



NUCLEAR ENERGY INSTITUTE

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March 7, 2003

Mr. Roy P. Zimmerman
Director
Office of Nuclear Security and Incident Response
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

SUBJECT: Electronic Fingerprint Processing

Dear Mr. Zimmerman:

Timely processing of fingerprint submissions becomes increasingly important as the nuclear industry implements Compensatory Measures for Access Authorization. The industry has committed substantial time and resources to developing the capability to submit fingerprints electronically. The stated goal was a response to the licensee within 72 hours of submission. Over the last two months unexpected delays in response to electronic fingerprint submissions have been experienced. Since this issue spans several parts of the NRC organization, we request Nuclear Security and Incident Response coordinate appropriate action.

The reliability of the Electronic Information Exchange (EIE) and the ability to get timely technical support to resolve issues is of concern. During January and February, the 72-hour goal was not consistently met. Licensees also report that they were unable to get timely technical support in evaluating the problem. Using the EIE contact number does not always produce a timely response.

There are also limitations on the amount of data that can be handled by the EIE system requiring submission of fingerprints in small batches. This affects the productivity of both the licensee and the NRC staff.

During normal working hours, licensees find it difficult to make contact with personnel in the Personnel Security Branch and that during some normal business days no fingerprint submissions were processed. Additionally, licensees find that the method of response to electronic submission is not always an electronic response but may be faxed or sent by overnight mail adding an additional delay.

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We recommend the following actions to support implementation of the Access Authorization Order:

1. Find and correct the fundamental cause of the unreliable operation of the EIE system.
2. Upgrade the internet backbone to current industry standards for capacity and reliability.
3. Provide licensees with an EIE IT contact number, with hours of operation, and committed response time.
4. Provide staffing to allow processing, on each business day, of all fingerprints submissions received on that day.
5. Provide a single number within the Personnel Security Branch that licensees can use during normal business hours to resolve fingerprint issues.

Being a relatively new process, some problems with the electronic submission of fingerprints are understandable. Having selected the EIE system as the backbone of this process, it is imperative that a high level of reliability be achieved. Any processing delays have significant economic impact for licensees.

If you have any questions, please contact me at 202-739-8105.

Sincerely,



James W. Davis

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