

Rulemaking Comments (74FR 17115)

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USNRC

From: Andrew Kauffman [kauffman.9@gmail.com]
Sent: Monday, June 15, 2009 4:25 PM
To: Rulemaking Comments
Cc: Reed, Elizabeth
Subject: Suggestions Regarding the ANPR for RTR Fingerprinting

June 16, 2009 (8:00am)
OFFICE OF SECRETARY
RULEMAKINGS AND
ADJUDICATIONS STAFF

SUBJECT: SUGGESTIONS REGARDING THE ADVANCE NOTICE OF PROPOSED RULEMAKING (ANPR) FOR FINGERPRINTING FOR CRIMINAL HISTORY CHECKS OF INDIVIDUALS GRANTED UNESCORTED ACCESS TO RESEARCH AND TEST REACTORS

I would like to provide a couple of suggestions regarding the April 14, 2009 *Federal Register* notice (Vol. 74, No. 70, pp 17115-17119) addressing the subject above. These suggestions do not provide answers to the questions posed in the ANPR, but I believe that they are important points for the NRC to consider when engaging in this rulemaking process.

1) The proposed rulemaking is intended to address fingerprinting-based criminal history records checks for unescorted access to research and test reactors (RTRs), as was addressed previously in NRC Order EA-07-074. However, there is another order that has been issued to RTRs regarding fingerprinting-based criminal history records checks. NRC Order EA-06-023 addressed fingerprinting-based criminal history records checks for access to Safeguards Information (SGI) at RTRs. To ensure consistency in the requirements for the implementation of fingerprinting programs at RTRs for both purposes, the NRC should consider including fingerprinting-based criminal history records checks for access to SGI at RTRs in this rulemaking process.

2) There are RTR facilities for whom similar, but not identical, requirements are in place for access to sources besides the reactor. For example, a facility might have NRC Agreement-State licensed sources for which it has similar requirements for fingerprinting those needing unescorted access and for reviewing criminal history records check results. In its rulemaking, the NRC should consider how it can create a system that can serve the requirements for both.

Best Regards,
Andrew Kauffman
Columbus, Ohio

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(148.184.100.43) with Microsoft SMTP Server id 8.1.358.0; Mon, 15 Jun 2009
16:26:02 -0400

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Mon, 15 Jun 2009 13:25:59 -0700 (PDT)

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by mx.google.com with ESMTPS id 2sm96227qwi.33.2009.06.15.13.25.53

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Date: Mon, 15 Jun 2009 16:25:13 -0400

From: Andrew Kauffman <kauffman.9@gmail.com>

User-Agent: Thunderbird 2.0.0.21 (Windows/20090302)

MIME-Version: 1.0

To: rulemaking.comments@nrc.gov

CC: Elizabeth Reed <Elizabeth.Reed@nrc.gov>

Subject: Suggestions Regarding the ANPR for RTR Fingerprinting

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