Belke

COMMITTEE CORRESPONDENCE

committee: WG-DC&RM

address writer care of: Northeast Utilities P.O. Box 270 Hartford, CT 06141-0270

subject: Working Group on Document Control and Records Management

date: March 18, 1988

^{copy to:} F. W. Knight S. D. Weinman P. E. Correia

- to: Members
 - The following is the agenda for the Work Group on Document Control and Records Management. The meeting is to be held a the Orlando Marriott, Orlando, Florida, 12 Noon to 5:00 p.m. on Tuesday, April 19, 1988.

AGENDA

- 1. Approval of the San Francisco, California Meeting Minutes of October 20, 1987.
- 2. Old Business
 - a. NCIG (Nuclear Construction Issues Group)
 - (1) Presentation by Steve Skidmore on NCIG efforts.
 - (2) Review proposal by NCIG on NQA-1, Supplement 17S-1 and
 - Appendix 17A-1 changes. (Attachment No. 1).
 - (3) Review Table 1 from Regulatory Guide 1.28, Revision 3.
 - b. Review the records section of the proposed Waste Management Standard, NQA-3 (Attachment No. 2).
- 3. New Business
 - a. Consider changing the Standard for records during shipping. (Attachment No. 3).
 - b. Process Inquiry QA 88-003 (Attachment No. 4).

John A. Winr WG-DC&RM Secretary



345 East 47th Street 4040055 880318 PDR WASTE 405 DCD

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INTIN

SUPPLEMENT 175-1

SUPPLEMENTARY REQUIREMENTS FOR QUALITY ASSURANCE RECORDS

GENERAL

This Supplement provides amplified requirements for quality assurance records. It supplements the requirements of Basic Requirement 17 of this Standard and shall be used in conjunction with that Basic Requirement when and to the extent specified by the organization invoking this Standard.

The requirements of this Supplement apply toquality assurance records which have been completed.

The term records, used throughout this Supplement, is to be interpreted as Quality Assurance Records.



2.1 Records System

A records system(s) shall be established by the organization responsible at the earliest practicable time consistent with the schedule for accomplishing work activities and in compliance with the general requirements of this Supplement. The records system(s) shall be defined, implemented, and enforced in accordance with written procedures, instructions, or other documentation.

2.2 Generation of Records-

The applicable design specifications, procurement documents, test procedures, operational procedures, or other documents shall specify the <u>data</u> records to be generated, supplied, or maintained by or for the Owner. Documents that are designed which contain the specified data nated to become records shall be legible, accurate, and completed appropriate to the work accomplished.

2.3 Record Validation-

Documents shall be considered valid-records complete records only if they contain the speonly if stamped, initialed, or signed and dated by authorized personnel or otherwise authenticated. This authentication may take the form of a statement by the responsible individual or organization. Handwritten signatures are not required if the document is clearly identified as a statement by the reporting individual or organization. These records ords may be originals or reproduced copies.

-Retention of Data

-Record Completion



the retention of data. Data is contained in quality

Quality assurance records contain essential data or data serving to support the validity of the essential data. The records shall be indexed. The indexing system(s) shall include, as a minimum, record retention times and the location of the record within the record system.

2.5 Distribution

The records shall be distributed, handled, and controlled in accordance with written procedures.

2.6 Identification

Records and/or indexing system(s) shall provide sufficient information to permit identification between the record and the item(s) or activity(ies) to which it applies.

2.7 Classification

Records shall be classified as Lifetime or Non-	
permanent by the Owner, or his agent when au-	retained on a
thorized, in accordance with the criteria given in	
paras, 2.7.1 and 2.7.2 below.	

2.7.1 Lifetime Records. Lifetime records are those that meet one or more of the following criteria:

(a) -those which would be of significant value in demonstrating capability for safe operation;

(b) those which would be of significant value in

maintaining, reworking, repairing, replacing, or modifying an item;

(c) those which would be of significant value in determining the cause of an accident or malfunction of an item;

(d) those which provide required baseline data for in-service inspections.

Lifetime 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: 2.7.1 Lifetime Retention of Data. Data designated as essential data shall be maintained by of for the plant Owner for the life of the particular item while it is installed in the plant or stored for future use.

<u>Essential data</u> is the technical data resulting from activities of:

- Design;
- Procurement;
- Manufacturing;
- Installation construction;
- Pre-operational and start-up testing; and
- Operation
- That which would be of significant value in maintaining, reworking, repairing, replacing, or modifying an item;
- that which would be of significant value in determining the cause of an accident or malfunction of an item;
- o that which would provide required baseline data for inservice inspections.

