

VIRGINIA ELECTRIC AND POWER COMPANY
RICHMOND, VIRGINIA 23261

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Gentlemen:

VIRGINIA ELECTRIC AND POWER COMPANY
SURRY POWER STATION UNITS 1 AND 2
NORTH ANNA POWER STATION UNITS 1 AND 2
OPERATIONAL QUALITY ASSURANCE PROGRAM
REVISED RECORD RETENTION COMMITMENT

In accordance with 10 CFR 50.54(a)(3), Virginia Electric and Power Company (Virginia Power) is submitting a revision to the Operating Quality Assurance Program for your review and approval. The proposed program changes reduce our current commitment for record retention requirements. Many record retention periods at Virginia Power are beyond the regulatory requirements. Thus, the proposed program changes will reduce our record retention requirements consistent with regulations and industry standards, eliminating unnecessary record retention requirements. Although quality record retention periods are being reduced, the proposed changes will ensure adequate records are maintained to document the quality of the activity consistent with existing regulatory requirements and standards. The proposed changes and the basis for the changes are included in the attachment.

The proposed Operational Quality Assurance program changes establish our new commitment for quality record retention periods. If you have any questions or require additional information, please contact us.

Very truly yours,



David A. Christian
Vice President - Nuclear Operations

Attachment

0004

cc: U. S. Nuclear Regulatory Commission
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NRC Senior Resident Inspector
Surry Power Station

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**Operational Quality Assurance Program
Topical Report
Record Retention Requirement Changes**

Discussion of Changes

Markup of Changes

Typed Changes

**Virginia Electric and Power Company
Surry Power Station
North Anna Power Station**

Introduction

A review of the NRC regulations and guidance document indicate that many of the operational phase records retention requirements have been incorporated into NRC regulations and in some cases the retention period is different than the current operational quality assurance (QA) program requirement. In addition, during this review it was identified that numerous record retention requirements could be reduced and still maintain adequate documented evidence of the activity affecting quality. In order to clarify records retention requirements and to eliminate unnecessary records retention requirements, Virginia Electric and Power Company is revising the current operational QA program requirements for record retention and providing a clarification of the definition of a quality record.

These changes are administrative in nature and do not affect the operations or design of the plant in any way. As such, an unreviewed safety question is not generated by these changes. However, the proposed reduction in record retention requirements does reduce our current commitment in the NRC approved operational QA program. Therefore, the proposed Operational QA Program record retention requirement changes are being submitted in accordance with 10 CFR 50.54(a)(3) for NRC review and approval prior to implementation.

Background

The Operational QA Program as approved by the NRC, contains a commitment to NRC Regulatory Guide 1.88, Revision 2 dated October 1976, "Collection, Storage, and Maintenance of Nuclear Power Plant Quality Assurance Records." Regulatory Guide 1.88 endorses ANSI N45.2.9-1974, "Requirements for Collection, Storage and Maintenance of Quality Assurance Records for Nuclear Power Plants." Tables 17.2-2 and 17.2-3 of the Operational QA Program include the record retention requirements for the operational phase in accordance with ANSI N45.2.9-1974, and the additional record retention requirements that were previously included in the North Anna and Surry Technical Specifications. The records retention requirements were removed from the North Anna and Surry Technical Specifications in amendments 208 and 189 for North Anna dated April 13, 1998 and 211 for Surry dated July 15, 1997.

Discussion of Change

ANSI N45.2.9-1974 defines QA Records as "those records which furnish documentary evidence of the quality of items and of activities affecting quality. For the purposes of this standard a document is considered a QA record when the document has been completed." The definition of QA Record is being further clarified and incorporated into Operational QA Program. The clarification is being made as follows:

The definition of QA Record is revised to the following: "Those records which furnish documentary evidence of the quality of item and activities affecting quality or compliance with the NRC regulations. Documents are considered to be quality records when the document has been completed, including all required signatures, reviews, and approvals. At the expiration of a QA record period, the

document is declassified and may be disposed of, if appropriate, as determined by Company management."

In place of "Life of Plant" we are using "Lifetime"^a This is consistent with the intent of ANSI N45.2.9-1974. The definition of lifetime for record retention is footnoted as follows:

- a) Lifetime is until the termination of the Facility Operating License, until termination of employment (training and qualification records), transfer of ownership (i.e., fuel) or service life of the facility, system, or component, as applicable.

Currently, tables exist in the QA Topical Report for both stations which includes station specific record retention requirements from the Technical Specifications. These tables are being combined into one table. The wording of the record retention requirements differs between the two stations due to the vintage of the Technical Specifications and plant licensing. Where these retention requirement wording differences occur, generic wording, consistent with ANSI Standard N45.2.9, is proposed for the record retention requirements for both stations. For example, the current record retention requirement for Environmental Qualifications includes specific reference to Technical Specification paragraphs. These references have been eliminated and the record retention requirement now reads: "Records of Environmental Qualification in accordance with 10 CFR 50.49."

Tables 17.2-2 for Surry and 17.2-3 for North Anna are being replaced with a common Table 17.2-2. This Table is proposed as an alternative to the record retention requirements of ANSI N45.2.9. The proposed record retention requirements are discussed below, including the basis for any changes that reduce the current commitment for retention. In addition, the existing record retention requirements for each station that are incorporated into the common record retention requirement are identified. Marked-up Tables 17.2-2 and -3, (in Attachment 2) have each record type numbered and the proposed Table 17.2-2 (in Attachment 3) has each record type identified by an alpha character consistent with the record types discussed below.

