

UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
REGION II  
230 PEACHTREE STREET, N. W. SUITE 818  
ATLANTA, GEORGIA 30303

July 28, 1975

J. H. Sniezek, Chief, Facility Inspection Branch  
Office of Inspection and Enforcement, Headquarters  
THRU: W. C. Seidle, Chief, Facilities Test and Startup Branch  
*WCS* Office of Inspection and Enforcement, Region II

DUKE POWER COMPANY (OCONEE UNITS 1, 2, AND 3), DCCKEI NOS. 50-269,  
50-270, 50-287 - RETENTION OF OPERATING RECORDS

Section 6.5.2 of the Oconee Technical Specifications (TS) requires that the licensee retain the Switchboard Record (electrical generation data), Reactor Operation Logbooks, and the Shift Supervisor's Logbooks for a period of six years. The Oconee FSAR states substantially the same requirements for retention of operating records. Thus, the TS appears to have defined operating records for this facility. In actual practice the facility maintains records such as the last completed controlling startup procedure and the last system alignment procedure. Temporary retention of these records satisfy general requirements of ANSI 18.7 and Criterion XVII of Appendix B.

Several other facilities in Region II include procedures, checklist, etc., in their definition of operating records discussed in their FSAR's. "Operating Records" retention is subsequently addressed in Technical Specifications. This is more restrictive than the Oconee Technical Specifications.

In the interest of uniformity, we request that IE Headquarters provide clarification of what is intended by retention of "operating records." The subject is addressed in ANSI 18.7, ANSI 45.2.9, Standardized Technical Specifications Appendix B, and FSAR's. Clarification should be incorporated in the appropriate document.

IE:II recommends the following position. If a specific retention requirement is not contained in the Technical Specifications or FSAR to further define "operating records," we conclude that the matter is of lesser importance than those items listed. Therefore, records such as controlling startup procedures, system alignment checksheets, or recorder charts of plant parameters are prime records to document



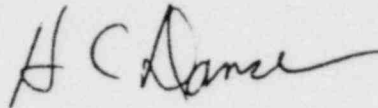
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conformance of plant requirements and should be retained for a period of one year. This retention period satisfies known requirements and also is compatible with the annual audit cycle recommended in ANSI 45.2.12.

We also understand that the Sandia inspection program requirements are based on a maximum of one year's data.

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



H. C. Dance, Senior Inspector  
Nuclear Engineering Section  
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IE:II:HCD

cc: H. D. Thornburg, IE:HQ  
F. J. Long, IE:II