

CCP-QP-008

Revision 24

CCP Records Management

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PRINTED NAME

APPROVED FOR USE

RECORD OF REVISION

Revision Number	Date Approved	Description of Revision
6	03/11/2002	Additions for use of e-QA system
7	06/07/2002	Incorporation of instructions for pagination and removal of text in Attachments.
8	09/04/2002	Added the definition of magnetic tape and incorporated text to clarify the requirements of computer generated electronic records (clarified steps 2.3.7 and 4.8.3). Updated Attachment 2 to reflect new fax machine number. Added new steps regarding duties for the CCP Site Project Manager and the release of records (steps 3.1 and 4.7).
9	08/27/2003	Updated to reflect issuance of Revision 5 of the QAPD. Made other editorial changes. Separated electronically fillable forms and updated references in the procedure.
10	10/15/2004	Clarified CCP Personnel and Facility Records Custodian responsibilities. Editorial changes throughout.
11	08/22/2005	Reorganized sections for improved flow and added clarifications. Deleted Attachments 3 through 6.
12	11/16/2006	Revised to implement the Waste Isolation Pilot Plant Hazardous Waste Facility Permit requirements resulting from the Section 311/Remote-Handled (RH) Permit Modification Request (PMR).
13	04/24/2007	Revised to change title in responsibilities and body of procedure and to add statement (Note) from QAPD and remove verbiage about in-process records.
14	09/19/2007	Revised to address finding from U.S. Department of Energy, Carlsbad Field Office, Corrective Action Report 07-016, Audit A-07-24. Also revised to provide some clarifications within the procedure, added a step to address superseding and voiding of documents (i.e., Batch Data Reports, Nonconformance Reports), and added a note at the beginning of section 4.9 to address computer modeling results methods.
15	10/28/2009	Revised to make personnel title changes and name changes to organizations. Added section 4.7.1[G] for lost records as well as a section for receipt and handling of Official Use Only (OUO) and Unclassified Controlled Nuclear (UCN) documents.
16	07/06/2010	Revised to clarify and address the submittal of historical source documents.

RECORD OF REVISION (Continued)

Revision Number	Date Approved	Description of Revision
17	11/02/2010	Revised to change the submittal process for Acceptable Knowledge (AK) documentation and section on historical source documents.
18	03/30/2011	Revised to support corrective action report (CAR)-LANL-0004-10.
19	08/02/2011	Revised to change the number of the form in the definition of retention period. Change to Section 4.8 for clarification.
20	08/10/2012	Revised to clarify editorial changes, transmitting of records, and destruction of QA records.
21	02/28/2013	Revised to incorporate Nuclear Waste Partnership (NWP) transition changes.
22	03/24/2014	Revised to include steps for the Record Index Module, addresses editorial guidelines for records, and to update records section.
23	09/03/2014	Revised Sections 3.4 and 3.5 to clarify the responsibilities of Records personnel for verification of records. Updated Section 3.6 to agree with the actions assigned to the WIPP Records Management Services (WRMS) Manager in Section 4.15. Added Section 4.1.2. Revised Step 4.4.1[B] in response to Waste Isolation Pilot Plant (WIPP) Form 14-239. Added Step 4.4.1[E] clarifying that "Remarks" and "Comments" spaces may normally be left blank.
24	02/10/2015	Revised to add Sections 3.4.7 and 4.10.2[C] to require validation of PDFs to ensure that the hardcopy record matches the scanned image. Replaced the title "Lead Records Custodian" with "CCP Records Manager" throughout the document. Added a NOTE to Section 4.10.2[C] stating that the requirement to validate hardcopy records applies only to characterization records completed on or after the effective date of this revision. Updated information in Attachment 1, Written Request for Records Destruction (Example). Deleted Section 3.6, WIPP Records Management Services (WRMS).

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1.0 PURPOSE

This document outlines the Central Characterization Program (CCP) Records Management Program. The records program involves CCP Records and interaction with the Waste Isolation Pilot Plant (WIPP) and Records Management Services (WRMS) as outlined in this procedure.

1.1 Scope

This procedure applies to the creation, maintenance, use, and disposition of records generated by the CCP.

2.0 REQUIREMENTS

2.1 References

Baseline Documents

- DOE/CBFO-94-1012, *U.S. Department of Energy Carlsbad Field Office Quality Assurance Program Document (QAPD)*

Referenced Documents

- *National Archives and Records Administration (NARA) Approved Record Schedules*
- CCP-QP-002, *CCP Training and Qualification Plan*
- CCP-QP-028, *CCP Records Filing, Inventorying, Scheduling, and Dispositioning*
- DOE M 471.1-1, *Identification and Protection of Unclassified Controlled Nuclear Information Manual*
- DOE M 471.3-1, *Manual for Identifying and Protecting Official Use Only Information*
- EA15RM3002-2-0, *Records Inventory and Disposition Schedules (RIDS)*

2.2 Training Requirements

- 2.2.1 Personnel performing this procedure will be trained and qualified in accordance with CCP-QP-002, *CCP Training and Qualification Plan*, prior to performing this procedure.

