



CONNECTICUT YANKEE ATOMIC POWER COMPANY

HADDAM NECK PLANT

362 INJUN HOLLOW ROAD • EAST HAMPTON, CT 06424-3099

APR 26 2005

Docket No. 72-039

CY-05-124

RE: EA-03-097

U. S. Nuclear Regulatory Commission
Attention: Document Control Desk
Director, Spent Fuel Project Office
Office of Nuclear Material Safety and Safeguards
Washington, D. C. 20555-0001

Haddam Neck Plant

Additional Information - Response to Order for Implementation of Additional Security Measures Associated with Access Authorization for the Independent Spent Fuel Storage Installation

On August 18, 2004¹, the U.S. Nuclear Regulatory Commission (NRC) issued an Order (EA-03-097) that modified the current license for the Haddam Neck Plant (HNP) to require compliance with additional security measures (ASMs) associated with access authorization applicable to our Independent Spent Fuel Storage Installation (ISFSI). On September 2, 2004², Connecticut Yankee Atomic Power Company (CYAPCO) submitted its written response to the Order. At that time, CYAPCO anticipated the spent fuel transfer project would be completed in early 2005.

Due to mechanical difficulties with certain equipment during the fall 2004, the transfer of all the spent fuel to the ISFSI was not expected to be completed until the second quarter of 2005. Therefore, CYAPCO did not assign permanent staffing to the ISFSI prior to the first implementation date for the ASMs. In a letter dated January 25, 2005³, CYAPCO requested an extension to the implementation date of the ASMs to sixty days after all spent fuel has been transferred to the ISFSI in order to complete the actions required by the ASM's for the permanent ISFSI staffing. In a letter dated March 24,

¹ M. Federline (NRC) letter to W. Norton (CYAPCO), "Issuance of Order for Implementation of Additional Security Measures Associated with Access Authorization for the Haddam Neck Plant", EA-03-097, dated August 18, 2004.

² W. Norton (CYAPCO) letter to USNRC, "Haddam Neck Plant, Response to Order for Implementation of Additional Security Measures Associated with Access Authorization for the ISFSI", dated September 2, 2004.

³ W. Norton (CYAPCO) letter to US NRC, "Additional Information-Response to Order for Implementation of Additional Security Measures Associated with Access Authorization for the ISFSI", dated January 25, 2005.

nmssol

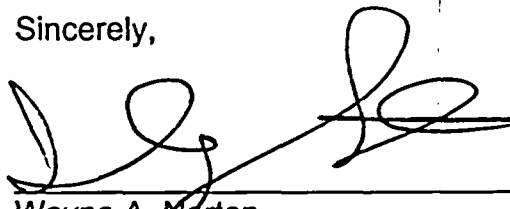
SISP review complete

2005⁴, CYAPCO submitted supplemental information requested by the NRC Staff in a teleconference with CYAPCO on March 17, 2005.

The purpose of this letter is to provide additional information requested by the NRC Staff in a teleconference with CYAPCO on April 21, 2005. This additional information is contained in Attachment 1 to this letter.

If you should have any questions regarding this submittal, please contact Mr. G. P. van Noordennen at (860) 267-3938.

Sincerely,



Wayne A. Norton
President

4/26/05
Date

Notary:

Subscribed and sworn before me

this 26th day of April 2005

Gerald P. van Noordennen
Notary Public

My Commission Expires 12-31-07

cc: S. J. Collins, NRC Region I Administrator
J. E. Dyer, NRC Director, Office of Nuclear Reactor Regulation
M. V. Federline, NRC Deputy Director, Office of Material Safety and Safeguards
T. B. Smith, NRC Project Manager, Haddam Neck Plant
R. R. Bellamy, Chief, Decommissioning and Laboratory Branch, NRC Region I
E. L. Wilds, Jr., Director, CT DEP, Monitoring and Radiation Division
B. Baxter, NRC, Office of Nuclear Security and Incident Response

⁴ W. A. Norton (CYAPCO) letter to US NRC, "Additional Information-Response to Order for Implementation of Additional Security Measures Associated with Access Authorization for the ISFSI", dated March 24, 2005.

Docket No. 72-039
CY-05-124

Attachment 1
Haddam Neck Plant
Additional Information-Response to Order for Implementation of Additional Security
Measures Associated with Access Authorization
for the Independent Spent Fuel Storage Installation
Security Access Authorization Manual

April 2005

JUL 20 2004

SECURITY ACCESS AUTHORIZATION MANUAL

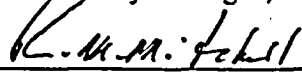
CONNECTICUT YANKEE ATOMIC POWER COMPANY

Reviewed:



Security Manager, CYAPCO

Approved:



Unit Manager, CYAPCO

Revision:

2

Effective Date:

7-20-04

CONNECTICUT YANKEE SECURITY ACCESS AUTHORIZATION MANUAL

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JUN 20 2004

CONNECTICUT YANKEE ATOMIC POWER COMPANY
SECURITY ACCESS AUTHORIZATION MANUAL

SECTIONS 1., 2., 3., 4., 5.

INTRODUCTION, APPLICABILITY, REFERENCES
DEFINITIONS AND RESPONSIBILITIES

Approved:


Unit Manager, CYAPCO

Revision:

1

Effective Date:

6-20-04

CONNECTICUT YANKEE ATOMIC POWER COMPANY
ACCESS AUTHORIZATION MANUAL
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1. INTRODUCTION

Assuring the safe storage of spent nuclear fuel and safe decommissioning of nuclear generating facilities requires that Nuclear Regulatory Commission (NRC) licensees develop and implement Security Access Authorization Programs. The Connecticut Yankee Atomic Power Company Security Access Authorization Program (SAAP) is designed to provide assurance of personnel trustworthiness, reliability and ensure that personnel granted unescorted access to Connecticut Yankee are not susceptible to coercion. The SAAP is an integral component of the Nuclear Security Program. This program is designed to protect the health and safety of the public and company/contractor employees by precluding acts, which may result in a radiological release.

This manual is designed so that the first nineteen chapters of the manual refer to protected area access. The last three chapters refer to industrial area access.

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2. APPLICABILITY

The Access Authorization Manual applies to all individuals requesting unescorted access authorization to the CYAPCO protected and industrial areas. CYAPCO Security is responsible for the granting and denying of unescorted access authorization. CYAPCO is responsible for ensuring regulatory compliance of the Security Access Authorization Program.

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3. REFERENCES

- 3.1 10 CFR 73.55, Requirements for Physical Protection of Licensed Activities in Nuclear Power Reactors Against Radiological Sabotage.
- 3.2 10 CFR 73.56, Access Authorization Program for Nuclear Power Plants.
- 3.3 Regulatory Guideline 5.66, Access Authorization Program for Nuclear Power Plants.
- 3.4 10 CFR 73.57, Requirements for Criminal History Checks of Individuals Granted Unescorted Access to Nuclear Power Facilities or Safeguards Information by Nuclear Licensees.
- 3.5 NUMARC Guideline 89-01, Industry Guidelines for Nuclear Power Plant Access Authorization Programs.
- 3.6 NUMARC 91-03, Data Exchange Guidelines.
- 3.7 10 CFR 26, Fitness for Duty Programs.
- 3.8 Haddam Neck Defueled Physical Security Plan.
- 3.9 Haddam Neck Independent Spent Fuel Storage Installation

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4. DEFINITIONS

- 4.1 **Appeal** - the process of initiating a formal review of unescorted access authorization denial or revocation.
- 4.2 **Applicant** - an individual seeking unescorted access authorization to the CYAPCO nuclear facility.
- 4.3 **Contractor/Vendor** - an organization or individual under contract to CYAPCO to provide services or supplies.
- 4.4 **NRG Contractor** - an organization or individual under contract to the Nuclear Regulatory Commission to provide services.
- 4.5 **Denial** - rejection, based on the results of a background investigation, including criminal history, and/or a psychological evaluation, security related incident and/or fitness for duty situation or evaluation, of an individuals request for unescorted access authorization.
- 4.6 **Industrial Area** - The area within the industrial area barrier fence that includes the Protected Area
- 4.7 **INPO** - Institute of Nuclear Power Operations
- 4.8 **Intent** - Text changes that add, delete, change or rearrange task steps or changes the purpose or scope of the manual.
- 4.9 **Non-intent** - Text changes that do not alter the purpose of the manual or the task steps. Examples are spelling, grammar, and clarity.
- 4.10 **Prospective Employee** - an individual who is in the process of becoming a CYAPCO employee.
- 4.11 **Review Appeals Committee** - the Committee, comprised of the Unit Manager, the Human Resources Manager and the Employee Concerns Program Manager that evaluates appeals to unescorted access authorization determinations for contractors and employees. Another Connecticut Yankee Manager or Director may be substituted for any of the three members of the Review Appeals Committee.
- 4.12 **Revocation** - the withdrawal, for cause, of an individual's unescorted access authorization, or unescorted access.
- 4.13 **Security Background Information Questionnaire** - informational document completed by the individual requesting unescorted access authorization, or other background investigation which provides the five (5) year historical data for the Protected Area and one (1) year historical data for the Industrial Area necessary to complete a background investigation and evaluation for the granting/denial of unescorted access authorization.

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- 4.14 **Suitable Inquiry** - a best effort verification of employment history for the past five (5) years but in no case less than three (3) years obtained through contacts with previous employers. Suitable Inquiry need only be completed for periods of employment of 30 days or more.
- 4.15 **Sanctions** - management actions taken to ensure compliance with federal regulations.
- 4.16 **Site** - Haddam Neck Plant (Connecticut Yankee Atomic Power Company)
- 4.17 **Unescorted Access Authorization** - the administrative determination of an individual's eligibility to be granted unescorted access.
- 4.18 **Unescorted Access** - the methodology or mechanism that provides the physical means of controlling access to protected and/or industrial areas.

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5. RESPONSIBILITIES

- 5.1 **Unit Manager, Haddam Neck Station** - is responsible for the administration of security at Connecticut Yankee.
- 5.2 **Security Manager** - is responsible for developing, implementing, and directing the Access Authorization Program.

Is responsible for maintaining and updating the Access Authorization Manual and Contractor Screening Policy. Is responsible for the approval/denial of unescorted access requests. The Security Manager or designee shall ensure the requirements of the Access Authorization Manual have been met prior to granting unescorted access authorization.
- 5.3 **The Fitness For Duty Collection Site Supervisor** - is responsible to ensure the administration of the Fitness for Duty Program elements of the Security Access Authorization Program, including Drug and Alcohol collection.
- 5.4 **Human Resources Department** - is responsible to initiate the requirements of the Security Access Authorization Program, for CYAPCO employees and CYAPCO employment applicants.
- 5.5 **Badging Personnel** - are responsible for determining the requirements necessary for unescorted access. The Badging Personnel shall ensure the requirements for Access Authorization have been met.

**CONNECTICUT YANKEE ATOMIC POWER COMPANY
SECURITY ACCESS AUTHORIZATION MANUAL**

SECTION 6.

Approved: _____

R. M. McFell

Unit Manager, CYAPCO

Revision: _____

1

Effective Date: _____

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6. UNESCORTED ACCESS AUTHORIZATION PROGRAM (PROTECTED AREA)

6.1 The purpose of the Access Authorization Program is to reduce the threat of an insider, including an employee in any position of committing an act which may result in a radiological release. The Security Access Authorization Program outlined in this Security Access Authorization Manual is designed to provide reasonable assurance that personnel granted unescorted access authorization for the protected area of the nuclear facilities are trustworthy, reliable and are fit to perform their duties.

6.2 To meet the objectives of the Security Access Authorization Program, three interrelated components have been established to ensure the trustworthiness, reliability and mental fitness of individuals seeking unescorted access to the CYAPCO nuclear facility. These components are:

- 6.2.1 A Background Investigation - to provide reasonable assurance that individuals are trustworthy and reliable, as determined through a review of their activities for the retrospective five (5) year period, including an FBI Criminal History Check, and the performance of a suitable inquiry.
- 6.2.2 A Psychological Evaluation - to provide reasonable assurance that individuals are reliable and mentally stable, through the administration of a written personality test and/or clinical interview, as determined by a licensed psychiatrist/psychologist.
- 6.2.3 A Continual Behavior Observation Program - to ensure the detection of behavior that may be a threat to interrupt the normal operation of the nuclear reactor or reflect on an individual's trustworthiness or reliability. This behavior includes, but is not limited to, drug or alcohol abuse, criminal activity, aberrant behavior, and significant changes in personality.

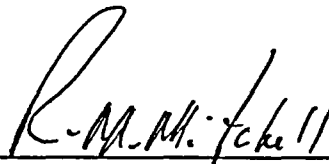
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SECTION 7.

UNESCORTED ACCESS AUTHORIZATION

Approved:


Unit Manager, CYAPCO

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7. UNESCORTED ACCESS AUTHORIZATION (PROTECTED AREA)

7.1 Contractor/Vendor

7.1.1 Contractor/vendor authorizations are initiated based on a request for unescorted access through the submission of an **Access Authorization** form by an Authorized Department Supervisor as listed on the Access Authorization Signature List and signed by the appropriate Contractor Representative. This form is submitted to the Badging Department for processing.

7.1.2 The Access Authorization form shall be maintained in the individual's security file.

7.1.3 The applicant's documentation package shall be reviewed by Badging Personnel who will categorize the applicant's request for unescorted access authorization into one (1) of four (4) clearance types:

7.1.3.1 **Full Unescorted Access Authorization - CYAPCO** and/or contractor/vendor personnel may be granted a full clearance to the protected areas of the nuclear facility based on favorable results of the following investigative elements:

- a. Employment History - for the retrospective five year period, but no less than three (3) years, for employment of thirty (30) days or more, to include activities within periods of unemployment in excess of thirty (30) days. Employment history should include a suitable inquiry.
- b. Education History - any claimed enrollment at an educational institution during the previous five (5) year period. In addition, verify the highest post high school, claimed level of attendance leading to a degree, regardless of time.
- c. Criminal History - a criminal history records check through the FBI in accordance with 10 CFR 73.57.
- d. Military History - if within the previous five (5) year period (claimed or developed) periods of military service shall be verified by receipt of DD214, or other National Personnel Records Center (NPRC) records.

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- e. Character and Reputation - reputation for emotional stability, reliability and trustworthiness is examined through contact with two (2) supplied and two (2) developed references.
- f. Credit Check - credit history is performed to establish the applicant's financial responsibility and credibility.
- g. Verification of Identity - through such means as a photo, social security number, date of birth, driver's license, military I.D., passport, personal recognition or other similar documents.
- h. Satisfactory completion of a MMPI and if applicable, an interview with a licensed psychiatrist/psychologist.
- i. Successful completion of appropriate Fitness For Duty testing including drug and alcohol screening within the past sixty (60) days or documentation that the individual was subject to random testing within the past 60 days.
- j. Must be part of a Continual Behavioral Observation Program (either site or contractor program).
- k. Complete Plant Access Training.
- l. Complete Screening Questionnaire.

