

September 20, 1996

MEMORANDUM TO: Paul H. Lohaus, Deputy Director
Office of State Programs

FROM: Donald A. Cool, Director *Original Signed by*
Division of Industrial and
Medical Nuclear Safety, NMSS

SUBJECT: CONTRACT WITH OAK RIDGE NATIONAL LABORATORIES
FOR ELECTRONIC SS&D SHEETS

I am responding to your August 19, 1996, note regarding a change in our earlier agreement for this project. My staff and staff from IRM's computer security, continue to have some reservations about certifying official signatures on the INTERNET, however, according to your staff the Office of the General Counsel and the Division of Freedom of Information and Publication Service have agreed that this is an acceptable risk for the Agency. We would like a copy of any written position that you may have obtained for future use. If it is Agency position to place information onto the INTERNET with certifying signature, then we concur with the contract modification. However, the Agreement States have always had an active role in how information in various systems are handled and state's law concerning this information may be different than NRC's. We would suggest that all of the Agreement State have an opportunity to express their input on this issue.

I would like to submit some other concerns associated with our agreement. First, our agreement was based on the fact that these electronic files were not to be used as an agency system of record. OSP appears to have changed direction. We maintain our position that these files do not constitute an agency record. Also, the scanned information was to be in a easily readable format that could integrate into a system of managing and searching information to support the Agency needs. The Portable Document Format (PDF) chosen will require users to obtain the reader software. Do we know if this reader will be free, in the future, to all users? Vendors typically give (shareware for free) earlier versions of their software as a marketing tool in order to sell them an enhanced version. We will continue to determine to what extent the PDF format can be used by the IMNS system.

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See previous concurrence *

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I would like to submit some other concerns associated with our original note. The first, our original agreement was based on the fact that these electronic files were not to be used as an agency system of record. OSP appears to have changed direction. Also, the scanned information was to be in a easily readable format that could integrate into a system of managing and searching information to support the Agency needs. The Portable Document Format (PDF) chosen will require IMNS contractors to purchase a software package that would convert the data. This activity will cost more IMNS contract time and dollars. The choice of an easily readable format seems to have been made in a vacuum.

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