2.3 Definitions

- 2.3.1 **Authentication** - Synonymous with validation.
- 2.3.2 **Computer System** - A configuration, or working combination, of hardware, software, and data communication devices.
- 2.3.3 **Destruction** - The physical destruction of records by shredding, incinerating, or other permanent means.
- 2.3.4 **Disposition** - The action taken regarding records no longer needed for current government business. Actions may include transfer to the Carlsbad Field Office (CBFO) Records Holding Facility or

Federal Records Center, transfer from one federal agency to another, transfer of permanent records to the National Archives and Records Administration (NARA), or destruction of nonpermanent records.

- 2.3.5 **Electronic Record** - A record in a form that is readable only by a computer. Electronic records are most frequently recorded on media such as disk, diskette, tape, and tape cartridges.
- 2.3.6 **External Records** - Records generated by the waste generating sites (e.g., procurement records, procedures, radiological surveys, facility operating logs, container packaging records, historical source documents, etc.). These records are not subject to the requirements of this procedure concerning legibility, pagination, accuracy, completeness, or revision.
- 2.3.7 **Inactive Record** - A record no longer required to conduct government business and therefore dispositioned in accordance with approved records schedules and stored for authorized retention periods.
- 2.3.8 **Index** - A listing of records and cross-reference information. At a minimum, an index will indicate record location within the record filing and storage system.
- 2.3.9 **Internal Use Only (IUO)** - A document that has been identified as Internal Use Only (IUO) and is considered proprietary, which is not to be disseminated beyond the organization.
- 2.3.10 **Legible** - For the purpose of this document, legible means that the characters, letters, and numbers making up data or information contained in a record can be read without difficulty or magnification.
- 2.3.11 **Lifetime Quality Assurance (QA) Records** - Records that are required to be retained and preserved in an acceptable condition for the operating life of the repository (i.e., until termination of the repository permit). Prior to destruction of any lifetime record, it shall be evaluated for upgrade to a post-closure record.
- 2.3.12 **Magnetic Tape** - A tape with a magnetizable surface on which data can be stored and retrieved. A tape or ribbon of any material impregnated or coated with magnetic or other material on which information may be placed in the form of magnetically polarized spots.

- 2.3.13 **Medium** - Refers to the physical form of recorded information such as paper, film, disk, magnetic tape, or other materials on which information can be recorded.
- 2.3.14 **Microfilming** - A photographic process used to record images of records on a fine-grain, high-resolution film in sizes greatly reduced from the original. Formats in general use are rolls of 16 millimeter (mm) images, pages of 16 mm images called microfiche, and 35 mm images mounted in aperture cards. Microform is a generic term for all microfilm formats.
- 2.3.15 **Migrate** - In electronic records, the process of moving from one computer system to another.
- 2.3.16 **National Archives and Records Administration (NARA)** - An independent government agency responsible for establishing policies and procedures for managing the records of the federal government. NARA exercises final authority for approving the disposition of government records.
- 2.3.17 **Nonpermanent Records** - Records having value for a specific, limited time and authorized by NARA (via approved disposition schedules) to be destroyed after that time. Nonpermanent records are sometimes referred to as temporary records.
- 2.3.18 **No Foreign National (NOFORN)** - No Foreign National (NOFORN) is a marking that identifies a document is not to be given to a person who is a foreign national – not a United States citizen.
- 2.3.19 **Nonrecord Material** - Those classes of documentary or other material that fail to meet the general definition of a record or fall under one of the following categories: (a) library or museum material made or acquired for reference or exhibition purposes; (b) extra copies of documents preserved only for convenience of reference on which no action is recorded or taken; (c) stocks of publications or other processed documents that require no action and are not part of a case on which action is taken; (d) routing slips and transmittal sheets adding no information to that contained in the transmitted material (i.e., concurrences or direction on how to proceed or implement); and (e) papers of a private or nonofficial character that pertain to an individual's private affairs.
- 2.3.20 **Official Use Only (OUO) Information** - Certain unclassified information that may be exempt from public release under the Freedom of Information Act and has the potential to damage governmental, commercial, or private interests if disseminated to persons who do not need to know the information to perform their

jobs or other U.S. Department of Energy (DOE) authorized activities.

2.3.21 **Personal Papers** - Materials of a private nature maintained by personnel at their work place that **DO NOT** relate to, or have an effect on, the conduct of business or activities related to the CCP. Personal papers maintained in desks and file drawers in the work place must at all times be segregated and stored separately from records.

2.3.22 **Post-closure Records**

- Records that assist in preventing action that could impair the long-term isolation of the waste.
- Records preserving information that would prevent inadvertent human intrusion, such as the nature and hazard of the waste and locations of the geologic repository operation area, the underground facility, bore holes, shafts, and boundaries of the controlled area.
- Records providing information relevant to post-closure monitoring and assessment of performance of the repository system.
- Records preserving, for future generations, information regarding the geologic setting relevant to mitigation of releases of radioactive materials.
- Records which would be of significant value after decommissioning and closure of the repository.

2.3.23 **Privacy Record** - Any item, collection, or grouping of information about an individual that contains his or her name or other personal identifier.

2.3.24 **Project Participant** - Any DOE site, generator site, or contractor organization that participates in a CBFO program. Subcontractor's records are the responsibility of the participant.

2.3.25 **Project Records** - Records created or received in support of the CCP.

