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Ontario Power Generation

Program

TITLE

INFORMATION MANAGEMENT

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DOCUMENT RELATIONSHIP	
Applicability:	OPG Wide
Receives Authority from:	OPG-CHAR-0002, CIO Management System

Document is Related to Pressure Boundary 🗹 Document Requires CNSC Notification 🗹

PURPOSE

This program: [B-1] [B-6] [B-9] [B-10] [B-12]

(a) Establishes a set of standards and procedures for the management of Ontario Power Generation's (OPG's) information throughout its life-cycle, regardless of media, including electronic systems such as e-mail, SharePoint, and the Intranet to ensure consistent and appropriate use.

(b) Describes requirements for a managed system of activities related to information.

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- (c) Establishes uniform and efficient processes for management, maintenance, and final disposition of records and documents throughout OPG.
- (d) Establishes the overall OPG process for governance including electronic filing, approval, distribution, and maintenance of the OPG Governance Framework.
- (e) For issues that impact on pressure boundary, N-MAN-01913.11-10000, Pressure Boundary Program Manual, shall also be applicable.

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EXCEPTIONS

None

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1.0 DIRECTION

This program is applicable to all OPG employees and agents (i.e., temporary staff and contractors). Any OPG employee or agent who produces or receives recorded information on behalf of OPG shall be instructed, through relevant contracts, to create and maintain records and documents in accordance with requirements set out in the implementing procedures and standards of this program.

The Information Management program ensures the following:

- (a) Documentation, including that for software, reflects station configuration and plant status control. **[B-6]**
- (b) Appropriate roles, responsibilities, and structure are standardized to include Document Owners, Responsible Officers, and Records Officers.
- (c) Preparation and use of documents, including those for software, are controlled and formatted, with status identified. **[B-6] [B-9] [B-12]**
- (d) Obsolete documents and software packages are identified and removed from use. **[B-9]**
- (e) Documents are available for use where the prescribed activity is being performed or where required for reference. **[B-8] [B-9]**
- (f) Creation and use of records is controlled.
- (g) Records, including vital records, are identified and maintained. [B-1] [B-12]
- (h) Records shall be designated permanent or non-permanent. Records that meet one or more of the following criteria shall be designated as permanent:
 - (1) Records of value in demonstrating capability for safe operation.
 - (2) Records required to maintain, rework, repair, replace, or modify a structure, system, or component.
 - (3) Records of value in determining the cause of an accident, malfunction, or unscheduled occurrence.
 - (4) Records required to provide baseline data for periodic inspection.
 - (5) Records that would be of value in decommissioning a system, component, or structure.
 - (6) Records as identified by Codes, Standards, or Laws.
- (i) Change control processes are applied appropriately against documents. [B-6] [B-11]
- (j) Appropriate processes and security requirements for managing records and documents, including those for software, according to Regulatory, Corporate, and Nuclear requirements are standardized. **[B-1] [B-6] [B-8] [B-12]**

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(k) A current listing or index of all records is identified and maintained. [B-1] [B-6] [B-12]

Note: Index of records is through an Approved Information Management System such as Asset Suite.

- (I) Uniform retention schedules are maintained to ensure that final disposition of records is carried out according to regulatory and business requirements. **[B-1] [B-6] [B-12]**
- (m) Controls are in place for the preparation, review, and approval of records, controlled documents, and governance documents.
- (n) Standardized business processes are in place for the management of electronic information and Approved Information Management Systems (AIMS).

This program describes the components and processes necessary to ensure an effective Information Management program. Figure 1, Information Management Program Governance, displays the hierarchy and structure of documents required for program implementation.

Each Responsible Officer and/or Records Officer shall assume accountability for their Business Unit's Information Management program. These programs shall be standard and consistent across OPG and include the standards and procedures depicted in Figure 1.

