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PROPOSED RULE
DOCKETER (53 FR 7534)
USNRC

ADVANCED NUCLEAR FUELS CORPORATION

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April 21, 1988
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OFFICE OF THE SECRETARY
DOCKETING & SERVICE
BRANCH

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U.S. Nuclear Regulatory Commission
Attention: Docketing and Service Branch
Secretary of the Commission
Washington, DC 20555

Gentlemen:

COMMENTS ON PROPOSED POLICY STATEMENT -
NUCLEAR POWER PLANT ACCESS AUTHORIZATION

We have reviewed the proposed policy statement entitled, "Nuclear Plant Access Authorization Program; Policy Statement," which was published in the Federal Register in Vol. 53, No. 46 on Wednesday, March 9, 1988.

Advanced Nuclear Fuels Corporation sends personnel to a number of nuclear generating stations for short periods of time for fuel inspection purposes. It must currently comply with about 20 different nuclear utility screening procedures.

We recognize that the nuclear utility makes the final decision concerning unescorted access and therefore expect some differences in screening requirements. The current differences are so great as to create a problem within ANF in devising our program to meet all utility requirements. Also, the programs have been constantly changing such that what was adequate one year is not adequate the next year. We believe that the adoption of the proposed NRC policy statement and the NUMARC guidelines will provide some program stability, a common screening basis for all nuclear utilities and hopefully minimize the differences between utilities. From our standpoint as a servicing contractor, it is extremely important there be a uniform implementation of the guidelines.

Another key portion of the guidelines for us is the transfer and reinstatement section. Our employees are only at the nuclear sites for a few weeks and their unescorted access authorization is terminated at the end of the stay. The ability to transfer or reinstate an unescorted access authorization favorably terminated within the last 365 days will many times eliminate the need to update an employee's background investigation and psychological evaluation.

We strongly endorse the policy of adopting industry generated guidelines.

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April 21, 1988

We appreciate this opportunity to comment on a proposed policy statement.

Sincerely,

A handwritten signature in cursive script, appearing to read "C. W. Malody".

C. W. Malody
Manager, Corporate Licensing

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