

204

RECORD #204

TITLE: Request for Interpretation RE Licensee Recordkeeping

FICHE:

MAY 19 1987

MEMORANDUM FOR: William L. Axelson, Chief  
 Nuclear Materials Safety and Safeguards Branch, RIII

FROM: John W. N. Hickey, Chief  
 Operations Branch  
 Division of Fuel Cycle, Medical, Academic, and  
 Commercial Use Safety, NMSS

SUBJECT: REQUEST FOR INTERPRETATION RE LICENSEE RECORDKEEPING

Your memorandum of April 3, 1987, to Glen Sjoblom forwarded an inquiry from a consultant service concerning whether records which are maintained only on computer media and not in hard copy satisfy the Commission's requirements for recordkeeping.

Computer storage of required records is a broad issue. We are not able to address all situations which may arise for all NRC licensees. In general, however, it appears to us that records maintained on computer media would meet the requirements of the regulations in many cases, provided the records are available for inspection and can be produced in hard copy promptly upon request. Computer recordkeeping would not be acceptable for those requirements which specify that a copy of a document must be held [see, e.g., 10 CFR §§ 20.311(d)(7), 30.39(d)(1)]. It would be the licensee's responsibility to take such measures as are necessary to ensure the reliability of the records, including protection from loss, tampering, alteration, or destruction, as is the case with any required records. Such measures should include storing separately one other copy (backup) of the computer storage medium for the time required.

Original Signed By  
 John W. N. Hickey

John W. N. Hickey, Chief  
 Operations Branch  
 Division of Fuel Cycle, Medical,  
 Academic, and Commercial Use Safety

cc: (w/ memo dtd 04/03/87,  
 W. Axelson to G. Sjoblom, and encl)  
 J. H. Joyner, RI  
 K. P. Barr, RII  
 R. J. Everett, RIV  
 J. Montgomery, RV  
 R. Alexander, RES  
 K. Black, AEOD  
 L. J. Cunningham, NRR  
 R. L. Fonner, OGC  
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