. Timely resolution of these issues will be important in demonstrating the effectiveness of NRC's HLW proceeding programmatic planning, managerial preparation and organization, and IT competency.

The team will report to and receive guidance from the full HLWESC, to develop an action plan and schedule to identify and address issues with HLW documents. The action plan and schedule are targeted for delivery by late July 2002 for discussion at an early August HLWESC meeting.

5. NMSS Initiative for NRC/DOE Meeting on LA Electronic Submission

Representatives from ASLBP, OGC, NMSS, and OCIO met in January 2002 to discuss electronic format and file organization approaches for the DOE LA. The meeting focused on the relationship between the EIE guidance for the electronic filing rule (E-rule) currently being developed and the already-promulgated Subpart J requirements for the EHD. File format standards in these two areas are not fully consistent. Subsequent meetings between NMSS, ASLBP, SECY, OCIO, and OGC were held to determine whether those standards should be identical, or if the E-rule should indicate that HLW submissions are covered by other electronic submission standards. The final consensus position was that DOE should be informed that, notwithstanding prior guidance in 10 C.F.R. § 2.1011(b)(2)(iv), image density standards for color and greyscale photos will have to be delivered to NRC using a minimum 200 dots per inch (dpi) resolution standard to ensure that they can subsequently be converted or upgraded as technology advances. This issue was identified for discussion with DOE at a June 2002 Technical Exchange meeting with DOE, which is discussed in section I.E below.

Another issue associated with DOE's potential submission of an electronic LA includes the E-rule's provisions allowing for paper submissions and its potential for being erroneously interpreted as applying to the DOE license application for a HLW repository. OGC has advised that the E-rule is not applicable to adjudicatory proceedings, and even if it were, specific requirements in Subpart J would override general E-Rule requirements when that rule is eventually promulgated.

A third issue raised by OCIO concerned the feasibility of directing submission of the DOE LA on CD-ROM and possibly not storing it in ADAMS because of its size. OGC has advised that

“submission” on an “electronic medium” such as a CD-ROM does not comply with the 10 C.F.R. § 2.1013 (c)(1) requirement for “electronic transmission.”

The above noted OCIO-led team will continue working to identify any outstanding technical issues in regard to DOE electronic submissions and solutions for addressing those issues that can be communicated to DOE.

NMSS conducted the first Technical Exchange on June 25-26, 2002, in Las Vegas, Nevada, between the NRC and DOE concerning the electronic submission of documents associated with a potential license application and associated proceedings for a Yucca Mountain HLW repository. The NRC staff and DOE representatives discussed technical issues and potential challenges that could affect electronic submission of documents.

Presentations by NRC included status reports on the key components to Subpart J automation requirements, including the high-level waste information architecture at NRC, EIE process and pilots, the use of the EHD for a potential HLW proceeding, electronic courtroom, and technical issues with a potential electronic license application submission and other large documents. DOE provided a briefing on the status of its efforts to publish its HLW document collection and make those materials available via the LSN, as did representatives from NMSS with respect to the NRC collection. Staff will continue these interactions with DOE and future meetings on electronic submissions are anticipated between NRC, DOE, and other potential parties.

NMSS is awaiting the recommendations of the OCIO-led team (expected Spring 2003) in order to provide DOE with the technical specifications for the electronic LA that eventually will be entered into ADAMS by OCIO and docketed by SECY in accordance with Subpart J. Resolving the problems associated with the submission and handling of large documents is important to the success of both the discovery and subsequent hearing processes.

6. Draft Regulatory Guide DG-3022: Topical Guidelines for the Licensing Support Network

As noted in the agenda items found in section III.A of this report, the draft Regulatory Guide that defines the scope of documentary material for inclusion in the LSN was released for public comment on July 2, 2002, and will be discussed at the upcoming LSNARP meeting. The purpose of the draft Regulatory Guide is to provide a list of the topics for which LSN participants should submit documentary materials for entry into the LSN. It represents a proposed Revision 1 to the existing Regulatory Guide 3.69. The draft revisions have been developed to be consistent with requirements for DOE LA content as described in 10 C.F.R. 63.21 and specified in the draft Yucca Mountain Review Plan, Revision 2. The comment period for the draft Regulatory Guide extends through September 30, 2002.