Record Types

a) Records and Drawing Changes Reflecting Plant Design Modifications Made to Systems and Equipment Described in the Final Safety Analysis Report

Current Retention Requirement - Life of plant
Proposed Retention Requirement – Lifetime^a

Current Table 17.2-2 line item (Surry): 10
Current Table 17.2-3 line item (North Anna): 11

This retention period is changed. There may be some modifications completed on components/systems that have since been removed from the

plant (e.g., original steam generators) that will no longer require maintaining records for the life of the plant. However, for the majority of plant modifications the record retention requirement is unaffected by the proposed change. Also, the wording for the record type is changed to provide consistency between both stations and ANSI Standard N45.2.9.

b) Records of New and Spent Fuel Inventory, Transfers of Fuel, and Assembly Histories

Current Retention Requirement - Life of plant
Proposed Retention Requirement - Lifetime^a

Current Table 17.2-2 line Item (Surry): 11
Current Table 17.2-3 line Item (North Anna): 12

This retention period is effectively **not** changed. The wording for this record type is changed to provide consistency between both stations and ANSI Standard N45.2.9. The appropriate fuel records will be transferred upon transfer of ownership. 10 CFR 74 requires documentation of the transfer of ownership and the content of the fuel assemblies.

c) Records of Plant Radiation and Contamination Survey

Current Retention Requirement - Life of plant
Proposed Retention Requirement - Lifetime^a

Current Table 17.2-2 line Item (Surry): 12
Current Table 17.2-3 line Item (North Anna): 13

This retention period is effectively **not** changed although the lifetime definition for retention is proposed. Although 10 CFR 20 has different record retention requirements for specific record types [e.g., 10 CFR 20.2103(a) requires retention of records of radiation surveys and radiation instrument calibrations made pursuant to 10 CFR 20.1501 and 10 CFR 20.1906 for a period of three years], the retention requirement is being maintained lifetime.

d) Records of Off-Site Environmental Monitoring Survey

Current Retention Requirement - Life of plant
Proposed Retention Requirement - Lifetime^a

Current Table 17.2-2 line Item (Surry): 13
Current Table 17.2-3 line Item (North Anna): 26

This retention period is effectively **not** changed although the lifetime definition for retention is proposed. The wording for this record type is changed to provide consistency between both stations and ANSI Standard N45.2.9. Although the current North Anna records retention requirements is very specific, the appropriate records have been and will continue to be maintained to ensure the results of the environmental monitoring program are adequately documented. In addition, 10 CFR 20.2107(a) requires retention of records of compliance with dose limits for individual members of the public in accordance with 10 CFR 20.1301 until the termination of the license.

e) Records of Radiation Exposure of All Plant Personnel, and Others who Enter Radiation Control Areas

Current Retention Requirement - Life of plant
Proposed Retention Requirement - Lifetime^a or as specified by 10 CFR 20

Current Table 17.2-2 line Item (Surry): 14
Current Table 17.2-3 line Item (North Anna): 14

This retention period is changed. The wording for this record type is changed to provide consistency between both stations and ANSI Standard N45.2.9. For the majority of this record type the retention period is lifetime and only a limited number of records have reduced retention periods. For example, 10 CFR 20 contains numerous provisions for retention of personnel radiation exposure records including §§20.2103(b)(3) [retain results of air sampling, surveys, and bioassays made pursuant to §20.1703(a)(i) and §20.1703(a)(ii) until termination of license], 20.2104(c)(2) [retain record of cumulative dose until termination of license], 20.2104(d) [retain records of cumulative occupational dose until termination of license], 20.2104(f) [retain records used to prepare cumulative occupational dose for three years after the record is made], 20.2105(b) [retain records of planned special exposures to radiation until termination of license], 20.2106(a) [retain records of individual monitoring results made pursuant to §20.1502 and records of doses received during planned special exposures, accidents, and emergency conditions until termination of license], and 20.2106(e) [retain records of radiation dose to embryo/fetus maintained with records of occupational dose to declared pregnant women until termination of license]. In some instances the regulations only require maintaining the base record for some number of years after the development of another quality record for which the base record provides input, e.g., the exposure records used to prepare the NRC

Form-4 are only required to be maintained for three years after preparing the form.

f) Records of Radioactivity Levels of Liquid and Gaseous Waste Released to Environment

Current Retention Requirement - Life of plant
Proposed Retention Requirement - Lifetime^a

Current Table 17.2-2 line Item (Surry): 15
Current Table 17.2-3 line Item (North Anna): 15

This retention period is effectively **not** changed although the lifetime definition for retention is proposed. The wording for this record type is changed to provide consistency between both stations and ANSI Standard N45.2.9.

g) Records of Transient or Operational Cycling Records for Those Plant Components That Have Been Designed to Operate Safely for a Limited Number of Transients or Operational Cycles

Current Retention Requirement - Life of plant
Proposed Retention Requirement - Lifetime^a

Current Table 17.2-2 line Item (Surry): 16
Current Table 17.2-3 line Item (North Anna): 16

This retention period is effectively **not** changed although the lifetime definition for retention is proposed. The wording for this record type is changed to provide consistency between both stations and ANSI Standard N45.2.9. Records will be maintained for those systems designed with a limited number of transients or operational cycle.

h) Records of In-Service Inspection

Current Retention Requirement - Life of plant
Proposed Retention Requirement - Lifetime^a

