

March 19, 2001

Mr. David A. Christian  
Senior Vice President - Nuclear  
Virginia Electric and Power Company  
5000 Dominion Blvd.  
Glen Allen, Virginia 23060-6711

SUBJECT: NORTH ANNA POWER STATION, UNITS 1 AND 2, AND SURRY POWER STATION, UNITS 1 AND 2 - APPROVAL OF PROPOSED REVISION TO THE QUALITY ASSURANCE PROGRAM DESCRIPTION REGARDING RECORDS RETENTION IN ACCORDANCE WITH 10 CFR 50.54(a) REQUIREMENTS (TAC NOS. MA8806, MA8807, MA8808, AND MA8809)

Dear Mr. Christian:

The purpose of this letter is to approve your proposed changes to your Operational Quality Assurance Program relating to records retention.

By letter dated April 5, 2000, as supplemented by letters dated September 8, 2000, and February 22, 2001, Virginia Electric and Power Company (VEPCO) submitted a proposed revision to the quality assurance (QA) program described in the Operational Quality Assurance Program, Topical Report VEP-1-5A. You proposed to reduce the commitment for the retention of QA records, in accordance with Title 10 of the *Code of Federal Regulations* (10 CFR) Section 50.54(a)(4). Separate record retention tables for Surry and North Anna are consolidated into a single table, using generic wording consistent with American National Standards Institute (ANSI) N45.2.9. Some record retention periods have been reduced, but remain consistent with ANSI N45.2.9 or applicable regulations. Record retention requirements associated with the security and emergency plans have been removed from the QA topical because they are explicitly contained in the Commission's regulations.

The enclosed Safety Evaluation documents the basis for our conclusion that the proposed change to your QA program continues to satisfy the criteria of Appendix B to 10 CFR Part 50 and is, therefore, acceptable.

D. A. Christian

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The staff has completed its evaluation of this revision; therefore, we are closing out TAC Nos. MA8806, MA8807, MA8808, and MA8809.

Sincerely,

*/RA/*

*/RA/*

Stephen R. Monarque, Project Manager  
Project Directorate II-1  
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Gordon E. Edison, Sr. Project Manager  
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Docket Nos. 50-280, 50-281, 50-338, and 50-339

Enclosure: As stated

cc w/encl: See next page

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**/RA/**

**/RA/**

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cc w/encl: See next page

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SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

PROPOSED CHANGE TO THE QUALITY ASSURANCE PROGRAM

RECORD RETENTION REQUIREMENTS FOR QUALITY ASSURANCE RECORDS

VIRGINIA ELECTRIC AND POWER COMPANY

SURRY POWER STATION 1 AND 2, AND NORTH ANNA POWER STATION 1 AND 2

DOCKET NOS. 50-280/281, 50-338/339

1.0 INTRODUCTION

By letter dated April 5, 2000 (Ref. 1), Virginia Electric and Power Company (the licensee) submitted a proposed change to the quality assurance (QA) program described in the Operational Quality Assurance Program Topical Report (QA topical) VEP-1-5A (Ref. 2), applicable to the Surry and North Anna nuclear power stations. The proposed change, submitted as a reduction in commitment in accordance with Title 10 of the *Code of Federal Regulations* (10 CFR) Section 50.54(a)(4), would revise retention periods for QA records. The change to the licensee's QA topical was revised by letter dated September 8, 2000 (Ref. 3), and February 22, 2001 (Ref. 4), in response to the staff's request for additional information.

2.0 BACKGROUND

Regulatory requirements for maintenance of records pursuant to 10 CFR Part 50 are established in 10 CFR 50.71. Subsection 50.71(c) specifies that records that are required by Part 50 regulations, by license condition, or by technical specifications, must be retained for the period specified by the appropriate regulation, license condition, or technical specification. The provisions of §50.71(d)(2) establish that if there is a conflict between the Commission's regulations in Part 50, license condition, or technical specification, or other written Commission approval or authorization pertaining to the retention period for the same type of record, the retention period specified in the Part 50 regulations shall apply, unless granted a specific exemption pursuant to the provisions of §50.12. According to §50.71(c), if a retention period is not otherwise specified, these records must be retained until the Commission terminates the facility license.

Criterion XVII, *Quality Assurance Records*, of Appendix B to 10 CFR Part 50 requires, in part, that, consistent with applicable regulatory requirements, the licensee shall establish requirements concerning record retention, such as duration, location, and assigned responsibility. American National Standard Institute (ANSI) standard N45.2.9-1974 (Ref. 5), as endorsed by Regulatory Guide (RG) 1.88, Revision 2 (Ref. 6), describes a method acceptable to the NRC staff for complying with the Commission's regulations with regard to collection, storage, and maintenance of QA records.