E. Interactions with DOE on Their Efforts and Readiness to Meet LSN Commitments

The DOE HLW document collection server has been successfully integrated with the LSN portal since last year. Subsequently, like NRC, DOE has formulated post-9/11 review criteria and is coordinating efforts for the release of documents, and the LSNA interactions with DOE have focused on technical improvements to facilitate downloading image documents from the DOE collection and improving the speed of the LSN "crawler" software in indexing the DOE documents. To those ends, the LSN staff continued to coordinate with DOE representatives from the LSNARP TWG on technical integration enhancements, efforts that have resulted in a limited number of test documents being made available to evaluate the new, improved LSN crawler.¹

At the June 25-26 Technical Exchange meeting reported above, DOE presented a schedule that calls for identification and processing of their holdings commencing in October 2002. Once identified and prepared, they plan to have their documentary holdings available on their production server commencing in August 2003, with loading completed in time for a planned initial certification in June 2004 -- six months prior to the currently projected December 2004 LA submittal. This plan included a time line that was not very specific and covered long time spans, but still represents significant progress as it is the first concrete operational schedule presented by DOE to the LSNA. Technical discussions with the DOE computer staff indicate that they are sizing their system to hold 300,000 documents (projected to represent 5,100,000 pages). It is worth noting that the LSN design criteria used approximately 5 million pages as its low-end design criteria and 15 million pages as its high-end criteria, so the LSN is well positioned to accommodate these new planning numbers.

The LSNA continued to coordinate with the Chief Information Officer of DOE's Civilian Radioactive Waste Management Program to verify DOE's commitment to make LSN access available in DOE reading rooms, as required by Subpart J, in fifteen locations across the State of Nevada.

F. NRC Compliance as Party to HLW Proceedings

NRC staff awaited the Commission's screening criteria for sensitive homeland security information during the reporting period and did not place any HLW documents on the LSN collection server. NMSS is now working to publish its collection of HLW header and document files.

In the meantime, LSN staff evaluated the structure and content of test data published for the NRC HLW document collection and provided detailed feedback to the NRC staff on the quality of NRC's LSN data as a prelude to further integration testing. The OCIO contractor continued to make progress in getting the NRC data in a format that can be used by the LSN portal per an action item

¹ A "crawler" or "spider" is a computer program that is directed to visit a designated location and parse through all the data it finds. In the Internet environment, the program subsequently fetches the information it finds, brings it back to its own server, and delivers it to other software that builds an index to that information. The spider then "throws away" the information it found, and continues the process with the next data or document that it finds until the entire target collection has been indexed.

closure meeting convened by OCIO on March 20, 2002. These efforts were coordinated in a March 26, 2002 meeting under NMSS lead.

When the sensitive homeland security information screening review process is implemented and final technical details are resolved with the NRC web publishing process, the agency expects to start making its HLW document collection available in December 2002.

Although the NRC Public Document Room provides a terminal with access to the NRC homepage, access to "external" Internet locations is blocked for public users at this time. However, OCIO has established a hyperlink from the NRC homepage to the LSN homepage, complying with the "and/or" requirement at 10 C.F.R. § 2.1007(a)(2).

G. Interactions with Other Participants on Their Efforts and Readiness to Meet LSN Commitments

On January 10, 2002, in accordance with the Nuclear Waste Policy Act (NWPA), Secretary of Energy Abraham notified the State of Nevada of his intention to recommend to President Bush that the Yucca Mountain site is scientifically sound and suitable for development as the nation's long-term HLW geological repository. There was an immediate and notable increase in the tempo of technical interactions with potential parties.