Lifetime of an item will depend on the function or purpose of the item in question and can be one of the following:

(a) Period of time the item is either installed in the plant or stored for future use (e.g., pump or motor);

(b) Period of time of a physical configuration(i.e., how the item is insalled);

(c) Time frame associated with a specific system functional configuration (e.g., core fuel

2.7.2 Nonpermanent Records. Nonpermanentrecords are those 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 because they do not meetthe criteria for intetime records.

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2.8 Retention of Records-

Records shall be retained in accordance with the above classifications. The retention period for non-permanent records shall be established in writing.

2.9 Corrected Information in Records

Records may be corrected in accordance with procedures which provide for appropriate review or approval by the originating organization. The correction shall include the date and the identification of the person authorized to issue such correction.

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3 RECEIPT

3.1 Responsibility

The individual or organization responsible for receiving records shall provide protection from damage or loss during the time that the records are in their possession.

3.2 Receipt Control

Each organization responsible for the receipt of records shall designate a person or organization responsible for receiving the records. The designee shall be responsible for organizing and implementing a system of receipt control of records for permanent and temporary storage.

As a minimum, a receipt control system shall include the following:

 (a) a method for designating the required records;

(b) a method for identifying records received;

(c) procedures for receipt and inspection of incoming records;

(d) a method for submittal of completed records to the storage facility without unnecessary delay.

3.3 Status

Each receipt control system shall be structured to permit a current and accurate assessment of the status of records during the receiving process. -Retention of Data. Data designated to be maintained on a nenpermanent basis

—contain technical data considered to be essential data.

-This data is retained in nonpermanent records for a minimum of one (1) year and at least one (1) year after a full power operating license is obtained or commercial operation is achieved.

Retention of Data

Data shall be retained in records

data

-2.10 Permissible Actions when Specified Technical Data is not Available

Technical data which is not available from the source specified by the Owner may be reestablished from acceptable alternative sources in accordance with permissible methods which are acceptable to the Owner, or his agent when authorized.

STORAGE, PRESERVATION, AND -SAFEKEEPING

4.1 Storage

The records shall be stored in predetermined location(s) that meet the requirements of applicable standards, codes, and regulatory agencies.

Prior to storage of records, a written storage procedure shall be prepared and responsibility assigned for enforcing the requirements of that procedure. This procedure shall include, as a minimum, (a) through (g) below:

(a) a description of the storage facility;

(b) the filing system to be used;

(c) a method for verifying that the records received are in agreement with the transmittal docspecified data ument and that the records are legible;

(d) a method of verifying that the records are those designated (see para. 3.2 above);

(e) the rules governing access to and control of the files:

(f) a method for maintaining control of and accountability for records removed from the storage facility:

(g) a method for filing supplemental information (see para. 2.9 above) and disposing of superseded records.

4.2 Preservation

Records shall be stored in a manner approved by the organization or organizations responsible for storage. In order to preclude deterioration of the records, the requirements of (a) through (c) below shall apply.

(a) Provisions shall be made in the storage arrangement to prevent damage from moisture, temperature, and pressure.

(b) Records shall be tirmly attached in binders or placed in folders or envelopes for storage in steel file cabinets or on shelving in containers.

(c) Provisions shall be made for special processed records (such as radiographs, photographs, negatives, microform, and magnetic media) to prevent damage from excessive light, stacking, electromagnetic fields, temperature, and humidity.

4.3 Safekeeping

Measures shall be established to preciude the entry of unauthorized personnel into the storage area. These measures shafi guard against larceny and vandalism.

Measures shall be taken to provide for replace--records containing essential data ment, restoration, or substitution of lost or damaged records.-

should

in which the essential data can not be determined (reference 2.10).

4.4.1 Essential Data Facilities Records shall be stored in facilities constructed

-4.4.1.1

and maintained in a manner which minimizes the risk of damage or destruction from the following. (a) natural disasters such as winds, floods, or fires:

(b) environmental conditions such as high and low temperatures and humidity;

(c) infestation of insects, mold, or rodents,

There are two satisfactory methods of providing storage facilities, single or dual.

4:4:1 Single Facility. Design and construction of a single record storage facility shall meet the criteria of (a) through (i) below:

(a) reinforced concrete, concrete block, masonry, or equal construction;

(b) floor and roof with drainage control. If a floor drain is provided, a check valve (or equal) shall be included.