2.3.26 **QA Record** - An authenticated record that provides objective evidence of the quality of items or activities.

- 2.3.27 **Record Medium** - Refers to the physical form of recorded information such as paper, film, disk, magnetic tape, or other materials on which information can be recorded.
- 2.3.28 **Records** - Those classes of documentary materials which may be disposed of only after the archival authority is obtained. The statutory definition of records (44 United States Code §3301, Definition of Records), "...includes all books, papers, maps, photographs, machine-readable materials or other documentary materials, regardless of physical form or characteristics, made or received by an agency of the United States government under federal law or in connection with the transaction of public business and preserved or appropriate for preservation by that agency or its legitimate successor as evidence of the organization, functions, policies, decisions, procedures, operations or other activities of the government or because of the informational value of the data in them." This definition applies to all departmental records including those created, received, and maintained by contractors pursuant to their contracts. Virtually all recorded information in the custody of the government (including information held by contractors which is considered by contract to be government information) regardless of its' media (hard copy, machine-readable, microform), is considered "government records." For the CCP, information meeting the above criteria is considered to be a record, unless it can be clearly identified as a nonrecord.
- 2.3.29 **Records Custodian** - An individual identified within an organization who is assigned the responsibility of, and trained for, assisting record originators regarding records management issues.
- 2.3.30 **WIPP Records Archive (WRA)** - A facility that meets the regulatory requirements for the storage of noncurrent records pending their destruction or transfer to a Federal Records Center or the NARA. The WIPP Records Archive (WRA) is located in Carlsbad, New Mexico.
- 2.3.31 **Records Inventory and Disposition Schedule (RIDS)** - The DOE form used to indicate the appropriate disposition of records. The purpose and content of the form may be placed in electronic media as long as all the requirements of the form are met.
- 2.3.32 **Record Series** - File units or documents arranged according to a filing system or kept together because they relate to a particular subject or function; result from the same activity; document a specific kind of transaction; take a particular physical form; or have some other relationship arising out of their creation, receipt, or use, such as restrictions on access and use. A record series may also

include related elements physically separated from it such as finding indexes or large documents (also sometimes called a file series). These records are generally handled as a unit for disposition purposes.

- 2.3.33 **Software Generated** - A form that is generated by controlled software that performs approved calculations.
- 2.3.34 **Unclassified Controlled Nuclear Information (UCNI)** - Certain unclassified but sensitive Government information concerning nuclear material, weapons, and components whose dissemination is controlled under section 148 of the Atomic Energy Act.
- 2.3.35 **Record Systems** - A common, integrated set of manual and/or automated activities for creating and identifying; collecting and controlling; processing and organizing; distributing; microfilming; storing and preserving; retrieving; and disposing of records applicable to preparation for storage, as well as the storage of machine readable records such as magnetic tapes, floppy disks, etc.
- 2.3.36 **Retention Period** - The period of time approved by NARA for records to be retained, whether in the originating office, Records Storage Facility or a Federal Records Center. The retention period is indicated on EA15RM3002-2-0, *Records Inventory and Disposition Schedules (RIDS)*.
- 2.3.37 **Uniform File Code (UFC)** - A standard filing system for correspondence records required by the DOE.
- 2.3.38 **Unscheduled Records** - Records for which no disposition authority has been identified on an approved disposition schedule.
- 2.3.39 **Validation/Authentication** - An activity that certifies the content of a document as being authentic and complete. This certification is documented by signing (or initialing) and dating the document unless otherwise authenticated. Validation/authentication may be made by the author, assigned reviewers, or individual(s) specifically assigned to review and validate documents.

3.0 RESPONSIBILITIES

3.1 CCP Manager or Designee

3.1.1 CCP Manager has the overall responsibility and authority for the content of records generated.

3.1.2 Verifies that the organization has a current approved RIDS.

3.1.3 Verifies that records are retained in accordance with retention requirements and not inadvertently or prematurely destroyed.

3.1.4 Verifies the timely disposition of records through in-house destruction.

3.1.5 Verifies that personnel are aware of the requirements to retain records according to approved retention requirements.

3.1.6 Provides adequate records management resources in the form of staff, equipment, and dedicated time to verify good record keeping practices.

