

Westinghouse Electric Corporation

Energy Systems

Box 355 Pittsburgh Pennsylvania 15230-0355

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> > June 23, 1998

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Document Control Desk U.S. Nuclear Regulatory Commission Washington, DC 20555

Attention: Suzanne C. Black

Subject: AP600 Compliance With Regulatory Guide 1.28, Revision 3

Dear Ms. Black:

Section 2, Quality Records of NRC Regulatory Guide 1.28, Revision 3, requires that programmatic nonpermanent records and product nonpermanent records be retained for 3 years and 10 years, respectively. An additional requirement states that programmatic and product nonpermanent records shall be retained "at least until the date of issuance of a full-power operating license of the unit."

At the present time, a definitive schedule for obtaining a full-power operating license for the AP600 does not exist. Considering this, Westinghouse will develop a records retention plan in conformance with Regulatory Guide 1.28 that is keyed to the Final Design Approval. AP600 compliance with the Section 2 requirements will be accomplished by initiating a retention period of 3 years for programmatic nonpermanent records and 10 years for the product nonpermanent records starting on the date that NRC issues the AP600 FDA.

Please contact me on 412-374-4334 or Bob Tupper on 412-374-5219, if you have any questions concerning this transmittal.

Brian A. McIntyre, Manager

Advanced Plant Safety and Licensing

iml

cc: T. R. Quay, NRC/NRR/DRPM

R. A. Gramm, NRC/NRR/DRCH/HQMB

H. A. Sepp, Westinghouse

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