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10 CFR Part 25, Access Authorization for Licensee Personnel

Comment On: NRC-2026-1519-0005
Information Collection: Access Authorization

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Comment on FR Doc # 2026-15858, NRC-2026-1519-0005, from Nuclear Energy Institute

Submitter Information

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General Comment

NEI Comments on Information Collection Renewal: Access Authorization (10 CFR Part 25); Docket ID: NRC-2026-1519; OMB Control No. 3150-0046

Attachments

10-05-2026_NRC_NEI Comments on 10 CFR Part 25

October 5, 2026

Ms. Kristen Benney
NRC Clearance Officer
Office of the Chief Information Officer
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Subject: NEI Comments on Information Collection Renewal: Access Authorization (10 CFR Part 25); Docket ID: NRC-2026-1519; OMB Control No. 3150-0046

Project Number: 689

Submitted via Regulations.gov

Dear Ms. Benney:

The Nuclear Energy Institute (NEI),¹ on behalf of its members, appreciates the opportunity to submit comments on the U.S. Nuclear Regulatory Commission's (NRC) proposed renewal of the information collection under 10 CFR Part 25, "Access Authorization" (OMB Control No. 3150-0046), published in the Federal Register on August 5, 2026 (91 FR 50561). This information collection is essential to national security because it provides the NRC with the personal history information needed to determine and continuously evaluate individuals' eligibility for access to classified areas, materials, and technical information. NEI therefore supports the continued collection, including the continuous vetting model, while emphasizing that the administrative processes used to collect and maintain the information should be streamlined.

The enclosed comments (Enclosure 1) provide recommendations to preserve the collection's essential national security function while improving regulatory clarity, standardizing reporting and recordkeeping practices, and modernizing the NRC's access authorization processes to reduce unnecessary administrative burden.

¹ The Nuclear Energy Institute (NEI) is responsible for establishing unified policy on behalf of its members relating to matters affecting the nuclear energy industry, including the regulatory aspects of generic operational and technical issues. NEI's members include entities licensed to operate commercial nuclear power plants in the United States, nuclear plant designers, major architect and engineering firms, fuel cycle facilities, nuclear materials licensees, and other organizations involved in the nuclear energy industry.

NEI appreciates the NRC's commitment to securing our nation's nuclear facilities and classified information. By implementing these proposed modernizations, the NRC can reduce the compliance burden on licensees while simultaneously improving data quality and security oversight.

If you have any questions or require additional information, please contact me at rm@nei.org or 202.439.2459.

Sincerely,

A handwritten signature in black ink, appearing to read 'Rich Mogavero', with a stylized, overlapping loop structure.

Rich Mogavero

Director, Security & Incident Preparedness

Enclosure 1: NEI Comments on Information Collection Renewal: Access Authorization (10 CFR Part 25)

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I. Proposed Enhancements to Data Quality, Utility, and Clarity

To maximize the quality and utility of information while addressing administrative burden, NEI recommends that the NRC consider the following:

- **Consolidated Reporting Checklists:** The NRC has consolidated the reporting burden of SEAD 3 and Section 25.21(b) due to their overlap. However, because they originate from different regulatory frameworks, licensees often struggle with inconsistent interpretations. The NRC should issue a unified, side-by-side compliance mapping checklist to clarify reporting thresholds, prevent duplicative notifications, and improve the consistency and quality of submitted data.

II. Minimizing Reporting Burdens through Modernization and IT

Modernizing the technological interfaces used for access authorization processes represents the greatest opportunity for burden reduction and regulatory efficiency. NEI proposes three technological updates:

- **Improve Transmission Formats:** The NRC's guidance for electronic submissions to the NRC continues to officially list outdated storage media (e.g., CD-ROM, DVD) and facsimiles as acceptable transmission methods. Physical media and faxes are becoming obsolete and administratively inefficient. The NRC should add to these formats within the electronic submission guidance, by creating a secure online transfer portal for all Part 25 transactions.
- **Implement a Unified Access Authorization Portal:** Currently, Facility Security Officers (FSOs) must rely on various administrative channels for different transactions. Visit Authorization Letters (VALs under Section 25.35) and reinstatement requests (Section 25.29) should be more streamlined through use of a web portal to electronically submit, track, and receive confirmation for reinstatements (25.29), extensions/transfers (25.31), and VALs (25.35) securely.
- **Automate and Simplify the Withdrawal Process (Section 25.25):** The requirement under Section 25.25 to make a telephone notification followed by a written confirmation of a clearance withdrawal is duplicative and burdensome. The NRC should replace this with a secure portal allowing FSOs to submit a digital withdrawal form that initiates processing. This single digital transaction would stop background investigations, save federal investigation costs, and eliminate duplicative FSO work.