3.1.7 Obtains written concurrence to destroy records exceeding their retention periods.

3.2 Cognizant Manager

3.2.1 Identifies those documents that become records.

3.2.2 Determines if the work activities are quality-affecting.

3.2.3 Identifies records in the implementing procedures.

3.3 CCP Records Manager or Designee

3.3.1 Acts as the liaison between the CCP and WRMS for records management.

3.3.2 Carries out the records management duties in accordance with approved implementing procedures.

3.3.3 Determines which nonpermanent records series are eligible for destruction.

3.3.4 Informs the CCP Manager or designee of the records that have expired retention periods.

- 3.3.5 After receiving approved written concurrence, dispositions the quality assurance (QA) and/or non-QA records.
- 3.3.6 Prepares and revises the RIDS in accordance with CCP-QP-028, *CCP Records Filing, Inventorying, Scheduling, and Dispositioning*, and verifies the RIDS remain current.
- 3.3.7 Identifies records that are eligible for in-house destruction.
- 3.3.8 Assists personnel with record retrieval from CCP Records as required.
- 3.3.9 Assists in obtaining approved disposition authorities for unscheduled records from NARA.
- 3.4 Records Custodian
 - 3.4.1 Carries out the records management duties in accordance with approved implementing procedures.
 - 3.4.2 Transmits completed QA records to the Host (generator/storage) site records centers or WIPP Records Archives (if applicable).
 - 3.4.3 Assists personnel with record retrieval from CCP Records, as required.
 - 3.4.4 Verifies that Records are legible and that there are no missing signatures.
 - 3.4.5 Ensure that the Attachment 2, CCP Records Transmittal/Receiving Form, is in agreement with the transmitted record.
 - 3.4.6 Enter all QA records into the Records Index Module.
 - 3.4.7 Perform a validation before transfer of PDF's to ensure that the hardcopy record matches the scanned image.
- 3.5 Facility Records Custodian
 - 3.5.1 Coordinates the compilation and the transfer of records generated at the Host (generator/storage) sites.
 - 3.5.2 Verifies that records are legible and that there are no missing signatures.
 - 3.5.3 Ensure that the Attachment 2 is in agreement with the transmitted record.

- 3.5.4 Enter all QA records into the Records Index Module.
- 3.5.5 Manages the transfer of completed and in-process records to CCP Records.
- 3.5.6 Assists personnel with record retrieval from CCP Records where applicable.
- 3.5.7 Carries out the records management duties in accordance with approved implementing procedures.

3.6 Personnel

- 3.6.1 Generates the necessary records that document the activities assigned to them. Each individual who creates records must verify the record(s) are legible, accurate, and complete, appropriate to the work accomplished.
- 3.6.2 Are aware of, and provide reasonable protection during the generation and processing of records intended to become QA Records.
- 3.6.3 Ensures that records are legible, accurate and complete, accurate to the work accomplished, when generating, reviewing and validating records.
- 3.6.4 Ensures that records are not inadvertently or prematurely destroyed.
- 3.6.5 Coordinates records issues with the respective Records Custodian(s)/Facility Records Custodian(s).

4.0 PROCEDURE

4.1 Generation of Records

Cognizant Managers

4.1.1 Prior to conducting a work activity:

- [A] Identify those documents that become records.
- [B] Determine if the work activities are quality-affecting.
- [C] Identify records in the implementing procedures.

NOTE

Records may be originals **OR** reproducible copies; however, original documents are preferred.

4.1.2 Documents referenced by final reports, except readily available references such as encyclopedias, dictionaries, engineering handbooks, national codes and standards etc. shall be retrievable from records files. Preparers of such records shall ensure that the documents are entered into the record system.

4.2 Legibility

Personnel

NOTE

Reproducible ink should be used whenever possible to verify maximum contrast on printed records. Records created in black ink typically produce better quality copies than do records printed in other color inks.

NOTE

Highlighter marking pens **SHALL NOT** be used on records. Bolding or underlining text are preferred alternatives to highlighting.

4.2.1 Verify that the records generated are legible and reproducible. If there is doubt, copy the record and then recopy the copied record (copy-a-copy test) to check the copied copy for legibility.

4.3 Accuracy

4.3.1 Verify that records are accurate to the work accomplished.

4.4 Completeness

4.4.1 Verify that records are complete per the following:

- [A] Blank spaces are filled in where information is required to be entered making the document complete.
- [B] Not Applicable (N/A or NA) is entered in spaces where information is not applicable or as otherwise indicated.
- [C] Blank spaces are acceptable when a record is a software generated page/form which performs calculations.
- [D] The document's intent is clear, even with some blanks not filled in. If so, the record is acceptable as is. A blank space in a record does not, in itself, make the record incomplete. For example:

Is the indicator light illuminated? ___✓___ YES _____ NO

This is an acceptable method of recording information, even when the NO space is blank.

- [E] "Remarks" and/or "Comments" spaces may be left blank, unless a condition identified during the associated activity necessitates further explanation by way of a remark or comment.

NOTE

Individuals handling documents intended to become QA Records shall provide reasonable protection for the records from damage or loss until the records are submitted to the records system (this includes documents generated during field operations).

4.5 Storage, Maintenance, Control, and Protection of QA Records

4.5.1 Store, maintain, and protect completed QA records as follows:

- [A] In an Underwriter Laboratories-listed one-hour fire rated (or equivalent) container, or a container certified by a person competent in the technical field of fire protection,

OR

- [B] Retain a copy in a location sufficiently remote from the original to preclude destruction as a result of a single event such as fire or natural disaster,
ALSO
- [C] Provide adequate protection of the QA records within the storage location to minimize the risk of damage or loss from humidity, natural disasters, adverse weather conditions, mold or infestations of insects or rodents.
- [D] **DO NOT** store QA records where they may be exposed to water or heat sources, **OR** where food is kept.

4.5.2 Access

- [A] Prevent access to QA records by unauthorized personnel as follows:

NOTE

Authorization must be documented either by signature and date on posted list, **OR** by letter on file. Authorization will be done by the CCP Manager or designee. The authorization list must be kept current.

- [A.1] Generate, post, and maintain a list designating the personnel who are authorized and permitted access to the QA records.

