

# Access Authorization Regulatory Issues for Nuclear Power Reactors

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# Introduction



- Issues raised by NRC inspectors
  - Vital Area Access
    - Reports of Interaction
    - Inspection findings
  - Self-Reporting of Legal Actions
    - Inspection findings



# Access to Vital Areas

## 10 CFR 73.56 (j)



- (j) *Access to vital areas.* Licensees or applicants shall establish, implement, and maintain a list of individuals who are authorized to have unescorted access to specific nuclear power plant vital areas during non-emergency conditions. The list must include only those individuals who have a continued need for access to those specific vital areas in order to perform their duties and responsibilities. The list must be approved by a cognizant licensee or applicant manager or supervisor who is responsible for directing the work activities of the individual who is granted unescorted access to each vital area, and updated and re-approved no less frequently than every 31 days.



# Access to Vital Areas 10 CFR 73.56 (j)



## – Vital Area Access lists

- Only individuals with a continued need to perform their duties
- Review of list by cognizant manager or supervisor
- List updated no less frequently than every 31 days
- Performance-based regulation
- Has implications for the IMP
- Industry bulletin forthcoming from NEI



## Self-Reporting of Legal Actions 10 CFR 73.56 (g) (1)

- (g) *Self-reporting of legal actions.* (1) Any individual who has applied for unescorted access or unescorted access authorization or is maintaining unescorted access or unescorted access authorization under this section shall promptly report to the reviewing official, his or her supervisor, or other management personnel designated in site procedures any legal action(s) taken by a law enforcement authority or court of law to which the individual has been subject that could result in incarceration or a court order or that requires a court appearance, including but not limited to an arrest, an indictment, the filing of charges, or a conviction, but excluding minor civil actions or misdemeanors such as parking violations or speeding tickets. The recipient of the report shall, if other than the reviewing official, promptly convey the report to the reviewing official. On the day that the report is received, the reviewing official shall evaluate the circumstances related to the reported legal action(s) and re-determine the reported individual's unescorted access or unescorted access authorization status.

## Self-Reporting of Legal Actions 10 CFR 73.56 (g) (2) (continued)

- (2) The licensee or applicant shall inform the individual of this obligation, in writing, prior to granting unescorted access or certifying unescorted access authorization



# Self-reporting of Legal Actions

## 10 CFR 73.56 (g) 1



- Self-reporting of Legal Actions
  - Applies to any applicant for UA or UAA or anyone maintaining either UA or UAA
  - Must report any legal actions taken by law enforcement or courts the person has been subject to that could result in incarceration or court order that requires a court appearance.
  - Must report to reviewing official, supervisor or other management official designated in site procedures



## Self-reporting of Legal Actions

- Alerts on NCIC activity
  - Rap-back feature capable with the IDENT system that will notify the organization submitting fingerprints of NCIC activity such as an arrest





# Questions



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