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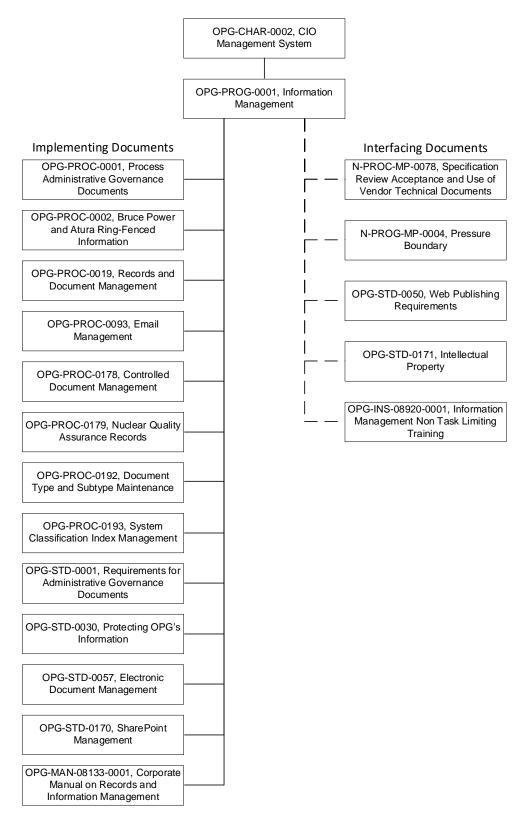


Figure 1: Information Management Program Governance

1.1 Administrative Governance Document Management [B-6] [B-8] [B-9] [B-11]

1.1.1 OPG-PROC-0001, Process Administrative Governance Documents

This procedure establishes controls for preparation, review, and approval of governance documents for all OPG Lines of Business (LOBs).

1.1.2 OPG-STD-0001, Requirements for Administrative Governance Documents [B-7]

This standard provides direction for each LOB to define governance that meets the minimum requirements of their business and obligations including a description of the OPG Governance Framework, criteria for selecting the type of governance document to use for a particular purpose and circumstance, interfaces, and minimum requirements for structure, content, and format that should be applied.

1.2 Electronic Information Management [B-2] [B-4] [B-8]

1.2.1 OPG-PROC-0093, E-mail Management

This procedure establishes direction for proper use, management, and cost control of OPG's e-mail system, including e-mail considered to be official records.

1.2.2 OPG-STD-0057, Electronic Document Management

This standard defines the requirements for managing electronic documents across OPG and identifies the following:

- AIMS
- Acceptable formats and standard document creation tools
- Quality check requirement
- Electronic approval
- Creation of documents by external organizations and vendors
- Creation of e-mail as an official record
- Availability of records
- Scanning and microfilming.

1.2.3 OPG-STD-0170, SharePoint Management

This document defines the Corporate direction for Microsoft SharePoint for OPG LOBs who harness this tool for collaboration and information management. It describes the current model for SharePoint Management and provides direction on use of Team Sites and the Intranet.

1.3 Records and Document Control [B-2] [B-3] [B-4] [B-5] [B-6] [B-8]

1.3.1 OPG-PROC-0002, Bruce Power and Atura Power Ring-Fenced Information

This procedure governs the management of OPG's Bruce Power and Atura Power Ring-Fenced information. The procedure identifies the following at a minimum:

• Compliance

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- Information in the Ring-Fence
- Access requirements
- Training
- Ring-Fence issues and violations.

1.3.2 OPG-PROC-0019, Records and Document Management [B-9] [B-10] [B-11]

This procedure provides direction to ensure that records in the custody or control of OPG are consistently managed, protected, and accessible throughout their life cycle. This procedure identifies the following at a minimum:

- Generation and authentication
- Identification, traceability, and classification
- Roles and accountabilities
- Submission
- Temporary and permanent storage controls
- Retention and life-cycle requirements
- Retrieval
- Changing, annotating or revising
- Transfer to another location
- Final disposition
- Performance measures and reports
- Verification and assessment.

1.3.3 OPG-PROC-0178, Controlled Document Management

This procedure identifies the following requirements for controlled documents: **[B-6] [B-9] [B-11] [B-12]**

- Processing requirements
- Acceptance criteria for new or revised controlled documents
- Obsoleting, superseding, or canceling a controlled document
- Minor revisions
- Document change requests
- Review and approval requirements (having access to pertinent background information)
- Indexing requirements
- Distribution requirements
- Receipt acknowledgement
- Verification of current issue of document
- Security-related documents
- Requirements for resolution of disputes.

1.3.4 OPG-PROC-0179, Nuclear Quality Assurance Records

This procedure identifies the following requirements for managing nuclear quality assurance records: **[B-1] [B-6] [B-10] [B-11] [B-12]**

- Generation and authentication of records
- Identification, traceability, retention and classification of records
- Submission of records

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- Temporary and permanent record storage controls
- Receipt inspection and processing of records
- Records retrieval
- Quality Assurance (QA) vault criteria
- QA vault access requirements
- Preservation control.

