

Summary of the July 25, 2007, Conference Call with Well Loggers Groups In Reference to Fingerprinting Requirements for Increased Controls Licensees

In response to NRC's presentation of the slides, "Fingerprinting Requirements for Increased Control Licensees," the following points and comments were made by stakeholders:

1. Turnaround and timeliness:

- FBI says processing should take 24 hours; NRC estimates 1 week for processing (if the payments are received and there is no missing information on the application). The Wireline group doubts this turnaround estimate is possible and believes that this process will, in reality, take between 2 and 4 weeks.
- Because timeliness is a concern, a process or mechanism that would allow newly-hired employees to have conditional access during the processing period should be established.
- Similar checks currently conducted by many of the licensees only take 2 days and probably include the same or similar data.
- The speed of acquiring results and determining T&R will be critical to the business operations of all companies involved. Therefore, every attempt should be made by the NRC to speed up the process and to limit business disruption.
- NRC estimates that they will be processing 20,000 - 30,000 fingerprints within the first 6 months. The NRC needs to make sure they factor annual licensee employee turnover rates (likely around 20%) into their estimates for periods beyond this.

2. Adjudication guidance should be provided with the Orders.

3. Transferability of fingerprints and criminal history records checks amongst licensees:

- Individuals will need to provide formal written approval to employers in order for them to transfer their data to another company. Some companies stated that they would be hesitant to accept this information from a former employer and would likely do their own checks, as required by their company policy.

4. Reciprocity amongst Federal agencies requiring the same or similar fingerprinting and criminal history records checks:

- Background checks are needed in the interest of national security but the NRC needs to make a concerted effort to look at other governmental agencies requiring the same or similar criteria (e.g., TSA, ATF) for other programs. If the NRC determines that reciprocity is not possible due to differences in requirements, Federal agencies need to work together and establish a standardized process with standardized criteria that will make it possible.

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FSME - Office of Federal and State Materials and Environmental Management Programs

ADM - Office of Administration

OGC - Office of the General Counsel

NSIR - Office of Nuclear Security and Incident Response

AESC - Association of Energy Service Companies