(c) doors, structure and frames, and hardware shall be designed to comply with the requirements of a minimum 2 hr fire rating;

(d) sealant applied over walls as a moisture or condensation barrier:

(e) surface sealant on floor providing a hard wear surface to minimize concrete dusting;

(f) foundation sealant and provisions for drainage;

(g) forced air circulation with filter system;

(h) fire protection system;

(i) only those penetrations used exclusively for fire protection, communication, lighting, or temperature/humidity control are allowed; all such penetrations shall be sealed or dampered to comply with the minimum 2 hr fire protection rating.

The construction details shall be reviewed for adequacy of protection of contents by a person who is competent in the technical field of fire protection and fire extinguishing.

If the facility is located within a building or structure, the environment and construction of that building can provide a portion or all of these criteria.

4:4:2'Alternate Single Facilities. The following are acceptable alternatives to the criteria of para. 4.4.1 above for a single facility:

(a) 2 hr fire rated vault meeting NFPA 232-1975;¹

(b) 2 hr fire rated Class B file containers meeting the requirements of NFPA 232-1975;1 or

(c) 2 hr fire rated file room meeting the requirements of NFPA 232-19751 with the following additional provisions:

containing essential data

4.4.1.2

NFPA 232-1975 is contained in Volume 9 of the National Fire Codes published by the National Fire Protection Association, 470 Atlantic Avenue, Boston, MA 02210.

(7) early warning fire detection and automatic fire suppression capability with electronic supervision at a constantly attended central station;

(2) records storage in tully enclosed metal cabinets;

(3) adequate access and aisle ways:

(4) prohibition in the room of work not directly associated with record storage or retrieval:

(5) prohibition in the room of smoking, eating, or drinking;

(6) 2 hr fire rated dampers or doors in all boundary penetrations.

4.4.1.3 4.4.3 Dual Facilities. If storage at dual facilities for each record is provided, the facilities shall be at locations sufficiently remote from each other to eliminate the chance of exposure to a simultaneous hazard. Each facility is not required to satisfy the requirements of either para. 4.4.1 or para. 4.4.2 above, but shall meet the other requirements of this Standard. 4.4.2

5 RETRIEVAL

Storage systems shall provide for retrieval of in---formation in accordance with planned retrieval times based upon the record type.

A list shall be maintained designating those personnel who shall have access to the files.

Records maintained by a Supplier at his facility or other location shall be accessible to the Purchaser or his designated alternate, e.g., the Owner.

6 **DISPOSITION**

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Records accumulated at various locations, prior to transfer, shall be made accessible to the Owner directly or through the procuring organization. The custodian shall inventory the submittals, acknowledge receipt, and process these records in accordance with this Standard.

Various regulatory agencies have requirements concerning records that are within the scope of this Standard. The most stringent requirements shall be used in determining the final disposition.

The Supplier's nonpermanent records shall not be disposed of until the applicable conditions listed in (a) through (c) below are satisfied:

(a) items are released for shipment, a Code Data Report is signed, or a Code Symbol Stamp is affixed;

- (b) regulatory requirements are satisfied;
- (c) operational status permits;
- (d) warranty consideration-is satisfied;
- (e) Purchaser's requirements are satisfied.

-4.4.2 Nonpermanent Data Facilities

Records containing nonpermanent data shall be in metal file storage within a fire controlled area.

data

(d)

---Commercial requirements between the purchaser and the supplier (i.e., warranty) are outside the scope of this standard.

APPENDIX 174-1 NONMANDATORY GUIDANCE ON QUALITY ASSURANCE RECORDS

1 GENERAL

This Appendix provides nonmandatory guidance on records as specified in Basic Requirements 17 and Supplement 175-1.

1.1 Records System

A procedure describing the records system(s) should include control of records withdrawn from storage which may be required during the completion of work activity.

1.2 Generation of Records

Documents which may later become records should be maintained and processed in a prudent manner to avoid unnecessary delay and/or expense when the record is needed.

2 LOST OR DAMAGED RECORDS

If replacement or restoration of lost or damaged records is not practical, action should be taken to assure the quality of items or activities affecting quality, e.g., reexamination or investigation by al------alternative ternate means.

The following is a list of typical lifetime records, that may contain essential data. The nomenclature of these may vary. <u>Records not</u> identified on this list are nonpermanent.