NOTE

Provisions for installation of locking mechanisms will be made for storage areas requiring controlled access. Authorized personnel allowed access to the storage areas will be given the lock code **OR** controlled location of the keys.

- [A.2] Protect locking mechanisms for storage cabinets/areas that require controlled access.
- [A.3] Store all records not currently being used in appropriate storage equipment (e.g., file cabinets, shelving, desks).
- [A.4] Lock file cabinets and offices as appropriate when leaving controlled access areas.

4.6 Records Separation and Availability

NOTE

Records will be separated from non-records and personal papers.

4.6.1 Provide a means to retrieve records by indexing with one of the following methods:

[A] Numerically (such as audit case files):

OR

[B] By subject, with guides dividing different subjects.

4.7 Corrections, Additions, Revisions, Supplements, and Lost Records

NOTE

When in-process record/records intended to become QA Records are being generated they shall be maintained (do not remove or destroy) and if corrections are required, then perform this by proper correction, superseding, or voiding as directed in the following sections of this procedure.

4.7.1 Make necessary changes, additions, revisions and supplements in accordance with the following guidelines:

[A] Corrections

[A.1] Correct errors by drawing a single line through the incorrect information (leaving the original text readable), entering the correct information, **AND** initialing and dating each correction made.

[A.2] **DO NOT** use correction fluid (white-out) or correction tape on records.

NOTE

Editorial changes may be made to records without the same level of review and approval as the original record. Editorial changes include **ONLY** the following:

- Clarification statements that do not affect the purpose of the record;
- Correcting grammar or spelling (the meaning has not changed);
- Renumbering sections, attachments or pagination;
- Date(s) that do **NOT** impact final disposition;
- Transcription errors;
- Sections that require N/A, but were left blank.

[A.3] Provide corrected or changed records (except for editorial changes) that have been validated back to the originating organization for review and revalidation.

NOTE

Original records may not be available for remote personnel to make necessary changes; therefore a printed copy of the scanned image from CCP Records may be used to make the changes. Changes will be transmitted in accordance with step 4.10.1.

[A.4] **IF** the original document is unavailable to the individual making a change to a record, **THEN** use a printed copy of the scanned image from CCP Records and make the change. This will then become the original.

[B] Additional Notations

[B.1] **IF** any additional information needs to be added to a record after validation, **THEN** enter the notation, **AND** initial and date each notation(s) made.

[C] Revisions, Regeneration, and Supplements

[C.1] **IF** a record needs to be revised due to illegibility or damage, **THEN** transcribe **OR** enhance the illegible, or damaged, portion of the record **AND** initial and date each part transcribed or enhanced.

- [C.2] **IF** a record must be regenerated due to damage, **THEN** regenerate the record and place a notation at the bottom of the regenerated page, "This record has been regenerated because of damage," sign, and date. Place the regenerated record in front or on top of the original damaged record.
- [C.3] **IF** a record has already been sent to CCP Records, **AND** needs a supplement or revision, **THEN** contact CCP Records.

NOTE

The following is a standard way to add new pages to a document, to supersede a page, and to add a corrected page.

[D] Adding Pages to Documents

- [D.1] When adding pages to a document, place new pages behind the page within the document that they will follow.

Example: The new pages are to be added right after page 35 within the document. Place the new pages behind page 35, **AND** number the new pages 35A, 35B, 35C.

- [D.2] **IF** the pages are added to the end of the document, **THEN** number them in sequential order.

Example: The last page of the document is page 40. Place the new pages after page 40, **AND** number the new pages as 41, 42, 43.

[E] Superseding Pages

- [E.1] When superseding a page with a new, corrected page, draw a single, diagonal line through the entire page to be superseded **AND** initial and date.

- [E.2] Place the new, corrected page to the front of the superseded page. Using the page number on the now superseded page, number the new, corrected page with the same number, then renumber the superseded page with the same number and an additional character (i.e., A, B, C).

Example: Superseded page was numbered 35. The new, corrected page will now be numbered 35, **AND** the superseded page will change to 35A.

[F] Superseding or Voiding of Whole Documents

[F.1] When superseding or voiding a whole document (not just pages within a document [i.e., BDRs, Nonconformance Reports]) stamp or write “superseded” or “void” on the first page of the document **AND** initial and date.

[G] Lost Records

[G.1] **IF** replacement or restoration of the record is **NOT** practical, **THEN** action should be taken to ensure the quality of the items or activities affecting quality, by using re-examination, investigation, or by other means.

4.8 QA Record Authentication/Validation

NOTE

Records become QA records when they are completed and authenticated/validated.

NOTE

Individuals who review and authenticate/validate records are responsible for the completeness and accuracy of those records.

[A] Authenticate/validate QA records through one of the following methods:

[A.1] Initial **OR** sign and date hard copy records, unless otherwise authenticated/validated.

[A.2] **IF** the nature of the record precludes signing, **THEN** validate the QA record using any reasonable form which clearly indicates that an authorized individual believes the record to be complete and accurate.

4.9 Protection, and Preservation of Computer Generated Electronic Records

NOTE

There are two types of electronic records:

- Electronic records that can be printed in a hard copy format.
- Electronic records that cannot be printed in a hard copy format.

