

## Ralph, Melissa

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**From:** Robert Carey [bcarey@ilrt.com]  
**Sent:** Tuesday, July 26, 2011 12:28 PM  
**To:** Ralph, Melissa  
**Subject:** Unescorted Access for Foreign Nationals

Melissa, I'd like to thank you for your response. Given the two-three weeks it normally takes to perform an Integrated Leakage Rate Test at a nuclear plant, obviously obtaining unescorted access would appear to be preferable. However, the individuals we are speaking of are engineers from [REDACTED]. We have already verified there are no Part 810 concerns applicable to the visits with the DOE. My next question is are there any guidelines or specific requirements for granting unescorted access to foreign nationals? We as U.S. citizens access several plants a year, and have done work in [REDACTED]. [REDACTED] is bit of an enigma to us at this point. Can you provide any other information? Before I approach a Client's security organization with such a request, I'd like to have an idea just how burdensome/costly the process might be. Thanks again for your help.

Robert M. Carey, CMRP  
Vice President  
ILRT Inc.  
813.390.2436

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**From:** accessauthorization Resource [mailto:accessauthorization.Resource@nrc.gov]  
**Sent:** Tuesday, July 19, 2011 3:48 PM  
**To:** bcarey@ilrt.com  
**Subject:** Response to your inquiry regarding visitor access

Mr. Carey:

Thank you for your inquiry regarding visitor access to nuclear power plants.

While all nuclear plants are required to comply with the NRC regulations (that apply to their facilities) their procedures and standards may vary within the constraints of applicable NRC regulations. The 5-day visitor access policy to which you refer is an example of a site-specific (licensee) policy or procedure implemented to meet both NRC and licensee requirements for visitor access. NRC visitor access requirements are listed under *Title 10 of the Code of Federal Regulations* (10 CFR) Section 73.55(g)(7) and include the requirement that licensees implement procedures for processing, escorting, and controlling visitors.

While the NRC does not have a specific regulatory requirement for limiting visitor access to 5 days, the intent of visitor access is to provide temporary, escorted access to nuclear power plant visitors. NRC licensees are encouraged to implement visitor access procedures and standards to ensure that visitor access is not used to circumvent unescorted access authorization requirements.

Visitors requiring longer-term access are subject to the provisions of 10 CFR 73.55(g)(7)(ii), which requires that:

*Individuals not employed by the licensee but who require frequent or extended unescorted access to the protected area and/or vital areas to perform duties and responsibilities required by the licensee at irregular or intermittent intervals, shall satisfy the access authorization requirements of § 73.56 and part 26 of this chapter, and shall be issued a non-employee photo identification badge that is easily distinguished from other identification badges before being allowed unescorted access to the protected and vital areas. Non-employee photo identification*

*badges must visually reflect that the individual is a non-employee and that no escort is required."*

The staff's recommendation is that you contact the licensee (individual site), if you have not done so already, to discuss your request. Based on the specific details of your situation, the licensee should be able to advise you on how to meet your needs while maintaining compliance with NRC regulations and with procedures and standards established to ensure that visitors do not constitute an unreasonable risk to public health and safety or the common defense and security.

Additional information on NRC requirements for Access Authorization is available through the NRC's Public Website: <http://www.nrc.gov/reactors/operating/ops-experience/access-authorization.html>

We hope that the information above answers your question. Please feel free to contact us should you require any additional information.

Regards,

*Melissa Ralph,*

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-----Original Message-----

From: Robert M. Carey [<mailto:bcarey@ilrt.com>]  
Sent: Monday, July 11, 2011 11:36 AM  
To: NSIR\_WebServices Resource  
Subject: Response from "Contact Us about Public Meetings on Nuclear Security and Safeguards;

Below is the result of your feedback form. It was submitted by

Robert M. Carey ([bcarey@ilrt.com](mailto:bcarey@ilrt.com)) on Monday, July 11, 2011 at 11:36:20

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comments: What is the basis of the 5 day max Visitor Access policy? Can it be relaxed? We had engineers from [REDACTED] watching an ILRT and its preparations this Spring and ran into this limitation (which proved severely limiting for the learning experience). They would like to observe another test (typically a 12-15 day trip IF no delays. How best can we manage this? Thanks for your response.

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