
INSPECTION PROCEDURE 88201 APPENDIX G

RECORDS MANAGEMENT

Effective Date: June 20, 2025

PROGRAM APPLICABILITY: IMC 2600, 2694

88201.G-01 INSPECTION OBJECTIVES

- 01.01 To determine if the applicant or licensee has adequately established and is implementing a records management system, in accordance with Title 10 of the *Code of Federal Regulations* (10 CFR) Sections 70.51 and 70.62(a)(2).
- 01.02 To determine if the applicant's or licensee's records management systems is adequately coordinated and integrated with other management measures.

88201.G-02 INSPECTION REQUIREMENTS

This inspection procedure (IP) is intended to provide inspection requirements and guidance applicable to a wide variety of potential construction projects at both existing and new fuel cycle facilities. These projects may vary greatly in scope, complexity, and risk to public health and safety. As a result, not all sections, or subsections, of this appendix may be applicable or implemented at a specific facility. Recommended inspection scope and hours for a specific new fuel cycle facility will be documented in the principal inspection plan (PIP) for that facility developed in accordance with Inspection Manual Chapter (IMC) 2694, "Fuel Cycle Facility Construction and Pre-Operational Readiness Review Inspection Program." Additionally, this appendix can be used to provide additional management measures inspection guidance for plant modification inspections at existing facilities but is not required to be implemented for these projects. Use of this appendix or sections of this appendix for modifications at existing fuel cycle facilities, would be done on a case-by-case basis, in accordance with IMC 2600, Appendix B, "NRC Core Inspection Requirements."

02.01 Records Management Program

Determine if the applicant or licensee has established and is implementing an effective records management program in accordance with any applicable requirements and/or commitments.

02.02 Records of Items Relied on for Safety (IROFS) Failures

Determine if the applicant or licensee is maintaining and updating records of IROFS failures in accordance with 10 CFR 70.62(a)(3).

88201.G-03 INSPECTION GUIDANCE

Specific Guidance

03.01 Records Management Program (Inspection Requirement 02.01)

The requirements for the management of records vary according to the nature of the facility and the hazards and risks it poses. The inspector should review areas related to the handling and storage of health and safety records and the records generated or needed in the design, construction, operation, and decommissioning phases of the facility. The review should provide reasonable assurance that the records management function is adequately coordinated and integrated with other management measures.

03.02 Records of IROFS Failures (Inspection Requirement 02.02)

As required by 10 CFR 70.62(a)(3) an applicant or licensee should maintain records of failures readily retrievable and available for NRC inspection, documenting each discovery that an IROFS or management measure has failed to perform its function upon demand or has degraded such that the performance requirements of § 70.61 are not satisfied. These records must identify the IROFS or management measure that has failed and the safety function affected, the date of discovery, date (or estimated date) of the failure, duration (or estimated duration) of the time that the item was unable to perform its function, any other affected IROFS or management measures and their safety function, affected processes, cause of the failure, whether the failure was in the context of the performance requirements or upon demand or both, and any corrective or compensatory action that was taken. A failure must be recorded at the time of discovery and the record of that failure updated promptly upon the conclusion of each failure investigation of an IROFS or management measure.

88201.G-04 RESOURCE ESTIMATE

The resource estimate for completing this appendix is dependent on the specific facility and will be as determined in the PIP for the facility. Details on the resource estimates are identified in IP 88201, Section 04, "Resource Estimate."

88201.G-05 PROCEDURE COMPLETION

Procedure completion is dependent on the specific facility and will be as determined in the PIP for the facility.

88201.G-06 REFERENCES

NUREG-1520, "Standard Review Plan for Fuel Cycle Facilities License Applications," Rev. 2

END

List of Attachments:

Attachment 1. Revision History for IP 88201 Appendix G

Attachment 1: Revision History for IP 88201 Appendix G

Commitment Tracking Number	Accession Number Issue Date Change Notice	Description of Change	Description of Training Required and Completion Date	Comment Resolution and Closed Feedback Form Accession Number (Pre-Decisional Non-Public Information)
	ML25010A404 06/20/25 CN 25-018	Initial issuance. Initial Issue to provide guidance for the Management Measures inspections of Fuel Facilities licensed under Part 70.	N/A	N/A