1.3.5 OPG-PROC-0192, Document Type and Subtype Maintenance

The purpose of this procedure is to define the process for controlling the addition, modification, or cancellation of document types and subtypes in an AIMS. Doc types should be used consistently throughout OPG and any requests for a new or modified doc type require approval. Doc type is second only to facility code in the records and controlled document module hierarchy and inappropriate allocation of doc types can have an impact on security, registration, searching, maintenance and retention of document collections.

1.3.6 OPG-PROC-0193, System/Subject Classification Index Management

The purpose of this procedure is to establish the requirements for proper control and maintenance of the system/subject indexes to achieve consistency across OPG. Indexes are a critical component of operating systems, and are embedded throughout OPG business processes including financial management, materials management, plant equipment identification, and documentation classification. This procedure applies to the indexes maintained in the System Classification Index (SCI) Asset Suite, SCI Web application, and SharePoint. **[B-12]**

1.3.7 OPG-STD-0030, Protecting OPG's Information

This standard provides instructions for the protection of information owned by or entrusted to OPG. This standard identifies the following at a minimum:

- Classification rules and requirements
- Responding to requests for information from external parties
- Protection of documents from unauthorized access
- Marking rules and methods
- Transporting, mailing, and transmitting requirements
- Destroying classified information.

1.3.8 OPG-MAN-08133-0001, Corporate Manual on Records and Information Management

This manual provides detailed task instructions on all aspects of records management from creation through to final disposition. This manual forms the basis of a good records management program.

1.4 Interfacing Documents

OPG-wide documents should be applied in Nuclear through programs defined in N-CHAR-AS-0002, Nuclear Management System. Aspects of the business that are common to OPG and have an impact on Nuclear shall have their interfaces clearly defined in N-CHAR-AS-0002.

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OPG-wide documents should be applied in Renewable Generation (RG) through programs defined in RG-CHAR-AS-0001, Renewable Generation Management System.

1.4.1 N-PROC-MP-0078, Specification, Review, Acceptance, and Use of Vendor Technical Documents

Details the process to be used to demonstrate that a technical document that was approved by an organization that is **not** part of OPG is suitable for filing and use by OPG. This procedure covers the specification, review, acceptance, and use of Vendor Technical Documents submitted by vendors to Nuclear. Vendors include any external supplier of equipment, material, or design-related services, such as manufacturers, suppliers, and design agencies.

1.4.2 N-PROG-MP-0004, Pressure Boundary

Defines the managed process to control the quality of Pressure Boundary activities at OPG's Nuclear and customer facilities. It provides the requirements and defines the responsibilities across OPG's Nuclear and customer facilities for compliance with and maintenance of the Pressure Boundary QA Program. It also provides the governance framework for the execution of Pressure Boundary field work activities. This is to ensure OPG Nuclear retains the Pressure Boundary Certificates of Authorization necessary to perform Pressure Boundary activities and remains compliant with the Nuclear Station Power Reactor Operating Licences, Provincial Boiler and Pressure Vessel Acts and regulations as applicable, and applicable Canadian Standards Association (CSA) Standards.

1.4.3 OPG-CHAR-0002, Chief Information Office Management System

The purpose of this charter is to set out how work is performed in order to develop and manage OPG Information Technology (IT) systems and to ensure that they can securely, reliably and cost-effectively meet OPG needs.

1.4.4 OPG-INS-08920-0001, Information Management Non-Task Limiting Training

Defines the task and knowledge levels candidates require in order to meet conditions to become qualified in Information Management positions supporting Nuclear.

1.4.5 OPG-STD-0050, Web Publishing Requirements

This standard describes the requirements for structure, minimum content, writing best practices, and use of the OPG intranet. It also provides direction to OPG Web Publishers (web authors and publishers) and Content Owners in creating and publishing content to the Intranet.

1.4.6 OPG-STD-0171, Intellectual Property

This standard provides instructions for the protection of intellectual property owned by or entrusted to Ontario Power Generation Incorporated (OPG). This standard applies to all OPG employees and agents (e.g., temporary staff and contractors).