Current Table 17.2-2 line Item (Surry): 19
Current Table 17.2-3 line Item (North Anna): 19

This retention period is changed from Life of Plant to Lifetime (of the component). The wording for this record type is revised to provide consistency between both stations and ANSI Standard N45.2.9. Section XI of the ASME Code, Section IWA-6310 (in conjunction with IWA-6340) requires retention of inservice inspection records for the service lifetime of the system or component. Maintaining inservice inspection records after the component has been removed from the plant is no longer necessary to establish the quality of the activity. Although the current Surry records retention

requirements is very specific, the appropriate records will be maintained to ensure that examinations and tests required by the ISI Program are adequately documented.

i) Minutes of Meetings of the Station Nuclear Safety and Operating Committee and Management Safety Review Committee

Current Retention Requirement - Life of plant
Proposed Retention Requirement - Lifetime^a

Current Table 17.2-2 line Item (Surry): 21
Current Table 17.2-3 line Item (North Anna): 22

This retention period is effectively **not** changed although the lifetime definition for retention is proposed. This wording for this record type is consistent with ANSI N45.2.9. However, we have included the titles of our safety committees.

j) Records of Current Individual Plant Staff Member Qualifications, Experience, Training and Retraining Records

Current Retention Requirement - Life of plant
Proposed Retention Requirement - Lifetime^a with numerous exceptions

Current Table 17.2-2 line Item (Surry): 18
Current Table 17.2-3 line Item (North Anna): 18

The retention periods are changed for various types of records. The wording is revised to be consistent with the ANSI Standard N45.2.9. Records of personnel experience are required to be maintained and are normally maintained in the personnel files.

This retention period is changed as follows:

Radiological Protection Training Records (e.g., Nuclear Employee Training (NET), Advanced Radiation Worker (ARW), Radiation Protection (RP) Technician Training and continuing training, etc.)

Retain for Lifetime^a

This retention period is effectively unchanged. Radiological training records for terminated employees and contractors will be maintained until termination of the plant license.

- Initial Training and Initial Qualification Records -

Retain initial training and qualification for Lifetime^a and requalification for 3 years

This retention period is effectively **not** changed. 10 CFR 73, Parts 73.26(d)(4) requires employees initial qualification records be maintained until termination of employment and each requalification for three years. Discussions with the NRC Human Factors Branch confirmed that this is also the "expected" interpretation for licensed Reactor Operator (RO) and Senior Reactor Operator (SRO) personnel and is considered appropriate for the other personnel training programs specified in 10 CFR 50.120 (i.e., non-licensed operators, shift technical advisors, I&C technicians, electrical maintenance personnel, mechanical maintenance personnel, radiological protection technicians, chemistry technicians, and engineering support personnel). The proposed change clarifies retention of requalification records to apply only to the current period of application.

- Licensed Operator - (RO/SRO) Requalification Records -

The proposed change clarifies specific retention requirements for licensed operators consistent with the Code of Federal Regulations (10 CFR Part 55)

Retain for six years after license renewal.

10 CFR 55.59(c)(5)(i) requires facility licensees to retain requalification records "until the operator's license is renewed." Currently, ROs and SROs have a six-year renewal period. In order to allow some additional time for review of these documents and for consistency with precedents set by the NRC staff in NUREG-1262, "Answers to Questions at Public Meetings Regarding Implementation of Title 10, Code of Federal Regulations, Part 55 on Operator's Licenses," dated November 12, 1987 (refer to the NRC's answer to question No. 168 on page 45), these records would be retained for six years after license renewal.

- Training Materials Subject to Revision [excluding materials associated with any radiological protection training such as Nuclear Employee Training (NET) and retraining, Advanced Radiation Worker (ARW) training, Radiological Protection (RP) Technician training, etc.], and [licensed] Reactor Operator (RO)/Senior Reactor Operator (SRO) training materials -

Retain Revision 0 for Lifetime^a, material associated with current revision and material associated with superseded revisions for three years.

These records are intended to support the documentation of individual training and retraining records for current members of the plant staff (note: one copy of these materials has been retained in the training records vault rather than one copy in each applicable individual's folder). The value of superseded materials is very limited from both a safety and a historical perspective. Therefore, the same retention period is applied to these records as are applied to the training and retraining records for current members of the plant staff.

- Retraining, Specialized Training, and Continuing Training Records (all personnel except ROs, SROs, and RP Technicians) -

Retain for three years.

ANSI N45.2.9-1974, Appendix A, Section A.6.1, "Operation Phase Activity Records" specifies that retraining records for current individual plant staff members are lifetime records. However, this represents an over-commitment, in that it conflicts with 10 CFR 26.21(b) and 10 CFR 26.22(c) (fitness-for-duty awareness training records), 10 CFR 34.31(c) (training records for radiographers and radiographers' assistants), Appendix R to 10 CFR 50 (III.I.4, concerning training records for fire brigade members), 10 CFR 55.59 (licensed operator retraining records - must be retained for 6 years), 10 CFR 71.135 (personnel qualification records associated with packaging and transportation of radioactive material), and with various parts of 10 CFR 73 (security personnel training and qualification). With the exception of 10 CFR 55.59, these regulations each refer to a three year retention period for associated records. Therefore, a three year retention period for retraining, specialized training, and continuing training is considered appropriate since the NRC has set this precedent in the above regulations.

- Contractor Training (except NET, ARW, RP Technician Training and RP Technician continuing training, etc.) -

Retain for three years after termination of employment.

