

United States Nuclear Regulatory  
Commission  
Atomic Safety and Licensing Board  
Attn: Document Control Desk  
11555 Rockville Pike  
Rockville, MD 20852  
Subject

Enclosed is DOE's Response to  
Interrogatories Related to Quality Control  
Procedures.

#### Request to Withhold From Public Disclosure

The file named "004 Figure 371 Plan View  
Main Excavation.pdf" contains business  
proprietary information and the USDOE  
requests that this file be withheld from  
public disclosure.

#### Contact

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#### Document Components:

A total of two (2) CD-ROMs are included  
in this submission. The CD-ROM labeled  
"DOE03-001 Evaluation Quality Control  
Parts 1, 2, and 3—Non-publicly Available"  
contains the following four (4) files:

- 001 Evaluation Quality Control (1 of 3).pdf  
48,321,678 bytes, publicly available
- 002 Evaluation Quality Control (2 of 3).pdf  
47,421,178 bytes, publicly available
- 003 Evaluation Quality Control (3 of 3).pdf  
49,223,167 bytes, publicly available
- 004 Figure 371 Plan View Main  
Excavation.pdf 101,175,297 bytes,  
proprietary

The CD-ROM labeled "DOE03-002  
Evaluation Quality Control Parts 1, 2, and 3—  
Publicly Available" contains the following  
three (3) files:

- 001 Evaluation Quality Control (1 of 3).pdf  
48,321,678 bytes, publicly available
- 002 Evaluation Quality Control (2 of 3).pdf  
47,421,178 bytes, publicly available
- 003 Evaluation Quality Control (3 of 3).pdf  
49,223,167 bytes, publicly available

#### Non-Document Description Example

##### Figure 371 Plan View Main Excavation

This single page, over-sized engineering  
drawing is referenced in "Evaluation Quality  
Control" part 2 of 3. The drawing is done in  
6 colors and is useful when printed using 24"  
by 36" paper stock or viewed on a large high  
resolution monitor using PDF reader  
software. It has been scanned at 300 dpi  
resolution and output in PDF 1.3 using the  
Image Only option. Figure 371 is one of four  
(4) files on the CD-ROM labeled "DOE03-  
001 Evaluation Quality Control Parts 1, 2,  
and 3—Non-publicly Available" and is  
located as the fourth file on the CD-ROM.

Sincerely,

J. Doe, Attorney for DOE

cc: Provide list of parties served

#### 4.3.1 Sensitive or Non-Public Documents

Documents containing information that is  
deemed sensitive unclassified, specifically  
Proprietary Information (e.g. trade secrets,  
privileged, or confidential commercial or

financial information), personal privacy  
information, or other Official Use Only  
information, may be submitted electronically  
on CD-ROM. Documents containing  
Classified Information (i.e., National Security  
Information and Restricted Data) and  
Safeguards Information may also be  
submitted electronically on CD-ROM.

Submissions made on CD-ROM must be  
accompanied by a transmittal letter (see  
section 4.3) that contains information  
regarding the sensitivity level of the  
transmitted documents. This letter should  
contain a listing of each file contained in the  
submission, with a description and the  
sensitivity for each file clearly marked.

When submitting documents via CD-ROM  
that contain both publicly and non-publicly  
available files, all of the files should be  
included on a CD-ROM. In addition, a  
separate CD-ROM must be provided that  
contains only the publicly available files.  
Each CD-ROM must be clearly labeled  
indicating its availability. Files contained on  
CD-ROMs labeled as "Publicly Available"  
will be released to the public.

CD-ROMs containing Classified  
Information must be processed and produced  
on systems approved under the provisions of  
10 CFR 95.49. Each CD-ROM must be clearly  
labeled as containing classified information.

The mailing package containing CD-ROMs  
with documents containing Proprietary,  
personal privacy, or Official Use Only  
Information must be marked and transmitted  
in accordance with the requirements set forth  
in 10 CFR 2.790(b). Packages containing  
Safeguards Information must comply with  
the requirements of 10 CFR 73.21(e), 73.21(g),  
and 73.21(h), as appropriate. CD-ROMs  
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 CFR 95.37, 95.39, and 95.41.