3:1-Design-Records

Applicable codes and standards used in design

Design-drawings

Design-calculations and record of checks-

Approved design-change-requests

Design-deviations

Design-reports

Design-verification-data-

Design-specifications and amendments

Safety analysis report

Stress reports for code items-

Systems-descriptions

Systems process and instrumentation diagrams

Technical analysis, evaluations, and reports

Essential Data associated with each record type

is identified below the applicable record title.

3.2 Procurement Records

Procurement specification Purchaser order (unpriced) including amendments

3.3 Manufacturing Records

Applicable codè data reports As-built drawings and records Certificate of compliance Eddy current examination final results Electrical control verification test results Ferrite test results Heat treatment records Liquid penetrant examination final results Location of weld filler material. Magnetic particle examination final results Major defect repair records Material properties records Nonconformance reports Performance test procedure and results records Pipe and fitting location report Pressure test results (hydrostatic or pneumatic) Radiograph review records Ultrasonic examination final results Welding procedures

3.4 Installation Construction Records

3.4.1 Receiving and Storage — Nonconformance/ reports

3.4.2 Civil

Check-off sheets for tendon installation Concrete cylinder test reports and charts Concrete design mix reports Concrete placement records Inspection reports for channel pressure tests Material property reports on containment liner and

- accessories Material property reports on metal containment shell and accessories
- Material property reports on reinforcing steel
- Material property reports on reinforcing steel splice sleeve material
- Material property repórts on steel embedments in concrete
- Material property reports on structural steel and bolting
- Material property reports on tendon fabrication material /
- Pile drive lóg
- Pile loading test reports
- Procedure for containment vessel pressure proof test and leak rate tests and results Reports for periodic tendon inspection Réports of high strength bolt torque testing
- , Soil compaction test reports

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- 3.4.3 Welding Ferrite test results Heat treatment records Liquid benetrant test final results Material property records Magnetic particle test final results Major weid repair procedures and results Radiograph review records Ultrasonic test final results Weld location diagrams Weld procedures
- 3.4.4 Mechanical Cleaning procedures and results Code data reports Installed lifting and handling equipment procedures, inspection, and test data Lubrication procedures Material properties records Pipe and fitting location reports Pipe hanger and restraint data Pressure test results (hydrostatic or pneumatic) Safety valve response test procedures

3.4.5 Electrical and 1 & C Cable pulling tension data Cable separation data Cable splicing procedures Cable terminating procedures Certified cable test reports Relay test procedures Voltage breakdown test results on liquid insulation

3.4.6 General As-built drawings and records Final inspection reports and releases Nonconformance reports Specifications and drawings

3.5 Pre-Operational and Start-Up Test Records

Automatic emergency power source transfer procedures and results

- Final system adjustment data
- Pressure test results (hydrostatic or pneumatic)
- Initial heatup, hot functional, and cooldown procedures and results
- Initial plant loading data
- Initial reactor criticality test procedures and results
- Instrument AC system and inverter test procedures and reports
- Main and auxiliary power transformer test procedures and results
- Off-site power source energizing procedures and test reports
- On-site emergency power source energizing procedures and test reports
- Plant load ramp change data
- Plant load step change data

Power transmission substation test procedures and results

Pre-operational test procedures and results

Primary and secondary auxiliary power test procedures and results

Reactor protection system tests and results. Start-up logs

Start-up test procedures and results

Station battery and DC power distribution test procedures and reports

Water chemistry report

3.6 Operation Records

- Records and drawing changes identifying facility design modifications made to systems and equipment described in the Final Safety Analysis Report
- New and irradiated fuel inventory, fuel transfers, and assembly fuel-depletion history records

Off-site environmental monitoring survey records Spent fuel shipment records

Facility radiation and contamination survey results Radiation exposure records for individuals entering radiation control areas

Records of gaseous and liquid radioactive material released to the environs

Records of transient or operational cycles for those facility components designed for a limited number of transients or cycles

Training and qualification records for current members of the plant operating staff In-service inspection records

 Records of reviews performed for changes made to procedures or equipment, or reviews of tests and experiments

Meeting minutes of the plant nuclear safety committee and company nuclear review board

Surveillance activities, inspections, and calibrations required by the technical specifications records

Records of reactor tests and experiments Changes made to operating procedures Low level radioactive waste shipments records Sealed source leak test results

Records of annual physical inventory of all sealed source material

Logs of facility operation covering time interval at each power level

- Records and logs of maintenance activities, inspections, repair, and replacement of principal items of structures, systems, and components Water chemistry reports
- Operational, shift supervisor, and control room logs
- Licensee event reports

Fire protection records

Nonconformance reports

Plant equipment operations instructions

Security plan and procedures ?