7.1.3.2 Transferred Unescorted Access Authorization (NUMARC 91-03, NEI 95-01) - An individual's unescorted access authorization granted by one utility in accordance with NUMARC Guideline 91-03 or NEI Guideline 95-01, may be transferred to CYACO upon completion of the following:

- a. Confirmation that the individual currently holds a valid unescorted access authorization or had a valid unescorted access authorization which was terminated under favorable conditions within the previous three hundred and sixty-five (365) days.

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- b. Crosscheck of information, such as name, date of birth, social security number, sex and other applicable physical characteristics for identification.
- c. Written consent from the individual to transfer the clearance from another utility, as applicable.
- d. Completion of Screening Questionnaire
- e. Criminal history verification.
- f. Fitness For Duty Verification.
- g. If the individual terminated from last utility over 30 days, a suitable inquiry must be completed.

Transfers of Unescorted Access Authorization may be via correspondence, computer data transfer, or telecopy.

7.1.3.3 Reinstatement of Full Unescorted Access Authorization - CYAPCO may reinstate the unescorted access authorization granted to an individual upon completion of the following:

- a. The individual returns to the CYAPCO nuclear facility and unescorted access authorization has not been interrupted for a continuous period of more than three hundred and sixty-five (365) days.
- b. The previous unescorted access was terminated under favorable conditions.
- c. The Screening Questionnaire and if applicable Fitness For Duty requirements are complete.
- d. If the individual's unescorted access has been interrupted by a continuous period of less than three hundred sixty-five (365) days, but more than thirty (30) days, a suitable inquiry shall be performed.
- e. Complete Plant Access Training.

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7.1.3.4 Update of Full Unescorted Access Authorization - unescorted access authorization may be granted to an individual whose previous unescorted access has been interrupted for more than three hundred and sixty-five (365) calendar days and termination of access was under favorable conditions when the following conditions are met:

- a. An updated background investigation, including a suitable inquiry to cover the individual's activities from the date the previous investigation was conducted or the period of when the last access was held, whichever is shorter.
- b. Completion of Screening Questionnaire.
- c. A successful completion of MMPI and, if applicable, an interview with a licensed psychologist/psychiatrist.
- d. Submittal of a criminal history check to the FBI through the NRC.
- e. Successful completion of Fitness For Duty testing, including drug and alcohol screening within the last sixty (60) days or individual was subject to random testing within the last 60 days.
- f. Complete Plant Access Training.

7.1.4 Badging Personnel shall update the access computer upon completion of the processing elements required for unescorted access.

7.1.5 The Security Manager or designee shall evaluate any derogatory information and determine if unescorted access authorization shall be denied.

7.1.6 All files shall be held in a Repository for retention.

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- 7.2 CYAPCO Employees - Unescorted access authorization for CYAPCO employees shall be granted in accordance with the criteria outlined in Section 7.1.3.**
- 7.2.1 The Human Resources Representative shall initiate the clearance process by having the applicant complete the required documentation, including:**
- 7.2.1.1 A Security Background Information Questionnaire. This includes an Authority to Release Background and Fitness For Duty Information and Records Form which serves to inform the applicant of the screening process and secures written consent to proceed with the screening process.**
 - 7.2.1.2 A Screening Questionnaire.**
 - 7.2.1.3 Employment Application (New Hires).**
- 7.2.2 The Human Resources Representative shall forward to CYAPCO security the original Security Background Information Questionnaire, a copy of the Employment Application, and the Screening Questionnaire. Also, the original Request Pertaining To Military Records form, if applicable.**
- 7.2.3 Badging Personnel will schedule applicants for the MMPI, Fitness For Duty Testing and Fingerprinting. Fingerprinting will be done by Badging Personnel.**
- 7.2.4 Fingerprint cards will be forwarded to the Security Manager or designee for processing.**
- 7.2.5 All Release of Information and Records Forms will be forwarded to CYAPCO Security.**
- 7.2.6 Once the contracted investigation agency has completed the Background investigation, they will forward their report to CYAPCO Security.**
- 7.2.7 When the unescorted access authorization requirements have been completed, CYAPCO Security shall enter the information into the access computer.**
- 7.2.8 When CYAPCO employees are required to go to another facility, they shall contact CYAPCO Security. CYAPCO Security shall contact the licensee to be visited and determine what criteria the CYAPCO employee is required to meet. The CYAPCO employee shall be notified by CYAPCO Security of the requirements.**

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- 7.2.9 CYAPCO employees who have not been granted Unescorted Access within the last 30 days will be required to comply with the following prior to badging:
 - 7.2.9.1 Fill out a Screening Questionnaire
 - 7.2.9.2 Complete an Access Authorization Form.
 - 7.2.10 CYAPCO Security will conduct an internal Suitable Inquiry on the individual granted site access.
 - 7.2.11 Any derogatory information that would effect unescorted access will be adjudicated prior to granting access.
 - 7.2.12 If Badging Personnel have questions/concerns regarding the access authorization status of CYAPCO employees, they should contact the Security Manager prior to badging.
- 7.3 NRC/NRC Contractors
- 7.3.1 NRC personnel seeking unescorted access authorization shall:
 - 7.3.1.1 Be listed on the NRC Access Authorization Letter.
 - 7.3.1.2 Attach letter to Access Authorization Form.
 - 7.3.1.3 Complete Plant Access Training.
 - 7.3.1.4 If individuals are not listed on the NRC Access Letter, they shall be screened in accordance with the criteria listed in Section 7.1.
 - 7.3.2 NRC Contractors seeking unescorted access authorization and who are authorized by a "Q" or "L" clearance shall:
 - 7.3.2.1 Complete the Screening Questionnaire.
 - 7.3.2.2 Successfully complete drug and alcohol testing or have been under an FFD Program within the past 60 days.
 - 7.3.2.3 Complete a Suitable Inquiry.
 - 7.3.2.4 Complete Plant Access Training Requirements, as applicable.
 - 7.3.3 NRC Contractors who are seeking unescorted access authorization and who are not authorized by a "Q" or "L" clearance shall be screened in accordance with the criteria listed in Section 7.1.

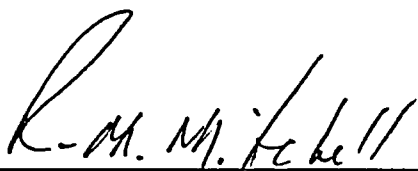
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SECTION 8.

CONDUCT OF BACKGROUND INVESTIGATION

Approved:


Unit Manager, CYAPCO

Revision:

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Effective Date:

6-20-04

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8. CONDUCT OF BACKGROUND INVESTIGATION

8.1 Consent - No element of the Security Access Authorization Program shall be initiated without the knowledge and written consent of the applicant. The applicant shall be informed of the types of records which shall be produced and retained, where such records shall be maintained, and the duration such records are normally retained. The applicant shall also be informed of his/her right to review the information to ensure its accuracy and completeness, as well as to whom and under what circumstances the information shall be released. An applicant may withdraw consent to conduct a background investigation or psychological evaluation at any time in writing. The applicant's withdrawal shall be documented. When withdrawal of consent is made, all processing of work in connection with either the background investigation or the psychological evaluation must cease as soon as possible after the notification. Withdrawal of consent to conduct the activities shall be deemed withdrawal of the individual's application for unescorted access authorization to the nuclear facilities.

8.2 The background investigation shall cover the retrospective period specified in the elements described below or since the eighteenth (18) birthday, whichever is shorter. A best effort attempt shall be made to obtain the required information and to document such attempts which address the individual's employment history, educational history, credit history, criminal history, military service, and the individuals character and reputation. The Security Manager shall determine whether a best effort attempt has been accomplished. The elements of the background investigative program shall be addressed as follows:

8.2.1 Employment History - verification of employment, of thirty (30) days or more, and/or activities during periods of unemployment, exceeding thirty (30) days, for the most recent five (5) year period through contact with the previous employer(s). The following information shall be verified and documented:

- 8.2.1.1 Date of the verification.
- 8.2.1.2 Complete dates of employment.
- 8.2.1.3 Disciplinary history.
- 8.2.1.4 Reason for termination.
- 8.2.1.5 Eligibility for re-hire.
- 8.2.1.6 Position held
- 8.2.1.7 Fitness for duty suitability.

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8.2.1.8 Any information which reflects negatively on the individuals trustworthiness or reliability as it impacts the granting of unescorted access to a nuclear facility.

8.2.1.9 Activities during periods of claimed unemployment for periods in excess of thirty (30) days.

NOTE: A best effort attempt to verify the five year employment history must be made. However, due to the number of employments many employees may have during a five (5) year period, such as crafts or trade personnel, all such verifications may not be possible. CYAPCO may thus use a documented three (3) year retrospective period for employment checks when all five (5) years cannot be verified. However, under no circumstances will access be granted on the basis of an employment check of less than three (3) years inclusive.

8.2.2 Criminal History - In compliance with 10 CFR 73.57 the fingerprints of each individual requiring unescorted access to the protected or vital areas of the facility shall be submitted to the Federal Bureau of Investigation (FBI) for the performance of a criminal history check. The results of the check will be considered to determine if unescorted access should be granted, continued or terminated. At CYAPCO's discretion and as permitted by federal, state, local or other applicable law, a criminal records check through the appropriate court or law enforcement agency may be performed. If a criminal history is discovered prior to the previous five (5) year period additional investigation may be required. Those individuals who possess a "Q" or "L" level government clearance may not be required to be finger printed. However, in that case a letter of verification of the clearance shall be obtained from the sponsoring agency.

8.2.3 Education - verify any claimed enrollment at an educational institution during the previous five (5) year period. In addition verify the highest level of claimed post high school attendance leading to a degree regardless of time. Records shall include as a minimum:

8.2.3.1 Person contacted.

8.2.3.2 Date of the verification.

8.2.3.3 Dates of attendance.

8.2.3.4 Highest level of attendance.

8.2.3.5 Reason for leaving.

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8.2.3.6 Record of any disciplinary history.

8.2.4 Credit Check - complete a check of the individual's credit history through the use of an established credit bureau. If the credit history cannot be obtained by this check, personal credit references shall be contacted to determine credit history.

NOTE: Prior to requesting a Credit History as part of a Background Investigation, a "Disclosure and Authorization Statement" must be completed. A "Summary of Your Rights Under the Fair Credit Reporting Act" will be provided by CYAPCO with each disclosure authorization.

8.2.5 References - to determine the reputation of the individuals' emotional stability, reliability and trustworthiness, reference checks shall be made with two (2) supplied references supplied by the applicant and two (2) developed references who had direct and frequent contact with the applicant. Developed references may be used in lieu of given if given are not able to be contacted. Emphasis must be placed on:

8.2.5.1 Identified psychological problems.

8.2.5.2 Criminal history.

8.2.5.3 Illegal use or possession of controlled substances.

8.2.5.4 Abuse of alcohol.

8.2.5.5 Susceptibility to coercion.

8.2.5.6 Any other conduct related to the applicant's trustworthiness or reliability to discharge job duties within the environment of a nuclear power plant.

NOTE: References shall not be individuals in the same household or relatives. When an individual is developed as a reference, the second developed reference should not be the first reference's spouse. Previous employers or employees may be used as a valid developed reference or listed reference, provided the individual personally knows the individual.

8.2.6 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

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DD Form 214 is to be determined by the Security Manager or designee.

- b. If the DD Form 214 cannot be authenticated, it will be necessary to obtain an official document (DD Form 214 or equivalent) from a military document custodian – the National Personnel Records Center, the specific military service records center, the military organizational unit or command, etc. A request for discharge information must be submitted to the record custodian within five (5) business days of granting unescorted access.
- 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 applicant's military discharge is found to be other than honorable or if a DD Form 214 is received indicating for other than honorable separation, further investigation is necessary to ascertain the details of the discharge. The Security Manager shall determine whether enough information has been developed to grant unescorted access.

8.2.7 Verification of Identity - the Investigative Agency must verify identity through such means as photograph, Social Security Number, date of birth, or comparison of the applicant's physical characteristics with employment, education, military and/or other records, and/or employer and character references who have a personal acquaintance with the applicant.

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**CONNECTICUT YANKEE ATOMIC POWER COMPANY
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SECTION 9.

PSYCHOLOGICAL CRITERIA

Approved: _____

R. M. M. Kelly

Unit Manager, CYAPCO

Revision: _____

1

Effective Date: _____

6-20-04

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9. PSYCHOLOGICAL CRITERIA

- 9.1 The reliability and stability of applicants for unescorted access authorization, shall be evaluated through the administration of a written personality test, and, if warranted, a clinical interview, as determined by a psychiatrist or licensed psychologist, if applicable.
 - 9.1.1 The test proctor shall read the instructions to the individual being tested.
 - 9.1.2 When the individual completes the testing he/she shall present proper identification and their test to the proctor, if applicable.
- 9.2 Any individual disqualified on the basis of the written examination can be scheduled for an interview with a licensed psychiatrist/psychologist, if applicable. If the individual is disqualified on the basis of the interview, unescorted access shall be denied.

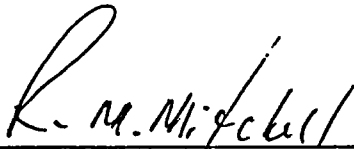
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SECTION 10.

FITNESS FOR DUTY CRITERIA

Approved:


Unit Manager, CYAPCO

Revision:

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10. FITNESS FOR DUTY CRITERIA

10.1 The individual's ability to perform his/her assigned duties in a safe and reliable manner shall be evaluated and observed. The elements which shall be evaluated to ensure the individuals fitness for duty are as follows:

10.1.1 Suitable Inquiry - a best effort verification of the individual's employment to determine if the individual was:

10.1.1.1 Tested positive for drugs or use of alcohol that resulted in on-duty impairment, or

10.1.1.2 Subject to a plan for treating substance abuse, (except for self referral for treatment), or

10.1.1.3 Removed from or made ineligible for unescorted access to any nuclear facility, or

10.1.1.4 Denied unescorted access at any nuclear facility or other employment in accordance with a Fitness for Duty Program.

10.1.2 Drug and Alcohol Testing - individuals requiring unescorted access shall be subjected to drug and alcohol testing in accordance with the requirements of 10 CFR 26. This program is designed to ensure that the individual is physically and mentally capable of performing tasks in a safe and reliable manner. The testing program is under the direct control of the CYAPCO Fitness for Duty Representative. Personnel who fail to meet the requirements of the drug and alcohol testing program shall have their access denied/revoked.

