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P.O. BOX 270 HARTFORD, CONNECTICUT 06101 (203) 666-6911

November 6, 1978

Docket Nos. 50-213 50-245 50-336

Director of Nuclear Reactor Regulation Attention: Mr. D. L. Ziemann, Chief Operating Reactors Branch #2 U. S. Nuclear Regulatory Commission Washington, D. C. 20555

References: (1) Letter, D. C. Switzer to A. Schwencer dated December 2, 1977.

(2) Letter, D. C. Switzer to G. Lear dated December 5, 1977.

(3) Letter, A. Schwencer to D. C. Switzer dated January 25, 1978.

## Gentlemen:

In a recent telephone conversation between you and Mr. J. R. Himmelwright, of my staff, the progress of the NUSCO Nuclear Records Program for Connecticut Yankee Atomic Power Company (CYAPCO) and Northeast Nuclear Energy Company (NNECO) was discussed. Mr. Himmelwright explained that the extended date of July 31, 1979 for full compliance with ANSI Standard N45.2.9-1974, as requested by us in References (1) and (2), and granted by Mr. Schwencer in Reference (3), will be met. The records vaults already meet the Standard, recognizing that although the two hour fire door requirement is still not formally in the Standard (current standard is four hours), the proposed change to the Standard is in committee, and you have accepted our two hour fire door as stated in Reference (3). We will, as of July 31, 1979, have all applicable records, or acceptable facsimilies thereof, properly stored in conformance to ANSI N45.2.9-1974 requirements.

Mr. Himmelwright voiced our concern to you, however, with respect to the progress of our microfilming activities and the NRC Staff's understanding of those efforts. Because of our inexperience in undertaking filming projects of this magnitude, and because the quantity of records requiring filming were, until very recently, underestimated, the filming of our records backlog will not be completed by the July 31, 1979 date, unless we hire additional temporary personnel or engage a contractor. Both of these options are highly undesirable to us. However, Mr. Schwencer's letter (Reference 3) seems to imply that completeness of the microfilming is needed for full ANSI compliance.

This impression may have been caused by the wording of Mr. Switzer's letters to Messrs. Lear and Schwencer (Reforences 1 and 2), that is, filming would be our only means of retention. Actually, as you know, the Standard does not require

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filming; filming was chosen by NUSCO as a convenient means of storage. We will, as already stated above, have all required records stored in compliance with the Standard, whether on film or in a combination of film and hard copy, on or before the July 31, 1979 date. All such records still stored in hard copy form will be properly indexed, and any will be retrievable in a timely manner if needed.

You indicated to Mr. Himmelwright that this now projected July 31, 1979 status of our nuclear records control effort should be satisfactory, subject to review by the NRC Staff following receipt of this letter. You also indicated you would circulate this letter to Branch 4 personnel for Millstone Unit 2 review.

Please inform us if our projected status for July, 1979 is not satisfactory.

Very truly yours,

CONNECTICUT YANKEE ATOMIC POWER COMPANY NORTHEAST NUCLEAR ENERGY COMPANY

> W. G. Counsil Vice President