- Emergency plan and procedures
- Quality Assurance and Quality Control Manuals
- Records of activities required by the security plan and procedures
- Records of activities required by the emergency plan and procedures
- Applicable records noted in other sections of this Appendix for any modifications or new construction applicable to structures, systems, or components
- Evaluation of results of reportable safety concerns as required by regulations

Annual environmental operating report Agnual plant operating report

Records to support licensing conditions such as safeguards and special nuclear material accountability

ATTACH MENT No. 2

(4) Assess and document impact on completed work.

16.3 RECURRING QUALITY PROBLEMS

For recurring quality problems where corrective actions have not been effective, management, as needed, shall:

(a) Determine the events leading to the quality problem's occurrence;

(b) Develop an understanding of the technical and work activities associated with the quality problem;

(c) Ascertain the quality problem's generic implications;

(d) Determine the extent to which similar quality problems, or precursors to the problem, have been recognized by the responsible organization, the effectiveness of any corrective actions that were taken, and recognition of any generic implications and impacts on completed work;

(e) Consider stopping work associated with the applicable activity; and

(f) Recommend remedial actions that can be taken by the responsible organization to preclude recurrence.

17 QUALITY ASSURANCE RECORDS

The provisions of NQA-1 Basic Requirement 17 and Supplement 17S-1 shall apply, with the following additions, modifications, and amplifications.

17.1 SAMPLES

For a nuclear waste repository, QA records include geotechnical samples, or other materials that support data.

17.2 REFERENCE RECORDS

Documents and samples referenced by final reports, except readily available references such as encyclopedias, dictionaries, engineers handbook, national codes and standards, etc., shall be retrievable from the QA records system.

17.3 CLASSIFICATION OF RECORDS

In lieu of classifying QA records as defined in Supplement 17S-1 Paragraph 2.7, QA records for nuclear waste repositories shall be classified as Post-Closure, Lifetime, or Nonpermanent in accordance with the criteria specified below.

(a) <u>Post-Closure QA Records</u> are those records that would likely be consulted by potential human intruders to identify the location of the geologic repository operations area, including the

underground facility, boreholes and shafts, boundaries of controlled area, and the nature and hazard of the waste.

Post-closure records are required to be retained for 300-1,000 years depending on the lifetime of the specific waste package(s) to be used in the repository at the selected site(s).

(b) <u>Lifetime QA Records</u> are those that meet one or more of the following criteria:

- Records which may be used for repository licensing.
- (2) Records used in support of site selection, site nomination, site characterization, and repository location recommendations.
- (3) Records used to identify and assess the performance capabilities of those engineered and natural barriers important to waste isolation.
- (4) Records of computer programs and mathematical models needed to perform ongoing correlations between performance assessment predictions and actual test results and data collection and analysis.
- (5) Records which would be of significant value in demonstrating capability for safe operation or in determining the cause of an

accident or malfunction of an item in a repository.

- (6) Records which would be of significant value in maintaining, reworking, repairing, replacing, or modifying repository systems, components, or structures.
- (7) Records which would be of significant value in exercising the retrieval option for the waste package.
- (8) Records which would be of significant value after decommissioning and closure of a repository.

Lifetime QA records are required to be retained and preserved in an acceptable condition for the operating life of the repository, i.e., until termination of the repository license.

(c) <u>Nonpermanent QA Records</u> are those QA records that do not qualify as postclosure or lifetime records. For a nuclear waste repository, nonpermanent records shall be retained for at least 3 years after initiation of repository operation or until the sites to which they relate are no longer under consideration as a repository site.

APPENDIX 17AW-1 NONMANDATORY GUIDANCE ON QUALITY ASSURANCE RECORDS

1 GENERAL

This Appendix provides listings which identify typical Post-Closure, Lifetime, and Nonpermanent QA Records required for the collection of scientific and technical information during the site characterization phase of nuclear waste repositories.