- On January 14, 2002, the LSN staff was contacted by technical representatives from the Nevada counties of Nye (Elaine Ezra), and Lincoln and White Pine (Jason Pitts) to begin arrangements for connecting their HLW document collections to the LSN. LSN staff provided both representatives with a copy of the LSN header generator software.
- The LSNA and NMSS representatives met on February 15, 2002, with Cheryl Noriega, a county commissioner from White Pine County, Nevada, and Josie Larson, the county's technical coordinator for LSN efforts. They were accompanied by John Gervers, a consultant to the county. LSN-related discussions centered on how the county can comply with 10 C.F.R. Part 2, Subpart J, requirements given the small volume of documents the county is likely to generate.
- On April 17, 2002, LSN staff provided web site set-up guidance and header generator software to Lander County, Lincoln County, and White Pine County representatives per their requests.
- Similar technical exchanges occurred with representatives of Clark County on April 23, 2002.
- On May 10, 2002, the LSN staff received notification that the LSN sites for the Nevada counties of White Pine and Lincoln were established and ready for testing.

- During the week of May 13, 2002, NRC's LSN contractor began assessing the installed configuration. A single server has been established collaboratively by Lincoln and White Pine Counties to house their individual collections. Some minor configuration issues were identified and have been brought to the attention of the counties' automation vendor. The Lincoln and White Pine joint effort was successful in using the header generator tool provided on the LSN web site to create bibliographic headers, and initial connectivity testing was completed. LSN staff expect to test document indexing in July and August 2002.
- Further technical exchanges with the Clark County staff took place on June 26, 2002. Clark is preparing to establish its LSN site and would like to begin testing in September 2002.
- At the June 25-26 DOE/NRC electronic submissions Technical Exchange meeting, Susan Lynch, Administrator of Technical Programs for the State of Nevada, indicated that depending on the outcome in July 2002 of the congressional process for overriding the Nevada Governor's veto of the President's December 2001 site recommendation, the State of Nevada would be interested in launching technical discussions with LSN staff and contractors this coming September.

H. LSN Implementation Project

1. LSN Response to Delay in DOE LA Submission

Efforts during the reporting period were focused on performing security enhancements and assessments of the LSN system while the DOE and NRC were developing post 9/11 guidelines for making materials available via the Internet.

Additionally, in the fall of 2001 a significant change in the target date for the DOE HLW repository license application occurred. Although there had been suggestions that the DOE application date was going to slip for some time, it was only at that time that it became evident that DOE's LA submission was not going to be received in March 2002. At the time of the initial LSN Capital Planning and Investment Control (CPIC) Business Case Analysis (BCA) submission, March 2002 was the agency planning date for the DOE HLW repository LA. However, since the fall of 2001 DOE has been stating publicly a license application date of December 2004, consistent with the President's FY 2003 budget request for DOE.

LSN staff analysis relative to this changed condition led to identification of long-term operational risks and fiscal impacts associated with DOE's two-and-a-half-year delay. DOE's delay will necessitate substantial maintenance activity to accomplish (1) a technology refreshment; (2) an operational strategy shift to keep the LSN search engine at current release versions; (3) and three years of additional operational support that will exceed the five-year term of the existing LSN design/operations contract, thus requiring a new procurement action. The LSNA response was to

detail the delay-associated risks and impacts, submit an update/revision to the original LSN CPIC BCA (ML 020840041) to OCIO, the ITBC Chairman, and OCFO.

2. Close Out of LSN Development Phase Contract and Start of Operations & Maintenance

The basic LSN development contract with GRC International, Inc., (GRCI) ended January 15, 2002. The contract for the base period of performance was completed on budget.

The LSN staff worked with the Office of Administration/Division of Contracts (ADM/DC) to exercise an option for operations and maintenance (O&M) support covering the performance period from January 16, 2002, through January 15, 2003. As requested by ADM/DC, the statement of work for the option period was modified to incorporate performance-based contracting principles.

