

SOUTH CAROLINA ELECTRIC & GAS COMPANY

POST OFFICE BOX 764

COLUMBIA, SOUTH CAROLINA 29218

O. W. DIXON, JR.
VICE PRESIDENT
NUCLEAR OPERATIONS

July 12, 1982

Mr. Harold R. Denton, Director
Office of Nuclear Reactor Regulation
U. S. Nuclear Regulatory Commission
Washington, DC 20555

Subject: Virgil C. Summer Nuclear Station
Docket No. 50/395
Recordskeeping

Dear Mr. Denton:

On April 26, 1982, the operations staff of the Virgil C. Summer Nuclear Station assumed the responsibility for handling, storage and disposition of those records associated with the construction phase of the station. South Carolina Electric and Gas Company (SCE&G) has an ongoing program committed to receiving, processing, microforming and indexing these records. Certain record types, notably radiographs, as well as processed rolls of microfilm of construction activity records are maintained in a vault located within the current Construction Administration Building. This vault is also used to store hardcopy records which are being prepared for microforming.

Current plans for record processing require use of the Construction Building Vault after the issuance of an operating license. For that purpose SCE&G performed an evaluation of this vault against the requirements of Regulatory Guide 1.88 as presented in Appendix 3A of the Virgil C. Summer Final Safety Analysis Report (FSAR). The current regulatory guide position in the FSAR addresses only the Service Building Records Room. A marked up copy of a proposed change to this position is provided to address both the Service Building Records Room and the Construction Building Vault. The evaluation determined that the Construction Building Vault is similar to the Service Building Permanent Records Room with the following clarifications and exceptions:

1. ANSI N45.2.9-1974 Section 5.6.2. The walls and floor are concrete. The vault is inside an existing structure, removing any requirement for roof sloping. The introduction of water into the vault in appreciable quantities is a remote possibility due to the enclosure of the vault in the existing Construction Administration Building.
2. FSAR Appendix 3A - page 130 bb, "The Permanent Records Room is equipped with an early warning fire detection and automatic fire suppression system, with electronic supervision at a constantly attended location."

Boo!

This statement is applicable to the Service Building Permanent Records Room. The Construction Building Vault is equipped with an automatic fire

Mr. Harold R. Denton
July 12, 1982
Page 2

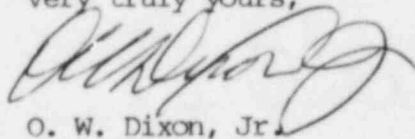
suppression system which meets the requirements of ANSI N45.2.9-1974.
SCE&G considers this adequate protection for the Construction Building Vault.

Additionally, SCE&G will comply with section 5.5 of ANSI N45.2.9-1974 (security) with a physical check of the vault by security personnel twice on each shift to ensure against unauthorized entry.

In summation, SCE&G will utilize the existing Construction Building Vault outlined above as an extension of the Service Building Permanent Records Room.

If you have any questions, please let us know.

Very truly yours,



O. W. Dixon, Jr.

WDS:OWD:glb

Attachment

cc: V. C. Summer w/o att.
G. H. Fischer w/o att.
H. N. Cyrus
T. C. Nichols, Jr. w/o att.
O. W. Dixon, Jr.
M. B. Whitaker, Jr.
J. P. O'Reilly
H. T. Babb
D. A. Nauman
C. L. Ligon (NSRC)
W. A. Williams, Jr.
R. B. Clary
O. S. Bradham
A. R. Koon
M. N. Browne
G. J. Braddick
J. L. Skolds
J. B. Knotts, Jr.
B. A. Bursey
NPCF
File

The Virgil C. Summer Nuclear Station quality assurance records program complies with the recommendations of this Regulatory Guide with the following exceptions and clarifications:

ANSI-N45.2.9-74

Section

Exceptions and Clarifications

5.3

During the interim period for which the SCE&G QA organization maintains records prior to transmittal to the records program (Permanent facility^{ies}), the records will be kept in two remote locations in an office environment without the need for a storage procedure defining the elements required by Paragraph 5.3. SCE&G justifies this position based on the fact that Paragraph 2.2.2 of ANSI 45.2.9 recognizes that these records are of no value in demonstrating plant acceptability but only establishes that activities were performed; and, based on the fact that these records will be accessible at two office locations stored in prudent office environments.

28

Note: This position is applicable to these non-permanent records being backfitted within the period from commercial operations to December 1982. It also applies to a planned quarterly retention of records (for compilation purposes) prior to turnover of future permanent and non-permanent records to the PRS as they are issued after commercial operations.

5.6

^{Service Building}
The permanent records room ~~is~~ constructed and located to protect contents from possible destruction by causes such as fire, flooding, insects, rodents and from possible deterioration by a combination of extreme variations in temperature and humidity conditions.

and the construction building vault are ³³

17

11

5.6

Service Building and the construction building vaults are ¹³
The permanent records room ~~is~~ designed to meet a 4
hour fire rating except for the fire dampers and elec-
trical penetrations, which are rated for 3 hours.

17

13

3.2.7

For SCE&G Quality Assurance organization generated records required by Appendix A, the following program will be implemented dealing with the turnover to the permanent facility¹⁰³, and retention times of non-permanent records as required by Paragraph 3.2.7.

33

1. SCE&G QA organization generated non-permanent records are as follows:

QA Procedures

QA Plans

Vendor Procedures

Vendor Survey Reports

Vendor Inspection Reports

Vendor Audit Reports

Surveillance Reports

28

2. After commercial operation, the records in 1, will be placed within the SCE&G records retention program (permanent facility¹⁰³) as issued.
3. Non-permanent records generated prior to commercial operations will only be placed within the record retention program (permanent facility¹⁰³) if they were generated within 3 years prior to commercial operation. SCE&G justifies this position based on the fact the Paragraph 2.2.2 of ANS 45.2.9 recognizes that these records are of no value in demonstrating plant acceptability but only establish that activities were performed; and, based on the fact that SCE&G utilizes these records for 3 years within procurement control programs.

33

33

In addition, as discussed with the NRC Staff:

1. The ^{service Building} permanent records room is equipped with an early warning fire detection and automatic fire suppression system, with electronic supervision at a constantly attended location. *The Construction Building Vault is equipped with an automatic fire suppression system.* | 17
2. Records are stored in metal cabinets. No records are stored on the floor. Adequate access and aisle ways are maintained. | 17
3. Work not directly associated with records storage or retrieval is prohibited within the ^{service Building} permanent records room ^{and the Construction Building Vault}. Examples of such prohibited activities include but are not limited to: records reproduction, film developing, and fabrication of microfiche cards. | 17
4. Smoking, eating and drinking are prohibited throughout the ^{service Building} permanent records room ^{and the Construction Building Vault}. | 33 | 17
5. Ventilation, temperature, and humidity control equipment is protected inside with standard fire dampers where they penetrate fire barriers bounding the storage facility^{ies}. | 33 | 17

6. Some records generated by Nuclear Operations during the operations phase are needed for varying periods of time at the place of origination for ready reference. These records will be stored temporarily in fire-resistant cabinets by the originators in areas pre-identified as Records Temporary Storage Facilities until they are transferred to the Permanent Records Storage Facility^{ies}. The length of time that records may remain in these areas will be defined for each type record in the QA Records Accumulation and Retention Chart. The requirements of ANSI N 45.2.9 regarding accountability and retrievability of these records will be met while the records are in the Records Temporary Storage Facilities Areas.

33 28