

14546

DOCKET NUMBER  
BYPRODUCTS 30-29567-CIVP



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D.C. 20555

DOCKETED  
USNRC

December 23, 1993

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OFFICE OF THE  
SECRETARY

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BRANCH

MEMORANDUM FOR: B. Paul Cotter, Jr.  
Chief Administrative Judge  
Atomic Safety and Licensing Board Panel

FROM: Samuel J. Chilk, Secretary *[Signature]*

SUBJECT: REQUEST FOR HEARING SUBMITTED BY  
CAMEO DIAGNOSTIC CENTRE, INC. *[Signature]*

Attached is a request for hearing dated December 17, 1993 and submitted by Cameo Diagnostic Centre, Inc. (Docket No. 30-29567) in response to an "Order Imposing A Civil Monetary Penalty" issued by the NRC Staff on November 24, 1993. The Order was published in the Federal Register at 58FR64341 (December 6, 1993). (Copy Attached)

The request for hearing is being referred to you for appropriate action in accordance with 10 C.F.R. Sec. 2.772(j).

Attachments: as stated

cc: Commission Legal Assistants  
OSC  
C&A  
EDO  
NMSS  
OE  
Paul Rosenbaum, President  
Cameo Diagnostic Centre, Inc.

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PDR ADOCK 03029567  
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*DS02*

CAMEO DIAGNOSTIC CENTRE, INC.

SPECIALIZED MEDICAL IMAGING AND MEASUREMENTS

155 MAPLE STREET / SPRINGFIELD, MA 01105

(413) 788-7000

'93 DEC 21 P 4 24

Director, Office of Enforcement  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

REQUEST FOR AN ENFORCEMENT HEARING

Docket No. 030-29567  
License No. 20-27908-01  
EA 93-005

Licensee submits this request in response to the ORDER IMPOSING A CIVIL MONETARY PENALTY.

Licensee claims such order is unreasonable; is yet further harassment of licensee.

Licensee proposes Enforcement Hearing be held in the Federal Building, 1550 Main Street, Springfield, Massachusetts.

Licensee, as the appellant, should have and does demand the right to broaden the scope of issues to be considered at the hearing; to include distorted or omitted facts thereby inducing the Commission to charge licensee with Violation I.A and I.B of the NOTICE OF VIOLATION AND PROPOSED IMPOSITION OF CIVIL PENALTY; also whether malice toward licensee was the factor influencing the Commission's decision to declare licensee as having been in violation of its requirements.

Licensee will, in accordance with 2CFR 2.720, exercise his rights to request issuance of subpoenas to secure evidence and documents; to compel testimony, oral or written, from certain NRC staff and NRC Commissioners.

December 17, 1993

Paul J. Rosenbaum

## NUCLEAR REGULATORY COMMISSION

[Docket No. 03018055; Byproduct Materials License No. 24-18089-01]

Receipt of Petition for Director's Decision Under 10 CFR 2.206; Advanced Medical Systems, Inc.

Notice is hereby given that the Nuclear Regulatory Commission Staff has received a Petition dated August 2, 1993, filed by William B. Schatz on behalf of the Northeast Ohio Regional Sewer District ("Petitioner" or "District"). The Petition requests, pursuant to 10 CFR 2.206, that the NRC institute a proceeding to modify the license of Advanced Medical Systems, Inc. ("AMS") to require, *inter alia*, that AMS provide adequate financial assurance to cover public liability pursuant to section 170 of the Atomic Energy Act of 1954, as amended, 42 U.S.C. 2210. The District alleges the following bases for this request: (1) There is a large volume of evidence indicating prior discharge of cobalt-60 to the sanitary sewer, and (2) hundreds of curies of loose cobalt-60 remain in AMS's London Road facility.

This portion of Petitioner's request is being treated as a separate matter from the District's Petition pursuant to 10 CFR 2.206 of March 3, 1993, receipt of which was published in the Federal Register on April 13, 1993 (58 FR 18282). The NRC will take appropriate action on the Petition within a reasonable time.

The August 2, 1993, Petition raises another issue that is separate from its request for action against AMS, regarding advance notification to the District from NRC licensees in its service area before release of radioactivity into the sanitary sewer. In view of the similarity of this issue to the subject of a rulemaking petition already filed by the District, also dated August 2, 1993, the NRC staff is consolidating this request for advance notice of sewer disposal of radioactive material with that rulemaking petition.

