



**UNITED STATES
NUCLEAR REGULATORY COMMISSION**
WASHINGTON, D.C. 20555-0001

July 22, 2015

Mr. Craig L. Adams, Director
National Health Physics Program
Department of Veterans Affairs
Veterans Health Administration
2200 Fort Roots Drive,
Bldg 101, 115 HP/NLR
North Little Rock, AR 72114

SUBJECT: MASTER MATERIAL LICENSEE'S USE OF ELECTRONIC SUBMISSIONS AND
ELECTRONIC SIGNATURES

Mr. Adams,

We have received inquiries regarding the use of electronic signatures in the context of permit actions under the Department of Veterans Affairs' (DVA's) master materials license (MML). Additionally, MMLs are interested in learning more about the U.S. Nuclear Regulatory Commission's (NRC) acceptance of electronic signatures.

With respect to electronic signatures in the context of permit actions, the MMLs may allow permittees to use electronic submissions and electronic signatures. Per the Government Paperwork Elimination Act (GPEA), which governs the use of electronic signatures for MML purposes, the NRC will not deny the legal effect of electronic submissions and electronic signatures solely because they are in electronic form. The NRC expects that electronic signatures that MMLs accept from their permittees will conform to the basic requirements of the GPEA. That is, the electronic -signature should 1) identify and authenticate a particular person as the source of the document and 2) indicate this person's approval of the information contained in the document.

With respect to the NRC's acceptance of electronic signatures:

The NRC currently accepts e-submissions and e-signatures through the Electronic Information Exchange (EIE) system and on CD-ROM, as described in 10 CFR 30.6(a)(3) and corresponding guidance. If an MML wishes to use e-submissions or e-signatures but not the EIE system or a CD-ROM, the e-signature should meet the following criteria:

- 1) uniquely identify the individual who affixed the signature,
- 2) ensure that the individual completing the signature process is the individual who started the process,
- 3) affix the date and time of the signature,
- 4) evidences the individual's intent to sign, and
- 5) allow an inspector to electronically review the record and all revisions, including the signature on each revision.

The following references provide the NRC Rules and Guidance on Electronic Submissions and Signatures:

1. 10 CFR 30.6, Communications;
2. Electronic Maintenance and Submission of Information Final Rule, 68 FR 58792 (Oct. 10, 2003);
3. Guidance for Electronic Submissions to the NRC, Revision 6.1, <http://pbadupws.nrc.gov/docs/ML1303/ML13031A056.pdf> (May 27, 2011);
4. Guidance on NRC's Web site: <http://www.nrc.gov/site-help/e-submittals.html>.

If you have any questions, you may contact Ms. Shirley Xu, from my staff at (301) 415-7640, or by e-mail at Shirley.Xu@nrc.gov.

Sincerely,

/RA/

Hipolito J. González, Chief
Materials Safety Licensing Branch
Division of Material Safety, State, Tribal
and Rulemaking Programs
Office of Nuclear Materials Safety
and Safeguards

The following references proved the NRC Rules and Guidance on Electronic Submissions and Signatures:

5. 10 CFR 30.6, Communications;
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8. Guidance on NRC's Web site: <http://www.nrc.gov/site-help/e-submittals.html>.

If you have any questions, you may contact Ms. Shirley Xu, from my staff at (301) 415-7640, or by e-mail at Shirley.Xu@nrc.gov.

Sincerely,

/RA/

Hipolito J. González, Chief
Materials Safety Licensing Branch
Division of Material Safety, State, Tribal
and Rulemaking Programs
Office of Nuclear Materials Safety and Safeguards

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