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1.5 Performance Measures and Reporting

- 1.5.1 For Records and Document Management, OPG Business Units should compile and report against established performance measures every second year (as set by the Corporate Official Records Officer [CORO]) in accordance with OPG-PROC-0019.
- 1.5.2 For Nuclear, N-PROC-RA-0023, Fleetview Program Health and Performance Reporting requires that program health indicators should be developed, implemented, and reported. For this program the following metrics will be collected and reported:
 - Every second year records self assessments completion and compliance rate
 - Quality checks accuracy rate
 - Turnaround time for controlled documents and records
 - Client submission rejection rate
 - Electronic Records Management (ERM) System Major Incidents.

1.6 Personnel and Training Qualifications

- 1.6.1 Staff identified as Program Owners, Responsible Officers, Records Officers, and staff performing Document Custodian functions, who have roles and accountabilities for implementing the requirements of this program, shall receive appropriate training.
- 1.6.2 Business Units may establish training requirements as applicable but, at a minimum, all OPG employees and agents shall complete Computer Assisted Learning (CAL) Courses CAL 64706, Document Management An Introduction and CAL 65139, Managing Information at OPG.
- 1.6.3 Staff members who are identified in OPG-PROC-0002 shall complete CAL 66078, Bruce Power Ring-Fence Training, or CAL 79075, Atura Ring-Fence Training, as appropriate. RG and Corporate Records Officers shall complete Qualification 35644 and Nuclear Records Officers shall complete Qualification 35885.

2.0 ROLES AND ACCOUNTABILITIES

2.1 Vice-President, Security and Emergency Services, Emergency Services and Training

- 2.1.1 Supports development of, updates, and makes available, training in conjunction with subject matter expert to meet program requirements.
- 2.1.2 Accountable to the President and CNO and works in partnership with the Nuclear organization to ensure the integrity of the Nuclear Management System (N-CHAR-AS-0002) is maintained in accordance with the expectations of the President and CNO.

2.2 Director, IT Services, Information Management, Tech and Admin Services

- 2.2.1 Develops and oversees the implementation of a comprehensive program, management system, and organization to manage information effectively and efficiently.
- 2.2.2 Assumes Program Owner roles and accountabilities in accordance with N-PROG-AS-0001, Nuclear Management Systems Administration, for the Records and Controlled Document Management program.

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- 2.2.3 Assumes Program Owner roles and accountabilities in accordance with N-PROG-MP-0004, Pressure Boundary, for the Records and Controlled Document Management program.
- 2.2.4 Provides continuous assessment of effectiveness of this program.
- 2.2.5 Ensures Document Management training programs are current and available for OPG employees and agents.
- 2.2.6 Maintains master list of OPG Responsible and Records Officers.
- 2.2.7 Provides centralized Records Management support to Nuclear and Corporate organizations.
- 2.2.8 Ensures Document and Records Management Staff are qualified in accordance with N-TQD-424-00001 and OPG-INS-08920-0001.
- 2.2.9 Ensures authorized personnel have access to records and controlled documents.
- 2.2.10 Ensures records and controlled documents are maintained throughout their life cycle.
- 2.2.11 Accountable to the President and CNO and works in partnership with the Nuclear organization to ensure the integrity of the Nuclear Management System (N-CHAR-AS-0002) is maintained in accordance with the expectations of the President and CNO.
- 2.2.12 Ensures this program has been reviewed against N-STD-MP-0027, Configuration Management, and ensures that the requirements of N-STD-MP-0027 are met by the program and appropriate implementing documents.

2.3 VP, Nuclear Regulatory Affairs

- 2.3.1 Ensures governance documents are reviewed for compliance with licensing and regulatory requirements.
- 2.3.2 Ensures licensing requirements are communicated to applicable program owner.

2.4 Document Owner

Accepts responsibility for the integrity of a document throughout its life cycle (accuracy, completeness, and consistency).

2.5 Line Management

- 2.5.1 Demonstrates commitment to this program by applying management expectations contained within the OPG Governance Framework.
- 2.5.2 Implements programs as defined by the program governance.
- 2.5.3 Provides effective oversight of staff and takes corrective action to address human performance and program execution deficiencies.
- 2.5.4 Ensures training of staff is consistent with program requirements, is effective, and meets performance expectations.

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2.5.5 Manages all documents and data, created or acquired, to perform assigned functions.