Contractor records are not addressed in Appendix A to ANSI N45.2.9-1974. These commitment documents state that training and qualification records for "current members of the plant staff" are to be retained for the duration of the facility operating license (lifetime) but provide no record retention requirement for contractor's training or qualification records. However, 10 CFR 73, Appendix B, Section II.C requires retention of qualification records for security contractor personnel for three years after termination of employment. Additionally, short-term retention of contractor training and qualification records has proven valuable, in that it reduces pre-outage burden on the plant training staff, in that the records may provide a basis for waiving NET or for just providing a short refresher course rather than the complete NET program.

- Institute of Nuclear Power Operations (INPO) Accreditation Documentation -

Retain initial accreditation for lifetime^a, current accreditation material, and superseded material for four years.

INPO Accreditation has a four-year cycle. The primary regulatory interest is in the facility's training programs initial accreditation and whether it is currently accredited. Hence, a four-year retention period is appropriate.

- Simulation facility materials (e.g., attachments, basis documents, performance tests, maintenance and modifications, fidelity reports, etc.) -

Retain initial certification for lifetime^a and subsequent certification records for four years after submittal of current NRC-474.

These records are required by 10 CFR 55.45(b)(4)(iv) and 10 CFR 55.45(b)(5)(iii). However, the simulation facility is a training aide, not an integral part of the nuclear plant. Although the simulation facility must be certified, the historical condition of that facility does not affect the nuclear plant in any way as long as the facility has been properly certified. Therefore, it is conservative to retain these records for the current period of certification and to discard the records four years after submittal of a new form NRC-474 to the NRC. The NRC has previously endorsed this position in NUREG-1262, "Answers to Questions at Public Meetings Regarding Implementation of Title 10, Code of Federal Regulations, Part 55 on Operator's Licenses," dated November 12, 1987 (refer to the NRC's answer to question No. 168 on page 45).

k) Records of Normal Nuclear Unit Operation, Including Power Levels and Periods of Operation at Each Power Level

Current Retention Requirement - 5 years
Proposed Retention Requirement - 5 years

Current Table 17.2-2 line Item (Surry): 1
Current Table 17.2-3 line Item (North Anna): 1

This retention period is **not** changed. The wording for this record type is revised to provide consistency between the stations and the ANSI Standard N45.2.9. The appropriate records will be maintained to adequately document plant operating conditions.

l) Records of Principal Maintenance Activities, Including Inspection Repair, Substitution or Replacement of Principal Items of Equipment Pertaining to Nuclear Safety

Current Retention Requirement - 5 years
Proposed Retention Requirement - 5 years

Current Table 17.2-2 line Item (Surry): 2
Current Table 17.2-3 line Item (North Anna): 2

This retention period is **not** changed. The wording for this record type is revised to provide consistency between the stations and the ANSI Standard N45.2.9. The appropriate records will be maintained to adequately document maintenance activities

m) Records of Reportable Events

Current Retention Requirement - 5 years
Proposed Retention Requirement - 5 years

Current Table 17.2-2 line Item (Surry): 3
Current Table 17.2-3 line Item (North Anna): 3

This retention period is **not** changed. The wording for this record type is revised to provide consistency between the stations. ANSI Standard N45.2.9 only discusses Abnormal Occurrence Reports. These reports are now called LERs. Therefore, this record type has been modified to include each event report made to the NRC in accordance with 10 CFR and the Technical Specifications (e.g., LERs, Special Reports etc.). This does not include routine information reports (e.g., tube plugging, ISI 90 day reports, 50.59 summaries, etc.)

n) Records of Periodic Checks, Inspections and Calibrations Performed to Verify that Surveillance Requirements are Being Met

Current Retention Requirement - 5 years
Proposed Retention Requirement - 5 years

Current Table 17.2-2 line Item (Surry): 4
Current Table 17.2-3 line Item (North Anna): 4

This retention period is **not** changed. The wording for this record type is revised to provide consistency between the stations and the ANSI Standard N45.2.9.

o) Records of Special Reactor Test or Experiment Records

Current Retention Requirement - 5 years/Life of Plant
Proposed Retention Requirement - 5 years or as specified in 10 CFR 50.71

Current Table 17.2-2 line Item (Surry): 17
Current Table 17.2-3 line Item (North Anna): 17

This retention period is changed to be consistent with 10 CFR 50.59 and to include a retention period for unreviewed safety questions. 10 CFR 50.59(b)(3) specifies that "... records of changes in procedures and records of tests and experiments shall be maintained for a period of five years."

However, no record retention period is specified for records of any change, test, or experiment, which is deemed to involve an unreviewed safety question. These records will be maintained in accordance with 10 CFR 50.71.

p) Records of Changes Made in Procedures Pursuant to 10 CFR 50.59

Current Retention Requirement - 5 years/ Life of Plant
Proposed Retention Requirement - 5 years

Current Table 17.2-2 line Item (Surry): 5 and 20
Current Table 17.2-3 line Item (North Anna): 5 and 21

This retention period is changed to establish retention requirements consistent with 10 CFR 50.59 and ANSI N45.2.9. The reviews performed for changes made to procedures described in the UFSAR are being incorporated into this record retention requirement. N45.2.9 requires retention of operating procedures, but 10 CFR 50.59 discusses changes to any procedures described in the safety analysis report. Thus, we have combined the procedure change record retention requirements of 10 CFR 50.59 and ANSI N45.2.9 into a single record type which includes changes for those procedures described in the safety analysis report. Security procedure changes are maintained in accordance with 10 CFR 73.70

q) Records of Radioactive Material Shipments

Current Retention Requirement - 5 years
Proposed Retention Requirement - 3 years

Current Table 17.2-2 line Item (Surry): 6
Current Table 17.2-3 line Item (North Anna): 6

This retention period is changed to be consistent with the regulations. Shipment and disposal of radioactive materials are governed by the provisions of 10 CFR 20, 10 CFR 20, Appendix G, 10 CFR 30, 40, 70 and 71. The retention periods are three years after the date of shipment or receipt of material.