Some record retention requirements have been relocated from licensee technical specifications to licensee QA program descriptions, consistent with the Commission's "Final Policy Statement on Technical Specification Improvements for Nuclear Power Reactors" (Ref. 7). The provisions of §50.71(c) continue to apply to these relocated record retention requirements. With respect to the collection, storage, and maintenance of QA records, the licensee's QA program complies with ANSI N45.2.9-1974, with the clarifications and alternatives specified in Table 17.2-0 of the QA topical. Currently approved record retention requirements are documented in Table 17.2-2 for the Surry Power Station and in Table 17.2-3 for the North Anna Power Station.

Based on review of these record retention requirements, the licensee has determined that some of these record retention requirements are inconsistent with requirements that have been incorporated into 10 CFR. In addition, the licensee has determined that some record retention requirements exceed regulatory requirements and can be reduced while maintaining adequate documented evidence of the items or activities affecting quality.

Accordingly, the licensee proposes to revise the QA program description in order to clarify the record retention requirements, and to reduce or eliminate record retention requirements where appropriate. The proposed revision also consolidates the record retention requirements for Surry and North Anna.

### 3.0 EVALUATION

#### 3.1 Consolidation of Record Retention Requirements for Surry and North Anna

The QA topical currently has separate record retention tables for the Surry and North Anna nuclear power stations. These requirements were originally located in the technical specifications for these plants and subsequently relocated to the QA program. The wording in these tables for the same types of records differs due to the vintage of the technical specifications and plant licensing. In consolidating these tables, the licensee has used generic wording consistent with the guidance of ANSI N45.2.9-1974. The staff finds that the licensee's rewording of the various record types, which is necessary to consolidate the tables, is acceptable in that it does not substantively affect the types of records to be retained.

#### 3.2 Clarification of ANSI N45.2.9 Terms "QA Record" and "Lifetime"

The licensee proposes to clarify its commitment to RG 1.88 by adding the following clarifications to Table 17.2-0, which addresses the licensee's commitments to standards, requirements, and guides.

##### 3.2.1 Quality Assurance Record

ANSI N45.2.9-1974 defines "quality assurance 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 quality assurance record when the document has been completed.

With regard to the term "QA record," the licensee proposes to add the following clarification to Table 17.2-0:

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 items 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."

The proposed clarification provides specificity to the actions constituting document completion and provides for disposition of records following the required retention period. Inclusion of documents confirming regulatory compliance does not reduce the scope of records to be maintained. The staff finds the licensee's clarification consistent with ANSI N45.2.9-1974 guidance and, therefore, acceptable.

### 3.2.2 Lifetime Records

ANSI N45.2.9-1974 categorizes lifetime records as those which meet one or more of the following criteria:

1. Those which would be of significant value in demonstrating capability for safe operation.
2. Those which would be of significant value in maintaining, reworking, repairing, replacing, or modifying the item.
3. Those which would be of significant value in determining the cause of an accident or malfunction of an item.
4. Those which provide required baseline data for inservice inspection.

Lifetime QA records are required to be maintained by or for the plant owner for the life of the particular item while it is installed in the plant or stored for future use.

With regard to the term "lifetime," the licensee proposes to add the following clarification to Table 17.2-0:

Consistent with ANSI N45.2.9, Section 2.2, the definition of lifetime for record retention is as follows:

Lifetime is

- (1) until the termination of the Facility Operating License;
- (2) until termination of employment (training and qualification records);

- (3) transfer of ownership (i.e., fuel); or
- (4) service life of the facility, system, or component, as applicable.

Table 17.2-2, which consolidates the required record retention periods, was revised by letter dated September 8, 2000, to clearly indicate the specific "lifetime" criterion to be applied to each record type.

- Lifetime criterion (1) is consistent with 50.71(c) in retaining these records "until the Commission terminates the facility license." For records associated with fuel, this requirement was revised (Ref. 4) to lifetime (criterion 1) plus 3 years and clarifies the requirement in that it is specific to the operating license. When the operating license expires, the quality assurance record retention requirements for fuel will then be readdressed for the possession-only licensee.
- Lifetime criterion (2) applies only to training and qualification records. In general, initial training and qualification records for nuclear power plant personnel addressed under §50.120 are retained for the term of employment. This retention period is consistent with the guidelines of ANSI N45.2.9-1974, Appendix A.6.1 in maintaining training records of current individual plant staff members. Radiation protection training records for all employees and contractors are retained until termination of the facility operating license.

Requalification records, except for licensed individuals, are maintained for three requalification periods, which is considered sufficient to maintain program integrity and for NRC inspection to verify the adequacy of the program; requalification records for licensed individuals are maintained for 6 years from the date of requalification, which is the license renewal period and is consistent with §55.59(c)(5)(i).

Records of initial training program accreditation by the Institute of Nuclear Power Operations (INPO) and simulator facility records are retained until termination of the operating license. Superseded INPO accreditation material is retained for 4 years; superseded simulator facility records are retained for a period of 4 years. These retention periods are appropriate and acceptable.

Original training material is retained until termination of the operating license. Superseded revisions of training material for plant personnel are retained for three qualification cycles. Superseded revisions of training material for licensed operator training are retained for 6 years. Superseded revisions of radiological training material are retained until termination of the operating license.