3. Hardware Reconfiguration

Partially in response to initial government test and acceptance findings on the delivered LSN, and partially in response to the events of September 11, 2001, the LSN staff took several steps to make the LSN architecture more secure and redundant. For instance, working in conjunction with ADM/DC, LSN staff processed an engineering change proposal (ECP) from the LSN contractor for a hardware reconfiguration that permits work to be distributed among the LSN servers so as to allow for immediate response by the “clustered” servers to individual component failures. The proposed configuration is intended to eliminate a single point of failure problem and provide robust backup and recovery.

Additionally, the LSN staff received and processed an LSN contractor ECP for hardware for a supplemental LSN reconfiguration intended to further improve system security, performance, and stability. ADM/DC requested that the contractor resubmit the proposal using General Services Administration (GSA) schedule items, which it did, resulting in ADM/DC approval to the contractor on March 26, 2002, to procure the additional hardware from the GSA schedule. During a part of the reconfiguration process, the LSN was unavailable and displayed a banner notifying users the system is being upgraded. LSN staff worked closely with the LSN contractor to coordinate and minimize LSN unavailability.

Reconfiguring the LSN hardware to make the LSN more secure, along with release 2.0 of the web site search engine and “spidering” software (i.e., the index building software) were completed by April 30, 2002. The release 2.0 web site user interface has no new features, but incorporates a new hardware design and leverages technology for faster page loading. Version 2.0 of the spider leverages multithreading, which will allow the LSN to spider large sites (e.g., DOE) faster. During May 2002 LSN staff began version 2.0 integration testing with the NRC and DOE, which DOE supported by posting 50 test documents. When version 2.0 is tested and accepted, one of the side-benefits will be that LSN staff will have demonstrated one aspect of technology refreshment - the ability to make an upgrade to the underlying commercial off-the-shelf (COTS) search engine software (Autonomy 4.0) - - with minimal effort.

NRC's LSN staff is currently processing a procurement action for the Division of Contracts (DC) to purchase a two-processor copy of Microsoft SQL Server Enterprise Edition, a final piece of software needed to ensure database redundancy. This software will let one database automatically pick-up if another should fail. A purchase order had been awarded for this software, however, the awardee made an error in its price. As purchase orders are not binding until the contractor initiates work and the contractor was not willing to provide the software at the price quoted, the initial purchase order was cancelled.

4. Administration of the LSN

During this reporting period, the LSN contractor completed development of a new and more secure module for administering the content of the LSN web pages by LSN staff. This administrative module enhances the LSN security posture by replacing the current web-accessible version with one installed directly on NRC desktops. During May 2002, LSN staff commenced acceptance testing of the new administrative module developed concurrently with the new release of LSN.

5. Disaster Recovery Exercise

On April 16, 2002, LSN staff observed a disaster recovery exercise at the AT&T Ashburn, Virginia facility that hosts the LSN servers. This was a dry run demonstration of the disaster recovery component of the business continuity plan currently in place for the LSN. Although the Ashburn facility was never actually taken off-line, all the resources necessary to do so were marshalled and that facility's preparations and performance were then compared to benchmarks for the AT&T hosting facilities' recovery timelines. The results were within AT&T's target for fulfilling the conditions of its service level agreements. Observing dry run exercises such as this by government project managers is an element of performing GISRA-required security assessments.

6. Security Profile of the LSN

In February 2002, the National Security Agency (NSA) was engaged to plan and conduct a vulnerability assessment on the LSN. NSA's support included an overview of its information security (INFOSEC) assessment; a high-level review to determine appropriate system security; network evaluations (cooperative penetration testing in which NSA searches for all vulnerabilities and recommends improvements); a "red team" (an adversarial approach similar to the network evaluations, but with no advance notice); and documentation of recommended improvements in a final report. On February 28, 2002, LSNARP TWG members were invited to participate in the NSA pre-assessment process, to include information identification and definition. A meeting with NSA representatives on the pre-assessment phase of the NSA security vulnerability assessment was held on March 26, 2002, with LSN staff and LSN data owners. Participants included NMSS HLW staff, a representative from the State of Nevada, and teleconference attendance by the Nuclear Energy Institute (NEI) and Mineral County, Nevada. A summary of the pre-assessment activities performed by NSA was distributed to the LSNARP via e-mail.