10.1.3 Continual Behavior Observation Program (CBOP) - CYAPCO employees and contractor or vendor employees granted unescorted access authorization shall be subject to a Continual Behavioral Observation Program (CBOP). The overall program includes the following:

10.1.3.1 Observation of the individual's behavior with the objective of reasonably assuring the detection of alcohol and drug abuse and other behavior that may be a potential threat to interrupt the normal operation of safe storage of spent nuclear fuel.

10.1.3.2 A program that provides for management/supervisory personnel responsibility for observing personnel for behavioral traits and patterns that may reflect adversely on their trustworthiness or reliability, and

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reporting those observations to appropriate management.

- 10.1.3.3 A training program which reasonably assures that management/supervisory personnel have the awareness and sensitivity to detect and report changes in behavior, to include suspected alcohol and drug abuse, which adversely reflects upon the individual's trustworthiness or reliability, and to refer these persons to management for appropriate evaluation and action. This training is a module of Plant Access Training.
- 10.1.3.4 Individuals with unescorted access authorization must be notified of his/her responsibility to report any arrest that may impact upon his/her trustworthiness.

NOTE

The Security Manager may determine that access can be automatically restored to permanently assigned site personnel. There are some personnel that remain under CYAPCO CBOP at CY that may not access the plant regularly. The Security Manager will evaluate these reinstatements on a case by case basis.

- 10.1.3.5 An individual granted unescorted access authorization who is away from Connecticut Yankee's behavioral observation program for more than 30 continuous days is considered to have his/her unescorted access authorization interrupted. The individual's access will be suspended.
- 10.1.3.6 If the individual still requires unescorted access, the individual, upon return to CYAPCO, shall complete and sign a Screening Questionnaire to determine the individual's trustworthiness.
- 10.1.3.7 A suitable inquiry will be conducted to cover the time period not covered by a behavioral observation program.

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SECTION 11.

CRIMINAL HISTORY NRC/FBI

Approved:

R. M. Mitchell

Unit Manager, CYAPCO

Revision:

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11. CRIMINAL HISTORY NRC/FBI

- 11.1 Applicants seeking unescorted access to CYAPCO or access to safeguards information shall be fingerprinted in accordance with the requirements of 10 CFR 73.57.
 - 11.1.1 Processing Personnel will determine the need for the applicant to complete the fingerprint process.
 - 11.1.2 Inform the individual of the requirements of the fingerprint program and his/her rights under the law.
 - 11.1.3 Establish the true identity of the individual.
 - 11.1.4 Complete the fingerprint card and Fingerprint Release form and take the applicant's prints.
- 11.2 Fingerprint cards shall be forwarded to the Security Manager on a daily basis.
- 11.3 The Security Manager or designee shall review the fingerprint information, prepare a submittal and, submit the fingerprint cards to the NRC/FBI as soon as possible.
 - 11.3.1 If, upon review of the fingerprint impressions it is determined that they were improperly taken (smudged, not rolled properly), the card will be returned to Badging for re-printing.

NOTE

In accordance with the information provided by NRC Information Notice 98-05, dated February 11, 1998, "only licensee employees will be authorized to have access to FBI Criminal History Record Information. Licensees that employ contractors to receive FBI CHRI or that divulge the FBI CHRI to contractors whose employees have been processed for access to Safeguards Information or to protected areas of nuclear power facilities may risk violation of 28 U.S.C. 534 and 42 U.S.C. 2169."

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- 11.4 CYAPCO shall use the information obtained, through the fingerprint submittal, solely as a part of the investigation process to determine the applicant's eligibility for unescorted access authorization to the nuclear facilities or access to safeguards information. CYAPCO shall not solely base the final determination to deny access on information received from the FBI involving:
 - 11.4.1 An arrest more than one (1) year old for which there is no information of the disposition of the case; or
 - 11.4.2 An arrest that resulted in dismissal of the charge or an acquittal.
- 11.5 When fingerprint cards are returned, the return date shall be entered into the computer.
 - 11.5.1 CYAPCO shall make available to the individual the contents of records obtained from the FBI if they impact his/her trustworthiness or reliability.
 - 11.5.2 Confirmation of receipt by the individual of this notification will be maintained by CYAPCO.
 - 11.5.3 If the individual believes that the information contained in the criminal record history is incorrect or incomplete, instructions for challenge are contained in Form 10.
- 11.6 For cards that are returned marked "Illegible" or "Unclassifiable," the following action should be taken:
 - 11.6.1 If this was a first submittal, return card to Badging for re-print.
 - 11.6.2 Upon receipt of card from Badging, re-examine rolled impressions prior to submittal to the NRC/FBI.
 - 11.6.3 If the impressions were improperly rolled or are smudged, return them to Badging to be re-done.
 - 11.6.4 If, upon examination, the rolled impressions were properly taken, resubmit to the NRC.
 - 11.6.5 If, after the second submittal of properly taken fingerprints, they are again returned marked "Unclassifiable," document this fact in the individual's file.
 - 11.6.6 If there is any indication that the reason for "Unclassifiable" prints was due to improper fingerprinting by the Licensee, a third set should be taken and submitted to the NRC.

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- 11.6.7 If two sets of prints are returned as "Unclassifiable" and both sets were acceptable when sent to the NRC, the Security Manager or designee may request a name search to be completed by the FBI.
- 11.7 Fingerprint criminal history results that indicate a criminal history record less than five years old.
 - 11.7.1 The Security Manager will adjudicate the criminal history.
 - 11.7.2 If resolution cannot be accomplished, the individuals file (electronic or paper) will be flagged for disposition upon return to the site.

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**CONNECTICUT YANKEE ATOMIC POWER COMPANY
SECURITY ACCESS AUTHORIZATION MANUAL**

SECTION 12.

EVALUATION CRITERIA FOR UNESCORTED ACCESS AUTHORIZATION

Approved: _____

R. M. M. Fehell

Unit Manager, CYAPCO

Revision: _____

1

Effective Date: _____

6-20-04

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12. EVALUATION CRITERIA FOR UNESCORTED ACCESS AUTHORIZATION

- 12.1 In the decision to grant/deny unescorted access authorization, CYAPCO's Security Manager or designee shall consider the information obtained during the background investigation, suitable inquiry, psychological evaluation and criminal history results. This information shall be reviewed using the criteria specified in this document. CYAPCO's Security Manager or designee must consider the following when evaluating the information gathered and formulating a recommendation for granting/denial of unescorted access authorization:
- 12.1.1 Willful omission or falsification of material information submitted in support of employment or request for unescorted access authorization.
 - 12.1.2 Illegal use or possession of a controlled substance or abuse of alcohol without adequate evidence of rehabilitation.
 - 12.1.3 A criminal history without adequate evidence of rehabilitation which establishes trustworthiness or reliability.
 - 12.1.4 History of mental illness or emotional instability that may cause a significant defect in the individual's judgment or reliability.
 - 12.1.5 Any evidence of coercion, influence, or pressure that may be applied by outside sources to compel an individual to commit any act of sabotage or other act which would adversely reflect upon the individual's trustworthiness or reliability.
 - 12.1.6 Evidence that the individual has committed or attempted to commit or aided or abetted another who committed or attempted to commit, any act of sabotage or other act that would pose a threat or reflect adversely upon the individual's trustworthiness or reliability.
 - 12.1.7 A psychological evaluation which indicates that the individual is a risk in terms of trustworthiness or reliability.
 - 12.1.8 Any other information that would adversely reflect upon the reliability and trustworthiness of the individual as related to the individuals being permitted unescorted access.
- 12.2 Derogatory criminal history information developed through the Security Background Investigation Questionnaire, applicant interview, FBI criminal history records or other sources shall be evaluated and adjudicated by the Security Manager in accordance with State and local criminal codes. The severity of the crime and the time frame in which the crime has been

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committed should be considered when making the final determination to grant/deny unescorted access authorization.

- 12.3 Derogatory information will be adjudicated utilizing the maxtrix (Appendix 2) as guidance.


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SECTION 13.

MANAGEMENT SANCTIONS

Approved:


Unit Manager, CYAPCO

Revision:

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6-20-04

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13. MANAGEMENT SANCTIONS

- 13.1 Applicants for unescorted access authorization who willfully omit or falsify information submitted to support their application shall be denied access authorization for a minimum of one (1) year.
- 13.2 Applicants who display a significant criminal history shall be denied access authorization for a minimum of one (1) year.
- 13.3 Individuals who have displayed a history of mental illness or emotional instability that may cause a significant defect in the individual's judgment or reliability shall not be granted access.
- 13.4 Applicants who have any evidence of coercion, influence, or pressure that may be applied by outside sources to compel an individual to commit any act of sabotage or other act which would adversely reflect upon the individual's trustworthiness or reliability shall be denied access.
- 13.5 Applicants who have committed or attempted to commit or aided or abetted another who committed or attempted to commit, any act of sabotage or other act that would pose a threat or reflect adversely upon the individual's trustworthiness or reliability shall be denied access authorization.
- 13.6 A pre-access psychological evaluation which indicates that the individual is a risk in terms of trustworthiness or reliability shall be cause for denial of access authorization for a minimum of one (1) year.
- 13.7 Applicants who test positive for drugs and/or alcohol during pre-access screening shall be denied access authorization for a minimum of one (1) year.
- 13.8 Applicants who engage in the sale, use or possession of illegal drugs within the protected area of a site shall be denied access for a minimum of five (5) years.
- 13.9 Applicants who refuse to provide test specimens or resign prior to removal for violation of Fitness for Duty Program policy will be denied access authorization for a minimum of one (1) year.
- 13.10 CYAPCO Employees who test positive for the first time shall be denied access for a minimum of 14 days.
- 13.11 Contractor individuals who test positive for the first time shall be denied access for a minimum of one (1) year.
- 13.12 CYAPCO Employees who have two positive FFD tests shall be denied access and terminated from employment.

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- 13.13 Individuals who have two positive FFD tests shall be denied access for a minimum of three (3) years.
- 13.14 Individuals who have three positive FFD tests shall be denied access indefinitely.
- 13.15 Applicants whose behavior brings into question the individual's trustworthiness or reliability, or poses a threat to the normal operation of the facility, may be denied access authorization for a minimum of one (1) year.
- 13.16 Applicants who have been convicted of a felony crime within the past five years or a drug related conviction in the past five (5) years shall be denied access for a minimum of one (1) year.
- 13.17 Individuals arrested on drug-related charges while holding unescorted access will be evaluated on a case basis, but are normally denied access pending court resolution.

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**CONNECTICUT YANKEE ATOMIC POWER COMPANY
SECURITY ACCESS AUTHORIZATION MANUAL**

SECTION 14.

REVIEW AND APPEALS PROCESS

Approved: _____

R. M. Mifflin

Unit Manager, CYAPCO

Revision: _____

1

Effective Date: _____

6-20-04

CONNECTICUT YANKEE ATOMIC POWER COMPANY
ACCESS AUTHORIZATION MANUAL
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14. REVIEW AND APPEALS PROCESS

14.1 Contractor/Vendor

- 14.1.1 The contracted investigation agency shall ensure that the Security Manager or designee is notified if derogatory information is developed during conduct of a background investigation for contractor personnel. The Security Manager or designee shall conduct an interview or further investigate the derogatory information. During the interview process the applicant will be informed of the derogatory information that has been developed. The applicant will then be given the opportunity to review the information to determine if he/she believes the information is correct and given the opportunity to explain the issue. If the individual believes that the information is incorrect or has additional information which may resolve or refute the derogatory information, the individual shall be given the opportunity to provide supporting documentation. The results of the applicant interview will be documented on the Security Interview Form.
- 14.1.2 If the individual fails to pass the psychological portion of the authorization process, the Security Manager or designee shall inform the individual that their access has been denied and that they have a right to appeal that decision.
- 14.1.3 Documentation of access denial will be maintained by the Security Manager.
- 14.1.4 The Security Manager or designee should ensure that any contractor/vendor employee who has access authorization at CYAPCO denied or revoked, is notified in writing of the following:
 - 14.1.4.1 The grounds for denial or withdrawal of access authorization
 - 14.1.4.2 The right to provide additional information
 - 14.1.4.3 The right to appeal using the Security Interview Form.
- 14.1.5 The Contractor/Vendor company shall be notified of the individuals denial or revocation by the Security Manager or designee. The Contractor/Vendor company shall be notified in writing of the denial, but not the reason for the denial or revocation.

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- 14.1.6 In order to initiate an appeal the affected individual must:
- 14.1.6.1 Submit a written request letter for appeal within ten (10) business days of receipt of the denial/revocation notification. Contractor/vendor employees shall submit request letters to the Security Manager or designee. 362 Injun Hollow Rd, East Hampton, CT 06424-3099.
 - 14.1.6.2 State the reason in the letter of appeal as to why the individual believes the judgment to deny or revoke access authorization is incorrect.
 - 14.1.6.3 Submit supporting information, if applicable.
- 14.1.7 Upon receipt of an appeal letter, the Security Manager or designee shall review the letter of appeal. The letter shall include the individual's reason as to why the denial/revocation is incorrect and any supporting information.
- 14.1.8 When the appeal letter has been reviewed and meets the above objective, Security Manager or designee, shall send a receipt requested letter acknowledging receipt of the appeal to the contractor/vendor individual. The Appeal Review Committee shall be notified that an appeal has been received and accepted for review.
- 14.1.9 The Appeal Review Committee, typically consisting of the Unit Manager, the Human Resources Manager and Employee Concerns Program Manager, shall review all documents related to the appeal and determine if the decision to deny/revoke access authorization should be affirmed or reversed. If any of these members is unavailable, another manager or director may be substituted on the Appeal Review Committee.
- 14.1.10 If the decision to deny or withdraw access authorization is affirmed the individual shall be notified by the Appeal Review Committee. The Security Manager or designee shall also be informed of the affirmation.
- 14.1.11 If the decision to deny or withdraw access authorization is reversed the Security Manager or designee shall be notified and informed of the rational for the reversal. The individual shall be notified by the Security Manager for the Appeal Review Committee. The decision of the Appeal Review Committee is final.

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- 14.1.12 The individual requesting the appeal shall not be notified of the results of the appeal until all steps in the appeal process have been completed.
- 14.1.13 All access authorization decisions not appealed within ten (10) business days, after notification of the denial/revocation, shall be considered final.
- 14.1.14 No access to the facility to include visitor access shall be granted to an individual whose case is under appeal.
- 14.1.15 Interview documentation, appeal decisions, and any other supporting documentation shall be incorporated into the individual's file and retained by the Security Manager.
- 14.1.16 Letters of appeal shall be maintained for a minimum of five (5) years, after the effective date of denial or revocation of the individual's access.

