



**SUBJECT: ANI INFORMATION BULLETIN 80-1A, Revision 6 DRAFT  
“NUCLEAR LIABILITY INSURANCE RECORDS RETENTION”**

**The following is a compilation of comments provided by NIRMA constituents for consideration in the final version of the subject Bulletin. Please incorporate these inputs as deemed appropriate.**

**ITEM 1.0 Page 3, Section 2**

**Current text:**

*Contractor Employees (The term “Contractor Employee” includes all non-utility employees, short term or long term, seeking unescorted access.)*

**Comment:** Please define ‘non- utility’

**ITEM 2.0 Page 4, Section 1.4**

**Current text:**

*Tests, answer sheets and acknowledgments of training should carry the signature of the individual trained as well as the date of the training. Electronic signatures may be used for CBT testing.*

**Comment:** Insert after “Electronic signatures” the following text **“or other form of electronic authentication”**

**ITEM 3.0 Page 5, Section 2.1**

**Current text:**

*Special instructions given to such persons should be documented.*

**Comment:** Please clarify ‘special instructions’

**ITEM 4.0 Page 13, Section XI.1**

**Observed:** It is noted that this Section has been expanded to include **all** radioactive shipment records whereas the prior Bulletin restricted requirements to radioactive waste shipments.

**Comment:** Please clarify need for expanded records on non-waste shipments

**Observed:** Record #1 of this Section includes “Surveys of transport vehicles and their loads.”

**Comment:** These surveys are not required under DOT or NRC for **all** shipments. Please include basis for the requirements for these additional records.

**ITEM 5.0 Page 14, Section XIII.5**

**Current text:**

*HP logs containing radiological survey information, contamination events, radiological incidents, release information, radiation monitor information, event descriptions, etc. (e.g., HP Office Log, Shift Technician Log, etc.)*

**Comment:** Please define “HP” - Hot Particle or Health Physics?

**General Note:** Throughout the document, please define all abbreviations/acronyms at the time of their first appearance in the document **or** include all of them in a designated section at the end of the document.

**ITEM 6.0 Page 14, Section XIII.6**

**Current text:**

*Quality assurance audits of TLD vendors*

**Comment:** Some facilities have considered NVLAP qualification sufficient to document QA requirements for these vendors and have not performed independent audits. Please clarify the need (or expectation) that QA audits be performed on TLD vendors.

**ITEM 7.0 Page 15 – Acceptable Storage Media, 2<sup>nd</sup> paragraph**

**Current text:**

*When transferring records from the original hardcopy to an acceptable alternate media, the facility must ensure the final format is capable of producing clear and legible copies for the duration of the recommended retention period. ... As such, when transferring records from the original media to an acceptable alternate media, administrative controls are essential (e.g ...etc.)*

**Comment:** Line 2 - Insert after “final” the word **“record”**

**Comment:** Line 2 - Insert after “capable of” the following text **“being retrieved and”**

**Comment:** Line 5 - Insert after “alternate media” the following text **“(or migrating electronic records from a legacy electronic media to another electronic media)”**

**ITEM 8.0 Page 16 – First Bullet, 2<sup>nd</sup> sentence**

**Current text:**

*IT and Records Management personnel should be cross-trained on one another's responsibilities.*

**Comment:** Cross-training should be clarified with respect to intent and degree of detail. This requirement should not be construed such that personnel within these two (2) organizations must be able to perform all the work activities of either group.

**Comment:** Suggested text change:

Delete “on one another’s responsibilities” and insert after “cross-trained” the following text **“such that personnel are familiar with the general duties and responsibilities of one another’s positions.”**

**Comment:** Suggest consideration for adding the following as another bullet in this area **“Effective management of electronic records demands coordination among three different management groups within an organization (IM, IT and RM).”** This principle is taken from NIRMA Technical Guideline TG-15, Management of Electronic Records.

**ITEM 9.0 Page 16 – Second Bullet**

**Current text:**

*Document Control should use an “Electronic Vault” to receive electronic files from the document originator. Interim storage concerns should be addressed (e.g., Where do documents reside before being downloaded to the final storage media? How long do they reside in interim storage?)*

**Comment:** **Line 1** - Replace “Document Control” with the following text **“Document Management or Records Management”**

**Comment:** **Lines 1& 2** - In lieu of requiring an “Electronic Vault” for the initial receipt of electronic files received from document originator, suggest that a facility could use an **“acceptable temporary storage location having file security and restricted edit capabilities, e.g., a restricted folder on the Local Area Network.”** Interim Storage concerns should be addressed as noted.

Consider incorporating the temporary storage option into this section of the bulletin.

**ITEM 10.0 Page 16 – Specials controls section, First & Second Bullets**

**Current text:**

*- The e-records should be safeguarded to ensure access to the data is controlled to prevent unauthorized manipulation.*

*- An audit trail should exist for the generation and transfer of e-records.*

**Comment:** If there is an “authorized manipulation,” suggest the audit trail include documentation of any changes to the e-record after it is received from the document originator.

**Comment:** After the second bullet, consider adding the following sentence “**Any corrections, changes or additions should be documented on the electronic record.**”

**END OF COMMENTS**

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NIRMA appreciates the opportunity to provide ANI feedback on this Draft Bulletin. Should there be any questions regarding these comments, please do not hesitate to contact me at (626) 302-3275 or [richard.giska@sce.com](mailto:richard.giska@sce.com).

Regards,

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