A copy of the Petition is available for inspection and copying in the Commission's Public Document Room, 2120 L Street, NW., Washington, DC 20555, and at the Local Public Document Room, Perry Public Library, 3753 Main Street, Perry, Ohio 44081.

Dated at Rockville, Maryland, this 24th day of November 1993.

For the Nuclear Regulatory Commission,  
Robert M. Berners,  
Director, Office of Nuclear Material Safety and Safeguards.  
[FR Doc. 93-29730 Filed 11-3-93; 8:45 am]  
BILLING CODE 7550-01-8

Cameo Diagnostic Centre, Inc.,  
Springfield, Massachusetts; Order  
Imposing a Civil Monetary Penalty  
[Docket No. 030-29567 and License No. 20-27908-01 and EA 93-006]

### I

Cameo Diagnostic Centre, Inc. (Licensee), Springfield, Massachusetts, is the holder of Byproduct/Sources Material License No. 20-27908-01 (License), issued by the U.S. Nuclear Regulatory Commission (NRC or Commission) on January 30, 1987. The License authorizes the Licensee to perform diagnostic procedures with radioactive byproduct material and to store Promethium-147, in accordance with the conditions specified therein.

### II

On December 29, 1992, the NRC performed an inspection of licensed activities at the Licensee's facility. During the inspection, nine violations of NRC requirements were identified. A written Notice of Violation and Proposed Imposition of Civil Penalty (Notice) was served upon the Licensee by letter dated April 16, 1993. The Notice states the nature of the violations, the provisions of the NRC's requirements that the Licensee had violated, and the amount of the civil penalty proposed for the violations.

The Licensee responded to the Notice on June 11 and July 23, 1993. In its response, the Licensee objects to the characterization of Violations IA and IB as "willful", and to the classification of these violations at Severity Level III; protests the civil penalty assessed for Violations IA and IB; and requests remission of that penalty.

### III

After consideration of the Licensee's response and the statements of fact, explanation, and argument for mitigation contained therein, the NRC staff has determined, as set forth in the Appendix to this Order, that the violations occurred as stated in the Notice, the Severity Level classification is appropriate, and the penalty proposed for Violations IA and IB should be imposed.

### IV

In view of the foregoing and pursuant to section 234 of the Atomic Energy Act

of 1954, as amended (Act), 42 U.S.C. 2282, and 10 CFR 2.205, it is hereby ordered that:

The Licensee pay a civil penalty in the amount of \$1,750 within 30 days of the date of this Order, by check, draft, money order, or electronic transfer, payable to the Treasurer of the United States and mailed to the Director, Office of Enforcement, U.S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, DC 20555.

### V

The Licensee may request a hearing within 30 days of the date of this Order. A request for a hearing should be clearly marked as a "Request for an Enforcement Hearing" and shall be addressed to the Director, Office of Enforcement, U.S. Nuclear Regulatory Commission, Washington, DC 20555, with a copy to the Commission's Document Control Desk, Washington, DC 20555. Copies also shall be sent to the Assistant General Counsel for Hearings and Enforcement at the same address and to the Regional Administrator, NRC Region I, 475 Allendale Road, King of Prussia, Pennsylvania 19406.

If a hearing is requested, the Commission will issue an Order designating the time and place of the hearing. If the Licensee fails to request a hearing within 30 days of the date of this Order, the provisions of this Order shall be effective without further proceedings. If payment has not been made by that time, the matter may be referred to the Attorney General for collection.

In the event the Licensee requests a hearing as provided above, the issues to be considered at such hearing shall be:

- Whether the Licensee was in violation of the Commission's requirements as set forth in Violations IA and IB of the Notice referenced in Section II above; and
- Whether, on the basis of such violations, this Order should be sustained.

Dated at Rockville, Maryland, this 24th day of November 1993.

For the Nuclear Regulatory Commission,  
Hugh L. Thompson, Jr.,  
Deputy Executive Director for Nuclear Materials Safety, Safeguards and Operations Support.

