

15.0 MANAGEMENT MEASURES

15.8 RECORDS MANAGEMENT

15.8.1 PURPOSE OF REVIEW

The purpose of this review is to verify that the applicant has established a facility records management system that complies with NRC requirements.

15.8.2 RESPONSIBILITY FOR REVIEW

Primary: Project Manager

Secondary: None

Supporting: Primary reviewers of SRP Sections 15.1, "Quality Assurance," and 15.2, "Configuration Management"

15.8.3 AREAS OF REVIEW

The applicant should submit a description of the facility records management system with the application for construction approval and should submit updated information with the license application for operations.

Areas related to the handling and storing of records generated or needed in the design, construction, and operation phases of the facility, including the following, should be reviewed with the application for construction approval.

- A. The process whereby records—such as training records, dosimetry records, effluent records, and records regarding the facility structures, systems, or components that are items relied on for safety—are specified, created, verified, categorized, indexed, inventoried, protected, stored, maintained, distributed, and deleted or preserved. The process may be linked with or be a part of the facility quality assurance and configuration management systems.
- B. The handling and control of various kinds of records and the methods of recording media that comprise the records including contaminated and classified records.
- C. The physical characteristics of the record storage facilities with respect to the preservation and protection of the records for their designated lifetimes.

15.8.4 ACCEPTANCE CRITERIA

15.8.4.1 Regulatory Requirements

The requirements for records management are addressed in the following:

- A. Code of Federal Regulations, *Title 10, Energy*, Part 19, “Notices, Instructions and Reports to Workers: Inspection and Investigations.”
- B. Code of Federal Regulations, *Title 10, Energy*, Part 20, “Standards for Protection Against Radiation.”
- C. Code of Federal Regulations, *Title 10, Energy*, Part 21, “Reporting of Defects and Noncompliance.”
- D. Code of Federal Regulations, *Title 10, Energy*, Part 25, “Access Authorization for Licensee Personnel.”
- E. Nuclear Regulatory Commission (U.S.), Washington, D.C. “Domestic Licensing of Special Nuclear Material (10 CFR Part 70).” *Federal Register*: Vol. 64, No. 146. pp. 41338-41357. July 30, 1999.

15.8.4.2 Regulatory Guidance¹

Regulatory guidance applicable to the area of records management is as follows:

U.S. Nuclear Regulatory Commission (U.S.) (NRC). NUREG-1460, Rev. 1, “Guide to NRC Reporting and Recordkeeping Requirements.” NRC: Washington, D.C. July 1994.

15.8.4.3 Regulatory Acceptance Criteria

The reviewer should find the applicant’s records management system acceptable if it satisfies the following criteria:

- A. Records are specified, prepared, verified, characterized, and maintained.
- B. Records are legible, identifiable, and retrievable for their designated lifetimes.
- C. Records are protected against tampering, theft, loss, unauthorized access, damage, or deterioration for the time they are in storage.

¹ Additional guidance for records is given in SRP Appendix F on quality assurance (Section F17) and in ASME NQA-1-1994 (Basic Requirement 17 and Supplement 17S-1) as referenced in SRP Section 15.1, “Quality Assurance.”

- D. Procedures are established and documented specifying the requirements and responsibilities for record selection, verification, protection, transmittal, distribution, retention, maintenance, and disposition.
- E. The organization and procedures are in place to promptly detect and correct any deficiencies in the records management system or its implementation.

Examples of the types of records that could be included in the system and that contribute to providing reasonable assurance of protection of worker and public health and safety and of the environment are listed in Appendix E to this SRP. Records should be categorized by relative safety importance to identify record protection and storage needs and to designate the retention period for individual kinds of records. The procedures should assign responsibilities for records management; specify the authority needed for records retention or disposal; specify which records must have controlled access and provide the controls needed; provide for the protection of records from loss, damage, tampering, or theft during an emergency; and specify procedures for ensuring that the records management system remains effective.