14.2 **CYAPCO Personnel**

- 14.2.1 If the individual is a union employee of CYAPCO, the appeal process shall be the contractual grievance procedure.
- 14.2.2 If the individual is a nonunion employee of CYAPCO, the appeal process shall be in accordance with Section 14.1.

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SECTION 15.

AUDITS

Approved:

R. M. Mitchell
Unit Manager, CYAPCO

Revision:

1

Effective Date:

6-20-04

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15. AUDITS

15.1 As of January 1, 2001 CYAPCO no longer accepted Contractor/vendors approved programs. The six approved programs as of January 1, 2001 will be audited on an annual basis for records retention purposes. CYAPCO utilizes the Nuclear Energy Institute (NEI) Audit program to accomplish these audits. A copy of the annual NEI audits is retained by CYAPCO. Audit periods may be extended beyond 12 months, but not to exceed 15 months, with a combined time interval for any three consecutive audit periods not to exceed 39 months. These audits will ensure:

15.1.1 A documented program which meets the standards the NEI audit program.

15.1.2 Their programs are assigned an administrator who is responsible to ensure implementation.

15.1.3 When using an outside screening agency to conduct a portion or all of the background investigation, the contractor/vendor uses a firm knowledgeable of Access Authorization Programs for Nuclear Power Plants.

NOTE:

Required Access Authorization audits for the calendar year 2001 are being completed by Northeast Utilities. Copies of these audits will be retained at Connecticut Yankee.

15.2 The auditors shall review records retention activities by examining records and conducting interviews with appropriate personnel to determine that the screening activities were accomplished in a correct and accurate manner and that records are retained appropriately.

15.2.1 In conducting an audit of the screening program, the auditor must ensure that the contractor/vendor is in conformance with 10CFR 73.56, Reg. Guide 5.66, NUMARC 89-01, and 10CFR 26 as applicable.

15.2.2 Audits shall be conducted utilizing the guidelines of NEI-94-02, "Standardized Industry Audit Process for Licensee Approved Contractor/Vendor Access Authorization and Fitness-for-Duty Programs."

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SECURITY ACCESS AUTHORIZATION MANUAL

SECTION 16.

TERMINATIONS

Approved:

R. M. Mitchell

Unit Manager, CYAPCO

Revision:

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6-20-04

CONNECTICUT YANKEE ATOMIC POWER COMPANY
ACCESS AUTHORIZATION MANUAL
Revision : 1

16. TERMINATIONS

16.1 **Normal Termination** - Upon receipt of Termination Notification, the Badging Personnel shall:

16.1.1 verify the name, social security number, and badge number of individual being terminated.

16.1.2 verify that the badge has been deactivated.

16.2 **Infrequent Access/CBOP (Contractors)** - At least weekly, Security Personnel shall generate a computer listing from the Security Computer and shall determine who has not used the badge in the previous thirty (30) day period. Security Personnel shall:

16.2.1 verify that the badge has been deactivated.

16.3 **Unfavorable Termination (For Cause)** - When an individual is terminated for-cause, the Security Manager or designee shall be notified of the termination and the reason for the termination prior to or concurrent with the terminated individuals removal from unescorted access. Wherever possible, notification to the individual on a for-cause termination will take place outside the Industrial Area. Processing personnel shall:

16.3.1 verify the name, social security number, and badge number.

16.3.2 verify that the badge has been deactivated.

16.3.3 check individual's file to see if transferred to another utility. If yes, notify respective utility.

16.4 **Thirty-one (31) Day Revalidation** - at least once every thirty-one (31) days the Security Manager or designee shall forward to all Cognizant Supervisors a Revalidation Listing of all personnel assigned to the Supervisor. The Supervisor shall review the listing and verify that the individual continues to need unescorted access. During the review, the Supervisor shall also note individuals that no longer require the need for unescorted access and note such on the listing. Upon receipt the Security Manager, or designee, shall:

16.4.1 verify that the badge has been deactivated.

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CONNECTICUT YANKEE ATOMIC POWER COMPANY
SECURITY ACCESS AUTHORIZATION MANUAL

SECTION 17.

TRAINING

Approved:


Unit Manager, CYAPCO

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6-20-04

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ACCESS AUTHORIZATION MANUAL
Revision : 1**

17. TRAINING

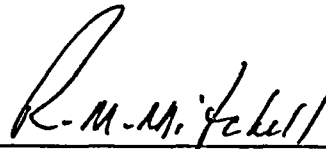
- 17.1 Personnel seeking unescorted access or continuation of unescorted access that has already been granted shall fulfill training requirements established by Connecticut Yankee Management.
 - 17.1.1 Training at Connecticut Yankee expires 365 days from completion of training. (Training taken on April 1, 1999 expires April 1, 2000.)
 - 17.1.2 When training is identified as expired, the individual shall not be eligible for unescorted access, until all training requirements have been completed. The Security computer automatically deactivates badges based on the expiration date. The expiration date is the training expiration date.

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SECTION 18.

MANUAL REVISIONS AND CHANGES

Approved:



Unit Manager, CYAPCO

Revision:

2

Effective Date:

7-20-04

**CONNECTICUT YANKEE ATOMIC POWER COMPANY
ACCESS AUTHORIZATION MANUAL
Revision : 2**

18. MANUAL CHANGES AND REVISIONS

- 18.1 An individual proposing a revision or change shall submit a draft of the proposed revision or change using the Manual Change Form 6 to the Security Manager or designee.
- 18.2 The Security Manager or designee shall evaluate the change as intent or non-intent. If the change is non-intent, the Security Manager or designee shall assign a change number and record the change in the Access Authorization Manual Change Log. The change may be incorporated into the document as part of the biannual review process, or distributed to manual holders.
- 18.3 As a minimum, this manual will be reviewed once every two years by a review committee appointed by the Security Manager.
- 18.4 For intent changes, the Security Manager or designee shall notify the Unit Manager in writing of the proposed change. The Unit Manager shall review the intent change proposal and take appropriate action.
- 18.5 The Security Manager or designee shall submit the final draft of revision and intent changes to the Unit Manager for sign off.
- 18.6 The Badging Department shall distribute changes or revisions to all Access Authorization Manual holders.

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SECURITY ACCESS AUTHORIZATION MANUAL

SECTION 19.

RECORDS RETENTION

Approved:

R. M. Mitchell
Unit Manager, CYAPCO

Revision:

1

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ACCESS AUTHORIZATION MANUAL
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19. RECORDS RETENTION

- 19.1 CYAPCO, in conducting the unescorted access authorization program, shall maintain actual screening records.
- 19.2 CYAPCO shall retain records for each person who is granted unescorted access authorization for a five-year period following termination of access authorization. This shall include records obtained from utilities participating in an electronic system of sharing screening information.

NOTE:

Many records generated prior to January 2001 were shared records between Millstone, NUSCO and Connecticut Yankee since the Access Authorization Program and central repository were shared. These shared records are retained at Millstone and are available to Connecticut Yankee upon request.

- 19.3 CYAPCO Processing Personnel who collect personal information for the purpose of processing unescorted access authorization shall safeguard the confidentiality of that information and provide protection against damage and deterioration.
- 19.4 Access to computer based information shall be granted to a level necessary to perform assigned duties and will be protected using software and passwords established for those purposes.
- 19.5 Information on computer disks shall be stored in locked file drawers.
- 19.6 Records and reports shall be stored in locked cabinets.

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SECURITY ACCESS AUTHORIZATION MANUAL

SECTION 20.

INDUSTRIAL AREA ACCESS

Approved:

R. M. Mitchell

Unit Manager, CYAPCO

Revision:

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ACCESS AUTHORIZATION MANUAL
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20. INDUSTRIAL AREA ACCESS AUTHORIZATION PROGRAM

- 20.1 The Industrial Area Access Authorization Program outlined in this Security Access Authorization Manual is designed to provide reasonable assurance that CYAPCO personnel and contractor/vendor employees granted access authorization for the Industrial Area are trustworthy, reliable and are fit to perform their duties.
- 20.2 To meet the objectives of the Industrial Area Access Authorization Program, components have been established to ensure the trustworthiness, and reliability of individuals working in the Industrial Area of CYAPCO.
 - 20.2.1 A Background Investigation - A background investigation is conducted to provide reasonable assurance that individuals are trustworthy and reliable, as determined through a review of their activities for the retrospective one (1) year period, including an FBI Criminal History Check, and the performance of a suitable inquiry.

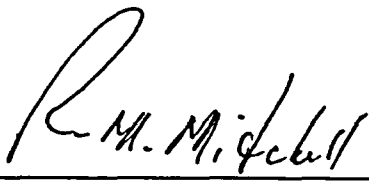
JUN 20 2004

**CONNECTICUT YANKEE ATOMIC POWER COMPANY
SECURITY ACCESS AUTHORIZATION MANUAL**

SECTION 21.

INDUSTRIAL AREA ACCESS AUTHORIZATION

Approved: _____


Unit Manager, CYAPCO

Revision: _____

1

Effective Date: _____

6-20-01

CONNECTICUT YANKEE ATOMIC POWER COMPANY
ACCESS AUTHORIZATION MANUAL
Revision : 1

21. INDUSTRIAL AREA ACCESS AUTHORIZATION

- 21.1 Industrial Area authorizations are initiated based on the submission of an **Access Authorization** form by an Authorized Department Supervisor or designee as listed on the Access Authorization Signature List and signed by the appropriate Contractor Representative. This form is submitted to the Processing Center for processing.
- 21.2 The Access Authorization form shall be maintained in the individual's security file.
- 21.3 The applicant's documentation package shall be reviewed by Processing Personnel prior to approval.
- 21.3.1 **Industrial Area Access** authorization may be granted based on favorable results of the following investigation elements:
- a. Verification of identity through one photo identification, e.g., driver's license, military I.D., passport, or other similar document.
 - b. Completion of a credit check.
 - c. Completion of an employment history check for the previous year in accordance with 10CFR 73.56, and suitable inquiry in accordance with 10CFR, Part 26.
 - d. Recommendation of one supplied and one developed character reference who has had frequent and direct association with the applicant (within the past year).
 - e. Evidence that a request for a criminal history check of the applicant by the FBI has been submitted to the NRC.
 - f. Successful completion of appropriate Fitness For Duty testing, including drug and alcohol screening within the past sixty (60) days, or documentation that the individual was subject to random testing within the last 60 days.
 - g. Complete Plant Access Training.
 - h. Complete Screening Questionnaire.

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CONNECTICUT YANKEE ATOMIC POWER COMPANY
SECURITY ACCESS AUTHORIZATION MANUAL

SECTION 22.

CONDUCT OF AN INDUSTRIAL AREA BACKGROUND INVESTIGATION

Approved:

R. M. Mitchell

Unit Manager, CYAPCO

Revision:

1

Effective Date:

6-20-04

**CONNECTICUT YANKEE ATOMIC POWER COMPANY
ACCESS AUTHORIZATION MANUAL
Revision : 1**

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22. CONDUCT OF AN INDUSTRIAL AREA BACKGROUND INVESTIGATION

22.1 Consent - No element of the Security Access Authorization Program shall be initiated without the knowledge and written consent of the applicant. The applicant shall be informed of the types of records, which shall be produced and retained, where such records shall be maintained, and the duration such records are normally retained. The applicant shall also be informed of his/her right to review the information to ensure its accuracy and completeness, as well as to whom and under what circumstances the information shall be released. An applicant may withdraw consent to conduct a background investigation or psychological evaluation at any time in writing. The applicant's withdrawal shall be documented. When withdrawal of consent is made, all processing of work in connection with either the background investigation or the psychological evaluation must cease as soon as possible after the notification. Withdrawal of consent to conduct the activities shall be deemed withdrawal of the individual's application for unescorted access authorization to the nuclear facilities.

22.2 The background investigation shall cover the retrospective period specified in the elements described below or since the eighteenth (18) birthday, whichever is shorter. A best effort attempt shall be made to obtain the required information and to document such attempts which address the individual's employment history, educational history, credit history, criminal history, military service, and the individual's character and reputation. The elements of the background investigative program shall be addressed as follows:

22.2.1 Employment History - verification of employment, of thirty (30) days or more, and/or activities during periods of unemployment, exceeding thirty (30) days, for the most recent one (1) year period through contact with the previous employer(s). The following information shall be verified and documented:

22.2.1.1 Date of the verification.

22.2.1.2 Complete dates of employment.

22.2.1.3 Disciplinary history.

22.2.1.4 Reason for termination.

22.2.1.5 Eligibility for re-hire.

22.2.1.6 Position held

22.2.1.7 Fitness for duty suitability.

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22.2.1.8 Any information which reflects negatively on the individuals trustworthiness or reliability.

22.2.1.9 Activities during periods of claimed unemployment for periods in excess of thirty (30) days.

NOTE: A best effort attempt to verify the one-year employment history must be made. Criteria for meeting "Best Effort" attempt shall be determined by the Security Manager.

22.2.2 Individuals granted access to the Industrial work are will be fingerprinted in accordance with 10CFR 73.57. Criminal history elements as specified in Section 1, Chapter II, shall apply.

22.2.3 Education - verify any claimed enrollment at an educational institution during the previous one (1) year period. Records shall include as a minimum:

22.2.3.1 Person contacted.

22.2.3.2 Date of the verification.

22.2.3.3 Dates of attendance.

22.2.3.4 Highest level of attendance.

22.2.3.5 Reason for leaving.

22.2.3.6 Record of any disciplinary history.

22.2.4 Credit Check - complete a check of the individual's credit history through the use of an established credit bureau. If the credit history cannot be obtained by this check, personal credit references shall be contacted to determine credit history.

NOTE: Prior to requesting a Credit History as part of a Background Investigation, a "Disclosure and Authorization Statement" must be completed. A "Summary of Your Rights Under the Fair Credit Reporting Act" will be provided by CYAPCO with each disclosure authorization.

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22.2.5 References - to determine the reputation of the individuals' emotional stability, reliability and trustworthiness, reference checks shall be made with one (1) supplied references supplied by the applicant and one (1) developed references who had direct and frequent contact with the applicant. Developed references may be used in lieu of given if given are not able to be contacted. Emphasis must be placed on:

22.2.5.1 Identified psychological problems.

22.2.5.2 Criminal history.

22.2.5.3 Illegal use or possession of controlled substances.

22.2.5.4 Abuse of alcohol.

22.2.5.5 Susceptibility to coercion.

22.2.5.6 Any other conduct related to the applicant's trustworthiness or reliability to discharge job duties within the environment of a nuclear power plant.

NOTE: References shall not be individuals in the same household or relatives. When an individual is developed as a reference, the second developed reference should not be the first reference's spouse. Previous employers or employees may be used as a valid developed reference or listed reference, provided the individual personally knows the individual.

