

Activity Records Management

1.0 Purpose This guideline provides a method for evaluating the facility's records management program.

2.0 Scope This guideline has been developed for use in the review and evaluation of records management programs including:

- Plant records.
- QA records.
- Safeguards records.

References

1. ANSI N45.2.9, "Requirements for the Collection, Storage, and Maintenance of Quality Assurance Records for Nuclear Power Plants."
2. INPO Good Practice.
3. ANSI N18.7, "Administrative Controls and Quality Assurance for the Operational Phase of Nuclear Power Plants."
4. NRC Inspection Module 35748B, "QA Program (Records)."
5. NRC Inspection Module 39301B, "Pre-Op Test Records."
6. NRC Inspection Module 39701, "Records Program."
7. NRC Inspection Module 39900B, "QA Records."
8. NRC Inspection Module 39940B, "Records (Fuel Fabrication)."

3.0 Guidelines

3.1 In preparation for and during the conduct of this surveillance

- Obtain and review implementing procedures, instructions, and drawings governing this activity.
- Prepare a guide or checklist using the selected items from this guideline.
- Review past surveys, audits, surveillances, and other evaluations/assessments.
- Ensure that checklists include, where applicable, actual observations of performance, general plant conditions, radiological work practices, housekeeping, work document controls and use, and safety practices.

Note: Refer to Chapter 1 for specific details on the attributes listed above.

3.2 Take a sample of records from various organizations and verify document location in permanent record file.

3.3 Take a sample of records intended for temporary storage from various organizations to verify adequate storage levels and at the proper protection level.

- 3.4 Take a sample of records classified as security safeguards information and verify proper control and storage in records files. (i.e., records files are locked, monitored, and/or properly packaged for transmittal)
- 3.5 Verify that permanent record storage facility meets the design requirement and is being properly maintained (i.e., fire protection system operability, humidity control, temperature limitations, fire rating on storage cabinets).
- 3.6 Assess the adequacy (storage and ease of retrievability) of special storage requirements (i.e., chart paper, radiograph storage, etc.).
- 3.7 Observe a representative sample of records management processes, reference paragraph 3.1, and evaluate to ascertain if performance and compliance to applicable criteria is satisfactory.
- 3.8 Verify the qualifications, and if applicable the certifications, of personnel performing records management activities.
- 3.9 Verify that documentation is adequately controlled per procedural requirements.
- 3.10 Verify that security and protection are provided for in safeguards documents.
- 3.11 Verify that written procedures are available for records management personnel for performance of their duties.
- 3.12 Verify that procedures for access control of records storage facilities are available. Items to consider for evaluation are
 - A. Access of files/records and stored disks/tapes.
 - B. Access authorization.
 - C. Identification of records system.
 - D. Timely retrievability of documents.

4.0 Other Guidelines for Consideration

- 4.1 See Chapter 1, "General Quality Surveillance Guidance."
- 4.2 See Chapter 4, "Software, Hardware, and Data Base Controls."
- 4.3 See Chapter 13, "Document Control."
- 4.4 See Chapter 17, "Procurement Document Control."