For records consisting of computer codes/computerized data relied on for safety, the application should establish and describe procedure(s) for maintaining readability and usability of older codes/data as computing technology changes.

Also, the applicant should commit to update the facility records management system to reflect any changes between the application for construction approval and a license application for operations.

15.8.5 REVIEW PROCEDURES

15.8.5.1 Acceptance Review

The primary reviewer should perform an acceptance review to determine if the application adequately addresses the specific items in Section 15.8.3, "Areas of Review." If the primary reviewer verifies that the records management system is adequately addressed, the primary reviewer should accept the application for the safety evaluation in Section 15.8.5.2. If the primary reviewer identifies significant deficiencies in the material provided, the primary reviewer should request that the applicant submit additional information prior to the start of the safety evaluation.

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15.8.5.2 Safety Evaluation

After determining that the application is acceptable for review in accordance with Section 15.8.5.1, the primary reviewer should perform a safety evaluation against the acceptance criteria described in Section 15.8.4. On the basis of its review, the staff may request that the applicant provide additional information or modify the application to meet the acceptance criteria in SRP Section 15.8.4. The primary reviewer should coordinate this review with the primary reviewers of SRP Sections 15.1, "Quality Assurance," and 15.2, "Configuration Management."

When the applicant updates the facility records management system for the license application for operations, the primary reviewer should focus the review on any new or changed material. The primary reviewer should also confirm that the material presented remains consistent with the material provided in the license application for operations in support of other chapters of this SRP.

15.8.6 EVALUATION FINDINGS

The primary reviewer should document the safety evaluation by preparing material suitable for inclusion in the Safety Evaluation Report (SER). The primary reviewer should describe the review, explain the basis for the findings, and state the conclusions.

The staff could document a safety evaluation for construction approval as follows:

The staff reviewed the applicant's records management system [Insert a summary statement of what was evaluated] and concluded that there is reasonable assurance that the system will (1) be effective in collecting, verifying, protecting, and storing information about the health and safety aspects of the facility and its operations and will be able to retrieve the information in readable form for the designated lifetimes of the records; (2) provide record storage facilities with the capability to protect and preserve records that are stored there during the mandated periods, including protection of the stored records against loss, theft, tampering, or damage during and after emergencies; and (3) ensure that any deficiencies in the records management system or its implementation will be detected and corrected in a timely manner. The staff concludes that the applicant's facility records management system meets the requirements of 10 CFR Part 70 and is acceptable.

The staff could document a safety evaluation for the license application for operations using a paragraph similar to the one use for the construction approval, but encompassing the new or changed material when compared to the safety evaluation for the construction approval.

15.8.7 REFERENCES

- A. Code of Federal Regulations, *Title 10, Energy*, Part 19, "Notices, Instructions and Reports to Workers: Inspection and Investigations."
- B. Code of Federal Regulations, *Title 10, Energy*, Part 20, "Standards for Protection Against Radiation."
- C. Code of Federal Regulations, *Title 10, Energy*, Part 21, "Reporting of Defects and Noncompliance."
- D. Code of Federal Regulations, *Title 10, Energy*, Part 25, "Access Authorization for Licensee Personnel."
- E. Code of Federal Regulations, Title 10, Part 70, Domestic Licensing of Special Nuclear Material, U.S. Government Printing Office, Washington, D.C., 1999.
- F. Nuclear Regulatory Commission (U.S.), Washington, D.C. "Domestic Licensing of Special Nuclear Material, (10 CFR Part 70)." *Federal Register*: Vol. 64, No. 146. pp. 41338-31357. July 30, 1999.
- G. American Society of Mechanical Engineers (ASME), "Quality Assurance Requirements for Nuclear Facility Applications," (An American National Standard). ASME NQA-1-1994, New York. 1994.
- H. U.S. Nuclear Regulatory Commission (U.S.) (NRC). NUREG-1460, Rev. 1, "Guide to NRC Reporting and Recordkeeping Requirements." NRC: Washington, D.C. July 1994.