2 TYPICAL POST-CLOSURE QA RECORDS Maps which identify site boundaries Drawings of site marker locations Underground facility configuration drawings

> Other records having long term archival and historical interest Groundwater and hydrologic regime maps and data (including analysis results)

> Hydrogeologic test results and data Isopach maps and supporting data Logs, maps, and geophysical data in support of subsurface correlation

3 TYPICAL LIFETIME QA RECORDS

3.1 <u>Siting and Site Characterization</u> <u>QA Records</u>

> Drill hole testing procedures Drill hole drilling procedures

Drill hole location surveys or maps Drill hole logs and core samples Drill hole test results (including evaluations and interpretations) Geophysical logs and data Geophysical test results Self-potential (electrical) logs

and data

Caliper logs and data Radioactivity logs and data (gamma, spectral-gamma, neutrongamma, alpha) Lithologic logs and data Seismic and resistivity survey procedures Seismic and resistivity location surveys and location maps Seismic and resistivity logs and data Seismic and resistivity test results (including evaluations) Laboratory analytical procedures Laboratory calibration procedures Laboratory testing procedures Laboratory record books Laboratory testing data and data processing Geologic maps and supporting data

Geologic library samples Geologic and soil sampling procedures Geologic test results Trench logs and data (including location surveys, maps, and results) Aerial mapping records (photographs and interpreted overlays) Microseismic records (paper or magnetic tape) Remote imagery reports and results Seismicity maps and supporting data Fault maps and supporting data Epicenter maps and supporting data Model definition and development reports Model acceptance criteria reports Model verification reports Model exercise reports and results Hydrogeologic test procedures Atmospheric test procedures Atmospheric test results and data Site characterization plan and all reference documents Site characteristic reports and all reference documents Test deviation records Unusual occurrence reports

Unusual occurrence reports Environmental test results Instrumentation installation and calibration records

Validated environmental data

3.2 DESIGN RECORDS

Graded QA methodology records Peer review reports and comment resolution

Technical computer codes and model photographs of systems, components, and structures

Qualification of existing data reports

4 TYPICAL NONPERMANENT RECORDS QA Program Manual/Plans QA Administrative Procedures Technical Procedures (other than those identified as Lifetime) Calibration Records (until Recalibrated) Audit and Surveillance Records Readiness Review Records Management Assessment Reports Task Plans

5 RECLASSIFICATION OF QA RECORDS

QA Records initially identified as lifetime or nonpermanent, and still available, may at any time be reclassified as Lifetime or Post-Closure, as appropriate.

ATTACHMENT No. 3

For al Mackinney From Mach Penanich The following recommendations are from 16 Comanche Peak Report Renuer Group (NRC Managers) and relate to the area of flast records. Swould like to discuss them with you to find out what a chim, yang, las been taken by your recards 116 te movide further quidance relative to the issues raised as a result of the CPRRG Report. The NRC flanned actim is also indicated. I ue den't lave tome to discuss after the MC meeting, I will be back in mig office ne New. 3, 1587 (301-492-8085) or fran Call you.

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04 (Stello memo)

Recommendation

ANSI N45.2.9 is silent on shipping, records. A definitive and documented regulatory position does not exist on controls during transfer between organizations.

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Planned Action

NRR will develop a regulatory position on this matter for incorporation as guidance in IMC 9900. If necessary, NRR will recommend that RES work with the committee responsible for ANSI N45.2.9 to make any needed changes in the standard.

Recommendation

in some cales

Consideration should be given to the TR1 position that "permanent" records removed from storage for use or revision revert to an "in-process" status, which do not require application of the full ANSI N45.2.9 provisions.

Planned Action

NRR will evaluate adopting the TRT position and determine whether a change to the current regulatory position should be made.

trachment No. 4



The American Society of Mechanical Engineers

345 East 47th Street New York: NY 10017

Codes and Standards

Huciear 212-705-7801

March 11, 1988

Ford W. Knight Westinghouse Electric Corp. Waste Technology Serv. Div. P. O. Box 286 Madison, PA 15663-0286

Subject: ANSI/ASME NQA-1-1986 Edition with the la-1986 Addenda, 175-1, Para. 2.3; Record Validation NQA Inquiry # QA88-003

Dear Ford:

Please have the Subcommittee on Programmatic Activities (Working Group on Document Control and Records Management) consider the attached inquiry.

The approved question/reply, along with the date and recorded vote of the Subcommittee action should be returned to me.