### Appendix—Evaluations and Conclusion

On April 16, 1993, a Notice of Violation and Proposed Imposition of Civil Penalty (Notice) was issued for nine violations identified during an NRC inspection. A civil penalty was proposed for Violations IA and IB. The

licensees responded to the Notice in two letters, dated June 11 and July 23, 1993, and objects to the characterization of Violations LA and LB as "willful", objects to the classification of Violations LA and LB at Severity Level III, protests the civil penalty assessed for Violations LA and LB, and requests remission of that penalty. The NRC's evaluations and conclusions regarding the licensee's request are as follows:

### 1. Restatement of Violations Assessed a Civil Penalty

LA. 10 CFR 35.13(e) requires that a licensee apply for and must receive a license amendment before it adds to or changes the areas of use or address or addresses of use identified in the application or on the license.

Contrary to the above, as of November 3, 1992, the licensee changed the address and location at which byproduct material was used from 110 Maple Street, Springfield, Massachusetts to 155 Maple Street, Springfield, Massachusetts, and the licensee did not receive an amendment to authorize the change of location until January 12, 1993.

LB. 10 CFR 30.9(a) requires, in part, that information provided to the Commission by a licensee be complete and accurate in all material respects.

Contrary to the above, the licensee did not provide to the Commission, information that was complete and accurate in all material respects. Specifically, the licensee did not inform the Commission that it had begun using licensed material at its new location (155 Maple Street, Springfield, Massachusetts), even though the licensee was reminded, in telephone conversations with the NRC on November 12, 19, and 25, 1992, and in a letter dated November 13, 1992, that licensed materials could not be used at the new location until a license amendment was obtained. This information was material because, had the correct information been known, it would have resulted in action by the NRC to prohibit licensed activity at the new address until a license amendment had been granted.

These violations represent a Severity Level III problem (Supplements VI and VII).

Civil Penalty—\$1,750.

### 2. Summary of Licensee Response Contesting the Severity Level III Classification of the Violations in Section I

The licensee, in its response, argues that Violations LA and LB do not fit the Severity Level III classification and that the violations were not willful. In

support of its contention that the two violations were not willful, the licensee states that it informed the NRC staff on October 21, 1992, that the licensee was moving the facility to a new address, and again on November 10, 1992, after the move was completed. The licensee contends that since the NRC did not issue an immediate "cease and desist order", the change in location of licensed activities did not have any radiological significance, and therefore does not match an example of a Severity Level III violation given in Supplement V.L.C.10 of the NRC Enforcement Policy (Enforcement Policy). In pertinent part, that example states: "... a change in the location where licensed activities are being conducted, or where licensed material is being stored where the new facilities do not meet safety guidelines; or a change in the quantity or type of radioactive material being processed or used that has radiological significance."

### 3. NRC Evaluation of Licensee Response

Some medical imaging activities conducted by Cameo Diagnostic Centre require an NRC license while others do not. The issue is not whether the licensee informed NRC that it was moving (or had moved), but rather whether the licensee willfully conducted NRC-licensed activities at the new address before it received a license amendment that authorized it to do so.

During the time period when the licensee informed the NRC staff that it was moving (and that it had moved), the NRC staff communicated with the licensee repeatedly to ensure that the licensee was not conducting NRC-licensed activities at the new address. These communications occurred during a face-to-face meeting with Mr. Paul Rosenbaum, the licensee's President on October 21, 1992, and, after the move, during telephone conversations with Mr. Rosenbaum on November 12, 19, and 25, 1992, and in a letter dated November 13, 1992. Despite these communications, Mr. Rosenbaum continued to conduct NRC-licensed activities at the new address, which was not an authorized location of use on the NRC license (Violation LA), and failed to inform the NRC staff that he was doing so (Violation LB).

When the NRC staff did learn that NRC-licensed material was being used at the new address in violation of the NRC license, the NRC staff put an immediate stop to this unauthorized use by notifying the licensee's daily suppliers of NRC-licensed material that License No. 20-27908-01 did not authorize receipt or use of NRC-licensed material at the new address. Thus, there was no need to issue an Order.

The NRC staff did not rely on Supplement V.L.C.10 of the Enforcement Policy to classify Violations LA and LB at Severity Level III. These violations were classified at Severity Level III because they were willful. The Enforcement Policy, Section IV.C, Willful Violations, states: "[T]he Severity Level of a violation may be increased if the circumstances surrounding the matter involve careless disregard of requirements, deception, or other indications of willfulness." In the meeting, the numerous telephone communications, and the letter documented above, Mr. Rosenbaum was informed by the NRC staff that NRC-licensed material could not be used at a new location without a license amendment. Nonetheless, Mr. Rosenbaum continued the use of licensed material at the unauthorized new location, and did not inform the NRC that such use was occurring. This unauthorized use of material, and the failure to report such use to the NRC, notwithstanding the multiple notifications from the NRC, demonstrates, at a minimum, a careless disregard for NRC requirements, if not a deliberate attempt to circumvent the regulations by Mr. Paul Rosenbaum, the licensee's President. Therefore, the violations were clearly willful, as that term is used in the Enforcement Policy.

