

MANAGEMENT MEASURES

11.9 RECORDS MANAGEMENT

11.9.1 PURPOSE OF REVIEW

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

11.9.2 RESPONSIBILITY FOR REVIEW

Primary: Licensing Project Manager

Secondary: None

Supporting: Primary reviewers of SRP Sections 11.1, "Quality Assurance," and 11.2, "Configuration Management"

11.9.3 AREAS OF REVIEW

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

1. The process whereby records, including training, dosimetry, effluents, classified, facility structures, systems, or components having safety-significance are created selected, verified, categorized, indexed, inventoried, protected, stored, maintained, distributed, deleted, or preserved. The process(es) may be linked with or be a part of the facility configuration management (CM) and quality assurance systems.
2. The handling and control of various kinds of records, and the methods of recording media that comprise the records including contaminated and classified records.
3. The physical characteristics of the records storage facilities with respect to the preservation and protection of the records for their designated lifetimes.

11.9.4 ACCEPTANCE CRITERIA

11.9.4.1 Regulatory Requirements

The requirements for records management are addressed in the following:

1. Code of Federal Regulations, *Title 10, Energy*, Part 19, "Notices, Instructions and Reports to Workers: Inspection and Investigations."

Management Measures

2. Code of Federal Regulations, *Title 10, Energy*, Part 20, "Standards for Protection Against Radiation."
3. Code of Federal Regulations, *Title 10, Energy*, Part 21, "Reporting of Defects and Noncompliance."
4. Code of Federal Regulations, *Title 10, Energy*, Part 25, "Access Authorization for Licensee Personnel."
5. 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.

11.9.4.2 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.

11.9.4.3 Regulatory Acceptance Criteria

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

1. Records are specified, prepared, verified, characterized, and maintained.
2. Records are legible, identifiable, and retrievable for their designated lifetimes.
3. Records are protected against tampering, theft, loss, unauthorized access, damage, or deterioration for the time they are in storage.
4. Procedures are established and documented specifying the requirements and responsibilities for record selection, verification, protection, transmittal, distribution, retention, maintenance, and disposition.
5. 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 which contribute to providing reasonable assurance of protection of public health and safety and of the

¹ Additional guidance for records is given in SRP Appendix C on quality assurance (Section 17) and in ASME NQA-1-1994 (Basic Requirement 17 and Supplement 17S-1) as referenced in SRP Section 11.1, "Quality Assurance."

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.

11.9.5 REVIEW PROCEDURES

11.9.5.1 Acceptance Review

The primary reviewer should evaluate the application to determine whether it addresses the "Areas of Review" discussed in Section 11.9.3, above. If significant deficiencies are identified, the applicant should be requested to submit additional material before the start of the safety evaluation.

11.9.5.2 Safety Evaluation

After determining that the application is acceptable for review in accordance with Section 11.9.5.1, above, the primary reviewer should perform a safety evaluation against the acceptance criteria described in Section 11.9.4. If, during the course of the safety evaluation, the primary reviewer determines the need for additional information, the primary reviewer should coordinate a request for additional information with the licensing project manager. The primary reviewer should coordinate this review with the primary reviewers of SRP Sections 11.1, "Quality Assurance, and 11.2, "Configuration Management."

11.9.6 EVALUATION FINDINGS

The primary reviewer should write an SER section that addresses each topic reviewed under this SRP Section and explains why the NRC staff has reasonable assurance that the applicant's commitment to a facility records management system is acceptable. License conditions may be proposed to impose requirements where the application is deficient. The SER should include a summary statement of what was evaluated and the basis for the reviewers' conclusions.

The staff can document the evaluation as follows:

The staff has reviewed the applicant's records management system [Insert a summary statement of what was evaluated] and has concluded that there is reasonable assurance that the system will (1) be effective in collecting, verifying, protecting, and storing

Management Measures

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 the 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, or 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.

11.9.7 REFERENCES

1. 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.
2. 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.