



Tennessee Valley Authority, 1101 Market Street, Chattanooga, Tennessee 37402-2801

October 23, 1997

U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, D.C. 20555

Gentlemen:

In the Matter of)	Docket Nos.	50-259	50-327
Tennessee Valley Authority)		50-260	50-328
			50-296	50-438
			50-390	50-439
			50-391	

BROWNS FERRY NUCLEAR PLANT (BFN) UNITS 1, 2, AND 3, SEQUOYAH NUCLEAR PLANT (SQN) UNITS 1 AND 2, WATTS BAR NUCLEAR PLANT (WBN) UNITS 1 AND 2, AND BELLEFONTE NUCLEAR PLANT (BLN) UNITS 1 AND 2 - RESPONSE TO GENERIC LETTER (GL) 88-18, "PLANT RECORD STORAGE ON OPTICAL DISKS," DATED OCTOBER 20, 1988

On October 20, 1988, NRC issued GL 88-18. The GL approved the use of optical disk document imaging systems for the storage and retrieval of record copies of quality assurance records. The GL also stated that licensees who plan to use optical disks for record storage should notify NRC.

The purpose of this letter is to notify NRC that TVA intends to use optical disks for the storage and retrieval of quality assurance records for BFN, SQN, WBN, and BLN. Per conversation with the author of this GL on October 1, 1997, notification by letter of TVA's intent to use the optical disk methodology is acceptable. Specific details of this project for meeting the quality controls specified in the GL are provided in the enclosure. The project will install and test the optical disks system software and hardware, and through procedural controls, allow transition from the present microfilm record storage system to manageable and uneditable electronic files stored on optical disks.

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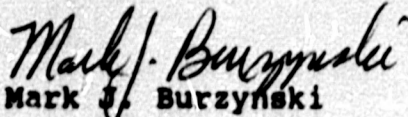
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If you have questions regarding this response, please contact Terry Knuettel at (423) 751-6673.

Sincerely,



Mark J. Burzynski
Manager
Nuclear Licensing

Enclosure

cc (Enclosure):

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cc: Continued on page 3

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**NRC Resident Inspector
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ENCLOSURE

**BROWNS FERRY NUCLEAR PLANT (BFN) UNITS 1, 2, AND 3, SEQUOYAH
NUCLEAR PLANT (SQN) UNITS 1 AND 2, WATTS BAR NUCLEAR PLANT
(WBN) UNITS 1 AND 2, AND BELLEFONTE NUCLEAR PLANT (BLN)
UNITS 1 AND 2**

**GENERIC LETTER (GL) 88-18, "PLANT RECORD STORAGE
ON OPTICAL DISKS," DATED OCTOBER 20, 1988**

Tennessee Valley Authority (TVA) currently utilizes the Saros Mezzanine Enterprise Library System and Saros Document Manager (SDM) user environment as the Electronic Document Management System (EDMS) foundation. However, it is TVA's understanding that the information industry may provide storage technologies other than Write Once, Read Many optical disks which may be more suitable for storing electronic records. It is TVA's intent to migrate to these technologies when cost effective, if the new technology meets the same general principles required by NRC GL 88-18.

The following is TVA's plan for addressing the controls specified in GL 88-18:

1. The optical disk technology does not allow deletion or modification of record images.
 - EDMS will use Write Once, Read Many optical disk technology which does not allow deletion or modification of electronic records once they are written to optical disk.
2. The image of each record is written onto two optical disks.
 - Each electronic record will be automatically stored and replicated on duplicate storage facilities that comply with applicable regulatory requirements.
3. 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.
 - Scanned electronic records will be verified for legibility. Illegible scanned records will be re-scanned. In the event that images are not verifiable, they will be indexed in EDMS, but maintained in hard copy storage. The system will perform internal checks to ensure that the verified electronic records are correctly stored and replicated.

4. One optical disk is stored in the document imaging system for online retrieval.
 - The optical disk maintained in the primary storage facility will be the primary source for online record retrieval. If the primary storage facility is unavailable, retrieval will be from the secondary online facility.
5. 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.
 - The secondary record storage facility will be located in a separate, remote location from the primary storage facility. The storage facilities meet the applicable regulatory requirements as described in the TVA Nuclear Quality Assurance Plan (TVA-NQA-PLN89-A).
6. 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.
 - Electronic files will be copied to and electronically verified on new optical disks prior to the expiration of the certified useful life of any disks.
7. Periodic random inspections of images stored on optical disks are performed to verify that there has been no degradation of image quality.
 - Periodic random assessments will be scheduled to assess adequate electronic record accessibility and corruption. Inspection frequencies could be extended if further standards or guidelines for optical storage are issued by the National Archives and Records Administration.
8. 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.
 - Should the optical disk storage system be replaced by a system incompatible with existing optical storage disks, the files representing the electronic records stored on those disks will be copied onto an acceptable media and data integrity electronically verified.