22.2.6 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 Security Manager or designee.
- b. If the DD Form 214 cannot be authenticated, it will be necessary to obtain an official document (DD Form 214 or equivalent) from a military document custodian – the National Personnel Records Center, the specific military service records center, the military organizational unit or command, etc. A request for discharge information must be submitted to the record custodian within five (5) business days of granting unescorted access.

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- 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 applicant's military discharge is found to be other than honorable or if a DD Form 214 is received indicating for other than honorable separation, further investigation is necessary to ascertain the details of the discharge. The Security Manager shall determine whether enough information has been developed to grant unescorted access.

22.2.7 Verification of Identity - the Investigative Agency must verify identity through such means as photograph, Social Security Number, date of birth, or comparison of the applicant's physical characteristics with employment, education, military and/or other records, and/or employer and character references who have a personal acquaintance with the applicant.

JUN 20 2004

Revision 1 June 20, 2004

SECURITY ACCESS AUTHORIZATION MANUAL

APPENDIX 1-FORMS

<u>Section</u>	<u>Title</u>	<u>Rev.</u>	<u>Eff. Date</u>
1.	Security Background Information Questionnaire	1	6/20/04
2.	Screening Questionnaire	1	6/20/04
3.	Fingerprint Release Form	1	6/20/04
4.	Termination Notification Form	1	6/20/04
5.	Security Interview Form	1	6/20/04
6.	Manual Change Form	1	6/20/04
7.	MMPI Test Results	1	6/20/04
8.	Request Pertaining To Military Records	1	6/20/04
9.	Confirmation of Receipt—Criminal History	1	6/20/04
10.	Criminal History—Instructions for Challenge	1	6/20/04
11.	Denial Notification—Access Authorization	1	6/20/04
12.	Disclosure and Authorization Statement Fair Credit Act	1	6/20/04
13.	Unescorted Access Authorization Program	1	6/20/04
14.	Privacy Act Statement	1	6/20/04
15.	91-03 Electronic Transfer	1	6/20/04
16.	Internal Suitable Inquiry	1	6/20/04

JUN 20 2004

FORM 1 Revision 1 June 20, 2004



CONNECTICUT YANKEE ATOMIC POWER COMPANY

HADDAM NECK PLANT

Security Background Information Questionnaire

FOR CYAPCO SYSTEM USE ONLY

A background investigation is requested for:

NAME OF EMPLOYEE	SOCIAL SECURITY NUMBER	DATE
COMPANY NAME		

I.D. VERIFICATION

Identity has been verified through one photo identification by: _____
(Signature)

(NOTE TO INVESTIGATOR: A temporary clearance is not authorized without I.D. verification.)

TYPE OF REPORT REQUIRED

- ☐ I. **FULL FIVE (5) YEAR BACKGROUND INFORMATION**
Information to verify all activities including Employment/Unemployment, Educational and Criminal (employment/residential).
- ☐ II. **BACKGROUND INFORMATION UPDATE FROM _____**
Information to verify all activities including Employment/Unemployment, Educational and Criminal (employment/residential since date indicated).
- ☐ III. **SUITABLE INQUIRY INFORMATION FROM _____ TO PRESENT.**
Information concerning Suitable Inquiry ONLY at all employers/plants since date indicated.
- ☐ IV. **INDUSTRIAL ONE (1) YEAR BACKGROUND INFORMATION**
Information to verify all activities including Employment/Unemployment, Educational and Criminal (employment/residential).

Authorization for Release of Background and Fitness for Duty Information**COMPLETE ALL SPACES – TYPE OR PRINT CLEARLY – IF NOT APPLICABLE, TYPE OF PRINT N/A**

LAST NAME	FIRST NAME	MI	DATE OF BIRTH	SOCIAL SECURITY NUMBER
-----------	------------	----	---------------	------------------------

Prior to granting you unescorted access to the Industrial/Protected Area of Connecticut Yankee Atomic Power Company, Connecticut Yankee is required by federal regulation to complete a background/fitness for duty investigation covering at least the last one (1) year (Industrial Area Access) or at least the last 5 years (Protected Area Access). The results of this investigation will be used to determine if you are suitable to be granted unescorted access to Connecticut Yankee and /or employment within the Licensee company.

NOTE

A falsified or incomplete response to questions in this questionnaire may constitute cause for denial or revocation of unescorted access, discharge, and/or rescission of offers of employment.

15 U.S.C.A. Section 1681d (a) (1) requires that you be advised that information from this form will be used to conduct a background/fitness for duty investigation as required by the Code of Federal Regulation (10 CFR 73 and 10 CFR 26). The background/fitness for duty investigation may include, but is not limited to, information relating to your character, general reputation, personal characteristics, use, possession or sale of illegal drugs, or abuse of drugs/alcohol or other prescription/non-prescribed drugs, if you have been treated for substance abuse, or if you have been removed or made ineligible for duties or denied unescorted access at any nuclear power plant under a fitness for duty policy within the past five (5) years.

Please fill out the attached forms in their entirety, leaving no blanks.

AUTHORIZATION AND RELEASE

I request and authorize anyone with any records or information about me to disclose fully all such records and information (e.g., fitness for duty information, disciplinary history, conditions of discharge, rehirable or not, etc.) to Connecticut Yankee Atomic Power Company or its screening contractor for the purpose of determining whether I am eligible for unescorted access to Connecticut Yankee Atomic Power Company, Haddam Neck Plant. I hereby release and such person or entity from any and all liability, claims, demands, causes of action and suits of any nature whatsoever in any way relative to the person's or entity's release of such background information to CYAPCO or its screening contractor.

I hereby release the Licensee, its subsidiaries and affiliates and their directors, officers, employees and agents from any and all liability, claims, demands, causes of action and suits of any nature whatsoever in any way relative to the acquisition and/or disclosure of any such background information.

This release will be used by CYAPCO to provide fitness for duty background information of the above named person. This release is valid for 180 days from the date signed by the applicant.

I further agree that a photocopy or facsimile of this authorization may be considered as the original.

SIGNATURE	DATE
WITNESS SIGNATURE	DATE

Security Background Personal History Questionnaire

COMPLETE ALL SPACES – TYPE OR PRINT CLEARLY – IF NOT APPLICABLE, TYPE OF PRINT N/A

This is a CONFIDENTIAL document and will be used to complete a background investigation required for access to any nuclear plant and/or employment with any Licensee company. All information provided on this questionnaire must be complete and accurate. Any misrepresentation or omission may constitute cause for denial or revocation of unescorted access, discharge and/or rescission of offers or employment.

PERSONAL HISTORY				
LAST NAME	FIRST NAME	MI	GENDER <input type="checkbox"/> MALE <input type="checkbox"/> FEMALE	
MAIDEN NAME OR ALIASES (IF ANY)				
PERMANENT ADDRESS (NUMBER AND STREET)		CITY		STATE
ZIP CODE				
SOCIAL SECURITY NUMBER	DATE OF BIRTH (MM/DD/YY)	HOME TELEPHONE NO.		BUSINESS TELEPHONE NO.
HEIGHT	WEIGHT	HAIR COLOR		EYE COLOR
PLACE OF BIRTH (CITY)			STATE	

If naturalized, give certificate number, date and place: _____

If alien, give registration number, native country, and date and place of entry into the US: _____

BACKGROUND REFERENCES		
List 6 persons with whom you have had frequent and direct association, who have known you for at least one (1) year, and who can vouch for your character. Do not include relatives. Include both business and home telephone numbers.		
NAME	HOME ADDRESS	TELEPHONE NUMBER (INCLUDING AREA CODE)

Security Background Personal History Questionnaire

EMPLOYMENT/UNEMPLOYMENT HISTORY - INCLUDE EXACT DATES

List every job you have held for the last one (1) / five (5) year(s). Include military service if within this time frame. Start with your current/most recent job or unemployment period first. Account for all time, including periods of unemployment. IF UNEMPLOYED, MAKE SURE YOU PROVIDE THE NAME AND TELEPHONE NUMBER OF A PERSON WHO CAN VERIFY THIS.

EMPLOYER'S NAME	DATES EMPLOYED/UNEMPLOYED (MM/DD/YY) FROM TO	POSITION HELD
ADDRESS/CITY/STATE/ZIP		TELEPHONE
JOB SITE (LOCATION/CITY/STATE) If nuclear station, list station.		SUPERVISOR
IF UNEMPLOYED, LIST REASON, NAME AND PHONE NO. OF PERSON WHO CAN VERIFY STATUS		REASON FOR LEAVING

EMPLOYER'S NAME	DATES EMPLOYED/UNEMPLOYED (MM/DD/YY) FROM TO	POSITION HELD
ADDRESS/CITY/STATE/ZIP		TELEPHONE
JOB SITE (LOCATION/CITY/STATE) If nuclear station, list station.		SUPERVISOR
IF UNEMPLOYED, LIST REASON, NAME AND PHONE NO. OF PERSON WHO CAN VERIFY STATUS		REASON FOR LEAVING

EMPLOYER'S NAME	DATES EMPLOYED/UNEMPLOYED (MM/DD/YY) FROM TO	POSITION HELD
ADDRESS/CITY/STATE/ZIP		TELEPHONE
JOB SITE (LOCATION/CITY/STATE) If nuclear station, list station.		SUPERVISOR
IF UNEMPLOYED, LIST REASON, NAME AND PHONE NO. OF PERSON WHO CAN VERIFY STATUS		REASON FOR LEAVING

EMPLOYER'S NAME	DATES EMPLOYED/UNEMPLOYED (MM/DD/YY) FROM TO	POSITION HELD
ADDRESS/CITY/STATE/ZIP		TELEPHONE
JOB SITE (LOCATION/CITY/STATE) If nuclear station, list station.		SUPERVISOR
IF UNEMPLOYED, LIST REASON, NAME AND PHONE NO. OF PERSON WHO CAN VERIFY STATUS		REASON FOR LEAVING

EMPLOYER'S NAME	DATES EMPLOYED/UNEMPLOYED (MM/DD/YY) FROM TO	POSITION HELD
ADDRESS/CITY/STATE/ZIP		TELEPHONE
JOB SITE (LOCATION/CITY/STATE) If nuclear station, list station.		SUPERVISOR
IF UNEMPLOYED, LIST REASON, NAME AND PHONE NO. OF PERSON WHO CAN VERIFY STATUS		REASON FOR LEAVING

Security Background Personal History Questionnaire

EDUCATION

List all enrollment at an educational institution during the last one (1) / five (5) year(s). List all post-high school attendance leading to a degree regardless of time. Indicate if you attended under another name.

DATES ATTENDED (MM/YY)		NAME AND ADDRESS OF SCHOOL (SPECIFY HIGH SCHOOL, COLLEGE, OR TRADE SCHOOL)	TYPE OF DEGREE	GRADUATED?	
FROM	TO			YES	NO

MILITARY

A request pertaining to military records (SF-180) must be included if this section is filled out. Complete this section only if you have served within the last one (1) / five (5) years.

BRANCH OF SERVICE	GRADE/RANK AT DISCHARGE	TYPE OF DISCHARGE	SERVICE NO.

CREDIT REFERENCES/CHECK INFORMATION

COMPANY		ACCOUNT NO.	
STREET ADDRESS	CITY	STATE	ZIP CODE
COMPANY		ACCOUNT NO.	
STREET ADDRESS	CITY	STATE	ZIP CODE

ADDITIONAL INFORMATION

--

-APPLICANT'S SIGNATURE REQUIRED-

**PLEASE
READ
AND
SIGN**

This application has been completed truthfully and without evasion or omission on my part. I hereby authorize the company to investigate any or all of my statements including references in considering me for employment. I understand that any false statements or omissions will result in denial of unescorted access, rejection of this application, or discharge or employment.

APPLICANT'S SIGNATURE

DATE

JUN 20 2004

FORM 2 Revision 1
June 20, 2004

CONNECTICUT YANKEE ATOMIC POWER COMPANY

HADDAM NECK PLANT

Screening Questionnaire

- PLEASE TYPE OR PRINT -

LAST NAME			FIRST NAME		MIDDLE NAME	SOCIAL SECURITY NO.		DATE
HOME ADDRESS			CITY	STATE	ZIP CODE	HOME PHONE NO.	DATE OF BIRTH	PLACE OF BIRTH
SEX	HEIGHT	WEIGHT	EYE COLOR	HAIR COLOR	DISTINGUISHING FEATURES			
DRIVERS LICENSE NO.		STATE	EXPIRATION DATE	CITIZENSHIP (COUNTRY)		COMPANY NAME		

An affirmative response to any of the following questions will not necessarily prevent approval of unescorted access. A falsified or incomplete response will be sufficient justification for denial of unescorted access.

Circle either the "YES" or the "NO" after each question and initial on the line after each question. Provide details to "YES" answers below.

- | | | | |
|---|-----|----|-------|
| 1. Have you ever tested positive for alcohol or drugs (legal or illegal drugs)? | YES | NO | _____ |
| 2. Have you ever used alcohol or drugs that resulted in on-the-job impairment? | YES | NO | _____ |
| 3. Have you ever been denied access at any nuclear power plant? | YES | NO | _____ |
| 4. Have you ever been removed from or made ineligible for activities for violating a Fitness for Duty Program? | YES | NO | _____ |
| 5. Have you ever been referred to or participated in a rehabilitation program for substance abuse? (Do not list self referrals.) | YES | NO | _____ |
| 6. Have you been convicted of a criminal or statutory offense in the past five (5) years? (Include major motor vehicle violations, e.g., Reckless Driving.) | YES | NO | _____ |
| 7. Have you been incarcerated in the past five (5) years? | YES | NO | _____ |
| 8. Have you been fired or forced to leave a job position in the past five (5) years? | YES | NO | _____ |
| 9. Have you been convicted of operation a motor vehicle under the influence of alcohol and/or drugs in the past five (5) years? | YES | NO | _____ |
| 10. Are you currently on probation or accelerated rehabilitation for any criminal or statutory offense? | YES | NO | _____ |
| 11. Do you have any court or legal actions pending against you? | YES | NO | _____ |
| 12. Have you had unescorted access at a nuclear power station? If yes, provide the name of the station and approximate termination date. | YES | NO | _____ |

Enter question numbers first, then provide details for YES answers.

I am aware that any false statement is sufficient cause for revocation of authorization to company property and possible arrest. _____ INITIALS	SECURITY REVIEWER _____ SIGNATURE
I am aware that I must report to security any criminal or statutory arrest that occur after I have been granted unescorted access, and this notification must be made on my first day back to work. _____ INITIALS	
I swear that these statements are true and correct to the best of my knowledge: _____ SIGNATURE	

An applicant may withdraw consent to a background investigation or a psychological evaluation at any time. Withdrawal of consent shall be deemed withdrawal of the application for unescorted access.

