

**OPERATIONAL QUALITY ASSURANCE PROGRAM
TOPICAL REPORT
VEP 1-5A
(UPDATED)**

Tabulation of Changes

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17.2-36	17.2-36 (Updated 4/88)
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Standard, Requirement or Guide

The Company's Position	Conformance Status	Justification
6) With the exception of the time intervals defined by the station Technical Specifications, the following definitions shall be applied when defining time intervals for other activities:		
<u>Weekly:</u> at least once per 7 days		
<u>Monthly:</u> at least once per 31 days		
<u>Quarterly or every 3 months:</u> at least once per 92 days		
<u>Semiannually or every 6 months:</u> at least once per 184 days		
<u>Every 9 months:</u> at least once per 276 days		
<u>Yearly or annually:</u> at least once per 366 days		
<u>Biennial (2 years):</u> at least once per 732 days		
<u>Triennial (3 years):</u> at least once per 1098 days		

The above time intervals may be extended by up to 25% provided the combined time interval for three consecutive activities does not exceed 3.25 times the specified time interval.

Standard, Requirement or Guide

The Company's Position

Conformance Status

Justification

The following clarification is substituted for the current subsection 5.4.3 "Provisions shall be made for special processed records (such as radiographs, photographs, negatives, microfilm and magnetic media) to prevent damage as appropriate to the record type and will address the manufacturer's recommendations."

4) With regard to Section 5.5 of ANSI N45.2.9 - 1974 titled Safekeeping: Routine general office and nuclear site security systems and access controls are provided.

5) With regard to Section 5.6 of ANSI N45.2.9 - 1974 titled Facility: Records shall be forwarded to the appropriate records storage facility promptly after completion when required processing and reviews have been completed.

Paragraph 4, subsection 3 is clarified to require a two-hour minimum fire rating to be consistent with the 1979 version of the Standard and NRC Criteria for Record Storage Facilities (Guidance - ANSI N45.2.9, Section 5.6) issued 7/15/79.

Paragraph 4, subsection 9 is clarified to read: "No pipes or penetrations except those providing fire protection, lighting, temperature/humidity control, or communications are to be located within the facility and they shall comply with a minimum two-hour fire protection rating."

Standard, Requirement or Guide

The Company's Position

Conformance Status

Justification

signaling system is provided, with a remote alarm located at a constantly attended station.

- d) Telephone service is provided to the file room, with the wire penetration constructed and sealed in accordance with NFPA No. 232-1975.
- e) All records stored in the file room are stored in metal cabinets, which are arranged to provide adequate access and aisleways. Work not directly related to the storage, retrieval or auditing of records is not allowed in the file room. Smoking, eating, and drinking is prohibited in the file room.
- f) A wall divides the file room into two sections, with one section used as a file room and the other section used for micro-filming of records. The dividing wall has a minimum fire rating of two (2) hours, including the fire door dampers in the duct penetrating the wall.

The Innsbrook Technical Center's vital records vault for nuclear records conforms to the requirements of Section 5.6 of ANSI N45.2.9-1974 without exceptions.