- Lifetime criterion (3) applies only to fuel inventory transfers and assembly histories. The phrase "transfer of ownership" applies to spent fuel transferred to the Department of Energy and does not apply to the transfer of the facility license to a new owner/operator, who would be required to retain all applicable records.

- Lifetime criterion (4) is consistent with ANSI N45.2.9-1974 in retaining QA records for “the life of the particular item” and is limited to the following component-related records.
  - 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.
  - Records of inservice inspections.
  - Records of 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.

The licensee's clarification of the term “lifetime” (criterion 4) is consistent with ANSI N45.2.9-1974 guidance, which provides the latitude to retain lifetime QA records “for the life of the particular item while it is installed in the plant or stored for future use.”

In summary, the staff finds the application of the four lifetime criteria, as applied to the specific records identified in the submittal, to be acceptable in that it is consistent with the guidance of ANSI 45.2.9-1974 and in conformance with applicable regulatory requirements.

### 3.3 Nonpermanent Records

ANSI N45.2.9-1974 categorizes nonpermanent records as those which meet all of the following criteria:

1. Those of no significant value in demonstrating capability for safe operation.
2. Those of no significant value in maintaining, reworking, repairing, replacing, or modifying the item.
3. Those of no significant value in determining the cause of an accident or malfunction of an item.
4. Those which do not provide baseline data for inservice inspection.

Nonpermanent records are required to show evidence that an activity was performed in accordance with the applicable requirements but need not be retained for the life of the item.

The licensee proposes to revise the retention period for the following nonpermanent records:

- Records of radioactive material shipments – The revised retention period of 3 years after the date of shipment or receipt of material is consistent with the applicable provisions of 10 CFR Part 20 (Subpart L and Appendix G) and 10 CFR Parts 30, 40, 70, and 71.

- Records of special tests or experiments – The revised retention period of 5 years is consistent with the provisions of 10 CFR 50.59(d)(3).
- Records of changes made in procedures pursuant to 10 CFR 50.59 – The revised retention period of 5 years is consistent with the provisions of 10 CFR 50.59(d)(3) and ANSI N45.2.9-1974, Appendix A.6.1.

The proposed revisions are consistent with applicable regulatory record retention requirements and, therefore, acceptable.

### 3.4 Removal from Record Retention Requirements for Records of the Station Security and Emergency Plans and Implementing Procedures Audits

The licensee proposes to remove the subject record retention requirements from the QA topical because they are established by specific NRC regulations.

Record retention requirements for audits of the security plan and implementing procedures are established by 10 CFR 73.55(g)(4)(ii); audits of the safeguards contingency procedures and practices are established by 10 CFR 50.54(p)(4); audits of the safeguards contingency plan are established by 10 CFR 73.70, Appendix C. 10 CFR Part 73 establishes record retention requirements for security records. Record retention requirements for audits of all elements of the emergency plan are established by 10 CFR 50.54(t).

Since retention periods associated with the security and emergency plans are established explicitly by the Commission's regulations, removal of associated requirements from the QA topical is appropriate and acceptable.

## 4.0 CONCLUSION

The licensee proposes to revise and consolidate the QA record retention requirements for the Surry and North Anna Power Stations. Where consolidation requires rewording of the same record types, the licensee has adopted generic wording consistent with the guidance of ANSI N45.2.9-1974. For those instances where record retention requirements have been incorporated directly into the regulations, the QA topical has been revised accordingly. The licensee's clarifications of the terms "quality assurance record" and "lifetime" are acceptable in that they are consistent with ANSI N45.2.9-1974 guidance and applied to the specific records identified in the submittal. The consolidated record retention requirements for Surry and North Anna continue to conform to the guidelines of ANSI N45.2.9-1974 or governing regulations. The licensee's QA program description, incorporating the revised record retention requirements, will continue to satisfy the requirements of Appendix B to 10 CFR Part 50 and is, therefore, acceptable.

## 5.0 REFERENCES

1. Letter, Virginia Electric and Power Company to U.S. NRC, "Operational Quality Assurance Program, Revised Record Retention Commitment," April 5, 2000.
2. Operational Quality Assurance Program Topical Report, VEP-1-5A, Amendment Five, June 1986, (Updated March 1998).

3. Letter, Virginia Electric and Power Company to U.S. NRC, "Operational Quality Assurance Program, Revised Record Retention Commitment, Request for Additional Information," September 8, 2000.
4. Letter, Virginia Electric and Power Company to U.S. NRC, "Operational Quality Assurance Program, Revised Record Retention Commitment, Request for Additional Information," February 22, 2001.
5. ANSI N45.2.9-1974 "Requirements for Collection, Storage, and Maintenance of Quality Assurance Records for Nuclear Power Plants," June 6, 1974.
6. Regulatory Guide 1.88, Revision 2, "Collection, Storage, and Maintenance of Nuclear Power Plant Quality Assurance Records, October 1976.
7. "Final Policy Statement on Technical Specifications Improvements for Power Reactors," July 22, 1993 (58 FR 39132).

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Date: March 19, 2001