



UNITED STATES
NUCLEAR REGULATORY COMMISSION

WASHINGTON, D. C. 20555

October 20, 1988

TO: ALL LICENSEES OF OPERATING REACTORS AND HOLDERS OF CONSTRUCTION PERMITS

SUBJECT: PLANT RECORD STORAGE ON OPTICAL DISKS (GENERIC LETTER 88-18)

The NRC has been requested by two utilities and an NSSS supplier to approve the use of optical disk document imaging systems for the storage and retrieval of record copies of quality assurance records. The purpose of this generic letter is to inform addressees that the staff approves the use of this method of record keeping when appropriate quality assurance controls are applied.

Appendix B of 10 CFR 50, under criterion XVII, "Quality Assurance Records," establishes requirements for a record keeping system, and chapter 17 of the Standard Review Plan (NUREG-0800) expounds on these requirements. The purpose of the record keeping system is to ensure that records are available when needed. ANSI N45.2.9-1974, "Requirements for Collection, Storage, and Maintenance of Quality Assurance Records for Nuclear Power Plants," as endorsed by Regulatory Guide 1.88 (Rev. 2) and Basic Requirements 17, Supplement 17S-1, and Appendix 17A-1 of ANSI/ASME-NQA-1 1983 edition, "Quality Assurance Program Requirements for Nuclear Facilities," as endorsed by Regulatory Guide 1.28 (Rev. 3) both describe quality assurance controls regarding records. Appropriate quality controls for an optical disk document imaging system include the following:

- The optical disk technology does not allow deletion or modification of record images.
- The image of each record is written onto two optical disks.
- The legibility of each record image is verified to ensure that the image is legible on both disks. If the image is illegible, the hard copy record is maintained as the record copy.
- One optical disk is stored in the document imaging system for on-line retrieval.
- The second (backup) optical disk is stored in a records storage facility meeting the requirements of ANSI N45.2.9-1974 for single copy storage or in a separate remote location.
- To ensure permanent retention of records, the records stored on an optical disk are acceptably copied onto a new optical disk before the manufacturer's certified useful life of the original disk is exceeded. This includes verification of the records so copied.
- Periodic random inspections of images stored on optical disks are performed to verify that there has been no degradation of image quality.
- If the optical disk document imaging system in use is to be replaced by an incompatible new system, the records stored on the old system's disks are acceptably converted into the new system before the old system is taken out of service. This includes verification of the records so copied.

Contact: J. Spraul, Performance & Quality Evaluation Branch
(301) 492-1021

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INFULTR

Licensees using optical disks for record storage should notify the NRC in an updated FSAR per 10 CFR 50.71(e) or by letter per 10 CFR 50.4(b)7. License applicants should notify the NRC in the SAR per 10 CFR 50.34.

Sincerely,

Dennis M. Crutchfield

Dennis M. Crutchfield
Acting Associate Director for Projects
Office of Nuclear Reactor Regulation



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WASHINGTON, D. C. 20555

October 20, 1988

MEMORANDUM FOR: All Project Managers

FROM: Dennis M. Crutchfield
Acting Associate Director for Projects
Office of Nuclear Reactor Regulation

SUBJECT: GENERIC LETTER 88-18

Enclosed is Generic Letter 88-18 which provides new staff positions regarding plant record storage on optical disks. The letter indicates approval of the use of this method of record keeping when appropriate QA controls are applied, and it lists appropriate controls.

Licenses and applicants are requested to inform the NRC if they begin storing plant records on optical disks. This information will be reviewed by the staff and the acceptability of the licensee/applicant's program will be reported.

In accordance with the Jordan to Sniezek memorandum of October 14, 1988, CRGR review is not needed.

/s/GHolahan for D. Crutchfield

Dennis M. Crutchfield
Acting Associate Director for Projects
Office of Nuclear Reactor Regulation

Enclosure:
Generic Letter 88-18

Concurrence by H/S 10/20/88

(A)ADR *Smithson*
DCrutchfield
10/20/88

Contact: J. G. Spraul, PQEB, NRR
492-1021

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and approval
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10/20/88*

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Concurrence Copy
for Generic Letter
 88-18 HS 10/20/88

Please Note !!

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 JHSniezek
 09/16/88

CR6R Review
 Not Needed -
 See Back ground.*
 JGSpraul
 10/18/88

* See previous concurrence.

* Memo dated 10/14/88 from E. Jordan to J. Sniezek.

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J
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J
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9/19 #3 1:3
H for
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CHB changes as noted.

C:GCB:NRR
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