



3071 E. Franklin Road  
Suite 210  
Meridian, ID 83642  
4 April 2024

James Steckel, Program Manager  
USNRC Office of Nuclear Regulatory Research  
Division of Engineering  
Regulatory Guide and Program Management Branch  
11555 Rockville Pike  
Rockville, MD 20852

Dear Mr. Steckel:

It has come to our attention that Regulatory Guide (RG) 1.28, "Quality Assurance Program Criteria (Design and Construction)", Revision 6, contains outdated titles for two of the referenced Nuclear Information and Records Management Association (NIRMA) Technical Guidelines (TG). Due to the mis-titling, we have been receiving mis-informed requests for guidance, where the requestor is asking which TG to use when establishing an electronic records management program under their respective Quality Assurance Program (re 10CFR50 Appendix B, Criterion XVII).

In the RG 1.28, in Section C. "Staff Regulatory Guidance", Item 3, "Quality Assurance Records (NQA-1 Requirement 17), Part b. "Managing Quality Assurance Records in Electronic Media", Subpart (2), it states the following:

The Nuclear Information and Records Management Association (NIRMA) technical guides (TGs), as listed below, provide guidance to establish the appropriate quality controls that incorporate the implementation of enterprise content management systems, web-based technologies, and higher capacity local- and wide-area networks. The NRC approves for use the 2011 versions of the NIRMA TGs.

- (a) NIRMA TG 11, "Authentication of Records and Media" (Ref. 17)
- (b) NIRMA TG 15, "Management of Electronic Records" (Ref. 18)
- (c) NIRMA TG 16, "Software Configuration Management and Quality Assurance" (Ref. 19)
- (d) NIRMA TG 21, "Electronic Records Protection and Restoration" (Ref. 20)

The two TGs that are mis-titled in RG 1.28, Revision 6 (and in the References section) are:

- NIRMA TG 16, "Software Configuration Management and Quality Assurance"
- NIRMA TG 21, "Electronic Records Protection and Restoration"

We believe the error in the titles stem from the original reference to these TGs in Regulatory Issue Summary 00-18, "Guidance on Managing Quality Assurance Records in Electronic Media", issued in October 2000. The RIS refers to the 1998 versions of these TGs.

In 2011, NIRMA embarked on a re-write of the four TGs mentioned under the RIS, and in the process of that re-write, re-titled the two aforementioned TGs. Therefore, the actual titles of the two TGs under discussion (2011 versions) are:

- NIRMA TG 16, “Software Quality Assurance Documentation and Records”
- NIRMA TG 21, “Required Records Protection, Disaster Recovery and Business Continuation”

We request that the NRC issue a change to Regulatory Guide 1.28 to reduce the confusion in the industry as to which guidance to follow when establishing and managing an electronic records program that contains quality assurance records. Given that the NRC has approved the use of the 2011 versions, we believe the NRC will act in favor of these changes.

FYI, I am mailing separate, individual letters to both you and Ms. Andrea Keim.

Sincerely,

A handwritten signature in cursive script that reads "Bruce Walters".

Bruce Walters, CRM/NS  
NIRMA President