

Mendiola, Doris

Subject: FW: Comments on Revision to Guidance for Electronic Submissions to the NRC
Attachments: E-47018 Letter to NRC_Comments on Revised Electronic Submission Guidance_Final.pdf

From: WILLIFORD Dennis (AREVA) [mailto:Dennis.Williford@areva.com]
Sent: Thursday, December 01, 2016 8:44 AM
To: Bladey, Cindy <Cindy.Bladey@nrc.gov>
Cc: SHAW JR Donis (AREVA) <don.shaw@areva.com>; Jacobs, Christian <Christian.Jacobs@nrc.gov>
Subject: [External_Sender] Comments on Revision to Guidance for Electronic Submissions to the NRC

Attached for your information is a courtesy copy of the letter being sent to you via mail with TN Americas LLC comments on the revised guidance for electronic submissions to the NRC. If you have any further questions, please give me a call.

Regards,
Dennis Williford

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E-RIDS = ADM-03
Add= M. Harick (mnn2)



November 30, 2016
E-47018

U. S. Nuclear Regulatory Commission
Attn: Cindy Bladey, Office of Administration
Mail Stop: OWFN-12-H08
Washington, DC 20555-0001

Subject: TN Americas LLC Comments on Revision to Guidance for Electronic Submissions
(Docket ID NRC-2016-0225)

Reference: "Guidance for Electronic Submissions to the NRC," Federal Register Notice, Vol. 81,
No. 213, Thursday, November 3, 2016.

This letter is being submitted in response to the referenced Federal Register notice on November 3, 2016 requesting comments on the revision to the guidance for electronic submissions to the Nuclear Regulatory Commission (NRC). TN Americas LLC appreciates the opportunity to provide comments on this revised guidance. We believe that this revision (Revision 8) provides needed updated guidance from the last revision in 2011 that will be beneficial to all persons and companies who wish to provide submissions to the NRC in electronic format. We have a few comments for additional clarification that we feel would be beneficial, as described further below.

1. Section 2.1, Page 2, last paragraph, 1st sentence. Reference is made to PDF creation solutions such as the "Create PDF" feature in Microsoft Office. We suggest that you add the "Print to PDF" feature also as we find it to be a more dependable option for creating PDFs in the proper format.
2. Section 3.2, Pages 14 - 18. We are glad to see direction concerning the submittal of external hard drives in Section 3.2, as we typically send an external hard drive due to the size of some of our files. The remainder of the subsections of Section 3.2 only reference OSM and not external hard drives. We suggest clarifying that this guidance applies to both OSM and external hard drives or distinguish between any differing guidance for OSM and magnetic media like external hard drives.

Additionally, regarding Section 3.2, we would appreciate it if NRC would consider USB flash drives as another option. The variety of USB flash drive sizes currently on the market are conveniently larger than the DVD limit of 4.7 GB and smaller than the size of portable external hard drives.

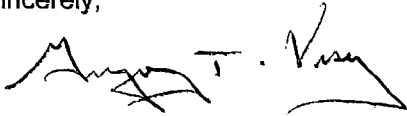
3. Section 3.2.2, Page 16, last paragraph. The NOTE at the bottom of the page addresses a cautionary statement that is suggested be added to the package for OSM submissions that the package should NOT be irradiated. Should packages containing magnetic media (i.e., external hard drives) also be marked with a similar warning regarding irradiation ?

If you have any questions or require additional information, please contact Dennis Williford by telephone at 704-805-2223, or by e-mail at Dennis.Williford@areva.com.

TN AMERICAS LLC

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Sincerely,

A handwritten signature in black ink, appearing to read "Gregory T. Vesey". The signature is stylized with a large, sweeping "G" and a distinct "V".

Gregory T. Vesey
Senior Vice President

cc: Christian Jacobs, U.S. Nuclear Regulatory Commission
Don Shaw, TN
Dennis Williford, TN