### 4. Summary of Licensee Response Requesting Mitigation of the Civil Penalty

The licensee protests the civil penalty and requests remission on the basis that the violations in Section I of the Notice were not willful, and did not represent a Severity Level III problem. The licensee also states that the \$1,750 civil penalty, being a 250% increase over the \$500 base penalty, was entirely unjustified, and was based on personal animus.

### 5. NRC Evaluation of Licensee Response

The reasoning that the NRC staff used in determining that the two violations were willful, and increasing the severity level classification to Severity Level III based on the willfulness, is explained in Section 3 above.

The Enforcement Policy, Section VI.B, states that civil penalties are proposed (absent mitigating circumstances) for Severity Level III violations and may be proposed for any willful violation. As explained in the NRC's April 16, 1993 letter, in assessing the civil penalty amount, the base civil penalty was escalated by 250% because: (1) NRC identified the violations (50%); (2) the licensee had extensive prior opportunity to correct the violations because of the

notice provided by the meeting, telephone communications, and letter documented above (100%); and (3) the duration of the violations continued from November 9, 1993, through December 11, 1993, and the NRC staff had to intervene to put a stop to them<sup>1</sup> (100%). These escalating factors were applied in accordance with the Enforcement Policy, Section VLB.2. While the licensee asserted that the enforcement action was based on "personal animus", the licensee did not address the application of the escalation/mitigation factors in the Enforcement Policy.

With respect to the licensee's contention that this enforcement action was based on "personal animus", escalated enforcement actions, such as the one involved here, are arrived at after a multi-disciplinary and multi-level management review, which includes legal and technical personnel at both the NRC Regional and Headquarters level. This review ensures that a proposed enforcement action is taken in accordance with the guidance in the Enforcement Policy; and that the action is fair, objective and commensurate with the severity of the violations.

#### 6. NRC Conclusion

The NRC concludes that the licensee has not provided an adequate basis for changing the characterization of Violations I.A. or I.B. as willful, changing the classification of these violations at Severity Level III, or mitigating the civil penalty. Accordingly, the NRC has determined that a monetary civil penalty in the amount of \$1,750 should be imposed.

#### Evaluation of Violations Not Assessed a Civil Penalty

Of the violations not assessed a civil penalty, the licensee admitted Violations II.A, II.B, II.E, and II.F, and denied Violations II.C, II.D, and II.G.

#### Restatement of Violation II.C

10 CFR 35.52(a) permits a licensee to dispose of byproduct material with a physical half-life of less than 65 days in ordinary trash, provided, in part, that the licensee first holds such byproduct

<sup>1</sup> As documented in a Demand for Information issued to the licensee on December 17, 1992 (EA 92-346), the NRC staff learned of the violations on December 11, 1992, and asked Mr. Rosenbaum to voluntarily agree to stop using NRC-licensed materials at the unauthorized location; however, Mr. Rosenbaum refused. The NRC staff then had to put a stop to the violations by notifying the licensee's daily suppliers that the licensee did not authorize receipt or use of NRC-licensed material at the new address.

material for decay a minimum of ten half-lives.

Contrary to the above, on May 31, 1988, July 5, 1988, August 29, 1988, December 20, 1990, June 28, 1991, December 8, 1991, and May 29, 1992, the licensee disposed of technetium-99m in ordinary trash without first holding some of this material for decay a minimum of ten half-lives. Specifically, licensee personnel informed the inspectors during the inspection that for all of these dates when the waste material was disposed, some of the waste material had been generated during scans performed during the 60 hours prior to the disposal, and therefore that material was not held for a minimum of 10 half-lives (60 hours for technetium-99m) prior to disposal.

This is a Severity Level V violation (Supplement VI).

#### Summary of Licensee Response Denying Violation II.C

The licensee denies that it violated the requirement to hold byproduct material with a physical half-life of less than 65 days for decay a minimum of ten half-lives before disposal in ordinary trash. The licensee indicated that NRC inspectors made an assumption that waste discarded on days other than a Monday had less than 60 hours (ten times the half life of technetium-99m, commonly used by the licensee) old byproduct material waste.

