

REGULATORY GUIDE

OFFICE OF STANDARDS DEVELOPMENT

REGULATORY GUIDE 1.88

COLLECTION, STORAGE, AND MAINTENANCE OF NUCLEAR POWER PLANT QUALITY ASSURANCE RECORDS

A. INTRODUCTION

Criterion XVII, "Quality Assurance Records," of Appendix B, "Quality Assurance Criteria for Nuclear Power Plants and Fuel Reprocessing Plants," to 10 CFR Part 50, "Licensing of Production and Utilization Facilities," requires, in part, that, consistent with applicable regulatory requirements, the applicant establish requirements concerning record retention, such as duration, location, and assigned responsibility. This guide describes a method acceptable to the NRC staff for complying with the Commission's regulations with regard to collection, storage, and maintenance of quality assurance records for all types of nuclear power plants. The Advisory Committee on Reactor Safeguards has been consulted concerning this guide and has concurred in the regulatory position.

B. DISCUSSION

Working Group N45-2.9 of the American National Standards Committee N45, Reactor Plants and Their Maintenance, has prepared a standard that provides general requirements and guidelines for the collection, storage, and maintenance of quality assurance records for nuclear power plants. This standard was approved by Subcommittee N45-2, Nuclear Quality Assurance Standards, of the American National Standards Committee N45 and the full committee and its Secretariat. It was subsequently approved and designated N45.2.9-1974^{*} by the American National Standards Institute on June 6, 1974.

*Lines indicate substantive changes from previous issue.

ANSI N45.2.9-1974, "Requirements for Collection, Storage, and Maintenance of Quality Assurance Records for Nuclear Power Plants," may be obtained from the American Society of Mechanical Engineers, 345 East 47th Street, New York, New York 10017.

As a result of discussions with applicants for construction permits and operating licenses following the issuance of this guide in August 1974, the NRC staff has recognized the existence of an acceptable alternative to the methods described in ANSI N45.2.9-1974 for protecting quality assurance records from the hazards of fire. In December 1975, the NRC staff published Revision 1 to this guide, which identified and incorporated this alternative. Comments were invited within 60 days of publication of Revision 1 for use in conjunction with early revision of the guide. After consideration of all comments, no substantive changes have been made in the regulatory position.

It should be noted that NFPA No. 232-1970, "Standard for the Protection of Records," which was referenced in regulatory position C.2 of Revision 1, was reconfirmed by the National Fire Protection Association at its 1975 fall meeting and is now designated NFPA No. 232-1975. No substantive changes exist between these documents. Regulatory position C.2 has been revised to reference NFPA No. 232-1975.

C. REGULATORY POSITION

The requirements and guidelines for collection, storage, and maintenance of nuclear power plant quality assurance records that are included in ANSI N45.2.9-1974 are acceptable to the NRC staff and provide an adequate basis for complying with the pertinent quality assurance requirements of Appendix B to 10 CFR Part 50, subject to the following:

1. Subdivision 1.5 of ANSI N45.2.9-1974 states, "Other documents that are required to be included as part of this standard are either identified at the point of reference or described in Section 8 of this stan-

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Comments and suggestions for improvements in these guides are encouraged at all times, and guides will be revised, as appropriate, to accommodate comments and to reflect new information or experience. This guide was revised as a result of substantive comments received from the public and additional staff review.

Comments should be sent to the Secretary of the Commission, U.S. Nuclear Regulatory Commission, Washington, D.C. 20555, Attention: Docketing and Service Section.

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dard." The specific applicability or acceptability of these listed documents has been or will be covered separately in other regulatory guides or in Commission regulations where appropriate.

2. Two methods for protection of quality assurance records from the hazards of fire are described in Subdivision 5.6 of ANSI N45.2.9-1974. NFPA No. 232-1975, "Standard for the Protection of Records," also contains provisions for records protection equipment and records handling techniques that provide protection from the hazards of fire. This standard, within its scope of coverage, is considered by the NRC staff to provide an acceptable alternative to the

NFPA No. 232-1975 is contained in Volume 10 of the National Fire Codes published annually by the National Fire Protection Association, 470 Atlantic Avenue, Boston, Massachusetts 02210.

fire protection provisions listed in Subdivision 5.6 of N45.2.9-1974. When NFPA No. 232-1975 is used, quality assurance records should be classified as NFPA Class 1 records (NFPA No. 232-1975, Chapter 5, Section 5222).

D. IMPLEMENTATION

The purpose of this section is to provide guidance to applicants and licensees regarding an implementation schedule for utilizing this regulatory guide.

Except in those cases in which the applicant proposes an acceptable alternative method for complying with the specified portions of the Commission's regulations, the methods described herein will be used in the evaluation of construction permit submittals after issuance of this guide.



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