The remaining record types are not identified in ANSI N45.2.9 and could be included into another record category. However, since these record types were specifically called-out by the NRC in the Technical Specification they will be included as separate line items.

r) Records of Sealed Source Leak Test Results and Physical Inventory of Sealed Source Material

Current Retention Requirement - 5 years
Proposed Retention Requirement - 5 years

Current Table 17.2-2 line Item (Surry): 7
Current Table 17.2-3 line Item (North Anna): 7 and 8

This retention period is **not** changed. These requirements were previously moved to the Operational QA Program from Technical Specifications. Two requirements for North Anna are combined into this one line item. Records of physical inventories of sealed sources is a new requirement for Surry. However, it is consistent with Surry Technical Specification, which requires a current inventory of radioactive material in possession at all time.

s) Records of the Service Lives of All Hydraulic and Mechanical Snubbers on Safety-Related Systems, Including the Date at Which the Service Life Commences and Associated Installation and Maintenance Records

Current Retention Requirement - Life of Plant
Proposed Retention Requirement - Lifetime^a

Current Table 17.2-2 line Item (Surry): 22
Current Table 17.2-3 line Item (North Anna): 23

This retention period is changed. This requirement was previously moved to the Operational QA Program from Technical Specifications. For record retention, the guidance provided by the NRC in 53 FR 19240 and by the ASME Code Committee in ASME OM Code 1990 (ISTA 3.3.3) is more appropriately the service life of the component rather than the life of the plant.

t) Records of Secondary Water Sampling and Water Quality

Current Retention Requirement - Life of Plant
Proposed Retention Requirement - Lifetime^a

Current Table 17.2-2 line Item (Surry): none
Current Table 17.2-3 line Item (North Anna): 24

This retention period is **not** changed. This requirement was previously moved to the Operational QA Program from the North Anna Technical Specifications. This record retention requirement is new to Surry Power Station.

u) Records of Environmental Qualification in accordance with 10 CFR 50.49

Current Retention Requirement - Life of Plant
Proposed Retention Requirement - Lifetime^a

Current Table 17.2-2 line Item (Surry): 23
Current Table 17.2-3 line Item (North Anna): 25

This retention period is changed. The wording is changed to provide consistency between the stations. 10 CFR Parts 50.49(g) and 50.49(j) require licensees to establish an environmental qualification program for safety-related electrical equipment and maintain current records verifying the qualification of that equipment. Additionally, §50.49(j) requires that records of the environmental qualification of safety-related electrical equipment shall be "maintained in an auditable form for the entire period during which the covered item is installed in the nuclear plant or is stored for future use to permit verification that each item of electric equipment important to safety covered by this section" is qualified for its application and meets its specified performance criteria when subjected to conditions postulated to exist when that equipment must perform its safety function.

v) Records of Reviews Performed for Changes Made to the OFFSITE DOSE CALCULATION MANUAL and the PROCESS CONTROL PROGRAM

Current Retention Requirement - Life of Plant
Proposed Retention Requirement - Lifetime^a

Current Table 17.2-2 line Item (Surry): 24
Current Table 17.2-3 line Item (North Anna): 27

This retention period is **not** changed. This requirement was previously moved to the Operational QA Program from Technical Specifications. 10 CFR 20.2107(a) contains provisions for retaining a record of compliance with dose limits for individual members of the public in accordance with §20.1301 until the termination of the license. The Offsite Dose Calculation Manual (ODCM) and the Process Control Program (PCP) and their implementing (technical) procedures are used to determine compliance with dose limits for individual members of the public.

w) Records of Audits Performed Pursuant to 10 CFR 50, Appendix B, Quality Assurance Programs

Current Retention Requirement – 6 years
Proposed Retention Requirement – 5 years

Current Table 17.2-2 line Item (Surry): none
Current Table 17.2-3 line Item (North Anna): none

This is a new line item for both Surry and North Anna and the retention period is changed. An existing record type [Item 20], "Records of QA activities (unless otherwise specified)," specific to North Anna with a Life of Plant retention period is being deleted to avoid confusion. Although audits could be included in this record type, the audit report retention period is specified in ANSI N45.2.9, Appendix A for records of pre-operational phase activities (e.g., design and construction) as six years. Most quality activities have specific retention periods defined in the regulation and/or ANSI Standard

N45.2.9-1974. For those quality records that do not have a retention time specified in the regulation or topical report 10 CFR 50.71 establishes the retention period.

In addition, the Quality Assurance organization was re-structured into the Nuclear Oversight Department and many of the associated responsibilities have been re-assigned. Based on these organizational changes, reference to "Quality Assurance Activities" needs to be eliminated.

