NUCLEAR SAFETY DIRECTORATE - BUSINESS MANAGEMENT SYSTEM		
TECHNICAL INSPECTION GUIDE **GUIDANCE: LC6 DOCUMENTS, RECORDS AUTHORITIES AND CERTIFICATES**		**T/INS/006** ISSUE 001
Approved By: *P Gardner*	P Gardner	Issue Date: 24/07/02
Open Government Status: Fully Open		Review Date: 31/12/10

1. Purpose and Scope

1.1 The purpose of this guidance is to facilitate a consistent approach to LC6 compliance inspection and to provide assistance to inspectors while carrying out their duties in this area.

1.2 The guidance does not indicate when or to what extent these compliance inspections should be made as these matters are covered in individual inspectors' inspection programmes.

1.3 The guidance provided is split into four main elements:

1) Purpose of the Licence Condition

2) Guidance on arrangements for LC6

3) Guidance on inspection of arrangements

4) Guidance on inspection of implementation of arrangements

2. Licence Condition

2.1 Licence Condition 6 in full:

1) The licensee shall make adequate records to demonstrate compliance with any of the conditions attached to this licence.

2) Without prejudice to any other requirements of the conditions attached to this licence the licensee shall make and implement adequate arrangements to ensure that every document required, every record made, every authority, consent or approval granted and every direction or certificate issued in pursuance of the conditions attached to this licence is preserved for 30 years or such other periods as the Executive may approve.

3) The licensee shall submit to the Executive for approval such part or parts of the aforesaid arrangements as the Executive may specify**.**

4) The licensee shall ensure that once approved no alteration or amendment is made to the approved arrangements unless the executive has approved such alteration or amendment.

5) The licensee shall furnish to the Executive copies of any such document, record, authority or certificate as the Executive specify.

3. Purpose of Licence Condition 6

3.1 LC6 requires that adequate arrangements are made and implemented

3.2 The purpose of this condition is to ensure that appropriate and adequate records are held by the licensee for a suitable period to demonstrate compliance with licence conditions.

4. Guidance on Arrangements for Licence Condition 6

4.1 The following list of elements in paragraph 4.3 provides NSD's view on what a licensee's arrangements should include to meet the requirements of the Licence Condition and also align with current best practice. The list is not exhaustive and will be subject to review and revision. Absence of any aspect on the list with respect to the licensee's arrangements does not necessarily mean that the arrangements are inadequate provided similar controls are applied in this way.

4.2 Adequate arrangements should identify the records required to demonstrate compliance with licence conditions and should include administrative arrangements for their collection, storage, retrieval, maintenance and disposal.

4.3 The record management system should include:

1) responsibilities for the identification (normally through record schedules) and control of records, an example of a records schedule is attached, as **Appendix A**, which is not intended to be exhustive but indicative of the types of records and other controls that apply. Note; the Retention Category relates to the period of storage eg 5, 10 or 30 years as appropriate.

2) methods, conditions and monitoring of storage / retention commensurate with the nature of the record and the media used,

3) means of retrieval.

4) levels of security to protect from corruption, unauthorised access, loss or damage,

5) duration of storage,

6) arrangements for the review and disposition of records,

7) arrangements for the periodic auditing of the control and storage of records,

8) references to national / international standards on record related aspects such that best practice is aimed for,

4.4 Records may be stored by media other than hard copy provided the licensee has established practical safeguards such as:

1) the continued ability to read the data must be assured taking into account the technological changes that may occur between making the record and its subsequent retrieval. (This may mean upgrading the record in line with new technology). **NB** For records relating to radiological waste packages particularly those destined for long term storage in a national repository this aspect is of major significance as the ability to read the record will need to be maintained for periods of upto hundreds of years.

2) The integrity of the computer programme should be confirmed (e.g. is it a proprietary product? has it been adequately tested and de-bugged?),

3) Evidence of maintenance of the system hardware must be available,

4) Assurance of the security of the system including the use of passwords and control of software amendment must be available,

5) There must be sufficient back-up of recorded data to guarantee preservation of the information so that records can be regenerated in the event of loss / deterioration of the original. Alternative locations for record storage should be used,

6) The system for recording and storing data must prevent the degradation of data,

7) Data must be readily obtainable from the storage system only by "authorised persons",

8) The copy (in whatever medium is being used) must be (or be able to produce) an exact representation of the original record (warts and all). Controls must be in place to ensure that the transfer is accurate. Quality control checks of the image to be stored e.g. immediately following scanning, must be an integral part of the system.