Where the electronic copy is not converted to hard copies it must be managed in accordance with the guidelines contained in this section. Properly performing these steps will ensure that electronic records are in compliance with the applicable requirements.

NOTE

Computer modeling results (e.g., Monte Carlo N Particle [MCNP], Origen2.2) that perform statistical and random computer runs of radionuclide distributions will not be maintained but summarized in the hardcopy calculation packages. The calculation packages document these computer runs and shall define the range of possible values, the methodology for randomly selecting from this range, and a representative example of the input values and output result.

NOTE

Electronic media for historical source documents transmitting Adobe portable document format (PDF) files or electronic databases may be compact discs (CDs) or digital video discs (DVDs).

4.9.1 Protection

[A] To minimize the risk of unauthorized additions, deletions, or alterations to electronic files, use power-on, file passwords, or control lists to control any unauthorized access.

[A.1] Place electronic records, when complete to read/write protection.

[B] Provide access of electronic records to authorized staff.

[C] Provide access in the work area of electronic file indices printouts, logs, disk labeling, **OR** other means to facilitate retrieval of active records by authorized users. Indicate the method used (including the directory path, if applicable) to transfer the information, the date compressed (if applicable), and file encryption information.

4.9.2 Preservation

- [A] Preserve records for the duration of their authorized retention period to verify their availability and provide verification of work performed by the facility and its supporting agencies.

4.9.3 Storage

- [A] Label all electronic media (computer generated) used to store records properly with the following: originating organization, filename, retention period (obtain from CCP Records), original software used, and the version of the software.

4.9.4 Media Backup

- [A] Back up electronic records on a regular basis to safeguard against the loss of information due to equipment malfunctions or human error.

4.9.5 Hardware/Software Changes

- [A] Protect records media **AND** migrate information before the media is no longer useful.
 - [A.1] As software programs change, transfer existing records to the newer software program.
 - [A.2] As hardware is phased out or upgraded, verify that all existing records can be read utilizing the new hardware.
 - (a) **IF** new software and hardware will **NOT** read the current electronic record(s), **THEN** migrate the records to a more accessible media.
 - (b) **IF** migration is **NOT** possible, **THEN** retain either the old software and hardware **OR** make a printout of the data **AND** file the hard copy.

4.10 Transmitting Records

NOTE

Transmitting completed QA records is for records going from one location or site to another.

NOTE

Records being forwarded within a Host site location or between Project-Office personnel DO NOT need an Attachment 2. Completed QA Records being sent from one location or site to another will be sent using Attachment 2.

4.10.1 Transmitting Completed QA Records

- [A] Send completed QA records (e.g., BDRs) via Attachment 2 to the Records Custodians/Facility Records Custodians.
 - [B] Before the completed QA record is transmitted, make a copy of Attachment 2 and the record, **AND** retain until receipt acknowledgement is received from the recipient.
-

NOTE

Transmittal of completed characterization records to the Host (generator/storage) site (when available) is performed according to the site-specific procedure regarding the submittal of characterization records to their records center. These characterization records will be maintained in accordance with their site-specific records procedures.

NOTE

Records that are designated as lifetime records shall be maintained for the life of the waste characterization program at a participating generator/storage site plus six years, or transferred to the WIPP Records Archive facility. Records designated as non-permanent records shall be maintained for 10 years from the date of record/generation at the participating generator/storage site, or at the WIPP Records Archive facility.

Records Custodian

4.10.2 Transmitting of Completed Characterization Records to the Host (generator/storage) Site or WIPP Records Archive (as applicable)

- [A] Return characterization records to the Host (generator/storage) site location or WIPP Records Archive (as applicable) either at pre-determined intervals **OR** at that end of the waste characterization process in accordance with approved RIDS.

- [B] **IF** the Host (generator/storage) site is closed and will no longer be in operation, **THEN** submit the documentation pertaining to that site to CBFO for permanent archiving, **OR** the WIPP Records Archive at the end of the waste characterization process in accordance with approved RIDS.

NOTE

The requirement to validate hardcopy records against scanned images applies only to completed characterization records where the final date is on or after the effective date of Revision 24 of this procedure. Characterization records completed prior to this date may be transferred without performing this step.

- [C] Perform a validation before transfer of PDF's to ensure that the hardcopy record matches the scanned image.
- [C.1] Upon completion of validation mark first page as validated and initial and date.
-

NOTE

The Waste Confirmation Organization represents the permittees and is required to confirm that waste shipments comply with permit requirements prior to shipment.

4.10.3 Transmitting of Waste Confirmation Video and Audio Media Recording

- [A] Transmit one copy of the video and audio recording media to the Waste Confirmation Organization.

4.11 Unclassified Controlled Nuclear Information (UCNI) and Official Use Only (OUO) Documentation

NOTE

Transmission of UCNI or OOU documents must be by means that preclude unauthorized disclosure or dissemination.

NOTE

UCNI documentation must include the required release and markings identified in DOE M 471.1-1, *Identification and Protection of Unclassified Controlled Nuclear Information Manual*. OOU documentation must include the required release and markings identified in DOE M 471.3-1, *Manual for Identifying and Protecting Official Use Only Information*.

