

Regulations Fundamentals Requirements and Updates

2017 NIRMA Conference
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United States Nuclear Regulatory Commission

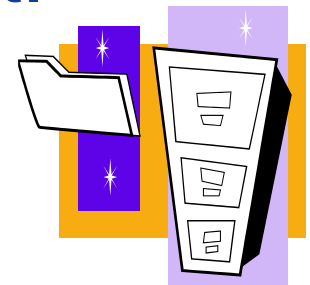
Protecting People and the Environment

Session Overview

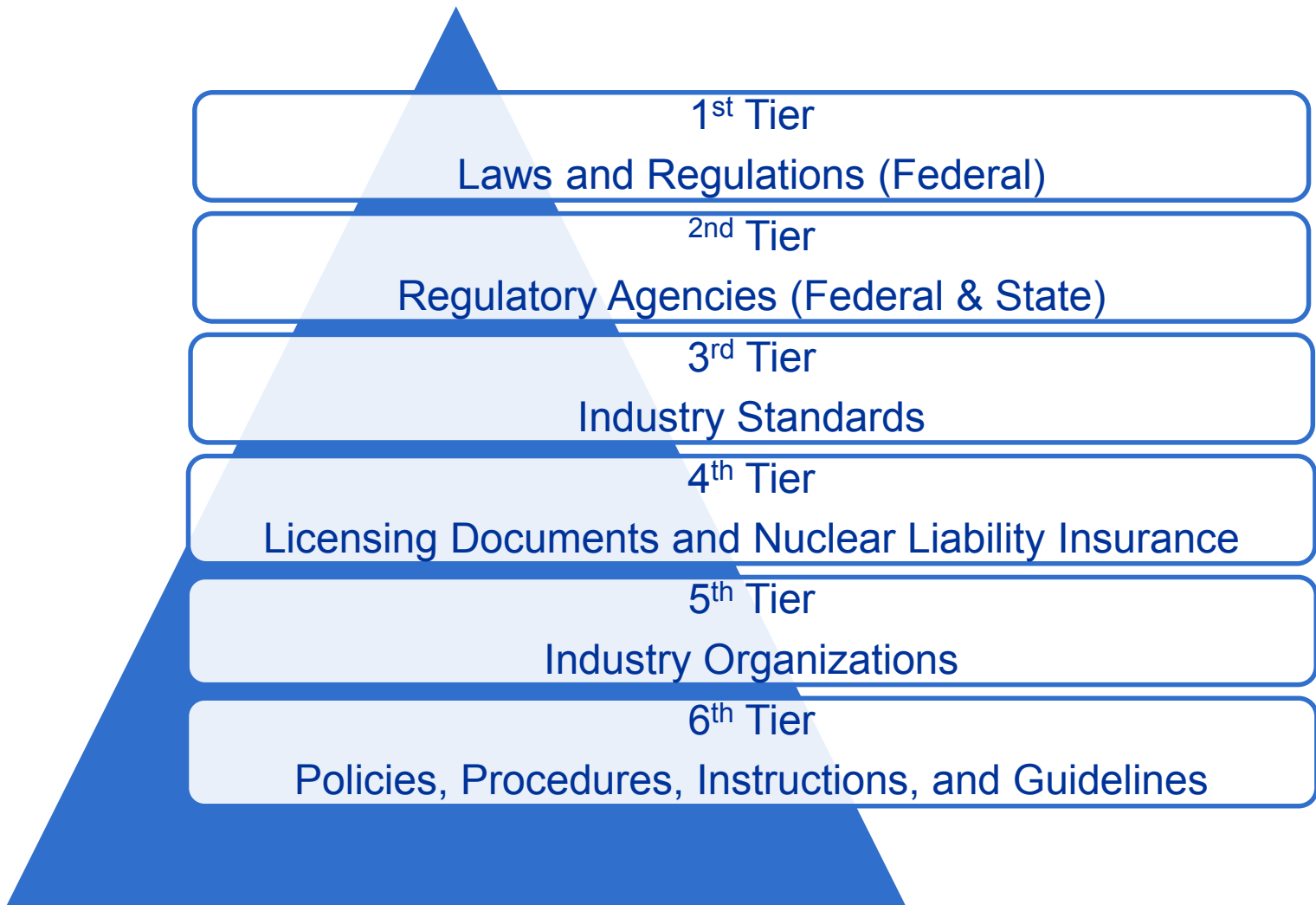
- This session will provide a basic introduction to nuclear Records Management (RM) requirements
- It is primarily structured for those who are new to the industry or to RM
- This session will discuss the hierarchy of nuclear RM requirements and provide examples of source documents/requirements
- This session will discuss the baseline requirements for an RM program at a nuclear facility.

Introduction

- Records Management activities are conducted, including storage, according to the requirements of many different sources or governing criteria.
- The authority level is different depending on the hierarchy of the requirement.