5. Guidance on Inspection of Arrangements

5.1 Part 5 of this guidance is to assist inspectors in judging the adequacy of the licensee's arrangements. It is not exhaustive and will be subject to review and revision in light of experience. It does, however, list aspects that can be examined during routine inspections.

5.2 Check that arrangements exist that deal with the identification arrangement and control of records. (This is normally part of the licensee's Quality or Safety Management Systems). Check that responsibilities and processes are clearly detailed for:

- the identification
- classification
- generation
- collation
- indexing
- storage (including duplication and remote location where reasonable)
- security of access
- review and inspection
- disposal

of records that are required under LC6 i.e. those that demonstrate compliance with the conditions of the licence.

5.3 Check that records have been identified. This can be by some form of schedule, list or in individual procedures.

5.4 Check that owners of records can be identified.

5.5 Check that records have been classified as either permanent or non permanent and assigned an appropriate retention period.

5.6 Check that permanent records are retained for at least 30 years.

5.7 Check that non permanent records have been assigned a retention period and a review prior to disposition.

5.8 Check that sound judgement has been applied to classifying non permanent records e.g. the record has been superseded by a subsequent record or it has ceased to be relevant for its original purpose or it will exist for less than 30 years due to the installation ceasing to be a licensed site. The record that demonstrates compliance with a particular licence condition may not need to consist of all the documents that have been used as the means to the achieve compliance eg Work Order Cards for maintenance tasks but there should be a record that indicates that all the maintenance tasks have been completed and verified and plant history maintained.

5.9 Check that storage conditions are appropriate for the media type used. Generally the licensee will have specified these. **T/AST/033** details the storage conditions for most media types.

5.10 Check that the condition of all records are reviewed to ensure no deterioration and that update, transfer, refresh facilities are used to maintain accuracy and clarity.

5.11 Check that records such as radiographs and physical specimens are also stored appropriately to avoid damage / deterioration / loss.

5.12 Check that records are readily retrievable.

5.13 Check that access to records is controlled and restricted to authorised personnel.

5.14 Check that documents requiring disposal have been dealt with in appropriate fashion.

5.15 Check that the arrangements are periodically audited.

5.16 Check for new records (i.e. records not already entered onto a schedule or detailed in procedures) that these meet the criteria of paragraph 5 e.g. following an LC 36 organisation / management process change.

5.17 Check that records required to be amended following a plant / safety case modification have been so amended. This check can be used to check most aspects of the licensee's arrangements.

5.18 Check that the licensee can relate the records it keeps with the LCs.

6. Guidance on Inspection of Implementation of Arrangements

6.1 Part 6 of this guidance is to assist inspectors in judging the adequacy of the licensee's implementation of its arrangements i.e. is the licensee doing what its arrangements say it should do.

The following list is not exhaustive and will be subject to review and revision.

6.2 Check that individuals with responsibilities connected with the management of records are familiar with these and carry them out.

6.3 Check that there exists a current record schedule, list and / or the records required to satisfy LC 6 and LC 25 are identified in procedures.

6.4 Check for a sample of records that someone is identified as the owner / custodian.

6.5 Check that records that are complete are stored in approved locations i.e. document centres, archives, libraries etc and not in individuals offices etc. Check that for electronically held records that the practical aspects at para 4 of **T/AST/033** have been applied namely:

1) The continued ability to read the data must be assured taking into account the technological changes that may occur between making the record and its subsequent retrieval. (This may mean upgrading the record in line with new technology).

2) The integrity of the computer programme should be confirmed. (e.g. is it a proprietary product ? has it been adequately tested and de-bugged?).

3) Evidence of maintenance of the system hardware must be available.

4) Assurance of the security of the system including the use of passwords and control of software amendment must be available.

5) There must be sufficient back-up of recorded data to guarantee preservation of the information so that records can be regenerated in the event of loss/ deterioration of the original. Alternative locations for record storage should be used.

6) The system for recording and storing data must prevent the degradation of data.

7) Data must be readily obtainable from the storage system by "authorised persons".

8) The copy (in whatever medium is being used) must be (or be able to produce) an exact representation of the original record (warts and all). Controls must be in place to ensure that the transfer is accurate. Quality control checks of the image to be stored e.g. immediately following scanning, must be an integral part of the system.