4.11.1 Transmitting of UCNI and OOU Documents

- [A] Documents identified as UCNI must be transmitted to CCP Records with an Attachment 2 and the transmittal must have the following statement placed in the comment section:

Matter transmitted contains Unclassified Controlled Nuclear Information. When separated from enclosures, this transmittal document does not contain UCNI.

- [B] Documents identified as OOU must be transmitted to CCP Records with an Attachment 2 and the transmittal must have the following statement placed in the comment section:

Document transmitted contains OOU information.

- [C] When transmitting externally:

[C.1] The UCNI or OOU matter must be contained in a single opaque envelope or wrapping with the recipient's address, a return address, and the words "To Be Opened by Addressee Only."

[C.2] Must be sent by the following U.S. mail methods:
First Class, Express, Certified, or Registered Mail,

OR

[C.3] Any commercial carrier, FedEx is preferred.

- [D] When transmitting internally the documents may be hand carried as long as the transmitter can maintain control over access to the document being transmitted.

4.11.2 Access and Protection of UCNI and OUO Documents

NOTE

When giving an authorized individual a copy of an UCNI or OUO document, the requirements they will be expected to perform while the document is in their possession must be made clear to the individual, see requirements below.

NOTE

Only authorized individuals may have access to UCNI or OUO documents (e.g., an individual with an official need to know in connection with the performance of official DOE-authorized activities).

- [A] Disseminate UCNI or OUO documentation to only authorized individuals.
- [B] Must maintain physical control of UCNI or OUO documentation to preclude unauthorized disclosure; store in locked receptacles, such as file cabinets, desks, or bookcases.
- [C] Reproduce only to the minimum extent necessary.
- [D] When a copy machine malfunctions during the copying of an UCNI or OUO document the copier must be cleared and all paper paths checked to verify that no UCNI or OUO material remains in the machine.
- [E] After its necessary use by an authorized individual, all copies of UCNI or OUO documentation must be destroyed by using strip cut shredders that result in particles of no more than ¼- inch wide strips or if on a CD the shredding of the disc.
- [F] Electronic UCNI or OUO documentation (e.g., PDF) maintained by CCP Records will be stored on a protected server and the files will be properly marked as UCNI or OUO.

4.12 Internal Use Only (IUO) and No Foreign National (NOFORN)

4.12.1 Transmitting of IUO and NOFORN Documents

- [A] Documents identified as IUO or NOFORN must be transmitted to CCP with an Attachment 2 and the transmittal must have it clearly identified in the Comments section that the document being transmitted is IUO or NOFORN.

4.12.2 Access and Protection of IUO and NOFORN

NOTE

Only individuals within the project may have access to IUO documents.
Dissemination outside of the project will not be permitted.

- [A] Disseminate IUO to internal project participants only. NOFORN is not to be disseminated to any Foreign National.
- [B] Must maintain physical control of IUO or NOFORN to preclude unauthorized disclosure; store in locked receptacles, such as file cabinets, desks, or bookcases.
- [C] Reproduce only to the minimum extent necessary.
- [D] After its necessary use by an authorized individual, all copies of IUO and NOFORN must be destroyed by a paper shredder or if on a CD the shredding of the disc.
- [E] Electronic IUO or NOFORN documentation (e.g., PDF) maintained by the CCP Records will be stored on a protected server and the files will be properly marked as IUO or NOFORN.

4.13 Receiving QA Records

4.13.1 Receipt process provides the following:

- [A] Provisions to permit a current and accurate assessment of the status of QA records.
- [B] A method for identifying the records required to be included in the records system.
- [C] A method for identifying the records that have been received.
- [D] Procedures for receipt and inspection of incoming records, including verification that the QA records are received in agreement with the transmittal document and that the records are legible.
- [E] Provisions to control and protect the records from damage or loss during the receiving processes.
- [F] A method for submittal of completed records to the storage facility without unnecessary delay.

4.13.2 The Facility Records Custodian assigned at each Host (generator/storage) site is responsible for receipt and transmittal of QA records. In the event that a Facility Records Custodian has not been assigned to a Host site, the CCP Records Manager will designate the person or organization responsible for receiving records.

4.13.3 Ensure that the Attachment 2 is in agreement with the transmitted record and that it is legible.

[A] **IF NOT,**
THEN notify the sender and perform the following:

[A.1] Work to resolve the issues with the sender.

[A.2] **IF** unable to resolve the issues,
THEN identify the record was rejected on Attachment 2 and return Attachment 2 and record to the sender.

4.13.4 Enter all QA records into the Records Index Module.

NOTE

Once QA records have been received in CCP Records, original records will **NOT** be removed without a specific need for the original record to be released. If an original record is removed from CCP Records, it is to be returned within fourteen (14) calendar days.

4.14 Retrieval of Original Records from CCP Records at the Project Office

4.14.1 Requests for retrieval of **ORIGINAL** records are handled as follows:

[A] Requestor, provide a written request to CCP Records providing the reason for the request and when the record will be returned.

Records Custodian/Facility Records Custodian

4.14.2 Process requests for retrieval of records already placed into CCP Records as follows:

[A] Pull the requested record.

[B] Make a copy of the record or assure that there is a PDF copy of the record.