2.6 Business Unit

- 2.6.1 Manages, controls, and provides custodianship of records created and received by their Business Unit.
- 2.6.2 Ensures that responsibilities are defined and regulatory and business requirements for Records Management are communicated.
- 2.6.3 Appoints a Records Officer.

2.7 Responsible Officers

Ensures that records under the custody or control of their Business Unit are maintained in a manner that satisfies Corporate and regulatory requirements.

2.8 Records Officers

- 2.8.1 Ensures that a Records and Document Management Program is in place for the Business Unit.
- 2.8.2 Ensures that processes are in place to ensure all Business Unit records are established on retention including the approval of all new records retention codes (RRCs).
- 2.8.3 Ensure records are disposed of in accordance with the Corporate Records Retention Schedule (CRRS).
- 2.8.4 Serves as the liaison with the Corporate Official Records Officer (CORO) in Business Admin and Information Management of CIO.
- 2.8.5 Ensure that Records Management maintenance procedures are in place relating to:
 - Access control (security)
 - Index control and maintenance
 - Quality control and filing
 - Safety practices
 - Environmental protection.
- 2.8.6 Ensure training requirements are completed in the Records Officer's Business Unit.
- 2.8.7 Leads the assessment and compliance activities every 2 years.

3.0 DEFINITIONS AND ACRONYMS

3.1 Definitions

Refer to the <u>Lexicon of Records Management Definitions</u> at Powernet > Business Functions > Information Management > IM Program Authority > Lexicon of Records Management Definitions.

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3.2 Abbreviations and Acronyms

AIMS	Approved Information Management System
CAL	Computer Assisted Learning
CIO	Chief Information Officer
CNO	Chief Nuclear Officer
CRRS	Corporate Records Retention Schedule
CORO	Corporate Official Records Officer
LOB	Line of Business
OPG	Ontario Power Generation
RG	Renewable Generation
RRC	Records Retention Code

4.0 BASES AND REFERENCES

4.1 Bases

- [B-1] ASME NQA-1, Quality Assurance Requirements for Nuclear Facilities Applications, Basic Requirement 17, Quality Assurance Records.
- [B-2] Personal Information Protection and Electronic Documents Act, S.C. 2000, c. 5.
- [B-3] Canada Business Corporations Act, .S.O. 1990, Chapter B.16.
- [B-4] OPG-STD-0059, Code of Business Conduct.
- [B-5] Electricity Generation Licence, EG 2003-0104, Ontario Power Generation Inc., Part 6 Bruce Decontrol Related Conditions, and Part 7, Ring-Fencing of Affiliate Market Functions.
- [B-6] ISO 14001:2004, Environmental Management Systems -Requirements with Guidance for Use 4.4.5 Control of Documents, 4.5.4 Control of Records.
- [B-7] CSA N286-12 Management System Requirements for Nuclear Facilities Clause 4.4(c)&(d) Internal and external interfaces, how and by whom decisions are made.
- [B-8] CSA N286-12 Management System Requirements for Nuclear Facilities Clause 4.7.2 Information.
- [B-9] CSA N286-12 Management System Requirements for Nuclear Facilities Clause 4.7.3 Documents.
- [B-10] CSA N286-12 Management System Requirements for Nuclear Facilities Clause 4.7.4 Records.
- [B-11] CSA N286-12 Management System Requirements for Nuclear Facilities Clause 4.10 Change.

[B-12] CSA N285.0, General Requirements for Pressure Retaining Systems and Components in CANDU Power Plants, Section 12.

4.2 References

4.2.1 Performance References

[C2][C3]CAL 64706, Document Management – An Introduction

CAL 65139, Managing Information at OPG

CAL 66078, Bruce Power Ring-Fence Training

CAL 79075, Atura Ring-Fence Training

N-CHAR-AS-0002, Nuclear Management System

N-MAN-01913.11-10000, Pressure Boundary Program Manual

N-PROC-MP-0078, Specification, Review, Acceptance, and Use of Vendor Technical Documents

N-PROC-RA-0023, Fleetview Program Health and Performance Reporting

N-PROG-AS-0001, Nuclear Management Systems Administration

N-PROG-MP-0004, Pressure Boundary

N-TQD-424-00001, Nuclear Pressure Boundary Fieldwork/Administration Training and Qualification Description

