Docket



## NUCLEAR REGULATORY COMMISSION WASHINGTON, D. C. 20655

August 29, 1988

Docket Nos. 50-498 and 50-499

Mr. J. H. Goldberg Group Vice-President, Nuclear Houston Lighting & Power Company P. O. Box 1700 Houston, Texas 77001

Dear Mr. Goldberg:

SUBJECT: OPTICAL STORAGE OF PLANT RECORDS FOR THE

SOUTH TEXAS PROJECT, UNITS 1 AND 2

By letter dated July 15, 1988 (ST-HL-AE-2722), Houston Lighting & Power Company (HL&P) requested the NRC's concurrence to use an optical disk document imaging system for the storage and retrieval of the record copy of quality assurance records for the South Texas Project (STP).

HL&P also stated that the following guidelines would be followed:

- The optical disk will be Write Once Read Many (WORM) technology that does not allow deletion or modification of record images.
- The image of each record will be written to two optical disks.
- The legibility of the image of each record will be verified to ensure that the document image is legible on both disks. If the image is illegible, the hard copy record will be maintained as the record copy.
- " Hard copy records will be destroyed after the optical disk images of the records have been verified as legible.
- One optical disk will be stored in the document imaging system for on-line retrieval.
- The second (i.e., backup) optical disk will be stored in a records storage facility meeting the requirements of ANSI N45.2.9-1974 for single storage or in a separate remote location.
- The records stored on an optical disk will be copied onto a new optical disk before the manufacturer's certified useful life of the disk is exceeded.
- Periodic random inspections of images stored in optical disks will be performed to verify that there has been no degradation of image quality.

- If the optical disk document imaging system currently employed is to be replaced by an incompatible new system, the records currently stored on the old system's media will be converted to the new system media before the old system is taken out of service.
- Optical disk images of records are anticipated to have the same retrievability as hard copy and microfilm records. The optical disk images of records shall be capable of being displayed on a computer monitor or printed as deemed necessary.

We have reviewed the request and, based on HL&P's commitments to follow the guidelines, find it acceptable.

The guidelines should be included in the first FSAR update.

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George F. Dick, Jr., Project Manager Project Directorate - IV Division of Reactor Projects - III, IV, V and Special Projects

cc: See next page

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-2-If the optical disk document imaging system currently employed is to be replaced by an incompatible new system, the records currently stored on the old system's media will be converted to the new system media before the old system is taken out of service. Optical disk images of records are anticipated to have the same retrievability as hard copy and microfilm records. The optical disk images of records shall be capable of being displayed on a computer monitor or printed as deemed necessary. We have reviewed the request and, based on HL&P's commitments to follow the guidelines, find it acceptable. The guidelines should be included in the first FSAR update. George F. Dick, Jrl. Project Manager Project Directorate - IV Division of Reactor Projects - III, IV, V and Special Projects cc: See next page

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