



**UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, DC 20555 - 0001**

March 5, 2004

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**SUBJECT: USE OF ELECTRONIC SIGNATURES IN QUALITY ASSURANCE PROGRAM RECORDS**

Dear Mr. Mindel:

Thank you for your e-mail of February 4, 2004, which requested clarification of the requirements governing the use of electronic signatures in quality-related documents. Specifically, you questioned if the use of an electronic signature on a supplier certificate of conformance met the requirements of 10 CFR Part 50, Appendix B, "Quality Assurance Criteria for Nuclear Power Plants and Fuel Reprocessing Plants," and applicable Regulatory Guides. The following response is intended to address your question concerning the use of electronic signatures within the context of quality assurance (QA) program activities governed by the requirements of Appendix B to 10 CFR Part 50.

For nuclear power plants, Criterion VI, "Document Control," and Criterion XVII, "Quality Assurance Records," of Appendix B, to 10 CFR Part 50, establish requirements for issuing, identifying, and retrieving QA records. Additionally, Criterion VII, "Control of Purchased Material, Equipment, and Services," of Appendix B requires that documentary evidence that material and equipment conform to procurement requirements be available at the nuclear power plant site prior to installation or use of such material and equipment.

Although NRC regulations address documentation control, the requirements of 10 CFR Part 50, Appendix B do not prescribe specific methods for approving and authenticating quality-related documents. However, Regulatory Guide (RG) 1.28, "Quality Assurance Program Requirements (Design and Construction)," endorses, with certain exceptions, the methods described in ANSI/ASME NQA-1-1983, "Quality Assurance Program for Nuclear Facilities," as an acceptable basis for complying with the quality assurance program requirements of 10 CFR Part 50, Appendix B. ANSI/ASME NQA-1-1983 defines a certificate of conformance as a document signed by an authorized individual certifying the degree to which items or services meet specified requirements. With regard to endorsement of a certificate of conformance, ANSI/ASME NQA-1-1983, Section 8.2.1, "Certificate of Conformance," states that the certificate shall be attested to by a person who is responsible for the quality assurance function and that means shall be provided to verify the validity of supplier certificates. The operational QA program guidance included in ANSI N18.7-1976/ANS 3.2, "Administrative Controls and Quality Assurance for the Operational Phase of Nuclear Power Plants," which has been endorsed, with certain exceptions, by RG 1.33, "Quality Assurance Program Requirements (Operation)," contains similar provisions for supplier certificates of conformance.

Provided that an organization subject to Appendix B QA requirements establishes adequate measures to maintain the integrity and validity of quality records, NRC regulations and associated regulatory guidance do not prohibit the use of electronic signatures. However, the measures established to control the use of electronic signatures should be capable of preventing falsification or alteration of electronic records and provide a means to authenticate electronic signatures. Regulatory Information Summary (RIS) 2000-018, "Guidance on Managing Quality Assurance Records in Electronic Media," dated October 23, 2000, provides guidance on managing QA records in electronic media. In particular, RIS 2000-18 provides a list of guidance documents related to establishing an electronic recordkeeping system to maintain the integrity, authenticity, and acceptability of QA records during their required retention period in accordance with the requirements of Appendix B to 10 CFR Part 50. I have enclosed a copy of RIS 2000-18 for your convenience.

Additionally, the NRC recently promulgated a notice of final rulemaking for the electronic maintenance and submission of information to the NRC (Federal Register - October 10, 2003, Volume 68, pages 58791-58835). Appendix A, "United States Nuclear Regulatory Commission (NRC) Guidance for Electronic Submissions to the Commission," to this rulemaking notice provides a description of the methods the NRC uses to verify the authenticity of an electronic signature. Additional information can be found at the NRC's electronic information exchange website (<http://www.nrc.gov/site-help/eie.html>).

In accordance with 10 CFR 2.790 of the NRC's "Rules of Practice," a copy of this letter will be made available electronically for public inspection in the NRC Public Document Room or from the NRC's document system (ADAMS), accessible from the NRC Web site at <http://www.nrc.gov/reading-rm/adams.html>.

Please do not hesitate to contact Mr. Kevin Coyne of my staff at (301) 415-1399 if you have additional questions.

Sincerely,

**/RA/**

Theodore R. Quay, Chief  
Emergency Preparedness & Plant Support Branch  
Division of Inspection Program Management  
Office of Nuclear Reactor Regulation

Enclosure: As stated

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