

July 17, 2000

MEMORANDUM TO: James Creed
Safeguards Program Manager
Division of Reactor Safety
Region III

FROM: Richard P. Rosano, Chief **/RA/**
Reactor Safeguards Section
Operator Licensing, Human Performance
and Plant Support Branch
Division of Inspection, Program Management
Office of Nuclear Reactor Regulation

SUBJECT: "NON-EMERGENCY WORK RELATED NEEDS" FOR ACCESS TO
VITAL AREAS AND FREQUENCY OF ACCESS TO THE AREA(S)

This memorandum is to respond to your e-mails dated March 22 and June 14, 2000, to clarify unresolved access authorization issues identified during inspections at the Prairie Island and Monticello Nuclear Power Stations. These issues were identified when performing IP 71130.02.02(g) to determine if the licensee has a process for granting access to plant equipment, including vital equipment, for authorized personnel who have an identified need for access. This determination was established for access to vital areas by the regional inspector and was compared to areas actually accessed over the past six months against the authorized areas.

10 CFR 73.55(d)(7) and Section 8.1 of the Prairie Island and Monticello security plans require that the access authorization program limit unescorted access to vital areas for non-emergency work related needs and that the access list be updated at least once every 31 days and be approved at least quarterly by the licensee manager or supervisor.

RSS determined that the findings were within the scope of 10 CFR 73.55(d)(7) and the IP 71130.02.02 (g) was administered correctly under the new baseline inspection procedures. The question of non-emergency work related to access to vital areas is based on job necessity to perform routine or preventative maintenance to vital equipment in these areas. Site access is subject to the PSP for any plant personnel needing to perform such jobs and is in accordance with 10 CFR 73.56 & 73.57 to determine trustworthiness of an individual.

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