

JUL 06 1988

MEMORANDUM FOR: Guy A. Arlotto, Director
Division of Engineering
Office of Nuclear Regulatory Research

FROM: Robert E. Browning, Director
Division of High-Level Waste Management
Office of Nuclear Material Safety
and Safeguards

SUBJECT: REVIEW OF NUCLEAR CONSTRUCTION ISSUES GROUP DOCUMENT,
"GUIDELINES FOR THE CONTENT OF RECORDS TO SUPPORT
NUCLEAR POWER PLANT OPERATION, MAINTENANCE AND
MODIFICATION (NCIG-08)"

In accordance with your June 1, 1988 request, we have reviewed the Nuclear Construction Issues Group document, "Guidelines for the Content of Records to Support Nuclear Power Plant Operation, Maintenance and Modification" (NCIG-08) dated April 1988. Our comments are listed below.

1. The guidelines for record retention times in Section 3.3 of the NCIG-08 document are inconsistent with Regulatory Guide 1.28, Revision 3, position C.2 for nonpermanent records. Regulatory Guide 1.28 position C.2 states that, "Programmatic nonpermanent records should be retained for at least 3 years and product nonpermanent records should be retained for at least 10 years or the life of the item if less than 10 years". Regulatory Position C.2 further states that, "For those product nonpermanent records generated before commercial operation begins, the retention period should be considered to begin upon completion of delivery. Product and programmatic nonpermanent records should be retained at least until the date of the full-power operating license of the unit." Contrary to the Regulatory Guide position, the NCIG-08 Section 3.3 guidelines propose certain of the nonpermanent records to be retained for a 3-year period only. The 3 and 10-year cycles for record retention periods specified in Regulatory Guide 1.28 assure consistency with Table NCA-4134, 17-2 in Section III - Subsection NRC of the ASME Boiler and Pressure Vessel Code. Again, as previously stated in our earlier comments regarding record retention, the 3- and 10-year retention periods for nonpermanent records evolved from agreements between NRC, ASME and ANSI to assure consistency in the record keeping process. Until such time, the ASME or ANSI organizations approach NRC with a request to consider retention periods other than previously agreed to, the NRC position for retention of nonpermanent quality records remains as stated in Regulatory Guide 1.28, Revision 3, Position C.2.

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2. On our initial review of Revision 0 of the NCIG document, we provided the following comment:

"At this time in the licensing process, with most nuclear plants having received their operating license, extensive recordkeeping systems have been established and are in working order. We question whether industry would be willing to alter such established systems on cost/benefit basis. We also question the need for the changes called for in the EPRI/NCIG document. Based on our experience in evaluating quality assurance program descriptions in the licensing process, applicants in general, have not expressed difficulty with or taken many exceptions to the types of quality assurance records listed in Appendix A of ANSI N45.2.9 and Table 1 in Regulatory Guide 1.28. Consequently, for our regulatory analysis, we would need additional background on the need for the changes called for in the EPRI/NCIG document."

The above comment still has not been addressed and should NCIG request the NRC to endorse the NCIG-08 document, this information would have to be provided to justify this.

3. Finally, as a general comment, we still find the NCIG document difficult to use with the various tables and examples in the document. This difficulty of usage may lead to certain misunderstandings in following the NRC's regulations and guidance for recordkeeping.

Should there be any questions concerning our review, please contact Bill Belke on 492-0445.

Robert E. Browning
Robert E. Browning, Director,
Division of High-Level Waste Management
Office of Nuclear Material Safety
and Safeguards

cc: O. Rothberg, RES
O. Gormley, RES

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