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MEMORANDUM FOR: Wilbur M. Morrison, Assistant Director for General Engineering Standards, Division of Engineering Standards

FROM: Walter P. Haass, Chief, Quality Assurance Branch
Division of Project Management

SUBJECT: FIRE PROTECTION REQUIREMENTS FOR THE STORAGE OF RECORDS

A meeting was held in my office on December 11, 1979, to discuss fire protection requirements for the storage of lifetime and non-permanent records that could impact on safety. Those in attendance were W. Campbell and D. Notley from your office, F. Nolan and J. Riesland from I&E, and J. Spraul and J. Gilray and myself from QAB. The consensus of those in attendance was that the guidance provided earlier (Ref., Heltemes/Morrison memo, "NRC Criteria for Record Storage Facilities," dated April 19, 1978, and item 17.4(2) on page 17.1-20 of SRP Revision 1) is still applicable.

More specifically, it was agreed that records (both lifetime and non-permanent) that could impact on safety can be secured in an acceptable manner from fire if, at a minimum, they are stored in two-hour fire rated file cabinets meeting NFPA No. 232 (Class B) without the need for additional fire protection requirements on the building. This we believe, is consistent with the referenced memo and item 17.4(2) of the SRP Revision 1. However, to assure there is no misunderstanding, we plan to clarify item 17.4(2) of the SRP to specifically state that additional fire protection requirements are not needed on the building when two-hour fire rated file cabinets are used. We will also eliminate the term "permanent-type records" and use in its place lifetime records and non-permanent records. Of course, records of concern are only those that could impact on safety.

The rationale supporting this position is as follows:

1. The loss of or damage to records does not generally pose an immediate threat to the public health and safety.
2. Lost or damaged records can to some degree be reconstructed by researching other files (i.e., engineering, principal contractors, or vendors), performing additional inspections or tests (including NDT), or removing a system or component for further evaluation.
3. There are no requirements to protect records from fire prior to final storage. This includes records prior to and during shipment of an item and during receipt, installation, and test of an item.

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4. We are not aware of any nuclear records having been lost or damaged by fire.

When Regulatory Guide 1.88 is next revised (or when a regulatory guide is issued endorsing NQA-1) we recommend it reflect (a) the controls described in SRP Section 17.1.17; (b) clarification of the term "permanent-type records" and; (c) the controls on the building containing two-hour fire rated file cabinets. Pursuant to W. Campbell's suggestion, it is also recommended that technical personnel within DSS and DOR be requested to comment on a listing of the types of records that could impact safety which should be maintained in storage.

Original signed by
Walter P. Haass

Walter P. Haass, Chief
Quality Assurance Branch
Division of Project Management

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