#### NRC Evaluation of Licensee Response to Violation II.C

During the inspection, Mr. Rosenbaum indicated to the inspectors that he did not ensure that technetium-99m waste had decayed for ten half-lives prior to disposing of it. Specifically, Mr. Rosenbaum stated that, if he disposed of waste at the end of the day and a patient procedure had been performed that day, then the waste from the procedure was in the waste that he disposed. Mr. Rosenbaum stated that, so long as a survey of the bag containing the waste indicated background levels, the bag was disposed as ordinary waste. The inspectors determined from a review of the licensee's records that disposals had been made on certain dates and that a technetium-99m patient procedure had been performed without 60 hours prior to those disposals. Thus the violation is based on Mr. Rosenbaum's statements and the inspectors' review of the licensee's records, and not mere "assumption" as the licensee argues. Accordingly, the NRC staff maintains that the violation did occur.

#### Restatement of Violation II.D

10 CFR 35.51(a) (1) and (3) require, in part, that a licensee calibrate the survey instruments used to show compliance with 10 CFR part 35 on all scales with readings up to 1000 millirem per hour with a radiation source, and that the licensee conspicuously note on the instrument the apparent exposure rate from a dedicated check source as determined at the time of calibration.

Contrary to the above, as of December 29, 1992, four CDV-700 Geiger-Mueller survey instruments used by the licensee to show compliance with 10 CFR part 35, had not been calibrated on the lowest scale, which has a maximum reading of 0.5 millirem per hour, and that is the scale most commonly used at the licensee's facility. Furthermore, the apparent exposure rate from a dedicated check source as determined at the time of calibration was not conspicuously noted on the instrument from April 1, 1987 through December 29, 1992.

This is a Severity Level IV violation (Supplement VI).

#### Summary of Licensee Response Denying Violation II.D

The licensee denied the violation involving survey instruments not calibrated on the lowest scale (with a maximum reading of 0.5 mr/hr) that is most commonly used at the facility. The licensee admits that the lowest scale was not calibrated, but denies that it was the most commonly used scale.

#### NRC Evaluation of Licensee Response to Violation II.D

10 CFR 35.51(a)(1) requires that the licensee calibrate all scales of survey instruments which measure radiation levels up to 1000 millirem per hour in the manner described. From March 1989 to the time of the inspection, the licensee did not have the lowest scale of its four CDV-700 Geiger-Mueller survey instruments calibrated. Furthermore, when, during the inspection, the technologists demonstrated their method of performing the various routine surveys, they indicated specifically that they use the most sensitive scale of these survey instruments which is the lowest scale. Therefore, the NRC concludes that failure to calibrate the lowest scale of survey instruments constitutes a violation of 10 CFR 35.51(a)(1).

#### Restatement of Violation II.G

Condition 14 of Amendment 3 of License No. 20-27908-01 requires that licensed material be possessed and used in accordance with statements, representations, and procedures contained in an application dated

October 8, 1986, and a letter dated November 20, 1986. Item 7 of the letter dated November 20, 1986, requires that area surveys be performed after each procedure. Item 17 of the application dated October 8, 1986, requires that area surveys include dispensing, preparation, injection, and imaging areas.

Contrary to the above, as of December 29, 1992, the licensee did not perform an area survey of dispensing, preparation, and imaging areas after each procedure. Specifically, the licensee performed surveys of only the injection area after each procedure.

This is a Severity Level IV violation (Supplement VI).

#### *Summary of Licensee Response Denying Violation II.G*

The licensee denied the violation involving its failure to perform area surveys of the dispensing, preparation, and imaging area after each procedure involving use of licensed material. The licensee contends that the term "each procedure" and the violation as written are too vague and without substantive meaning.

#### *NRC Evaluation of Licensee Response to Violation II.G*

The licensee's letter dated November 20, 1986 stated that "area surveys will be performed after each procedure". The licensee's application, dated October 8, 1986, in Item 17, requires that area surveys include dispensing, preparation, injection, and imaging areas. In the context of this licensee's submittal, the NRC understands the term "procedure" to refer to a patient imaging procedure. As documented in the inspection report, during the inspection, the licensee's technologist reported to the NRC inspectors that only the injection area was surveyed after each patient imaging procedure. The licensee did not meet the requirement because the dispensing, preparation, and imaging areas where NRC-licensed material was used for the patient imaging procedure were not surveyed at the conclusion of the patient procedure.