#### 4.3.2 Oath or Affirmation

NRC regulations require that some  
documents be filed under oath or affirmation.  
There are currently two acceptable methods  
for providing this oath if such a document is  
submitted on CD-ROM.

1. Documents requiring oath or affirmation  
submitted on CD-ROM must include the  
following statement on either the transmittal  
letter or the first page of the document  
contained on the CD-ROM and must contain  
the signature of the person swearing to the  
accuracy of the information submitted: "I  
declare under penalty of perjury that the  
foregoing is true and correct. Executed on  
[date]".

If the oath or affirmation is submitted on  
the transmittal letter, it must contain the  
original signature of the person swearing to  
the accuracy of the information. If submitted  
as part of the document contained on the  
CD-ROM, the page containing the signature  
must be provided as a scanned PDF  
Searchable Image (Exact) file along with the  
PDF version of the entire document being  
submitted.

2. Oath or affirmation affidavits may also  
be created in hard copy and physically  
signed. The original paper copy may either  
be submitted along with the transmittal letter  
and CD-ROM, or can be scanned to create a

PDF Searchable Image (Exact) file of the  
original signature page which may be  
submitted on the CD-ROM with the rest of  
the PDF file of the entire attachment. NOTE:  
The transmittal letter should indicate that a  
separate affidavit is being provided as part of  
the submittal package.

#### 4.3.3 Living Documents

Many large documents historically  
submitted to the NRC have been maintained  
as living documents and have used a page-  
replacement approach for update. Paper  
submissions can still use this approach for  
providing updates to living documents.

In the electronic environment, this  
approach is not practicable. Consequently, if  
a submitter chooses to make electronic  
submission of these documents, all  
subsequent updates must be submitted as  
total replacements. The updated version  
must include a list of changed pages and  
each changed page must include both a  
change indicator for the area changed (for  
example, a bold line vertically drawn in the  
margin adjacent to the portion actually  
changed) and a page change identification  
including either the date of change, change  
number, or both.

#### 4.3.4 CD-ROM File Format

The acceptable file formats are stated in  
Section 2.1. However, for text-oriented  
documents, the preferred file formats are  
Portable Document Format (PDF) Formatted  
Text and Graphics and PDF Searchable Image  
(Exact). PDF Image Only is preferred for  
submission of graphic image documents.  
PDF files should be scanned at the  
resolutions stated in Section 2.5 of this  
document.

Large documents made up of multiple files,  
folders, etc., often require the inclusion of a  
search engine on the CD-ROM to facilitate  
navigation, search, and retrieval of the  
document. The inclusion of the search engine  
enables the user to access the material  
contained on the CD-ROM without having to  
rely on other software in the user's resident  
environment. The NRC encourages the  
inclusion of these search engines to facilitate  
the use of the materials in stand-alone mode.  
However, only those products that do not  
require the end-user to purchase a license to  
use the products are acceptable.

#### 4.3.5 Packaging/Labeling

When submitting documents that contain  
both publicly and non-publicly available  
files, all of the files should be included on  
a CD-ROM. In addition, a separate CD-ROM  
must be provided that contains only the  
publicly available files. Each CD-ROM must  
be clearly labeled indicating its availability.  
CD-ROMs labeled as "Publicly Available"  
will be released to the public (sent to the  
Public Document Room, where they are  
available for inspection and copying). The  
mailing package containing CD-ROMs with  
documents comprised of Proprietary,  
personal privacy, or Official Use Only  
Information must be marked and transmitted  
in accordance with the requirements set forth  
in 10 CFR 2.790(b). Packages containing  
Safeguards Information must comply with  
the requirements of 10 CFR 73.21(e), 73.21(g),  
and 73.21(h), as appropriate. CD-ROMs