Yours truly,

Steve Weinman

Steve Weinman, Secretary on Nuclear Quality Assurance Committee (212) 705-7025

SW/ak

cc: MC & ExC Officers D.B. Haynes A.L. MacKinney R.B. Wallace J.A. Winn

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RECII): QA88-003 SRCH ID	:	DATE :	03/10/88	TIME:	11:22:00	F'AGE :	1
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ra. 2	Subject: ANSIZASME N 2.3; Record Validation	QA-1-1986	Editi	on with th	e 1a-198	86 Addenda,	178-1,	Pa
Und th	Committee: F01054000 Special Committee/Sub We Working Group on Doc	0 committee ument Con	: Sub trola	committee nd Records	on Frogr Managee	ammatic Ac	tivitie	5 ä

Special Notes/Interp. 4: ___

No. 01

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RECID:	QA88-003	SRCH	TD:	DATE :	03/10/88	TIME:	11:22:00	PAGE :	2

(Q1) Question: Do the options stated in ANSI/ASME NQA-1, 175-1, para. 2.3 for record validation, eliminate the need to stamp, initial or sign records such as inspection reports, assuming the reports are identified to the reporting in dividual or organization?

(R1) Reply: To be formulated.

(02) _

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(82) _

DIPOND Better Things for Better Living

E. I. DU PONT DE NEMOURS & COMPANY

SAVANNAH RIVER PLANT P O BOX 117 AUGUSTA. GEORGIA 30913-2399

ENGINEERING DEPARTMENT

February 8, 1988

Secretary ASME Nuclear Quality Assurance Committee Nuclear Department 345 East 47th Street New York, New York 10017

Dear Sir:

ENGINEERING DEPARTMENT - ATOMIC ENERGY DIVISION - SAVANNAH RIVER PLANT

This inquiry is directed to:

- o ANSI/ASME NQA-1-1986 Edition with 1a Addenda.
- o Supplement 17S-1.
- o Paragraph 2.3 titled "Record Validation".

This inquiry is submitted to obtain an interpretation that defines the limits, if any, of the requirements stated in Paragraph 2.3.

Paragraph 2.3 states in part that records are valid only if stamped, initialed or signed, or "otherwise" authenticated. Authentication may take the form of a statement by the individual or organization. Handwritten signatures are not required if the document is identified as a statement by the reporting individual or organization.

Question: Do the options stated in this paragraph eliminate the need to stamp, initial or sign records such as inspection reports, assuming the reports are identified to the reporting individual or organization?

This inquirer interprets the words of paragraph 2.3 literally; i.e., records are not required to be stamped, initialed, or signed by the individual responsible for the report when the document is identified to the responsible organization.

2 February 8, 1988 ASME Nuclear Quality Assurance Committee

Discussion:

Exhibit 1, is a simulated inspection report issued by "ABC Inc.". The simulated procedure that requires the form to be initiated does not require the inspector to stamp, sign or initial the form. The form does not provide for the entry of an inspector's stamp, signature or initials. Is this considered to be a valid record that provides objective evidence to the quality of an item or activity?

If additional information or discussion is needed concerning this matter, please contact Jerry Padula at (803) 557-5535.

ATOMIC ENERGY DIVISION

Everett K. Wingate, ' Jr. 4

Quality Assurance Supervisor

EKW:lw Atch

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ABC, INC.	GENERAL INSPECTION F	EPORT	Page 1 of 1 Date 1-11-8
ITEM/ACTIVITY: ELE	CTRICAL GROUND TEST OF 480 V	OLT. 3 PHASE SYSTEM. S	
TC-1501-A. PROJECT	1780		
TYPE OF INSPECTION:	(Surveillance, Witness, Tes	t, Exam, etc.) <u>MEGGE</u>	<u>R</u>
DRAWING NUMBER(s):WS-14635_Rev.	_6	
LOCATION: <u>"S" AREA, E</u>	UILDING "H", LEVEL 1, ROOM 1	05 THROUGH 116	
PROCEDURE/INSTRUC	TION USED:QCI 25-2 F	REV. 2.a	
MEASURING AND TEST	EQUIPMENT: BIDDLE ME	GGER TESTER. CDS 147	/3
ACCEPTANCE CRITER	IA:MIN. 100 MEGOHI	MS	
	N/A		
INSPECTION RESULTS:	ACCEPT _X_		
	REJECT		
DR NUMBER, ACCEPT	ABLE REINSPECTION:	<u>N/A</u>	
		E. K. Wing Dated 2/8/ EXHIBIT 1	ate, Jr. Letter 88

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