

April 27, 2001

MEMORANDUM TO: John A. Grobe, Director
Division of Reactor Safety
Region III

FROM: Cynthia A. Carpenter, Acting Deputy Director */RA/*
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

SUBJECT: NRR RESPONSE TO TIA 2000-19, ADEQUACY OF PERSONNEL
ACCESS CONTROL TO VITAL AREAS (TAC NOS. MB0880 and
MB0881)

By memorandum dated December 21, 2000, Region III requested Office of Nuclear Reactor Regulation (NRR) technical assistance to determine the acceptability of the licensee's practices for controlling unescorted access to vital areas at Quad Cities Nuclear Power Plant, Units 1 and 2. As noted in the unresolved item (URI) in Inspection Report 50-254/265/00-19, the inspector identified a situation in which several individuals had been granted unescorted access to a specific vital area even though the performance of their duties did not appear to justify the access level. Region III noted that this may conflict with the commitments in Section 7.3.3 of the site security plan.

The NRR technical staff has completed its analysis of this issue. The rule change to 10 CFR 73.55(d)(7)(i)(A), referred to as the "Insider Rule," and the Statements of Consideration for that rule, published in the *Federal Register* Volume 62, No. 231, dated December 2, 1997, state that a determination to grant access to a specific vital area for an individual to perform assigned duties automatically provides for access to other vital areas, should it be required. Prior to this rule change, vital area access was based on performance of specific duties. Licensees can now maintain a single list of vital area access allowing any authorized individual to have access to all vital areas. In addition, each licensee is responsible for properly controlling access by establishing procedures to ensure that persons no longer needing unescorted access are not granted such access.

NRR staff reviewed the Insider Rule, Section 7.2.1 of the site security plan, Section 7.3.3 of the site security plan, and the licensee's position paper that was submitted as a result of the URI. NRR concludes that the licensee appropriately revised Section 7.2.1 of the site security plan to conform to the regulatory position taken in the Insider Rule. Further, NRR concludes that the licensee's practice of permitting access to all vital areas for individuals whose work needs pertain only to a single vital area conforms to the regulatory requirements and the licensee's security plan commitments.

If you have any questions on this matter, please contact Stewart Bailey at (301) 415-1321 or Barry Manili at (301) 415-2912.

Docket Nos. 50-254 and 50-265

cc: Brenda Platchek, Region I
Loren R. Plisco, Director, Region II
Kenneth E. Brockman, Director, Region IV

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