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AUG 07 1975

H. C. Dance, Senior Inspector, Nuclear Engineering
Section, Facilities Test and Startup Branch, IE:II

THRU: J. H. Sniezek, Chief, Facility Inspection Branch,
Office of Inspection and Enforcement

DUKE POWER COMPANY, RETENTION OF OPERATING RECORDS - DOCKET NOS.
50-269, 50-270, AND 50-287

The following comments are provided in response to your July 28, 1975 memorandum to J. H. Sniezek relating to the retention of operating records:

1. Based on legal requirements, each licensee is required to retain only those specific operating records which are described in the Facility License, Technical Specifications and applicable Rules and Regulations, e.g., 20, 30, 40, 50, 55, 70, 71, and 73.
2. Regulatory Guides endorse industry standards which discuss record retention requirements. Regulatory Guides and endorsed industry standards do not have any legal status at an operating facility unless they are referenced in the facility technical specifications.

It is noted that many FEAR's contain commitments relating to conformance with Regulatory Guides and industry standards. When a licensee does not conform to such commitments, the matter should be classified as a "deviation" and action as described in MC-0800 initiated to resolve the problem.

3. Standardized Technical Specifications (STS) establish Regulatory requirements for retention of records which may differ from similar requirements established in technical specifications for older facilities. At the present time, Regulatory does not plan to backfit STS to the pre- D C Cook facilities. However, based on inspection findings, it may be possible to request RL to upgrade TS for older facilities to reflect specific sections of the STS. Such action will have to be taken on a case-by-case basis.

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If you have any questions concerning this matter, please contact me on Extension 7451.

Original Signed by
E. J. Nolan

F. J. Nolan
Senior Reactor Inspection Specialist
Facilities Inspection Branch

cc: W. C. Seidle, IE:II
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