

QA Program (Records)
Procedure No.: 35748B
Issue Date: 10-1-76

SECTION I
INSPECTION OBJECTIVE

Ascertain whether the licensee has developed a QA program relating to the control of records that is in conformance with Regulatory requirements, commitments in the application and industry guides and standards.

SECTION II
INSPECTION REQUIREMENTS

1. Records to be Maintained

a. Program Review

(1) Verify that requirements and provisions to maintain the following types of records have been established:

- (a) Preoperational and startup tests
- (b) Normal reactor operation including operating logs, recorder charts, and computer printouts.
- (c) Principal maintenance activities
- (d) Design changes and modifications including safety evaluations associated with 10 CFR 50.59 type changes.
- (e) Reportable occurrences
- (f) Surveillance test results
- (g) Baseline data and inservice inspections

- (h) On and offsite safety committee (Group)
meeting minutes
 - (i) Procurement documents
 - (j) Receipt inspection and testing
 - (k) QA audit reports
 - (l) Personnel training records
 - (m) Safety related (non Technical Specification)
Calibration results
 - (n) Personnel qualification records
 - (o) Special reactor test and experiments
 - (p) Defects and noncompliance (10 CFR 21)
 - (q) Fire protection/prevention activities
 - (r) Engineering drawings
- (2) Verify that responsibilities have been assigned to assure that the records identified under (1) above will be maintained.
- (3) Verify responsibilities have been assigned and controls established to assure transfer and retention of construction phase records.

*b. Implementation

- (1) Review 10% of the startup test records and 10 additional records (no more than 2 from the same category) from the remaining categories identified in 1.a.(1).
- (2) Select 2 construction phase records, if this transfer activity has begun, and verify that they were transferred in accordance with the controls identified in 1.a.(3).

2. Record Storage

a. Program Review

- (1) Verify that record storage controls in accordance with SAR commitments have been established which accomplish the following:
 - (a) Describes the record storage facility or

facilities for the records identified
under 1.a.(1) and (3) above.

- (b) Designates a custodian(s) in charge of
storage facilities identified in
2.a.(1)(a), above.
- (c) Describes the filing system(s) to be used
to allow for the retrieval of records
identified under 1.a.(1) and (3) above.
- (d) A method for verifying that records
received are in agreement with the
transmittal document or a pre-esta-
blished records checklist, as applicable.
- (e) Makes provisions for governing access to
files and for maintaining an accounta-
bility of records removed from the storage
facility.

(f) Establishes methods for correcting or filing supplemental information and disposing of superseded records. Required review and approval should be specified.

(2) Verify that responsibilities have been assigned to assure that the record storage controls identified under 2.a.(1) above will be implemented.

b. Implementation

Verify the following by review of the 10 records selected in paragraph 1.b(1) above:

- (1) The record is listed on a records checklist or index.
- (2) It is readily retrievable from its designated file.
- (3) The record is not stored loosely but is firmly attached in binders or placed in folders or envelopes, or other suitable protection.

- (4) It is stored in a suitable file cabinet or shelving in a container in a predetermined location.
- (5) That the record storage facility is in accordance with 2.a.(1)(a) above.

3. Record Retention

a. Program Review

- (1) Verify that provisions have been made which establish the retention periods for the types of records identified under 1.a.(1) above.
- (2) Verify that responsibilities have been assigned for establishing the retention periods of records not covered by the FSAR, or Technical Specifications, or 10 CFR.
- (3) Verify that authority and responsibility for authorizing disposal of records no longer required has been specified.

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*b. Implementation

Verify by interview of the record storage custodian(s)
that the retention period controls are understood.

SECTION III
INSPECTION GUIDANCE

References: ANSI N45.2.9-1974; Section 17.2.17 of FSAR: Section 6.10 of the proposed Technical Specifications.

1. Records to be Maintained

Section 6.10 of the Technical Specifications identifies those records that the facility is required to maintain. The records required by the Technical Specifications should basically coincide with those identified in the inspection procedure. The types of records involving radioactive shipments, radioactive releases to the environs, plant radiation and contamination surveys, offsite environmental surveys, personnel exposures, and fuel inventories and transfers were not included with the several types of records listed as they are covered in other IE Inspection procedures.

Paragraph 3.2.2 of ANSI N45.2.9 discusses an index of QA records that should be established by the plant. The index

should identify record retention times, storage locations, etc. The plant should establish the index prior to receipt of records and those records identified in the Technical Specifications should be part of the index. Commitments relative to ANSI N45.2.9 should be discussed in Section 17.2.17 of the FSAR.

The transfer of construction phase records may not occur for a prolonged period after initial operation of the facility. However, provisions for maintaining records identified in A.1 through A.5 to ANSI N45.2 should be established.

- 1.b(2) All AE and contractor records are transferred to the licensee upon completion of construction. However, records associated with some equipment, e.g. radiographs of shop welds of the reactor vessel, may be retained by the vendor as described in applicable codes. The licensees control system should address such records and the provisions established for gaining access to them.

2. Record Storage

- a(1)(a) - Section 17.2.17 of the SAR should identify the storage facilities that will be provided for protecting records from fire, flood, tornado, etc. The inspector should determine that record storage locations have been designated and that the protection provided is consistent with FSAR commitments.
- a(1)(d) Sections 4.3 and 5.3 of ANSI N45.2.9 discuss records receipt control and transmittal documents. The purpose for records receipt control and transmittal document usage is to assure that record files are complete. Normally records from sources outside the plant or nonroutine records would be transferred to storage with a transmittal document so that the custodian can determine their completeness. Routinely prepared records such as surveillance test results and operating records can be accounted for and transferred to storage using a receipt control system.

3. Record Retention

Record retention requirements are normally established in Section 6.10 of the Technical Specifications. Guidance relative to retention of records other than those identified in the Technical Specification is provided in Appendix A to ANSI N45.2.9.

- a.(1) Responsibility to preclude inadvertent disposal of records should be clearly defined.

NOTE:

- 1. Only single * requirements need to be inspected when the reactor facility for which the application is being made for an operating license is located at the same site and will use the same site management that was inspected within the previous 24 months.

2. The program review function should be completed during the operation preparedness phase of MC 2513.
3. A Records Program for plant operations is not required until the facility license is issued. Therefore, inspection of program implementation may be deferred if necessary but should be completed within the first six-month period of operation.
4. For record keeping purposes, the program review and program implementation phases of the inspection will be assigned 50% of the total inspection effort.