The change from six to five years will also provide consistent retention requirements for nonpermanent record types generated during operational phase activities.

x) Security/Emergency Plan and Implementing Procedures Audits

Current Retention Requirement – 5 years/Life of Plant

Proposed Retention Requirement – consistent with Part 10 of the Code of Federal Regulations and NRC approved plans

Current Table 17.2-2 line Item (Surry): Item 8 and 9

Current Table 17.2-3 line Item (North Anna): 9 and 10

This retention period is changed to be consistent with Part 10 of the Code of Federal Regulations. However, since a requirement for record retention is established in 10 CFR parts 50 and 73, these line items are being removed from the QA topical.

References

1. Title 10 of the Code of Federal Regulations.
2. NUREG-1262, "Answers to Questions at Public Meetings Regarding Implementation of Title 10, Code of Federal Regulations, Part 55 on Operator's Licenses," dated November 12, 1987.
3. NUREG-1431, "Standard Technical Specifications - Westinghouse Plants," Vol. 1, dated September 1992.
4. NUREG-1460, Revision 1, "Guide to NRC Reporting and Recordkeeping Requirements Compiled from Requirements in Title 10 of the Code of Federal Regulations as Codified on December 31, 1993," dated July 1994.
5. NRC Regulatory Guide 1.33, "Quality Assurance Program Requirements (Operation)," dated February 1978.
6. ANS-3.2/ANSI N18.7-1976, "Administrative Controls and Quality Assurance for the Operational Phase of Nuclear Power Plants," dated February 19, 1976.
7. NRC Regulatory Guide 1.88, "Collection, Storage and Maintenance of Nuclear Power Plant Quality Assurance Records," Revision 2, dated October 1976.
8. ANSI N45.2.9-1974, "Requirements for Collection, Storage, and Maintenance of Quality Assurance Records for Nuclear Power Plants."
9. ANI/MAELU Information Bulletin 80-1A, Revision 4, "Nuclear Liability Insurance Record Retention," dated February 11, 1994.
10. 53 FR 19240, "Retention Periods for Records," dated May 27, 1988, [Final Rule establishing four specific record retention periods (3 years, 5 years, 10 years, and life of the component, area, or facility) for 10 CFR Parts 4, 11, 25, 30, 31, 32, 34, 35, 40, 50, 60, 61, 70, 71, 73, 74, 75, 95, and 110. Federal Register states that "the requirements in this rule take precedence over and supersede any conflicting requirements presently in the technical specifications"].
11. NRC Administrative Letter 95-06 entitled, "Relocation of Technical Specification Administrative Controls Related to Quality Assurance," dated December 12, 1995.
12. ASME OM Code, "Inservice Inspection Requirements for Snubbers," approved by the Code Committee in 1990, not yet endorsed by the NRC.
13. NRC-Approved Emergency Plans for North Anna and Surry Power Stations.
14. NRC-Approved Security Plans for North Anna and Surry Power Stations.

Mark-up of Quality Assurance Program Changes

Virginia Electric and Power Company

LIST OF FIGURES (APPENDIX A)

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Table 17.2-0 (continued)
STANDARD, REQUIREMENT OR GUIDE

Regulatory Guide 1.88 (continued) — *Collection, Storage and Maintenance of Nuclear Power Plant Quality Assurance Records* - (Rev. 2, 10/76) - Endorses ANSI N45.2.9-1974

The Company's Position	Conformance Status	Justification
<p>(12) With regard to Section A.6 of Appendix A to ANSI N45.2.9-1974 entitled, <i>Operation Phase Activity Records</i>, Section A.6.1, "Operation, Maintenance & Testing," is replaced by the information in Tables 17.2-2 and 17.2-3.</p>		
<p>(13) With regard to Section 1.4 of ANSI N45.2.9-1974 entitled Definitions. The definition of "Quality Assurance Records" is revised to the following: "Those records which furnish documentary evidence of the quality of item and activities affecting quality or compliance with the NRC regulations. Documents are considered to be quality records when the document has been completed, including all required signatures, reviews, and approvals. At the expiration of a QA record period, the document is declassified and may be disposed of, if appropriate, as determined by Company management."</p>		
<p>(14) Consistent with ANSI N45.2.9, Section 2.2, the definition of lifetime for record retention is footnoted as follows:</p> <p>1 Lifetime is until the termination of the Facility Operating License, until termination of employment (training and qualification records), transfer of ownership (i.e., fuel) or service life of the facility, system, or component, as applicable.</p>		

Revision 35—09/01/99
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SPS UFSAR

17.2-83



Table 17.2-2
~~SURRY POWER STATION RECORDS RETENTION REQUIREMENTS~~

Description of Records (Operational Phase Activities)	Retention Period
1 Records of normal plant operation, including power levels and periods of operation at each power level.	5 years
2 Records and logs of principal maintenance activities, including inspection, repair, substitution or replacement of principal items of equipment related to nuclear safety.	5 years
3 Reportable Events and Special Reports.	5 years
4 Records of Periodic Checks, Inspections, and Calibrations Performed to Verify that Surveillance Requirements are Being Met.	5 years
5 Records of changes made in the Operating Procedures pursuant to 10 CFR 50.59.	5 years
6 Records of radioactive material shipments.	5 years
7 Records of leakage testing of miscellaneous radioactive source test results, in units of microcuries, of tests performed pursuant to Tech Spec 4.16.	5 years
8 Records of the Station Emergency Plan and implementing procedures audits.	Life of Plant
9 Records of the Station Security Plan and implementing procedures audits.	Life of Plant
10 Records of changes made to the plant and plant drawings as described in the FSAR pursuant to 10 CFR 50.59.	Life of Plant
11 Records of new and irradiated fuel inventory, fuel transfers and assembly histories.	Life of Plant
12 Records of facility radiation and contamination surveys.	Life of Plant
13 Records of off-site environmental monitoring surveys.	Life of Plant
14 Records of radiation exposure of all plant personnel, and others as required by 10 CFR 20.	Life of Plant
15 Records of gaseous and liquid radioactive material released to the environs.	Life of Plant
16 Records of transient or operational cycles for those facility components that have been designated to operate safely for a limited number of transients or operational cycles.	Life of Plant
17 Records of any special reactor test or experiments pursuant to 10 CFR 50.59.	5 years
18 Records of training and qualification for current members of the plant staff.	Life of Plant
19 Records of in-service inspections performed pursuant to Technical Specifications. (Including radiographs, photographs, and summary reports of inspection of steam generator tubing.)	Life of Plant

