

SOUTH CAROLINA ELECTRIC & GAS COMPANY

POST OFFICE BOX 764

COLUMBIA, SOUTH CAROLINA 29218

T. C. NICHOLS, JR.  
VICE PRESIDENT AND GROUP EXECUTIVE  
NUCLEAR OPERATIONS

September 29, 1981



Mr. Harold L. Denton, Director  
Office of Nuclear Reactor Regulation  
U. S. Nuclear Regulatory Commission  
Washington, D. C. 20555

Subject: Virgil C. Summer Nuclear Station  
Docket No. 50/395  
Records Storage

Dear Mr. Denton:

As discussed with Mr. Bill Kane and Mr. Jack Spraul of the NRC, South Carolina Electric and Gas Company provides a markedup copy of a revised position on Regulatory Guide 1.88 for the Virgil C. Summer Nuclear Station. This should resolve the concern of the Staff in regards to the storage of non-permanent records. This position will be incorporated in the next FSAR amendment.

Please let us know if you have any questions.

Very truly yours,

A handwritten signature in cursive script that reads "T. C. Nichols, Jr.".

T. C. Nichols, Jr.

RBC:TCN:lkb

Attachment

cc: V. C. Summer  
G. H. Fischer  
H. N. Cyrus  
T. C. Nichols, Jr.  
J. C. Ruoff  
D. A. Nauman  
W. A. Williams, Jr.  
R. B. Clary  
O. S. Bradham  
A. R. Koon  
M. N. Browne  
B. A. Bursey  
J. L. Skolds  
J. B. Knotts, Jr.  
H. E. Yocom  
F. L. Lamphere  
J. B. Cookinham  
NPCF  
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INSERT A

During the interim period for which the SCE&G QA organization maintains records prior to transmittal to the records program (Permanent facility), the records will be kept in two remote locations in an office environment without the need for a storage procedure defining the elements required by Paragraph 5.3. SCE&G justifies this position based on the fact that Paragraph 2.2.2 of ANSI 45.2.9 recognizes that these records are of no value in demonstrating plant acceptability but only establishes that activities were performed; and, based on the fact that these records will be accessible at two office locations stored in prudent office environments.

Note: This position is applicable to these non-permanent records being backfitted within the period from commercial operations to December 1982. It also applies to a planned quarterly retention of records (for compilation purposes) prior to turnover of future permanent and non-permanent records to the PRS as they are issued after commercial operations.

INSERT B

For SCE&G Quality Assurance organization generated records required by Appendix A, the following program will be implemented dealing with the turnover to the permanent facility, and retention times of non-permanent records as required by Paragraph 3.2.7.

1. SCE&G QA organization generated non-permanent records are as follows:

- QA Procedures
- QA Plans
- Vendor Procedures
- Vendor Survey Reports
- Vendor Inspection Reports
- Vendor Audit Reports
- Surveillance Reports

2. After commercial operation, the records in 1, will be placed within the SCE&G records retention program (permanent facility) as issued.
3. Non-permanent records generated prior to commercial operations will only be placed within the record retention program (permanent facility) if they were generated within 3 years prior to commercial operation. SCE&G justifies this position based on the fact the Paragraph 2.2.2 of ANSI 45.2.9 recognizes that these records are of no value in demonstrating plant acceptability but only establish that activities were performed; and, based on the fact that SCE&G utilizes these records for 3 years within procurement control programs.

INSERT B Con't

Note: Implementation of retrofitting non-permanent records generated within 3 years prior to commercial operation into the SCE&G permanent facility is expected to be completed by December 1982.

INSERT C

Vendor QA Manuals - Manuals will not be sent to PRS, however, objective evidenc (audit and survey reports) that manuals were reviewed will be sent.

1.88 COLLECTION, STORAGE AND MAINTENANCE OF NUCLEAR POWER PLANT  
QUALITY ASSURANCE RECORDS (Revision 2; 10/76)

The Virgil C. Summer Nuclear Station quality assurance records program complies with the recommendations of this Regulatory Guide with the following exceptions and clarifications:

ANSI-N45.2.9-74

<u>Section</u>	<u>Exceptions and Clarifications</u>	
<b>5.3</b>	<b>INSERT A</b>	<b>28</b>
5.6	The permanent records room is constructed and located to protect contents from possible destruction by causes such as fire, flooding, insects, rodents and from possible deterioration by a combination of extreme variations in temperature and humidity conditions.	17
5.6	The permanent records room is designed to meet a 4 hour fire rating except for the fire dampers and electrical penetrations, which are rated for 3 hours.	11
<b>3.2.7</b>	<b>INSERT B</b>	<b>28</b>
3.2.7 App. A	Applicable codes and standards will either be maintained at the plant site or will be readily accessible from other sources.	17
3.2.7 App. A	<b>INSERT C</b> <del>Only records identified as lifetime records are required to be maintained.</del>	13
		<b>28</b>

In addition, as discussed with the NRC Staff:

1. The permanent records room is equipped with an early warning fire detection and automatic fire suppression system, with electronic supervision at a constantly attended location. 17

2. Records are stored in metal cabinets. No records are stored on the floor. Adequate access and aisle ways are maintained. | 17
  
3. Work not directly associated with records storage or retrieval is prohibited within the permanent records room. Examples of such prohibited activities include but are not limited to: records reproduction, film developing, and fabrication of microfiche cards. | 17
  
4. Smoking, eating and drinking are prohibited throughout the permanent records room. | 17
  
5. Ventilation, temperature, and humidity control equipment is protected inside with standard fire dampers where they penetrate fire barriers bounding the storage facility. | 17
  
6. Some records generated by Nuclear Operations during the operations phase are needed for varying periods of time at the place of origination for ready reference. These records will be stored temporarily in fire-resistant cabinets by the originators in areas pre-identified as Records Temporary Storage Facilities until they are transferred to the Permanent Records Storage Facility. The length of time that records may remain in these areas will be defined for each type record in the QA Records Accumulation and Retention Chart. The requirements of ANSI N 45.2.9 regarding accountability and retrievability of these records will be met while the records are in the Records Temporary Storage Facilities Areas. | 28