LSN staff coordinated information and interviews for the LSN vulnerability assessment performed by NSA, including coordination with OGC to generate an NSA-required memo to provide agency permission for NSA to use a software tool to identify Internet vulnerabilities on the LSN site. The assessment was performed during the week of June 10, 2002. NSA interviewed staff at the LSN contractor's facility and at the AT&T Ashburn, Virginia facility at which the servers that host the LSN are located. The final, written NSA assessment report is expected in late July or early August 2002 and will be reported in the next semiannual report covering activities for the period July-December 2002.

I. Native Americans Communications Plan

On March 27, the LSNA and Chief Administrative Judge Bollwerk attended a meeting with the Office of State and Tribal Programs (OSTP) and NMSS to discuss initiatives, current activities, and information resources that could be used in an effort to develop a consistent communications plan for informing Nevada Native American interests about the LSN. A draft LSN communications plan outlining coordination between internal offices, messages, media products, and potential target offices was developed by the LSNA and was forwarded for review by ASLBP management. Follow-on meetings will be scheduled after the LSNA integrates information provided at this meeting and additional contact lists are finalized.

II. Issues

A. Sensitive Homeland Security Information Issues Associated with DOE and NRC Collections

Availability of the DOE and NRC HLW document collections via the LSN was held in abeyance pending guidance for withholding sensitive homeland security information. A staff requirements memorandum (SRM) was signed on May 28, 2002, approving proposed criteria for withholding certain sensitive homeland security information from the public. The NRC guidance and its implementation was documented in a June 17, 2002 memorandum from the Executive Director for Operations (EDO), entitled "Withholding Sensitive Homeland Security Information." This information was provided to DOE and the public to provide insight into the screening criteria that will be applied by NRC for its own HLW document collection that will be populated to the LSN.

However, the guidance provided in the above-noted SRM and EDO memorandum does not address potential situations where a third party in the proceeding submits a non-redacted version of a sensitive homeland security document already in their possession. A hypothetical example is a DOE or NRC legacy document that, following homeland security review, the Federal agency authoring the document chooses to make available in redacted form only, but which the State of Nevada or other potential party already has as an un-redacted document in their collection and chooses to post it. This action potentially makes the Federal agency's redaction ineffectual and the un-redacted version available via an NRC system. This situation has been brought to the attention of the EDO by ASLBP per the direction provided in the June 17 EDO memorandum and will be discussed at the September 2002 meeting of the LSNARP.

Additionally, with respect to sensitive homeland security information, the extent to which either agency places additional restrictions upon the public availability of HLW documents may have an impact upon the LSN, as well as the Pre-License Application Presiding Officer and the Commission, by generating additional disputes regarding the availability of HLW documents that will have to be resolved on a case-by-case basis. See 10 C.F.R. §§ 2.1010, 2.1015(b)(1).

B. NRC User Desktop Compatibility with LSN

As previously reported, LSN technical staff identified an issue associated with the standard NRC desktop configuration and its display of TIFF images on a user's workstation inside NRC. DOE TIFF image files are single-page images. The LSN views TIFF image files within the Netscape web browser using a plug-in and has additional code to allow the user to move between pages. Conversely, NRC's desktop uses a separate executable to view TIFF image files. These different approaches -- an executable v. a plug-in -- were reconciled. LSN staff received approval from OCIO to install TIFF viewer (ALTERNATIFF) on NRC user machines, and this issue is now considered to be resolved.