DELETE AND INSERT COMBINED 17.2-2

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 Revision 31—09/01/99

NAPS UFSAR
 SPS UFSAR

17.2-102



Table 17.2-2
 SURRY POWER STATION RECORDS RETENTION REQUIREMENTS

Description of Records (Operational Phase Activities)	Retention Period
20 Records of reviews performed for changes made to procedures or equipment or reviews of tests and experiments pursuant to 10 CFR 50.59.	Life of Plant
21 Records of meetings of the onsite and offsite nuclear safety review committees. (currently SNSOC and MSRC)	Life of Plant
22 Records of the service lives of all hydraulic and mechanical snubbers on safety-related systems, including the date at which the service life commences and associated installation and maintenance records.	Life of Plant
23 Records of Environmental Qualification which are covered under the provisions of Tech Spec 6.7.	Life of Plant
24 Records of reviews performed for changes made to the OFFSITE DOSE CALCULATION MANUAL and the PROCESS CONTROL PROGRAM.	Life of Plant

DELETE AND
 INSERT COMBINE 17.2-2



~~Table 17.2-3~~

NORTH ANNA POWER STATION RECORDS RETENTION REQUIREMENTS

Description of Records (Operational Phase Activities)	Retention Period
1 Records of normal plant operation, including power levels and periods of operation at each power level.	5 years
2 Records and logs of principal maintenance activities, including inspection, repair, substitution or replacement of principal items of equipment related to nuclear safety.	5 years
3 Reportable Events and Special Reports.	5 years
4 Records of Periodic Checks, Inspections, and Calibrations Performed to Verify that Surveillance Requirements are Being Met.	5 years
5 Records of changes made in the Operating Procedures.	5 years
6 Records of radioactive material shipments.	5 years
7 Records of Sealed Source Leak Tests and Results.	5 years
8 Records of annual physical inventory of all sealed source material of record.	5 years
9 Records of the Station Emergency Plan and implementing procedures audits.	5 years
10 Records of the Station Security Plan and implementing procedures audits.	5 years
11 Records of changes made to the plant and plant drawings as described in the FSAR pursuant to 10 CFR 50.59.	Life of Plant
12 Records of new and irradiated fuel inventory, fuel transfers and assembly histories.	Life of Plant
13 Records of facility radiation and contamination surveys.	Life of Plant
14 Records of radiation exposure of all plant personnel, and others as required by 10 CFR 20.	Life of Plant
15 Records of gaseous and liquid radioactive material released to the environs.	Life of Plant
16 Records of transient or operational cycles for those facility components that have been designated in Technical Specification Table 5.7-1 to operate safely for a limited number of transients or operational cycles.	Life of Plant
17 Records of any special reactor test or experiments pursuant to 10 CFR 50.59.	Life of Plant
18 Records of training and qualification for current members of the plant staff.	Life of Plant
19 Records of in-service inspections performed pursuant to Technical Specifications. (Including summary reports of inspection of steam generator tubing.)	Life of Plant
20 Records of Quality Assurance activities. (Unless otherwise specified).	Life of Plant

DELETE TABLE 17.2-3



Table 17.2-3 NORTH ANNA POWER STATION RECORDS RETENTION REQUIREMENTS	
Description of Records (Operational Phase Activities)	Retention Period
21 Records of reviews performed for changes made to procedures or equipment or reviews of tests and experiments pursuant to 10 CFR 50.59.	Life of Plant
22 Records of meetings of the onsite and offsite nuclear safety review committees. (currently SNSOC and MSRC)	Life of Plant
23 Records of the service lives of all hydraulic and mechanical snubbers required to be operable by Technical Specification 3.7.10, including the date at which the service life commences and associated installation and maintenance records.	Life of Plant
24 Records of secondary water sampling and water quality.	Life of Plant
25 Records of Environmental Qualification in accordance with 10 CFR 50.49 and Paragraph 2.C(4) of License No. NPF-7 for Unit 2.	Life of Plant
26 Records of analyses required by the radiological environmental monitoring program that would permit evaluation of the accuracy of the analysis at a later date. This would include procedures effective at specified times and QA records showing that these procedures were followed.	Life of Plant
27 Records of reviews performed for changes made to the OFFSITE DOSE CALCULATION MANUAL and the PROCESS CONTROL PROGRAM.	Life of Plant

DELETE TABLE 17.2-3



Proposed Quality Assurance Program Changes

Virginia Electric and Power Company



Revision 35—09/01/99
Revision 31—09/01/99

NAPS UFSAR
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17.2-i

**VIRGINIA ELECTRIC
AND
POWER COMPANY**

**OPERATIONAL QUALITY ASSURANCE PROGRAM
TOPICAL REPORT**

**VEP-1-5A
(UPDATED)**

Amendment Five
June, 1986
(Updated 03/98)

