



Carolina Power & Light Company

APR 6 1988

SERIAL: NLS-88-081
10CFR50.71(d)(1)

United States Nuclear Regulatory Commission
ATTENTION: Document Control Desk
Washington, DC 20555

BRUNSWICK STEAM ELECTRIC PLANT, UNIT NOS. 1 AND 2
DOCKET NOS. 50-325 & 50-324/LICENSE NOS. DPR-71 & DPR-62
USE OF OPTICAL DISK STORAGE FOR PLANT RECORDS

Gentlemen:

By letter dated December 8, 1987, Carolina Power & Light Company (CP&L) requested NRC concurrence on the use of an optical disk storage system for microforming of plant records. During a March 8, 1988 conference call with the NRC, the Staff requested additional information relative to the Company's request. This information is provided in Enclosure 1 to this letter.

Please refer any questions regarding this submittal to Mr. Stephen D. Floyd at (919) 836-6901.

Yours very truly,

Leonard V. Loflin
Manager
Nuclear Licensing Section

EKN/ekn

Enclosure

cc: Dr. J. Nelson Grace
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ENCLOSURE 1

RESPONSE TO NRC QUESTIONS ON OPTICAL DISK STORAGE

RESPONSE TO NRC QUESTIONS ON OPTICAL DISK STORAGE

1. How will the optical disk system be used to store data such as radiography film?

No attempts will be made to convert radiography film or other data that requires special handling such as strip charts and safeguards information.

2. How will inspections for data disk deterioration be documented?

Methods utilized to inspect data stored on disk will be procedurally addressed and the results documented for the life of the plant.

3. Will quality control measures be implemented to verify that data transposed to optical disk is legible?

Yes, on a sampling basis scanned documents, which have been transposed to optical disk, will be confirmed to be legible.

4. What steps will be taken if deterioration of data is determined to be evident?

If degradation of data is confirmed during biennial inspections or in the normal course of business, the data will be transferred to a replacement disk or returned to its original format until the root cause is corrected. Degradation is defined in the biennial inspection as D-min/D-max readings outside the parameters of 0.80 to 1.50 density and/or resolution reading of 2.8 line pairs discernible, or greater, in a target image.

In routine daily observations, degradation is defined as random or batches of illegible images with no indication that these images represented source documents which were considered illegible data (suspect) when initially transposed to disk.

5. What security measures will be implemented to assure backup of data stored on optical disk?

A security copy or "backup" disk will be retained in Brunswick's records storage facility (ANSI 45.2.9 qualified). These disks shall be treated as the plant's master copy and will not be used for routine on-line access purposes. Documentation in its original format will not be disposed of until confirmation of successful down loading from the on-line working file disk has been verified via an audit trail.

Due to the Company's sensitivity to items 3 and 5, CP&L intends to initially use the optical system for distributing vital data only. During this initial implementation of the system, the Company will retain the data transposed to optics in its original format. It is anticipated that extremely high volumes of information, including diversified types of information, will be retrieved during this initial period. Data will be frequently verified to determine proper copying when down loading from the on-line working disk to the master (vault) disk. The type and volume of problems which surface during the initial implementation of the system will influence the sophistication and extent of the audits required to preclude data loss.