

REAL ID Act of 2005:
U.S. Nuclear Regulatory Commission Phased Enforcement Plan

The REAL ID Act of 2005 (REAL ID Act) and U.S. Department of Homeland Security (DHS) implementing regulations in 6 CFR Part 37 prohibit Federal agencies from accepting non-compliant State-issued driver's licenses and identification cards (DL/IDs) to verify the identity of individuals entering nuclear power plants. Nationwide, card-based enforcement of the REAL ID Act requirements begins on May 7, 2025.

DHS issued a final rule on January 14, 2025 (90 FR 3472), that enables Federal agencies to implement REAL ID Act requirements using a phased enforcement plan. Under such a plan, an agency would not be required to achieve full card-based enforcement of REAL ID Act requirements until May 5, 2027. As discussed in Nuclear Regulatory Commission (NRC) Information Notice 2025-02 ([ML25043A220](#)), the NRC has chosen to implement a phased enforcement plan for administering REAL ID Act requirements applicable to NRC regulatory requirements for licensed nuclear power plants.

Under this plan, the NRC will implement full card-based enforcement of REAL ID Act requirements for DL/IDs used for the purpose of entering nuclear power plants on **May 5, 2027**. During the NRC's phased enforcement period, licensees, contractors, and vendors should take steps to make any necessary changes to procedures, conduct training as appropriate, and communicate with personnel regarding the need to obtain and possess a compliant form of identification.

This plan consists of three phases, ahead of full enforcement, during which the NRC will conduct activities as described below.

Phase 1: Inform *(March 2025 – April 2025)*

- Publish NRC Information Notice 2025-02 (Implementation of the REAL ID Act of 2025 and Considerations for U.S. NRC Nuclear Power Plant Licensees) and Phased Enforcement Plan.
- Conduct outreach activities:
 - Notify the public of the NRC's plans through NRC Office of Public Affairs communications (NRC website, social media).
 - On the NRC's public website (<https://www.nrc.gov>), establish a "REAL ID Act" webpage containing information and links to the NRC information notice, phased enforcement plan, and question-and-answer (Q&A) document.
 - Highlight REAL ID requirements and phased enforcement at the industry's annual conference (Access Authorization and Fitness for Duty Workshop, June 2025).

Phase 2: Monitor & Prepare *(May 2025 – June 2026)*

- Engage with industry stakeholders, through ongoing periodic interactions, regarding communication needs and lessons learned.
- Develop and issue updates to NRC inspection procedures providing guidance on the review of licensee procedures and observation of activities pertaining to the use of State-issued DL/IDs for purposes of entering nuclear power plants.
- Brief/train NRC inspectors on inspection guidance at the Spring 2026 NRC Security Counterpart Meeting and Technology Refresher training course.

Phase 3: Reinforce *(July 2026 – April 2027)*

- Hold an NRC public meeting in Summer 2026 to answer stakeholder questions and remind them of the full enforcement date.
- Update NRC guidance (e.g., Q&A document) based on lessons-learned from initial stages of industry implementation.
- Consider issuing a follow-up Information Notice and/or working with the NRC Office of Public Affairs to further engage with stakeholders, if needed to enhance awareness.

Full Enforcement *(May 7, 2027)*

- Assess licensee compliance with REAL ID requirements during NRC inspection of licensee access authorization and access controls programs.
- Document issues/observations, cite findings/violations as warranted.
- Provide additional guidance/updates, as needed to address issues and lessons-learned identified through operating experience.

Phased Enforcement Plan of REAL ID Act Requirements at Nuclear Power Plants DATE April 29, 2025

DISTRIBUTION: No Ticket

JMcKirgan, NSIR/DPCP

TInverso, NSIR/DSO

ABowers, NSIR/DPCP

SWalker, NSIR/DPCP

BYip, NSIR/DPCP/CSB

JVazquez, NSIR/DPCP/AAFPB

BZaleski, NSIR/DPCP/AAFPB

BBaxter, NSIR/DPCP/RSB

JMaltese, OGC/GCRPS/HLWFCNS/NLO

JPeralta, OE/EB

DFurst, OE/EB

ADAMS Accession No.: ML25101A211; ML25101A213

OFFICE	NSIR/DPCP/AAFPB	NSIR/DPCP/AAFPB	OGC/GCRPS /HLWFCNS/NLO	NSIR/DPCP
NAME	BZaleski <i>BZ</i>	JVazquez <i>JV</i>	JMaltese <i>JM</i>	JMcKirgan <i>JM</i>
DATE	Apr 11, 2025	Apr 18, 2025	Apr 22, 2025	Apr 29, 2025
OFFICE	NSIR/DPCP/AAFPB			
NAME	JVazquez <i>JV</i>			
DATE	Apr 29, 2025			

OFFICIAL RECORD COPY