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April 30, 1979

Docket No. 50-219

Mr. Eldon J. Brunner, Chief  
Reactor Operations and Nuclear Support Branch  
United States Nuclear Regulatory Commission  
Region 1  
631 Park Avenue  
King of Prussia, Pennsylvania 19406

Dear Mr. Brunner:

Subject: Single Copy Record Storage

References: a) Inspection 50-219/78-04  
b) Inspection 50-219/79-05

This refers to your letter to Mr. Ivan R. Finfrock, Jr., dated April 3, 1979 on Single Copy Record Storage.

Regarding our schedule of milestones, we had planned on making this information available to your inspectors during inspections at our facilities; rather than forwarding it to the regional office. In light of your request, we will address, in this letter, those milestones which have not been fully achieved at this time. Regarding full compliance to ANSI N45.2.9, the JCP&L Operational Quality Assurance Plan discusses our position on this matter. Through continuing implementation of our commitment, we may recognize additional alternatives which will enhance our program. As in the past, alternatives to ANSI Standards will be included in revisions to the Operational Quality Assurance Plan.

Our February 28, 1979 letter used the term "bulk of the single copy records" because even though a significant effort has been devoted to identifying, collecting, cataloging, and transferring single copy records to the bank vault, we are still identifying relatively small groups of single copy records which need to be transferred to the vault. As these records are identified, they will be collected, cataloged, and forwarded to the vault in an orderly fashion. To the best of our knowledge at this time, all single copy records have been transferred to the records vault; except for twelve file boxes of radiographs (which have been identified and cataloged since the last record shipment to the vault) and 1978 strip charts. These documents will be transferred to the records vault by June 1, 1979.

With regard to the Single Copy Records which are collected on a "Day-to-Day" basis, JCP&L intends to collect these records for a period of time which is dependent upon the nature of the record and the need for access to that record. We do not envision that this time period will exceed

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Mr. Eldon J. Brunner, Chief (2)  
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six (6) months. During this time, the records will be kept in a air conditioned, fire resistive building, such as the main and auxiliary office buildings at the plant, on metal shelves or in metal desks or file cabinets. In the case of strip charts (a major portion of the Single Copy Records), they will be kept on steel shelves in the plant Document Center which is located in an air conditioned, fire resistive building. If Single Copy Records are kept on site in excess of six months, they will be kept in a one hour rated file cabinet or better. These file cabinets will be located in a fire resistive, air conditioned building.

The duplicate record system has been in place for a few years and is being utilized for maintaining those records which can be easily duplicated and are efficiently maintained in this manner. As with any program, the system is being upgraded from time to time; regardless, JCP&L interprets that our current system for duplicate records does comply with JCP&L's commitment to ANSI N45.2.9. As with Single Copy Records, there is a time period before a document is incorporated in the duplicate file system. We consider this to be the same as your statement regarding "those records which are being generated on a day-to-day basis", and control them in accordance with JCP&L Document Control procedures.

In regard to milestone dates, all current, open items relate to procedure development and implementation; principally in the area of Single Copy Records. It is our intent to have this task completed by July 15, 1979; at which time the Records Retention Program will comply with ANSI N45.2.9 as discussed in this letter and the Operational Quality Assurance Plan.

Very truly yours,



Donald A. Ross  
Manager - Nuclear Operation Stations

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