C. Consistency with DOE's Yucca Mountain Schedule

LSN staff completed efforts to rebaseline the LSN project plan, including revised forecasts for budget, schedule, and FTEs based on the latest estimated DOE license application filing date of December 2004. LSN staff completed an analysis of LSN impacts, identified a strategy for managing technology refreshment, and identified the funding issues associated with the project budget. As noted above, this analysis was incorporated into ASLBP planning for, and information provided during, the current budget cycle. The funding issues for technology refreshment have been addressed in ASLBP's FY 2004 budget request and FY 2003 reprogramming request. The LSNA will continue to monitor developments in the DOE LA schedule and assess potential impacts on the agency's HLW automation initiatives.

D. Adequacy of NRC's ADAMS and EHD Infrastructure

As noted above, the LSNA met in February 2002 with representatives of OGC, NMSS, and OCIO to resolve issues associated with data format requirements being proposed for the E-rule covering nonadjudicatory submissions. Some E-rule data format guidance differs slightly from existing HLW adjudicatory submission standards already detailed in 10 C.F.R. Part 2, Subpart J.

A number of meetings were held to address the issue of NRC guidance to DOE on the submission of large documents. Participants have included NMSS, OCIO, SECY, OGC, and ASLBP. These meetings raised the issue of the efficacy of the NRC's current technical infrastructure to deliver large, complex technical documents usable to HLW proceeding participants and the public via the ADAMS-based EHD. Also, as noted earlier, the LSNA accompanied OCIO, SECY, OGC, and NMSS representatives to an NRC/DOE Technical Exchange in Las Vegas, Nevada, on June 25-26, 2002. Representatives from OCIO covered the HLW-related EIE and the EHD capabilities, with the objective of identifying technical issues associated with DOE's electronic submission of its LA that is anticipated to be a very large, complex document that could tax NRC's current

technology infrastructure capabilities. The OCIO-sponsored team will identify gaps in and solutions to NRC's ability to accept and process electronic submissions for discovery and the high-level waste proceeding.

Challenges exist and are being addressed at many levels to resolving the technical issues associated with using electronic materials in the HLW repository proceeding. Arriving at appropriate technical solutions is key to developing a comprehensive operational plan for making the most effective use of EIE, EHD, and the planned electronic courtroom (DDMS). If there are no clear technical solutions that can encompass all the affected systems, changes to the NRC's HLW license submission rule to accommodate existing agency technology or to develop agency information management strategies to respond to the existing regulatory environment may be considered further. As the target date for the DOE LA approaches, time constraints inherent in implementing projects to augment existing agency IT systems may limit the alternatives that can be considered if a selected solution is to be in place before the LA is received.

III. Future LSN-Related Activities

A. LSN Advisory Review Panel Meeting

Planning for a September 2002 LSNARP meeting to be held in Las Vegas, Nevada, was initiated. The LSNA has identified a number of potential agenda topics including:

- LSN progress report on LSN
- Results of system security risk assessment performed by NSA
- Demonstration of LSN production version 2.0
- Identification of participant LSN training needs and user expectations; possible training strategies and approaches; points of contact for training coordination efforts
- Proposed Revision 1 to Topical Guidelines 3.69 (Draft Regulatory Guide DG-3022, published in the Federal Register for comment on July 2, 2002, 67 Fed. Reg. 44478)
- Review of relevancy (requested by Clark County, Nevada)
- Role of a rural county in the licensing (distinction between party with standing, interested governmental party, etc.) (requested by White Pine County, Nevada)
- The importance of participation in the LSN as a prerequisite for being a participant in the licensing process (requested by White Pine County, Nevada)
- LSN public availability/access via NRC and DOE reading rooms and Nevada libraries
- LSN system upgrade prior to LA
- Summary of June 25-26, 2002 NRC/DOE Technical Exchange on Electronic Submissions
- Overview of NRC plans for digital courtroom environment
- Overview of NRC and DOE efforts to implement sensitive homeland security information screening and impact on document retrieval and display.

COORDINATION:

The Office of General Counsel has no legal objection.

The Office of the Chief Financial Officer has reviewed this paper for resource implications and has no objections.

The Office of the Chief Information Officer has reviewed this paper and has no objections.

IRAI

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