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Table 17.2-0 (continued)
STANDARD, REQUIREMENT OR GUIDE

Regulatory Guide 1.88 (continued) — *Collection, Storage and Maintenance of Nuclear Power Plant Quality Assurance Records* - (Rev. 2, 10/76) - Endorses ANSI N45.2.9-1974

The Company's Position	Conformance Status	Justification
(12) With regard to Section A.6 of Appendix A to ANSI N45.2.9-1974 entitled, <i>Operation Phase Activity Records</i> , Section A.6.1, "Operation, Maintenance & Testing," is replaced by the information in Table 17.2-2.		
(13) With regard to Section 1.4 of ANSI N45.2.9-1974 entitled, <i>Definitions</i> . The definition of "Quality Assurance Records" is revised to the following: "Those records which furnish documentary evidence of the quality of item and activities affecting quality or compliance with the NRC regulations. Documents are considered to be quality records when the document has been completed, including all required signatures, reviews, and approvals. At the expiration of a QA record period, the document is declassified and may be disposed of, if appropriate, as determined by Company management."		
(14) Consistent with ANSI N45.2.9, Section 2.2, the definition of lifetime for record retention is footnoted as follows: <ul style="list-style-type: none"> a. Lifetime is until the termination of the Facility Operating License, until termination of employment (training and qualification records); transfer of ownership (i.e., fuel); or service life of the facility, system, or component, as applicable. 		

Table 17.2-2 RECORDS RETENTION REQUIREMENTS	
Description of Records (Operational Phase Activities)	Retention Period
Records and drawing changes reflecting plant design modifications made to system and equipment described in the final safety analysis report	Lifetime ^a
Records of new and spent fuel inventory, transfers of fuel, and assemblies histories	Lifetime ^a
Records of plant radiation and contamination surveys	Lifetime ^a
Records of off-site environmental monitoring surveys	Lifetime ^a
Records of radiation exposure of all plant personnel, and other who enter radiation control areas	Lifetime ^a
Records of radioactive levels of liquid and gaseous waste released to the environment	Lifetime ^a
Records of transient or operational cycles for those plant components that have been designated to operate safely for a limited number of transients or operational cycles	Lifetime ^a
Records of inservice inspections	Lifetime ^a
Records of meetings of the Station Nuclear Safety and Operating Committee and the Management Safety Review Committee	Lifetime ^a
Records of the service lives of all hydraulic and mechanical snubbers on safety-related systems, including the date at which the service life commences and associated installation and maintenance records	Lifetime ^a
Records of secondary water sampling and water quality	Lifetime ^a
Records of Environmental Qualification in accordance with 10 CFR 50.49	Lifetime ^a
Records of reviews performed for changes made to the offsite dose calculation manual and the process control program	Lifetime ^a
Records of normal plant operation, including power levels and periods of operation at each power level	5 years
Records of principal maintenance activities, including inspection, repair, substitution or replacement of principal items of equipment related to nuclear safety	5 years
Reportable events reports	5 years
Records of periodic checks, inspections, and calibrations performed to verify that surveillance requirements are being met	5 years
Records of special reactor tests or experiments	5 years

Table 17.2-2 (continued) RECORDS RETENTION REQUIREMENTS	
Description of Records (Operational Phase Activities)	Retention Period
Records of changes made in procedures pursuant to 10 CFR 50.59	5 years
Records of Audits Performed to 10 CFR 50, Appendix B, Quality Assurance Program	5 years
Records of radioactive material shipments	5 years
Records of sealed source leak test results and physical inventories of sealed sources material	5 years
Records of current individual plant staff members qualifications, experience, training and retraining	Lifetime or as noted below
<ul style="list-style-type: none"> • Radiological protection training records (e.g., Nuclear Employee Training, Advanced Radiation Worker, Radiation Protection Technician, etc.) 	Lifetime ^a
<ul style="list-style-type: none"> • Initial training and qualification records 	Lifetime ^a
<ul style="list-style-type: none"> • Requalification records (excepted licensed individuals) 	3 years
<ul style="list-style-type: none"> • Requalification records for licensed individuals 	6 years after license renewal
<ul style="list-style-type: none"> • Training materials (excluding materials associated with any radiological protection training and licensed operator training materials) 	Revision 0 - Lifetime and subsequent Revisions - 3 years
<ul style="list-style-type: none"> • Retraining , specialized training, continuing training records (except licensed individual and Radiological Protection technicians) 	3 years
<ul style="list-style-type: none"> • Contractor training (except Nuclear Employee Training, Advanced Radiation Worker, Radiation Protection Technician training and retraining etc.) 	3 years
<ul style="list-style-type: none"> • INPO Accreditation records 	Initial accreditations - Lifetime ^a and superceded material - 4 years

Table 17.2-2 (continued) RECORDS RETENTION REQUIREMENTS	
Description of Records (Operational Phase Activities)	Retention Period
<ul style="list-style-type: none">• Simulator facility records (e.g., certification and basis documents, NRC Form-474, performance test, fidelity reports, maintenance and modifications, and basis documents, etc.)	Initial accreditation records - Lifetime ^a and superceded material - 4 years after submittal of NRC Form-474

- a. Lifetime - is until the termination of the Facility Operating License, until termination of employment (training and qualification records); transfer of ownership (i.e., fuel); or service life of the facility, system, or component, as applicable.

Table 17.2-3 [DELETED]