Connecticut Yankee Atomic Power Company will collect information for determining the suitability of individuals requesting unescorted access to its Industrial/Protected Area(s) which may include criminal history information, credit information, psychological evaluation, education history, military service, information from references concerning character and reputation, employment history, and any information relating to an applicant's trustworthiness or reliability to discharge job duties within the environment of a nuclear power plant.

Records are maintained, at a minimum, as required by federal regulations 10 CFR 73.56, 10 CFR 73.57, and 10 CFR 26.

JUN 20 2004

FORM 3 Revision 1 June 20, 2004



CONNECTICUT YANKEE ATOMIC POWER COMPANY
HADDAM NECK PLANT

**Fingerprint Requirement - Nuclear
Release Form**

**To: Current Possessors or Applicants for Unescorted Access to Nuclear Power
Facilities or Safeguards Information**

From: Connecticut Yankee Security

Regulations issued by the Nuclear Regulatory Commission pursuant to Public Law 99-399, "The Omnibus Diplomatic Security and Anti-Terrorism Act of 1986" require each nuclear power reactor licensee to fingerprint each individual who is permitted unescorted access to the facility or who is permitted access to Safeguards Information. The fingerprints so obtained are to be forwarded to the Federal Bureau of Investigation for the purpose of conducting a criminal records check and will be used in determining suitability for granting or denying unescorted access to the facilities or Safeguards Information.

Prior to any denial or revocation of unescorted access to nuclear power facilities or Safeguards Information, you have the right to review the contents of the record obtained from the FBI for the purpose of assuring correct and complete information. If you believe the record to be incorrect or incomplete upon receipt of the criminal history information, you have ten (10) days to initiate action to challenge the contents of the FBI record. These procedures include direct application by you challenging the record of the agency that contributed the questioned information or direct challenge as to the accuracy or completeness of an entry on the criminal history record to the Criminal Justice Information Services Division, 1000 Custer Hollow Road, Clarksburg, West Virginia 26306.

I have read and understand the information contained in the above statement.

SIGNATURE			DATE	
NAME (Please Print)		DATE OF BIRTH	SOCIAL SECURITY NUMBER	
STREET ADDRESS	CITY	STATE	ZIP CODE	

FOR SECURITY USE ONLY		
DATE FINGERPRINTED	SIGNATURE OF OFFICIAL TAKING FINGERPRINTS	LOCATION FINGERPRINTS TAKEN

**CONNECTICUT YANKEE ATOMIC POWER COMPANY****HADDAM NECK PLANT****NOTICE OF TERMINATION OF UNESCORTED ACCESS**

NAME OF EMPLOYEE	SOCIAL SECURITY NUMBER	KEY CARD NUMBER
------------------	------------------------	-----------------

Please be advised that the above named person, employed by _____,
has completed all required nuclear station work effective _____. Unescorted Nuclear Station access
for this individual is no longer required.

Condition of Termination of Unescorted Access for this person is:

Favorable

Unfavorable*

☐☐

*Unfavorable terminations shall be clarified to station security.

SIGNATURE	TITLE	DATE
-----------	-------	------

JUN 20 2004

FORM 5 Revision 1 June 20, 2004

**CONNECTICUT YANKEE ATOMIC POWER COMPANY****HADDAM NECK PLANT****Security Interview**

NAME OF EMPLOYEE	SOCIAL SECURITY NUMBER	DATE
EMPLOYER		

REASON FOR INTERVIEW

- ☐ Information provided on screening questionnaire ☐ Results of Background Check
☐ Results of MMPI ☐ Results of Criminal History Check
☐ Other:

INTERVIEW

APPLICANT	DATE
-----------	------

RESULTS OF SECURITY INTERVIEW

☐ NO ACTION TAKEN. Interview resulted in satisfactory explanation. Documents attached? ☐ YES ☐ NO

INTERVIEWER	DATE
-------------	------

JUN 20 2004

FORM 5 Revision 1 June 20, 2004



CONNECTICUTYANKEE ATOMIC POWER COMPANY

HADDAM NECK PLANT

Security Interview

Unescorted Access Revoked/Denied. Interview and subsequent review resulted in revocation/denial of unescorted access for the following reason(s):



APPEAL PROCEDURE

This is to confirm that, for the reason set forth above and discussed with you on _____, 20____, during your interview with _____, the decision has been to revoke/deny your unescorted access to Connecticut Yankee. You have the right to appeal this decision if you desire. To file an appeal you must complete and return this form to:

Security Manager
Connecticut Yankee Atomic Power Company
362 Injun Hollow Road
East Hampton, CT 06424-3099

Your appeal must be received by the close of business on _____, 20____, together with a written statement and any documents or information you believe should be considered. You should note that the results of the appeal will be final.

SIGNATURE

DATE

I hereby appeal the decision to revoke/deny my unescorted access. I have attached a written statement and any documents or information to be considered.

I may be contacted by you at the following address: *(PLEASE PRINT LEGIBLY)*

NAME

STREET ADDRESS

CITY

STATE

ZIP CODE

PHONE NUMBER



CONNECTICUT YANKEE ATOMIC POWER COMPANY

HADDAM NECK PLANT

MMPI OR MMPI2 TEST RESULTS

NAME OF EMPLOYEE	SOCIAL SECURITY NUMBER
EMPLOYER	

MMPI TEST RESULTS

RETAKE REQUIRED

- ☐ The results of the MMPI taken by this individual led to an Invalid Profile. The test should be retaken or a clinical interview should be conducted.

NO CLINICAL INTERVIEW REQUIRED

- ☐ The MMPI results indicate that a personal interview is not necessary. Based on the MMPI this individual is determined to be suitable for unescorted access at a nuclear power plant at this time.

CLINICAL INTERVIEW REQUIRED

- ☐ The MMPI results indicate that a clinical interview is required to further evaluate the individual.

An interview has been scheduled for: TIME: _____ DATE: _____

EVALUATING PSYCHOLOGIST	LIC #	DATE
-------------------------	-------	------

CLINICAL INTERVIEW RESULTS

- ☐ The individual did not arrive for an interview as scheduled.

After conducting a clinical interview, I have determined:

- ☐ The individual is recommended for unescorted access at a nuclear power plant at this time.
- ☐ The individual is not recommended for unescorted access at a nuclear power plant at this time.

EVALUATING PSYCHOLOGIST	LIC #	DATE
-------------------------	-------	------

The confidentiality of this record is required under Chapter 899 of the Connecticut General Statutes, Sections 52-146(c) through Sections 52-146(f). This material shall not be transmitted to anyone other than specified without written consent or other authorization as provided in the aforementioned statutes.

JUN 20 2004

Standard Form 180 (Rev. 3-99)
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Previous edition unusable

OMB No. 3095-0029 Expires 7/31/2002

**REQUEST PERTAINING
TO MILITARY RECORDS**

To ensure the best possible service, please thoroughly review the instructions at the bottom before filling out this form. Please print clearly or type. If you need more space, use plain paper.

SECTION I - INFORMATION NEEDED TO LOCATE RECORDS (Furnish as much as possible.)

1. NAME USED DURING SERVICE (Last, first, middle)		2. SOCIAL SECURITY NO.		3. DATE OF BIRTH		4. PLACE OF BIRTH	
5. SERVICE, PAST AND PRESENT (For an effective records search, it is important that ALL service be shown below.)							
BRANCH OF SERVICE	DATES OF SERVICE		CHECK ONE		SERVICE NUMBER DURING THIS PERIOD (If unknown, please write unknown)		
	DATE ENTERED	DATE RELEASED	OFFICER	ENLISTED			
a. ACTIVE SERVICE							
b. RESERVE SERVICE							
c. NATIONAL GUARD							
6. IS THIS PERSON DECEASED? If "YES" enter the date of death. <input type="checkbox"/> NO <input type="checkbox"/> YES _____				7. IS (WAS) THIS PERSON RETIRED FROM MILITARY SERVICE? <input type="checkbox"/> YES <input type="checkbox"/> NO			

SECTION II - INFORMATION AND/OR DOCUMENTS REQUESTED

1. **REPORT OF SEPARATION** (DD Form 214 or equivalent) This contains information normally needed to verify military service. A copy may be sent to the veteran, the deceased veteran's next of kin, or other persons or organizations if authorized in Section III, below. NOTE: If more than one period of service was performed, even in the same branch, there may be more than one Report of Separation. Be sure to show EACH year that a Report of Separation was issued, for which you need a copy.

☐ An UNDELETED Report of Separation is requested for the year(s) _____

This normally will be a copy of the full separation document including such sensitive items as the character of separation, authority for separation, reason for separation, reenlistment eligibility code, separation (SPD/SPN) code, and dates of time lost. An undeleted version is ordinarily required to determine eligibility for benefits.

☐ A DELETED Report of Separation is requested for the year(s) _____

The following information will be deleted from the copy sent: authority for separation, reason for separation, reenlistment eligibility code, separation (SPD/SPN) code, and for separations after June 30, 1979, character of separation and dates of time lost.

2. OTHER INFORMATION AND/OR DOCUMENTS REQUESTED

3. **PURPOSE (OPTIONAL)**—An explanation of the purpose of the request is strictly voluntary. Such information may help the agency answering this request to provide the best possible response and will in no way be used to make a decision to deny the request.) _____

SECTION III - RETURN ADDRESS AND SIGNATURE**1. REQUESTER IS**

☐ Military service member or veteran identified in Section I, above

☐ Legal guardian (must submit copy of court appointment)

☐ Next of kin of deceased veteran _____
(relation)

☐ Other (specify) _____

2. SEND INFORMATION/DOCUMENTS TO
(Please print or type. See instruction 3, below.)

3. **AUTHORIZATION SIGNATURE REQUIRED** (See instruction 2, below.)
I declare (or certify, verify, or state) under penalty of perjury under the laws of the United States of America that the information in this Section III is true and correct.

Name

Signature of requester (Please do not print.)

Street

Date of this request Daytime phone ()

City

E-mail address

This form is available at <http://www.nara.gov/regional/mprs/180.html> on the National Archives and Records Administration Web Site

INSTRUCTIONS

Please detach this portion before submitting request.

1. Information needed to locate records. Certain identifying information is necessary to determine the location of an individual's record of military service. Please try to answer each item on this form. If you do not have and cannot obtain the information for an item, show "NA," meaning the information is "not available." Include as much of the requested information as you can.

2. Restrictions on release of information. Release of information is subject to restrictions imposed by the military services consistent with Department of Defense regulations and the provisions of the Freedom of Information Act (FOIA) and the Privacy Act of 1974. The service member (either past or present) or the member's legal guardian has access to almost any information contained in that member's own record. Others requesting information from military personnel/health records must have the release authorization in Section III of this form signed by the member or legal guardian, but if the appropriate signature cannot be obtained, only limited types of information can be provided. If the former member is deceased, surviving next of kin may, under certain circumstances, be entitled to greater access to a deceased veteran's records than a member of the public. The next of kin may be any of the following: unmarried surviving spouse, father, mother, son, daughter, sister, or brother. Employers and others needing proof of military service are expected to accept the information shown on documents issued by the military service department at the time a service member is separated.

3. Where reply may be sent. The reply may be sent to the member or any other address designated by the member or other authorized requester.

4. Charges for service. There is no charge for most services provided to members or their surviving next of kin. A nominal fee is charged for certain types of service. In most instances service fees cannot be determined in advance. If your request involves a service fee, you will be notified as soon as that determination is made.

SEE REVERSE FOR PRIVACY ACT AND PUBLIC BURDEN STATEMENTS

LOCATION OF MILITARY RECORDS

The various categories of military service records are described in the chart below. For each category there is a code number which indicates the address at the bottom of the page to which this request should be sent.

- Health and personnel records.** In most cases involving individuals no longer on active duty, the personnel record, the health record, or both can be obtained from the same location, as shown on the chart. However, some health records are available from the Department of Veterans Affairs (VA) Records Management Center (Code 11). A request for a copy of the health record should be sent to Code 11 if the person was discharged, retired, or released from active duty (separated) on or after the following dates: ARMY—October 16, 1992; NAVY—January 31, 1994; AIR FORCE and MARINE CORPS—May 1, 1994; COAST GUARD—April 1, 1998. Health records of persons on active duty are generally kept at the local servicing clinic, and usually are available from Code 11 a week or two after the last day of active duty.
- Records at the National Personnel Records Center.** Note that it takes at least three months, and often six or seven, for the file to reach the National Personnel Records Center (Code 14) in St. Louis after the military obligation has ended (such as by discharge). If only a short time has passed, please send the inquiry to the address shown for active or current reserve members. Also, if the person has only been released from active duty but is still in a reserve status, the personnel record will stay at the location specified for reservists. A person can retain a reserve obligation for several years, even without attending meetings or receiving annual training.
- Definitions and abbreviations.** DISCHARGED—the individual has no current military status; HEALTH—Records of physical examinations, dental treatment, and outpatient medical treatment received while in a duty status (does not include records of treatment while hospitalized); TDRL—Temporary Disability Retired List.
- Service completed before World War I.** The oldest records pertaining to military service veterans are at the National Archives, for service that was completed before the following dates: ARMY—enlisted, 11/1/1912, officer, 7/1/1917; NAVY—enlisted, 1/1/1886, officer, 1/1/1903; MARINE CORPS—1/1/1905; COAST GUARD—1/1/1898. National Archives Trust Fund (NATF) forms must be used to request these records. Obtain the forms by e-mail from Inquire@nara.gov or write to the Code 6 address.