The violation uses the same words as the licensee did in its submittal. Hence, the licensee's questioning of the meaning of the term "each procedure" and the argument that the violation is vague are without merit. Therefore, the NRC maintains that the violation occurred as stated in the Notice.

#### *NRC Conclusion*

The licensee has not provided an adequate basis for withdrawal of Violations II.C, II.D or II.G. Therefore,

the NRC staff concludes that these violations occurred as stated.

[FR Doc. 93-29727 Filed 12-3-93; 8:45 am]  
BILLING CODE 7599-01-01

[Docket Nos. 50-250, 50-251, 50-935 and 50-388]

Florida Power and Light Co., Turkey Point Nuclear Generating Units 3 and 4, St. Lucie Plant Units 1 and 2;  
Exemption

#### I

Florida Power and Light Company (the licensee) is the holder of Facility Operating License Nos. DPR-31 and DPR-41, which authorize operation of the Turkey Point Nuclear Generating Units 3 and 4, and DPR-67 and NPP-18, which authorize operation of the St. Lucie Plant Units 1 and 2. The licensee provides, among other things, that the licensee is subject to all rules, regulations, and orders of the Commission now or hereafter in effect.

The facilities consist of two pressurized water reactors at each of the licensee's two sites, Turkey Point Units 3 and 4 located in Dade County, Florida, and St. Lucie Plant Units 1 and 2 located in St. Lucie County, Florida.

#### II

Title 10 CFR 73.55, "Requirements for physical protection of licensed activities in nuclear power reactors against radiological sabotage," paragraph (a), in part, states that "The licensee shall establish and maintain an onsite physical protection system and security organization which will have as its objective to provide high assurance that activities involving special nuclear material are not inimical to the common defense and security and do not constitute an unreasonable risk to the public health and safety."

10 CFR 73.55(d), "Access Requirements," paragraph (1), specifies that "The licensee shall control all points of personnel and vehicle access into a protected area." 10 CFR 73.55(d)(5) requires that "A numbered picture badge identification system shall be used for all individuals who are authorized access to protected areas without escort." 10 CFR 73.55(d)(5) also states that an individual not employed by the licensee (i.e., contractors) may be authorized access to protected areas without escort provided the individual "receives a picture badge upon entrance into the protected area which must be returned upon exit from the protected area \* \* \*"

The licensee proposed to implement an alternative unescorted access control

system which would eliminate the need to issue and retrieve badges at each entrance/exit location and would allow all individuals with unescorted access to keep their badge with them when departing the site.

An exemption from 10 CFR 73.55(d)(5) is required to allow contractors who have unescorted access to take their badges offsite instead of returning them when exiting the site. By letters dated October 13, and November 2, 1993, the licensee requested an exemption from certain requirements of 10 CFR 73.55(d)(5) for this purpose.

#### III

Pursuant to 10 CFR 73.5, "Specific exemptions," the Commission may, upon application of any interested person or upon its own initiative, grant such exemptions in this part as it determines are authorized by law and will not endanger life or property or the common defense and security, and are otherwise in the public interest. Pursuant to 10 CFR 73.55, the Commission may authorize a licensee to provide alternative measures for protection against radiological sabotage provided the licensee demonstrates that the alternative measures have "the same high assurance objective" and meet "the general performance requirements" of the regulation, and "the overall level of system performance provides protection against radiological sabotage equivalent" to that which would be provided by the regulation.

Currently, unescorted access into protected areas of the St. Lucie units is controlled through the use of a photograph on a badge and a separate keycard. At the Turkey Point units, unescorted access into protected areas is controlled through the use of a photograph on a combination badge and keycard. (Hereafter, these are referred to as "badges"). The security officers at each entrance station use the photograph on the badge to visually identify the individual requesting access. The badges for both licensee employees and contractor personnel, who have been granted unescorted access, are issued upon entrance at each entrance/exit location and are returned upon exit. The badges are stored and are retrievable at each entrance/exit location. In accordance with 10 CFR 73.55(d)(5), contractor individuals are not allowed to take badges offsite. In accordance with the plants' physical security plans, neither licensee employees nor contractors are allowed to take badges offsite.

Under the proposed system, each individual who is authorized for unescorted entry into protected areas