OPG-CHAR-0002, Chief Information Office Management System

OPG-INS-08920-0001, Information Management Non Task Limiting Training

OPG-MAN-08133-0001, Corporate Manual on Records and Information Management

OPG-PROC-0001, Process Administrative Governance Documents

OPG-PROC-0002, Bruce Power and Atura Power Ring-Fenced Information

OPG-PROC-0019, Records and Document Management

OPG-PROC-0093, E-mail Management

OPG-PROC-0178, Controlled Document Management

OPG-PROC-0179, Nuclear Quality Assurance Records

OPG-PROC-0192, Document Type and Subtype Maintenance

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OPG-STD-0050, Web Publishing Requirements

OPG-STD-0057, Electronic Document Management

OPG-STD-0170, SharePoint Management

OPG-STD-0171, Intellectual Property

Qualification 35644, Records Officer - Non-Nuclear

Qualification 35885, Records Officers - Nuclear

RG-CHAR-AS-0001, Renewable Generation Management System

4.2.2 Developmental References

[C4]CAN/CGSB 72.34-2005, Electronic Records as Documentary Evidence

CAN2-72.11-93, Microfilm and Electronic Images as Documentary Evidence

CSA-N285.0, General Requirements for Pressure Retaining Systems and Components in CANDU Nuclear Power Plants, Section 12.1

CSA-N286.0-92, Overall Quality Assurance Program Requirements for Nuclear Power Plants

DoD 5015.2-STD, Electronic Records Management Software Applications Design Criteria Standard

EPRI NCIG-08, Electrical Power Research Institute, Guidelines for the Content of Records to Support Nuclear Power Plant Operation, Maintenance and Modification

IAEA SG-G-3.1, Application of the Management System for Facilities and Activities

INPO 12-013, Performance Objectives and Criteria for Operating

ISO15489-1, Information and Documentation – Records Management, Part 1 General

ISO/TR 15489-2, Information and Documentation – Records Management, Part 2 Guidelines

N-STD-MP-0027, Configuration Management

NIRMA TG 15-2011, Management of Electronic Records

5.0 REVISION SUMMARY

This is an **intent** revision.

• Minor wording changes throughout.

- Owner, Approver, and Authorizer names and titles updated.
- Exceptions section added. Incorporates DCR 151598.
- Section 1.0, aligned wording regarding OPG employees and agents.
- Section 1.0 (k), removed the word Nuclear as listings of all records are maintained in AIMS.
- Section 1.0 (m), identified that controls are in place for records and controlled documents in addition to the governance documents identified in the previous revision.
- Figure 1 updated to show implementing and interfacing document changes.
- Section 1.2.1 and 1.2.4 removed as OPG-PROC-0054 and OPG-PROC-0165 have been superseded by OPG-STD-0170, SharePoint Management. As a result, numbering in Section 1.2 has changed. Incorporates DCR 156780.
- New Section 1.2.3 added to discuss OPG-STD-0170, SharePoint Management.
- Section 1.3.1, updated to include Atura in the ring fence.
- Section 1.3.7, updated to remove Intellection Property and Copyright details. This information was moved to new OPG-STD-0171, Intellectual Property.
- Section 1.4, added reference to RG-CHAR-AS-0001.
- Section 1.4.1, repositioned OPG-INS-08920-0001 to Section 1.4.4.
- Sections 1.4.1 and 1.4.2, updated wording to current.
- Section 1.4.6, new interface to OPG-STD-0171, Intellectual Property.
- Section 1.6.2, aligned wording regarding OPG employees and agents.
- Section 1.6.3, added reference to new CAL 79075, Atura Ring-Fence Training. Updated "non-Nuclear" to "RG and Corporate".
- Section 2.0, updated titles to represent current roles and accountabilities and align to organization changes. Incorporates DCR 154899.
- Section 2.2.5, aligned wording regarding OPG employees and agents.
- Section 2.2.12 and Section 4.2.2, added reference to N-STD-MP-0027, Configuration Management. Incorporates DCR 136139.
- Sections 2.4, 2.7, and 2.8, removed most of the lead-in descriptions of these positions as they are located in the Lexicon of Records Management Definitions.
- Section 2.8.4, updated CORO department.

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- Section 4.1, [B-2] removed as it is applicable to new OPG-STD-0171. B-3 to B-13 renumbered in this section and throughout the body of the document.
- Section 4.2, updated references.