6.6 Check out a number of permanent and non-permanent records with respect to their classification in relation to their retention periods. Has appropriate judgement been used to establish the classification.

6.7 Check that particular records can be retrieved quickly. (Choose a sample).

6.8 Following a modification to the plant / safety case check that related records have been updated e.g. as built.

6.9 Check that the arrangements have been audited and corrective actions resolved satisfactorily.

6.10 Check that access to records or storage areas is controlled.

APPENDIX 1

EXAMPLE
SITE LICENCE SCHEDULE FOR REACTOR STATION

LC2, Marking of Site Boundary	Licensed Site Drawing SXB OC09900-008/4	3	Station	Security Officer	Paper	Siz B	Siz B	Site Security Plan D
	Site Boundary Inspection, Station Security Log	1	Station	Security Officer	Paper	Siz B		
LC 3, Restriction on Dealing with Site	Records of Assignments	3	Property Services	Company Secretary	Paper	NE HQ Barnwood		
LC 4, Nuclear Matter Stored on Site	Movement Certificate HP 52A	1	Prod Health Physics	Health Physicist Prod	Paper	Prod HP Office		DI/RH/14/31
	R/A Source Location Form RH/S09	3	Prod Health Physicist	Health Physicist Prod	Paper	Prod HP Office	DCRS	DI/RH/14/4
	Sealed Source Register Form RH/SO1	3	Prod Health Physicist	Health Physicist Prod	Paper	Prod HP Office	DCRS	DI/RH/14/5
	Unsealed Source Register Form RH/S09	3	Prod Health Physicist	Health Physics Prod	Paper	Prod HP Office	DCRS	DI/RH/14/5
	Fuel Box Packing sheet BNF/36/0502	3	Fuel Records	Prod Support Head	Paper	Fuel Record Office	DCRS	DI/P/15/20
	Fuel Charged and Discharged NFER HQ/10/1049	3	Fuel Records	Prod Support Head	Paper	React Physics Records		DI/EP/15/11
	NFER Programme	2	React Physics	Performance Head	Paper	Barnwood HQ		DI/EP/15/11
	Euratom Records Safeguards File	3	Performance Section	Performance Head	Paper	Reactor Physics EB		DI/EP/15/25 DI/EP/15/...
LC 4, Nuclear Matter Stored on Site (Continued)	New Fuel Store Drawing SPe759	2	Drawing Office	D Office Supervisor	Paper/ Hard Disc	Drawing Office		

	Irradiated Fuel Store Drawing SPeG36	2	Drawing Office	D Office Supervisor	Paper	Drawing Office		
LC 5, Consignment of Nuclear Matter	Removal of R/ A Material from Site RH/T08	3/4	Acc HP	Station Health Physicist	Paper	HP Office	DCRS	DI/RH/16/3
	Disposal of Waste Oil Form RH/T09	3/4	Acc HP	Station Health Physicist	Paper	HP Office	DCRS	DI/RH/16/6
	Consignment of Solid Waste to Drigg D4/ BNFL	3/4	Acc HP	Station Health Physicist	Paper	HP Office	DCRS	DI/RH/16/3
	Spend Fuel Consignment Docs GEN 289, GEN 290	3/4	Prod Shift	Prod Support Head	Paper	Prod Support Office	DCRS	DI/P/15/28
	Reject Fuel Packing Sheet Ops 16	3/4	Prod Support	Product Support Head	Paper	Prod Support Office	DCRS	DI/PO/15/21
	Consignment Certificate RH/ TO1	3/4	Acc HP	Station Health Physicist	Paper	HP Office	DCRS	DI/RH/16/3
LC 6, Documents, Records Authorities and Certificates	Site Licences XX, (and variations), XXA, XXB, XXC	3	NII	OSB Head HSD	Paper	OSB Store		
	Authorities, Consents/ Approval and Directions	3	NII	OSB Head HSD	Paper	OSB Store		
	Site Licence Instruments	3	NII	OSB Head HSD	Paper	OSB Store		
	Record Schedule PartMCP 5/1	2	Quality Systems	Quality Systems Head	Paper	Doc Centre		
	Primary Implementation Docs MCP 1, AppendixA	3	Quality Systems	Quality Systems Head	Paper	Doc Centre	DCRS	