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Director
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May 30, 2000

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

Subject: Plant Record Storage on Optical Disks (pursuant Generic Letter 88-18)

References: RBS letter RBG-35,713 dated October 3, 1991

Arkansas Nuclear One Units 1 & 2 Docket Nos. 50-313 & 50-368 License Nos. DPR-51 & NPF-6	Grand Gulf Nuclear Station Docket No. 50-416 License No. NPF-29
River Bend Station Docket No. 50-458 License No. NPF-47	Waterford 3 Steam Electric Station Docket No. 50-382 License No. NPF-38

CNRO-2000/00019

Ladies and Gentlemen:

On October 20, 1988, the Nuclear Regulatory Commission issued Generic Letter 88-18 titled Plant Record Storage on Optical Disks. GL 88-18 stated that licensees using optical disks for record storage should notify the NRC in an updated FSAR per 10 CFR 50.71 (e) or by letter per 10 CFR 50.4 (b) 7. River Bend Station made such a notification in its October 3,1991 letter to you referenced above (our letter RBG-35,713).

In accordance with the guidance of Generic Letter 88-18, Entergy Operations Inc. (EOI) will implement optical disk technology for the storage and retrieval of plant records, including quality assurance records. This implementation has been completed at all four of the EOI plants as of the date of this letter.

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The current plans call for River Bend Station to migrate to the optical imaging system utilized by the other three sites by Summer, 2001. At that time, the River Bend Station will be in compliance with the response documented herein. Until then, RBS is in compliance with its 1991docketed letter. We do not plan on another submittal when RBS migrates to our newer system. EOI complies with the requirements outlined in Generic Letter 88-18. The specific line items to ensure appropriate quality controls are employed are listed below followed by the EOI response to the item.

The optical disk technology does not allow deletion or modification of record images.

The optical disk technology implemented at the sites utilizes WORM platters (write once, read many). Once an image file is written to the optical disk, it cannot be revised or deleted from the disk.

The image of each record is written onto two optical disks.

Each image file is written to two disks known as the primary and secondary optical platters.

The legibility of each record is verified to ensure that the image is legible on both disks.

Documents are made available in one of two ways, either through the scanning process or by copying a native file. Once the document is available, a legibility verification of the image from magnetic media is performed. After the index information has been entered, the image is available to be committed to optical media.

The verification performed compares the contents of the files at the binary level.

In the event that the data is not read back correctly, the file is written to the optical platter once again and verified. This process confirms that the data can be read back correctly over the life of the disk.

One optical disk is stored in the document imaging system for on-line retrieval.

The primary disk remains in the optical storage library (jukebox). The default image, supplied upon request for viewing, is retrieved from the magnetic disk .

The second (backup) optical disk is stored in a record storage facility meeting the requirements of ANSI N45.2.9-1974 for single copy storage or in a separate remote location.

As documents are committed to the system, the hardcopy of each document will be temporarily placed in a separate remote location. When the secondary disk is filled the secondary disk will be removed from the jukebox and stored in the QA record storage facility (per EOI's Quality Assurance Program Manual). The hardcopy records, which were temporarily stored and are now contained in the primary and secondary disks, may then be disposed.

To ensure permanent retention of records, the records stored on an optical disk are acceptably copied onto a new optical disk before the manufacturer's certified useful life of the original disk is exceeded. This includes verification of the records so copied.

The current manufacturer's certified life expectancy is 35 years. If at the end of that period, the life expectancy has not been increased, or if for any reason the life expectancy is decreased, the information on the optical disks will be copied onto new optical disks or to other media which may be approved at that time. Once the information has been copied, a verification will be performed to ensure data integrity.

Periodic random inspections of images stored on optical disks are performed to verify that there has been no degradation of image quality.

A random inspection program is in place to provide for adequate image inspections. This process calls for a sample of the stored images to be retrieved and verified on an annual basis.

If the optical disk document imaging system in use is to be replaced by an incompatible new system, the records stored in the old system's disks are acceptably converted into the new system before the old system is taken out of service. This includes verification of the records so copied.

Should the optical disk storage system be replaced by a system incompatible with the existing optical storage disks, the files representing the plant records and quality assurance records stored on the disks will be copied onto acceptable media and data integrity verified. Should you have any questions concerning our processes or this submittal, please contact Mr. Bruce McCall at 601-437-6225 or Mr. Les England at 601-368-3766.

Sincerely,

M. A Krupa

MAK/LAE/baa
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