

November 26, 2004

Mr. Joseph D. Ziegler
Director
Office of License Application and Strategy
U.S. Department of Energy
P.O. Box 364629
North Las Vegas, Nevada 89036-8629

RE: CURRENT DEPARTMENT OF ENERGY (DOE) PLANNING ESTIMATES FOR
LICENSING SUPPORT NETWORK (LSN) CERTIFICATION

Dear Mr. Ziegler:

In light of the Commission's November 10, 2004 Memorandum and Order (CLI-04-32) and Deputy Director Arthur's comments at the November 22, 2004 DOE/NRC quarterly management meeting, I am writing to request updated document and page count estimates relative to the number of documents the Department of Energy (DOE) intends to certify as available via the Licensing Support Network (LSN) website.

At that meeting, Mr. Arthur indicated that DOE currently is performing a "close reading" of the Commission's November 10 decision to identify all the actions needed for certification. In this regard, however, it does not seem unreasonable to expect that DOE has been actively reassessing its compliance activities in the almost three months that have elapsed since the August 31, 2004 Pre-License Application Presiding Officer (PAPO) Board ruling. As a consequence, we anticipate that an updated DOE document/page count estimate would be available in the near term.

The current LSN operating parameters are based on your April 11, 2003 letter that provided a DOE high-end projection of no more than 4 million documents and 36.5 million pages of LSN-accessible material. If accurate, that high-end document/page count would provide a comfortable margin for LSN search engine and index sizing, particularly given that DOE's initial high-level waste document collection certification of 2.1 million documents fell substantially short of those projections. Our experience to date is that the 1,391,858 documents DOE has made available for LSN indexing represent approximately 16.7 million pages. Using these figures, the 2.181 million documents identified on the record during in the July 27, 2004 PAPO proceeding yields a projected page count of 26.1 million pages, which would be well within the LSN sizing margin.

Nonetheless, I now find it necessary to make this additional request for a document and page count estimate because very recently the DOE technical staff cautioned us that the document collection may yet approach four million documents upon certification. If the current document-to-page count proportion outlined above holds true, a 4 million document submission will result in 48 million pages, which would exceed your previous high-end estimate by 11.5 million pages. This is an increase of more than 30 percent above your previous page count estimate.

In my November 21, 2003 communication to the LSN Advisory Review Panel membership, I noted:

The NRC relies on the parties/potential parties to provide official notification of any anticipated material changes in load schedules, document/page volumes, or document collection server configuration. Given the lead times involved in federal government budget/procurement processes and the complexities of technology insertion, failure by any of the LSN program entities promptly to communicate, update, or routinely validate key planning assumptions could be detrimental to the overall success of the LSN. Therefore, party/potential party LSNARP representatives are urged to notify the LSNA immediately if there have been any material changes to their organization's planned document collection since June 2003 (e.g., size increase of more than 5 percent).

Accordingly, I am again asking for an update to the DOE collection size projections for both documents and total number of pages, together with your estimate of the confidence level you have in the revised estimates. A response by no later than Monday, December 6, 2004, would be greatly appreciated. If you have any questions regarding this request, please contact me at 301-415-7401 or via e-mail at djg2@nrc.gov.

Once again, thank you for your assistance in our planning efforts.

Sincerely,

/RA/

Daniel J. Graser
Licensing Support Network Administrator

Copies:

M. Schmit, ASLBP
G. P. Bollwerk, ASLBP