Hierarchy of Requirement Sources



Requirement Sources

- 1st Tier –

- *Federal Laws and Regulations*

- Atomic Energy Act of 1954
 - 42 U.S.C. §§ 2011-2021, 2022-2286i, 2296a-2297h-13
 - U.S. Atomic Energy Commission
- Energy Reorganization Act of 1974
 - 42 U.S.C.A. § 5801
 - U.S. Nuclear Regulatory Commission (NRC)
 - U.S. Department of Energy (DOE)
- Code of Federal Regulations
 - 10 CFR Parts 0 to 199



Requirement Sources

- 2nd Tier –

- *U.S. Regulatory Agencies*

- Government regulating Government
 - Office of Management and Budget (OMB)
 - General Services Administration (GSA)
 - National Archives and Records Administration (NARA)
- Nuclear Regulatory Commission (NRC)
- Department of Energy (DOE)
- Federal Energy Regulatory Commission (FERC)
- Occupational Safety & Health Administration (OSHA)
- Environmental Protection Agency (EPA)
- Securities and Exchange Commission (SEC)



Requirement Sources

- 2nd Tier (Continued)

- *State Agencies*



- Governing legal codes
- Radiation protection
- Air & water control
- Environmental protection
- Emergency preparedness
- Labor

Requirement Sources

- 3rd Tier

- ◆ *Industry Standards*

- American National Standards Institute (ANSI)
- American Nuclear Society (ANS)
- American Society of Mechanical Engineers (ASME)
- Association for Information and Image Management (AIIM)
- Institute of Electrical and Electronics Engineers (IEEE)
- National Fire Protection Association (NFPA)



Requirement Sources

- 4th Tier

- ◆ *Licensing Documents*

- Quality Assurance Plan (QAP)
- Final Safety Analysis Report (FSAR)
- Technical Specifications (Tech Specs)
- Site Emergency Plan (EP)
- Operator License (OL)

- ◆ *Nuclear Liability Insurance*

- American Nuclear Insurers (ANI)



Requirement Sources

- 5th Tier

- ◆ *Industry Organizations*

- Electric Power Research Institute (EPRI)
- Institute of Nuclear Power Operations (INPO)
- Nuclear Energy Institute (NEI)
- Nuclear Information and Records Management Association (NIRMA)



Requirement Sources

- 6th Tier
 - ◆ *Policies*
 - ◆ *Procedures*
 - ◆ *Instructions*
 - ◆ *Guidelines*



Requirement Sources

- Other Considerations

- *Plant Commitments*

- Licensing Department can provide commitments

- *Business Practices*

- Litigation
 - Rate Cases
 - Partnership agreements



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Multiple Requirement Sources

- Different requirement sources may necessitate that the same record type be handled differently.
- The management of records requires reviewing all applicable requirements to determine which one has the highest authority and/or imposes the most stringent requirements.



Baseline Requirements

- There are six baseline requirement categories
 - Responsibility
 - Revision/distribution of controlled documents
 - Receipt
 - Storage, Preservation, and Safekeeping
 - Retrieval
 - Disposition



Resource Information

- **Code of Federal Regulations**

- 10CFR50 Appendix B Criterion VI - Document Control
- 10CFR50 Appendix B Criterion XVII - Quality Assurance Records

- **American National Standards Institute**

- ANSI N45.2.9 - Requirements for Collection, Storage, and Maintenance of Quality Assurance Records for Nuclear Power Plants
- ANSI N18.7 - Administrative controls and quality assurance for the operation of nuclear power plants

- **American Society of Mechanical Engineers**

- NQA-1-1994 - Quality Assurance Requirement for Nuclear Facility Applications

- **Nuclear Regulatory Commission**

- Regulatory Guide 1.88 - Collection, Storage, and Maintenance of Nuclear Power Plant Quality Assurance Records
- Regulatory Guide 1.33 - Quality Assurance Program Requirements (Operation)
- Generic Letter No. 88-18 - Plant Record Storage on Optical Disks
- Regulatory Issue Summary 2000-18 (RIS 00-18) - Guidance on Managing Quality Assurance Records in Electronic Media



Contact your site corporate facility to obtain these resources

NIRMA Process Development Guides

- PDG01 - Information Management Process Description Guideline
- PDG02 - Document Control and Records Management Process Description



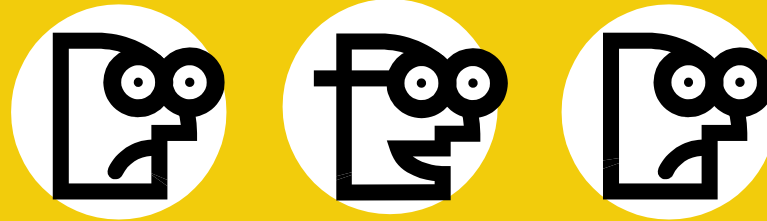
NIRMA Technical Guidelines Related to Records Requirements

- TG 11, Authentication of Records and Media
- TG 13, Records Turnover
- TG 15, Management of Electronic Records
- TG 16, Software Quality Assurance Documentation and Records
- TG 17, Management of Nuclear Related Training Records
- TG 21, Required Records Protection, Disaster Recovery and Business Continuation
- TG 22, Management of Electronic Vendor Technical Documents

Contact information NIRMA website:

<http://nirma.org>





It's QUESTION TIME!!

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