- [C] **IF** there is not a PDF scanned copy of the record,
THEN place a copy of record into the records file.
- [D] Place a completed Check Out Card in the record file.
- [E] Notify requestor of availability of the requested record for pick-up **OR** deliver the **ORIGINAL** requested record to the person who made the request.

4.15 Destruction of QA and Non-QA Records

4.15.1 Destruction of QA Records

- [A] **DO NOT** destroy QA records until each of the following conditions are met:
 - [A.1] Expiration of the NARA approved retention, as noted in the CCP RIDS, has occurred.
 - [A.2] Evaluation of lifetime records for the potential need to upgrade them to post-closure records has been performed by the CCP Manager or designee.
 - [A.3] CCP Manager or designee determines if regulatory requirements are satisfied, operational status permits the disposal of such records, and the related contractual requirements have been satisfied.
 - [A.4] In cases of conflicting requirements concerning records retention requirements, the most stringent requirements shall be used in determining the final disposition.
- AND**
- [A.5] CCP Manager or designee determines that there are no enforcement actions against the CCP.

NOTE

QA records that may be relevant to an enforcement action, regardless of disposition, will be maintained until the New Mexico Environment Department (NMED) determines they are no longer needed for enforcement action, and then the records may be dispositioned as directed in step 4.15.2.

- [B] **IF** all of the listed conditions are **NOT** met,
THEN DO NOT destroy the affected records series, **AND** CCP Manager or designee, follow step 4.15.3.

- [C] **IF** all of the listed conditions are met,
THEN CCP Manager or designee complete the Written Request for Records Destruction, (See Attachment 1, Written Request for Records Destruction), for an example **AND** submit to the WRMS Manager before destroying QA records.
- [D] Upon receipt of the approved written concurrence, CCP Manager or designee forward the approval to the CCP Records Manager or designee.

CCP Records Manager or Designee

- [E] Receive the approved written concurrence and disposition the QA records.

4.15.2 Destruction of Nonpermanent, Non-QA Records

CCP Records Manager or Designee

- [A] Determine which nonpermanent records series are eligible for destruction by reviewing the RIDS to determine the length of time the records series is to be retained.
- [B] Inform the CCP Manager or designee of the records which have expired retention periods.

CCP Manager or Designee

- [C] **IF** in agreement,
THEN the CCP Manager or designee, completes and forwards Written Request for Records Destruction, including a reference to the current RIDS, to the WRMS Manager before destroying the nonpermanent, non-QA records.

CCP Records Manager or Designee

- [D] After receiving the approved written concurrence, disposition identified non-permanent or non-QA records.

4.15.3 Requesting an Extension of the Record Retention Period

- [A] **IF** the CCP Manager or designee determines that the approved record retention period needs to be extended,
THEN CCP Manager or designee, perform the following:
 - [A.1] Send a memorandum to the WRMS Manager with a request and justification of an extension.

- [A.2] Maintain the memorandum with the respective RIDS.
- [A.3] Take the appropriate action, depending on the response to the memorandum.

5.0 RECORDS

5.1 Records generated during the performance of this procedure are maintained as QA records in accordance with the requirements of this procedure. The records are the following:

5.1.1 Non-QA

- [A] Written Request for Records Destruction
- [B] Written Request for Retrieval of Original Record
- [C] Request for Extension Memorandum

5.1.2 QA/Nonpermanent

- [A] Attachment 2 – CCP Records Transmittal/Receiving Form
- [B] Records Index Module

Attachment 1 – Written Request for Records Destruction (Example)

Nuclear Waste Partnership

John Smith
Technical & Field Engineering, Incorporated
2101A South Canal
Carlsbad, NM 88220

SUBJECT: REQUEST FOR CONCURRENCE TO DISPOSE OF RECORDS

Dear Mr. Smith:

This is a request for concurrence to dispose of the following record series according to our current Records Inventory and Disposition Schedule dated April 10, 2004.

<u>RECORD SERIES</u>	<u>RETENTION PERIOD</u>	<u>INCLUSIVE DATES</u>
Landlord Housekeeping Pre-checklists - Item #24	1 year	January, 2003 through July, 2003
Key Inventory Logs - Item #17	2 years	January, 2002 through June, 2002

If you have any questions, please contact Ms. Jane Smith, of my staff,
at (575)555-5555.

Sincerely,

CONCURRENCE:

David Doe
Characterization Project Manager

John Smith, Manager
WIPP Records Management
Services (WRMS)

SP: ab

cc: J. Smith, Technical & Field Engineering

Attachment 2 – CCP Records Transmittal/Receiving Form

CCP Records / Records Custodian, 4021 National Parks Highway - MS: GSA 212, Carlsbad, New Mexico 88220

Telephone Number: 575-234-7523

Fax Number: 575-234-7033

Attn: _____ Ship to: _____ _____ _____ Telephone Number: _____	From: _____ Site: _____ Company: _____ Telephone Number: _____ Date Sent: _____		
Document Number	Title / Description	Record Date	Total Pages
Comments			

(When the Record accepted line has been completed, the rest of the page below may be left blank.)
 Acceptance/Rejection Signature and Date

Records Accepted _____
Signature Printed Name Date

Records Rejected _____
Signature Printed Name Date

Reason for Rejection:

Re-submittal: _____
Signature Printed Name Date