BRANCH	CURRENT STATUS OF SERVICE MEMBER	WHERE TO WRITE ADDRESS CODE
AIR FORCE	Discharged, deceased, or retired with pay (See paragraph 1, above, if requesting health record.)	14
	Active (including National Guard on active duty in the Air Force), TDRL, or general officers retired with pay	1
	Reserve, retired reserve in nonpay status, current National Guard officers not on active duty in the Air Force, or National Guard released from active duty in the Air Force	2
	Current National Guard enlisted not on active duty in the Air Force	13
COAST GUARD	Discharged, deceased, or retired (See paragraph 1, above, if requesting health record.)	14
	Active, reserve, or TDRL	3
MARINE CORPS	Discharged, deceased, or retired (See paragraph 1, above, if requesting health record.)	14
	Individual Ready Reserve or Fleet Marine Corps Reserve	5
	Active, Selected Marine Corps Reserve, or TDRL	4
ARMY	Discharged, deceased, or retired (See paragraph 1, above, if requesting health record.)	14
	Reserve; or active duty records of current National Guard members who performed service in the U.S. Army before 7/1/72	7
	Active enlisted (including National Guard on active duty in the U.S. Army) or TDRL enlisted	9
	Active officers (including National Guard on active duty in the U.S. Army) or TDRL officers	8
	Current National Guard enlisted not on active duty in Army (including records of Army active duty performed after 6/30/72)	13
	Current National Guard officers not on active duty in Army (including records of Army active duty performed after 6/30/72)	12
NAVY	Discharged, deceased, or retired (See paragraph 1, above, if requesting health record.)	14
	Active, reserve, or TDRL	10

ADDRESS LIST OF CUSTODIANS (BY CODE NUMBERS SHOWN ABOVE) - where to write/send this form					
1	Air Force Personnel Center HQ AFPC/DPSRP 350 C Street West, Suite 19 Randolph AFB, TX 78150-4721	5	Marine Corps Reserve Support Command (Code MMI) 15303 Andrews Road Kansas City, MO 64147-1207	8	U.S. Total Army Personnel Command 200 Stoval Street Alexandria, VA 22332-0400
2	Air Reserve Personnel Center/DSMR 6760 E. Irvington Pl. #4600 Denver, CO 80280-4600	6	National Archives & Records Admin. Old Military and Civil Records (NWCTB—Military), Textual Services Division 700 Pennsylvania Ave., N.W. Washington, DC 20408-0001	9	Commander USAEREC Attn: PCRE-F 8899 E. 56th St. Indianapolis, IN 46249-5301
3	Commander CGPC-Adm-3 U.S. Coast Guard 2100 2nd Street, S.W. Washington, DC 20593-0001	7	Commander U.S. Army Reserve Personnel Command ATTN: ARPC-ALQ-B 1 Reserve Way St. Louis, MO 63132-5200	10	Naval Personnel Command 5720 Integrity Drive Millington, TN 38055-3130
4	Headquarters U.S. Marine Corps Personnel Management Support Branch (MMSB-10) 2008 Elliot Road Quantico, VA 22134-5030			11	Department of Veterans Affairs Records Management Center P.O. Box 5020 St. Louis, MO 63115-5020
				12	Army National Guard Readiness Center NGB-ARP 111 S. George Mason Dr. Arlington, VA 22204-1382
				13	The Adjutant General (of the appropriate state, DC, or Puerto Rico)
				14	National Personnel Records Center (Military Personnel Records) 9700 Page Avenue St. Louis, MO 63132-5100

PRIVACY ACT OF 1974 COMPLIANCE INFORMATION

The following information is provided in accordance with 5 U.S.C. 552a(e)(3) and applies to this form. Authority for collection of the information is 44 U.S.C. 2907, 3101, and 3103, and E.O. 9397 of November 22, 1943. Disclosure of the information is voluntary. If the requested information is not provided, it may delay servicing your inquiry because the facility servicing the service member's record may not have all of the information needed to locate it. The purpose of the information on this form is to assist the facility servicing the records (see the address list) in locating the correct military service record(s) or information to answer your inquiry. This form is then filed in the requested military service record as a record of disclosure. The form may also be disclosed to Department of Defense components, the Department of Veterans Affairs, the Department of Transportation (Coast Guard), or the National Archives and Records Administration when the original custodian of the military health and personnel records transfers all or part of those records to that agency. If the service member was a member of the National Guard, the form may also be disclosed to the Adjutant General of the appropriate state, District of Columbia, or Puerto Rico, where he or she served.

PAPERWORK REDUCTION ACT PUBLIC BURDEN STATEMENT

Public burden reporting for this collection of information is estimated to be five minutes per response, including time for reviewing instructions and completing and reviewing the collection of information. Send comments regarding the burden estimate or any other aspect of the collection of information, including suggestions for reducing this burden, to National Archives and Records Administration (NHP), 8601 Adelphi Road, College Park, MD 20740-6001. DO NOT SEND COMPLETED FORMS TO THIS ADDRESS. SEND COMPLETED FORMS AS INDICATED IN THE ADDRESS LIST ABOVE.

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FORM 9 Revision 1 June 20, 2004



CONNECTICUT YANKEE ATOMIC POWER COMPANY

HADDAM NECK PLANT

FBI Criminal History Confirmation of Receipt

Connecticut Yankee Atomic Power Company

I have reviewed my FBI Criminal History Report and find the information to be correct / incorrect. (Circle one.)

NOTE:

If you wish to dispute the results of your criminal history check, you must do so within 10 days of receipt of the criminal history check. A copy of the disputed criminal history request shall be supplied to the Security Manager.

I do / do not (circle one) wish to challenge the information in the report.

If, after reviewing the criminal record history, you believe that the information is incorrect or incomplete in any respect and wish to change, correct, or update the alleged deficiency or to explain any matter in the record, the following procedure is available:

You can make direct application to the agency that contributed the challenged information or you can direct the challenge as to the accuracy or completeness of any entry to the Criminal Justice Information Services Division, 1000 Custer Hollow Road, Clarksburg, West Virginia 26306. In the later case, the FBI will forward the challenge to the agency that submitted the data requesting that agency to verify or correct the challenged entry. Upon receipt of an official communication directly from the agency that contributed the original information, the FBI Identification Division will make any changed necessary.

NAME (print) _____ DOB _____ SSN _____

SIGNATURE _____ DATE _____

SECURITY MANAGER/DESIGNEE _____ DATE _____

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FORM 10 Revision 1 June 20, 2004



CONNECTICUT YANKEE ATOMIC POWER COMPANY

HADDAM NECK PLANT

362 INJUN HOLLOW ROAD • EAST HAMPTON, CT 06424-3099

TO |

FROM | J. M. Lenois
Security Manager
CY-3515

SUBJECT | CRIMINAL HISTORY RECORDS, INSTRUCTIONS FOR CHALLENGE

If, after reviewing the criminal record history, you believe that the information is incorrect or incomplete in any respect and wish to change, correct, or update the alleged deficiency or to explain any matter in the record, the following procedure is available:

You can make direct application to the agency that contributed the challenged information, or you can direct the challenge as to the accuracy or completeness of any entry to the Assistant Director, Federal Bureau of Investigation Identification Division, Washington, D.C. 20537-9700. In the later case, the FBI will forward the challenge to the agency that submitted the data requesting that agency to verify or correct the challenged entry. Upon receipt of an official communication directly from the agency that contributed the original information, the FBI Identification Division will make any changes necessary.

NOTE

The Security Manager may restrict unescorted access until receipt of an updated criminal history check.

JML/pmu
cc: File

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FORM 11 Revision 1 June 20, 2004



CONNECTICUT YANKEE ATOMIC POWER COMPANY

HADDAM NECK PLANT
362 INJUN HOLLOW ROAD • EAST HAMPTON, CT 06424-3099

CONFIDENTIAL

TO

Date: _____

FROM J. M. Lenois
Security Manager
CY-3515

SUBJECT UNESCORTED ACCESS DENIAL

Unescorted Access is denied to _____ *SSN:* _____
because he/she does not meet the screening requirements of Connecticut Yankee
Atomic Power Company.

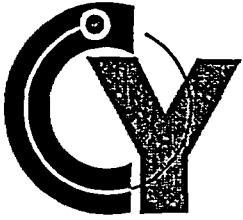
Detailed information has been provided to the individual by James Lenois, at CY
ext. 3515.

JML/pmu
cc: File

CONFIDENTIAL

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FORM 12 Revision 1 June 20, 2004



CONNECTICUT YANKEE ATOMIC POWER COMPANY

HADDAM NECK PLANT

Fair Credit Reporting Act Disclosure and Authorization Statement

PLEASE READ THIS STATEMENT CAREFULLY BEFORE SIGNING BELOW

For the purpose of evaluating my application for access authorization and/or employment, I understand Connecticut Yankee Atomic Power Company may obtain or have prepared a consumer report or investigative consumer report concerning my prior employment, military service, education, credit worthiness, credit standing, credit capacity, character, general reputation, personal characteristics, criminal background record, or mode of living.

I understand that upon written request to Connecticut Yankee Atomic Power Company, I will be informed whether an investigative consumer report was requested and given full information as to the nature and scope of this investigation. I understand that an investigative consumer report is a report in which information concerning my character, general reputation, personal characteristics, or mode of living is obtained through personal interviews with neighbors, friends, or associates with whom I am acquainted.

By signing below, I am authorizing Connecticut Yankee Atomic Power Company to obtain a consumer or investigative consumer report on me as part of the Company's screening process for access authorization. During the period in which I retain access authorization, I further authorize the Company to obtain additional consumer or investigative consumer reports on me to evaluate my trustworthiness and reliability for the purposes of determining continued access authorization.

By my signature below, I also acknowledge the Connecticut Yankee Atomic Power Company has provided me with a summary of my rights under the Federal Fair Credit Reporting Act. (A summary of your rights under the Federal Fair Credit Reporting Act prepared by the Federal Trade Commission is attached.)

NAME OF APPLICANT (PLEASE PRINT)

SIGNATURE OF APPLICANT

DATE

A Summary of Your Rights Under the Fair Credit Reporting Act

The federal Fair Credit Reporting Act (FCRA) is designed to promote accuracy, fairness, and privacy of information in the files of every "consumer reporting agency" (CRA). Most CRAs are credit bureaus that gather and sell information about you—such as if you pay your bills on time or have filed bankruptcy—to creditors, employers, landlords, and other business. You can find the complete text of the FCRA, 15 U.S.C. 1681-1681u, at the Federal Trade Commission's website (<http://www.ftc.gov>). The FCRA gives you specific rights, as outlined below. You may have additional rights under state law. You may contact a state or local consumer protection agency or a state attorney general to learn those rights.

- You must be told if information in your files has been used against you. Anyone who uses information from a CRA to take action against you—such as denying an application for credit, insurance, or employment—must tell you, and give you the name address, and phone number of the CRA that provided the consumer report.
- You can find out what is in your file. At your request, a CRA must give you the information in your file and a list of everyone who has requested it recently. There is no charge for the report if a person has taken action against you because of information supplied by the CRA if you request the report within 60 days of receiving notice of the action. You also are entitled to one free report every twelve months upon request if you certify that (1) you are unemployed and plan to seek employment within 60 days, (2) you are on welfare, or (3) your report is inaccurate due to fraud. Otherwise, a CRA may charge you up to eight dollars.
- You can dispute inaccurate information with the CRA. If you tell a CRA that your file contains inaccurate information, the CRA must investigate the items (usually within 30 days) by presenting to its information source all relevant evidence you submit, unless your dispute is frivolous. The source must review your evidence and report its findings to the CRA. (The source also must advise national CRAs to which it has provided the data of any error.) The CRA must give you a written report of the investigation and a copy of your report if the investigation results in any change. If the CRA's investigation does not resolve the dispute, you may add a brief statement to your file. The CRA must normally include a summary of your statement in future reports. If an item is deleted or a dispute statement is filed, you may ask that anyone who has recently received your report be notified of the change.
- Inaccurate information must be corrected or deleted. A CRA must remove or correct inaccurate or unverified information from its files, usually within 30 days after you dispute it. However, the CRA is not required to remove accurate data from your file unless it is outdated (as described below) or cannot be verified. If you dispute results in any change to your report, the CRA cannot reinsert into your file a disputed item unless the information source verifies its accuracy and completeness. In addition, the CRA must give you a written notice telling you its has reinserted the item. The notice must include name, address and phone number of the information source.
- You can dispute inaccurate items with the source of the information. If you tell anyone—such as a creditor who reports to a CRA—that you dispute an item, they may not then report the information to a CRA without including a notice of your dispute. In addition, once you've notified the source of the error in writing, it may not continue to report the information if it is, in fact, an error.
- Outdated information may not be reported. In most cases, a CRA may not report negative information that is more than seven years old; ten years for bankruptcies.
- Access to your file is limited. A CRA may provide information about you only to people with a need recognized by the FCRA—usually to consider an application with a creditor, insurer, employer, landlord, or other business.
- Your consent is required for reports that are provided to employers or reports that contain medical information. A CRA may not give out information about you to your employer or prospective employer without your written consent. A CRA may not report medical information about you to creditors, insurers, or employers without your permission.
- You may choose to exclude your name from CRA lists for unsolicited credit and insurance offers. Creditors and insurers may use file information as the basis for sending you unsolicited offers of credit or insurance. Such offers must include a toll-free number to call if you want your name and address removed from future lists. If you call, you must be kept off the list for two years. If you request, complete, and return the CRA form provided for this purpose, you must be taken off the lists indefinitely.
- You may seek damages from violators. If a CRA, a user, or in some cases a provider of CRA data violates the FCRA, you may sue them in state or federal court.

The FCRA gives several different federal agencies authority to enforce the FCRA:

FOR QUESTIONS OR CONCERNS REGARDING:
CRAs, creditors, and others not listed below

PLEASE CONTACT:
Federal Trade Commission
Consumer Response Center—FCRA
Washington, D.C. 20580
(202) 326-3761

National banks, federal branches/agencies of foreign banks
(word "National" or initials "N.A." appear in or after bank's name)

Office of the Comptroller of the Currency
Compliance Management, Mail Stop 6-6
Washington, D.C. 20219
(800) 613-6743

Federal Reserve System member banks (except national banks
and federal branches/agencies of foreign banks)

Federal Reserve Board
Division of Consumer & Community Affairs
Washington, D.C. 20551
(202) 452-3693

Savings associations and federally chartered savings banks
(word "Federal" or initials "F.S.B." appear in federal institution's name)

Office of Thrift Supervision
Consumer Programs
Washington, D.C. 20552
(800) 842-6929

Federal credit unions (words "Federal Credit Union" appear in institution's name)

National Credit Union Administration
1775 Duke Street
Alexandria, VA 22314
(703) 518-6360

State-chartered banks that are not members of the Federal Reserve System

Federal Deposit Insurance Corporation
Division of Compliance & Consumer Affairs
Washington, D.C. 20429
(800) 934-FDIC

Air, surface, or rail common carriers regulated by former Civil Aeronautics Board or Interstate Commerce Commission

Department of Transportation
Office of Financial Management
Washington, D.C. 20590
(202) 366-1306

Activities subject to the Packers and Stockyards Act, 1921.

Department of Agriculture
Office of Deputy Administrator—GIPSA
Washington, D.C. 20250
(202) 720-7051

TO: Applicants for Unescorted Areas

FROM: CYAPCO SECURITY

DATE: February 1, 2001 (Revised June 2004)

SUBJECT: Unescorted Access Authorization Program

Connecticut Yankee Atomic Power Company has established a Security Access Authorization Program to provide assurance that personnel who are granted unescorted access to the Connecticut Yankee nuclear facilities are trustworthy, reliable and not susceptible to coercion. This program is designed to protect the health and safety of the public and employees by precluding acts which may result in a radiological release.

Applicants for unescorted access to the nuclear facilities, and individual's who have been granted unescorted access, have rights and responsibilities under that program. This document describes those rights and responsibilities.

