



NUCLEAR ENERGY INSTITUTE

Ralph E. Beedle

SENIOR VICE PRESIDENT AND
CHIEF NUCLEAR OFFICER,
NUCLEAR GENERATION

September 28, 2001

Mr. Samuel J. Collins
Director, Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Mail Stop O5 E7
Washington, DC 20555-0001

Dear Mr. Collins:

To clarify access authorization requirements, NEI requests that the NRC immediately endorse the enclosed "pen and ink" revision to NUMARC 89-01, Appendix of Regulatory Guide 5.66, *Access Authorization Program for Nuclear Power Plants*. This revision clarifies checks of military service, requiring the same level of verification as other employment. This revision is similar to the proposals contained in NEI 99-08 forwarded to the NRC staff on December 14, 2000.

In its endorsement, the NRC should clearly state that this revision may be implemented by licensees without a need to submit a revision to Physical Security Plan commitments.

If you have any questions, please contact me or Jim Davis (202-739-8105).

Sincerely,

A handwritten signature in black ink, appearing to read "R. Beedle", is written over a horizontal line.

Ralph E. Beedle

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**Revision 1 to
NUMARC 89-01
Industry Guidelines for Nuclear Power Plant Access Authorization Programs**

To all users of Regulatory Guide 5.66, *Access Authorization Program for Nuclear Power Plants*, of June 1991—make the following “pen and ink” change to the Appendix, NUMARC 89-01:

Delete current Section 6.2.4 Military Service on page 5 and 6 of the Appendix and substitute the following:

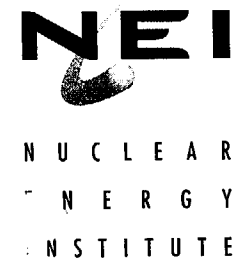
6.2.4 Military Service as Employment:

- a. Service may be verified by means of direct contact with the applicant’s last command/duty station or an authenticated copy of the applicant’s DD form 214. Authenticity of the DD Form 214 is to be determined by the licensee or C/V conducting the BI.
- b. If the licensee or C/V cannot authenticate the individual-provided DD Form 214, it will be necessary to obtain an official document (DD Form 214 or equivalent) from a military record custodian—the National Personnel Records Center, the specific military service records center, the military organizational unit, or command, etc. A request for the discharge information must be submitted to the record custodian within five (5) business days of granting unescorted access. Military record center addresses may be found on the National Personnel Records Center’s Standard Form 180.
- c. It is not necessary to check military service of an applicant serving in the Reserves or National Guard, unless the applicant served on active duty beyond the annual reserve active-duty requirements within the background screening period.
- d. When an attempt to obtain the information is not forthcoming from the original request, two additional requests, submitted at a nominal six-month interval, would constitute a “best effort.”
- e. Foreign military service and discharge characterization would be checked on a “best effort” basis.
- f. If the licensee, C/V or BI Screening Company determines that an applicant’s discharge is other than honorable or if a DD Form 214 is received indicating other than honorable separation occurred, further investigation is necessary to ascertain the details of the discharge.

Annotate the cover page of NUMARC 89-01 to show “Revision 1 entered”.

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