1. All individuals who require unescorted access to the Protected Areas must have a background investigation conducted. The background investigation will cover the preceding 5-year period or since the 18th birthday, whichever is shorter. This investigation will include a verification of employment, unemployment, education, military service, credit, as well as interviews with character references and a criminal history check obtained through FBI fingerprint records.
2. Participation in the Security Access Authorization Program is voluntary. Background investigations will not be conducted without the written consent of the individual. In addition, the individual may withdraw consent to participate in the program at any time.
3. If an individual does not agree to undergo a background investigation, psychological evaluation, fingerprinting, or drug and alcohol screening, the individual will not be considered for unescorted access to CYAPCO's nuclear facilities.
4. All inquiries are conducted in a manner that ensures that only pertinent information is obtained and is not released to anyone who is not directly involved in the process.
5. The Security Access Authorization files will be maintained at CYAPCO security facilities. The files will be maintained for a period of five years from the date on which the individual's unescorted access authorization was terminated.
6. Unescorted access authorization may be suspended, withdrawn, or denied when an individual's reliability or trustworthiness comes into question.
7. When adverse information is developed, normally an interview is arranged between the individual and security personnel to inform the individual of the nature of the information. During the interview, the individual has the opportunity to provide additional or corrective information relevant to the case.
8. An individual has a right of appeal. The individual must submit a letter of appeal stating the reason for the appeal and provide any supporting information to aid in the evaluation of the appeal. The letter must be received by the Security Manager within ten (10) business days of the individual's notification of the denial or withdrawal. Any letter that is received

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without justification for the appeal will be returned to the individual and the appeal process shall not be placed into effect.

9. An individual has the right to confirm the correctness and completeness of criminal history information. The information will be provided to the individual during the security interview. If an individual believes the information in the record is incomplete or incorrect, the individual has the right to make a direct challenge to the recording law enforcement agency or the Assistant Director, Federal Bureau of Investigation Identification Division, Washington, DC 20537-9700. In accordance with the requirements of the regulation, 10CFR73.57, CYAPCO shall allow the individual ten (10) business days to initiate the challenge.
10. The requirements of 10CFR73.56 specifically require the individual to notify CYAPCO of any arrests during the period the individual is granted unescorted access authorization. This includes any traffic violation which includes the use of alcohol and/or drugs. Other minor traffic violations, such as speeding, are not required to be reported. Arrests should be reported at the site where the individual currently holds unescorted access.

PRIVACY ACT STATEMENT

Pursuant to 5 U.S.C. 552a, enacted into law by Section 3 of the Privacy Act of 1974 (Public Law 93-579), the following statement is furnished to individuals who supply information to the Nuclear Regulatory Commission on the form listed below. This information is maintained in a system of records designated as NRC-39 and described at 58 Federal Register 36480 (July 7, 1993); or the most recent Federal Register publication of the Nuclear Regulatory Commission's "Republication of Systems of Records Notices" that is available at the NRC Public Document Room, Gelman Building, 2120 L Street NW, Washington, DC.

1. FORM TITLE AND NUMBER: Fingerprint Card (FD-258).
2. AUTHORITY: Public Law 99-399, "Omnibus Diplomatic Security and Antiterrorism Act of 1986." Section 149 of the Atomic Energy Act, 42 USC 2169. The authority for soliciting the social security number is Executive Order 9397, dated November 22, 1943.
3. PRINCIPAL PURPOSES: Requires Federal Bureau of Investigation criminal history fingerprint checks for individuals who are granted unescorted access to NRC-licensed nuclear power facilities or access to unclassified Safeguards Information.
4. ROUTINE USES: To provide licensees information needed for their unescorted access or access to unclassified Safeguards Information determinations. Information may also be disclosed to an appropriate Federal, State, local, or foreign agency in the event the information indicates a violation or potential violation of law and in the course of an administrative or judicial proceeding. In addition, this information may be transferred to an appropriate Federal, State, local or foreign agency to the extent relevant and necessary for an NRC decision about you or to the extent relevant and necessary for that agency's decision about you. Information from this form may also be disclosed in presenting evidence, to an NRC contractor, or to a Congressional office to respond to their inquiry made at your request.
5. WHETHER DISCLOSURE IS MANDATORY OR VOLUNTARY AND EFFECT ON INDIVIDUAL OF NOT PROVIDING INFORMATION: Disclosure of your social security number is voluntary. If you choose not to supply it, your employment, your unescorted access or your access to unclassified Safeguards Information may be delayed. Disclosure of all other information is also voluntary; however, if it is not supplied, your employment, your unescorted access or your access to unclassified Safeguards Information may be delayed or your fingerprint card may not be processed.
6. SYSTEM MANAGER AND ADDRESS: Director, Division of Security, Office of Administration, U.S. Nuclear Regulatory Commission, Washington, D.C. 20555.

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UNESCORTED ACCESS AUTHORIZATION
TRANSFER FORM

Transferring Licensee: Connecticut Yankee Atomic Power Company

Receiving Licensee:

Company: Connecticut Yankee Atomic Power Company

Company:

Site Name: Haddam Neck

Site Name:

Point of Contact: James Lenois

Point of Contact:

Address: 362 Injun Hollow Rd.

Address:

East Hampton, CT. 06424

Telephone #: (860) 267-3515

Telephone #:

Telecopy #: (860) 267-1661

Telecopy #:

1. Personal Data For Worker:

Subject individual has provided written consent for the release of any information or documentation pertinent to evaluation for unescorted access authorization at any nuclear power plant.

Name: _____ Aliases/Nicknames: _____
Last First Middle

Home Address: _____ Telephone #: () -

SSN #: - -

Gender: Male: _____ Female: _____ Date and Place of Birth: _/_/_

Color eyes: _____ Color hair: _____ Height: _____ Weight: _____

Other distinguishing features: _____

Identity verified by: _____ on: _/_/_

2. UNESCORTED ACCESS AUTHORIZATION STATUS:

	Date:	Month	Day	Year
a. Initial access granted:.....				
b. Transferring company access:	(1) granted:.....			
	(2) terminated without			
	disqualification:.....			
c. Background investigation (verification of identity, employment history, educational history, military service, character and reputation, and credit check) completed without disqualification by: _____	on:			
d. Fingerprint card and criminal history record maintained by: _____ where it was determined that there was no disqualifying information in the record on:.....				
e. 10 CFR 26 provisions completed without disqualification:				
(1) Suitable inquiry:.....				
(2) Date of last drug and alcohol test:.....				
(3) Date last subject to random testing:.....				
f. Psychological evaluation completed without disqualification:.....				
g. Behavioral observation program period without disqualification:.....				
from:.....				

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to:.....

h. Has individual had access to the Protected Area:

Yes ☐ (or) No ☐

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3. TRAINING:

Completion date

Challenge exam

Month Day Year

Month Day Year

- a. Plant access training:..... _____
- b. Radiological protection training:.... _____
- c. Respiratory protection training:..... _____
- d. Fitness - for - duty training:..... _____
- (1) Awareness training:..... _____
- (2) Escort training:..... _____
- (3) Supervisory behavioral
observation training:..... _____

[illegible]

4. RADIOLOGICAL EXPOSURE RECORDS:

Verified NRC form 4/5 date or equivalent transmitted:

Yes:_____ No:_____

5. RESPIRATORY PROTECTION QUALIFICATION:.....

#1	#2	#3
1	2	3
4	5	6
7	8	9
10	11	12
13	14	15
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- a. Date passed respirator medical qualification:.....
- b. Fit test and qualified on:
- (1) Date:.....
- (2) Brand:.....
- (3) Model:.....
- (4) Size:.....
- (5) Fit method:.....
- (6) Fit factor:.....

Activity limitations of medical restrictions:.....

6. ACCESS AUTHORIZATION HISTORY/AUDIT TRAIL (period, company, point of contact):

First: _____

Second:

Third: _____

Fourth:

Fifth: _____

7. CERTIFICATION:

To my knowledge, the information provided on: _____

SSN# _____, is certified to be accurately transcribed from company records. If any disqualifying information is determined subsequent to this submittal, your point of contact will be properly informed.

Remarks:

PLEASE USE YOUR DISCRETION IN USING THE INFORMATION PROVIDED DUE TO THE FACT THAT WE ARE A DECOMMISSIONING FACILITY.

Signed: _____ Date: ____/____/____

Name: _____

Position: _____

Company: _____

JUN 20 2004



CONNECTICUT YANKEE ATOMIC POWER COMPANY

HADDAM NECK PLANT

362 INJUN HOLLOW ROAD EAST HAMPTON, CT 06424-3099

Form 16 Revision 1 June 20, 2004

SUITABLE INQUIRY

STATEMENT

The Suitable Inquiry for: _____, SSN# ____/____/____

was verified by: _____, On: _____ through

Information obtained from the Contract Security System

Unescorted Access was held by this individual from: _____ to _____.

During this period of time, the individual was covered under a Continuous Observation,
and Fitness-For-Duty program.

Additional Information:

(Signed)

(Date)

SECURITY ACCESS AUTHORIZATION MANUAL

APPENDIX 2 - ADJUDICATION

<u>Section</u>	<u>Title</u>	<u>Rev.</u>	<u>Eff. Date</u>
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1.	Adjudication Matrix		
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APPENDIX 2 - ADJUDICATION MATRIX

1. Adjudication Matrix

All derogatory information uncovered as part of the screening process will be adjudicated prior to allowing unescorted access.

All derogatory information obtained after unescorted access is granted will be adjudicated. This information will be used in conjunction with other available information to determine eligibility for continued unescorted access.

Adjudication of derogatory information may be accomplished by direct interview with the individual, reviewing information supplied by the individual, or reviewing information supplied by others. The method of adjudication will be determined by the seriousness of the derogatory information.

Adjudication of derogatory information will generally fall into one of the three categories listed below. The examples given are not "all inclusive."

GROUP A - Issues considered serious enough to deny unescorted access.

GROUP B - Issues not normally considered so serious as to deny access unless other factors used in conjunction with this information show a lack of suitability for unescorted access.

GROUP C - Issues not considered so serious as to deny access, but warrants adjudication.

The following are examples of derogatory information that would be included in the category of **GROUP A**.

- Any Felony conviction within the last FIVE (5) years.
- Any Drug related conviction within the last FIVE (5) years.
- Willful omission or falsification of material information submitted as part of the screening process.
- A Psychological evaluation which indicates that the individual is a risk in terms of Trustworthiness or Reliability.
- A Positive Pre-Access drug/alcohol test.
- A Previous Positive Drug/Alcohol test within the station's approved program time frames.
- A Second Positive Drug/Alcohol test would result in denial of unescorted access for a minimum of THREE (3) years.
- Two (2) Driving While Intoxicated (DWI) convictions within the last TWO (2) years.
- Three (3) Driving While Intoxicated (DWI) convictions within the last FIVE (5) years.

- Any Felony Arrest reported while afforded unescorted access. Denial will be initiated, pending final court disposition.
- Individuals with a previous Positive Drug/Alcohol Test who refuse to provide proof of rehabilitation.

The following are examples of derogatory information that would be included in the category of **GROUP B**:

- Criminal History as listed on the individual's Screening Questionnaire.
- Criminal History discovered as a result of the FBI fingerprint returns.
- Discrepancies between the Screening Questionnaire and the FBI criminal history.
- Discrepancies uncovered between documentation provided and documentation uncovered during the screening process.
- Combination of items listed in Group C that show a pattern of Untrustworthiness or unreliable behavior.
- Any non felony arrest while afforded unescorted access.
- Individuals presently on Probation.
- Individuals presently on Accelerated Rehabilitation.
- Any individual who has been incarcerated within the last FIVE (5) years resulting from a felony conviction.

The following are examples of derogatory information that would be included in the Class of **GROUP C**:

- Adverse information supplied by a reference as part of the Background Investigation.
- Adverse information supplied by an employer as part of the Background Investigation.
- Adverse Credit History.
- Any adverse information uncovered outside the scope of the five year Background.
- Other than Honorable Discharge from the Military.
- Repeated Failure to follow company Rules and Regulations (safety, security, HP, etc.).

Appendix 3

Connecticut Yankee Compliance Policy

Our mission at Connecticut Yankee is to restore this site safely and cost effectively so that it can be used for other purposes.

Because many work activities at the site can be dangerous, we have policies and procedures that provide controls to ensure a safe work environment. Also there are many regulatory requirements that pertain to decommissioning, and there are controls in place to ensure compliance with these regulations. Training, site procedures, WP&IRS, pre-job briefs, craft meetings and postings are some of the ways these controls are communicated to workers. It is the responsibility of ALL workers to perform their work activities in compliance with established policies and procedures.

CY Management expects that violations of site requirements will be properly and promptly investigated and resolved by the management of the worker(s) involved. When necessary it is also expected that disciplinary action will be taken to help enforce CY policies, procedures and expectations. CY has a Corporate Compliance Committee that serves to ensure disciplinary action is administered in a fair and appropriate manner for contractors and CY employees alike. All discipline except verbal warnings requires review of the proposed action by this committee before it is administered.

Much work is performed by contracted companies due to the specific abilities and qualifications of their workforce. Contracted companies working on site are expected to use their own disciplinary action policies to deal with personnel performance issues. The requirement for prior Corporate Compliance Committee review must be followed. In addition, CY intends to restrict site access, amongst other actions, when any worker or visitor commits a violation of these requirements, if the worker's company fails to take appropriate action and if CY determines that restriction of site access is an appropriate response. Examples of such violations and their consequences include:

Category: Industrial/Radiation Safety (serious/life threatening actions or violations of policies or procedures, such as tagging, fall protection, lack of proper electrical safety gear, improper entry into a confined space area, unapproved entry into a High Radiation Area, etc.)

Consequences: 1st time, temporary restriction of site access; 2nd time, permanent restriction of site access

Category: Procedure compliance (deliberate or repeated non-compliance)

Consequences: 1st time, temporary restriction of site access; 2nd time, permanent restriction of site access

Category: Theft (theft of company property)

Consequences: 1st time, permanent restriction of site access

Category: Cheating (cheating on company administered tests or examinations)

Consequences: 1st Time, permanent restriction of site access

Category: Fighting (physical altercation)

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Consequences: 1st time, temporary restriction of site access; 2nd time, permanent restriction of site access

Category: SCWE Compliance (deliberate or repeated non-compliance with Safety Conscious Work Environment expectations)

Consequences: 1st time, temporary restriction of site access; 2nd time, permanent restriction of site access

The above list provides some specific examples. It is not all inclusive and it does not supersede other formal guidance regarding discipline or other actions taken in association with programs such as Fitness for Duty (FFD) or the disciplinary procedure in the Local 457 collective bargaining agreement applicable to Connecticut Yankee employees.

Discipline for willful and/or repeat offenses will be based on the severity and frequency of occurrences.