

# Florida Power

CORPORATION

Crystal River Unit 3

Docket No. 50-302

April 27, 1992  
3F0492-01

U.S. Nuclear Regulatory Commission  
Attention: Document Control Desk  
Washington, D.C. 20555

Subject: Access Authorization Program Certification

Dear Sir:

On April 25, 1991, the Nuclear Regulatory Commission (NRC) published the final rule on Access Authorization Programs for Nuclear Power Plants (10 CFR 73.56). The rule requires licensees to establish and implement an access authorization program that consists of three basic elements: Background Investigation, Psychological Assessment, and Behavior Observation. The objective of this program is to increase the assurance that personnel granted unescorted access to protected and vital areas of nuclear power plants are trustworthy and reliable and do not pose a threat to commit radiological sabotage.

FPC has reviewed our existing programs against the requirements contained in the final rule. The primary differences were in the areas of temporary unescorted access, updating/reinstatement, transferring of access authorization, and a review process. The appropriate elements of NUMARC 89-01 and Regulatory Guide 5.66 have been implemented to satisfy the requirements of 10 CFR 73.56.

As discussed in the Supplementary Information section of the final rule, the elements of the access authorization program have been published twice for public comment; once in 1984 in the proposed rule and once in 1988 in the NUMARC Guidelines (Industry Guidelines for Nuclear Power Plant Access Authorization Programs) which were included as an appendix to the NRC proposed policy statement. Florida Power Corporation (FPC) incorporated these Guidelines into our access authorization program in 1989. The FPC program included a five year background investigation, psychological assessment and continuous behavioral observation for all individuals granted unescorted access to the nuclear power plant. These requirements were included in FPC's Nuclear Personnel Access Authorization Screening Program for FPC employees in February 1989 and required for contractor's programs by contract addendum. This addendum required Contractors to be in compliance with these requirements by June 30, 1989.

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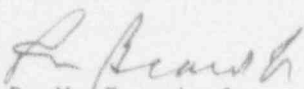
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The issue of "grandfathering" has been the subject of significant discussion between the NRC and the industry. The final rule includes provisions for grandfathering for those individuals who have had uninterrupted access authorization for at least 180 days on April 25, 1991. This 180 day period began on October 27, 1990. The rule and associated guidance require the files for individuals granted unescorted access after that date to be updated (documentation validated) or the individual to be reinstated under the new program. Licensees who have recently implemented the access authorization requirements consistent with the new rule benefit from this grandfathering provision.

However, FPC's previous program implemented in 1989 met earlier guidelines which included the principal program elements now required by Part 73.56. Thus, it is FPC's position that individuals granted unescorted access in accordance with that program continue to have valid access authorization. This issue has been discussed with the Safeguards Branch of the Office of Nuclear Reactor Regulation (Nancy Ervin). That office agrees that the critical program elements have not changed since 1989. A program that met the earlier guidelines would meet the rule's requirements. Therefore, FPC employees and contractors that have had continuous unescorted access since June 30, 1989 and have been under a continuous behavior observation program, are considered to hold a valid unescorted access in accordance with the current 10 CFR 73.56.

Therefore, Florida Power Corporation hereby certifies that its Access Authorization Program meets the requirements of 10 CFR 73.56. An appropriate commitment to Regulatory Guide 5.66 will be added to the Security Plan in accordance with 10 CFR 50.54(p).

Sincerely,



P. M. Beard, Jr.  
Senior Vice President  
Nuclear Operations

PMB/GMF

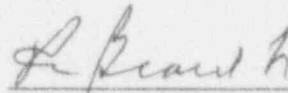
xc: Regional Administrator, Region II  
Senior Resident Inspector  
NRR Project Manager

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STATE OF FLORIDA

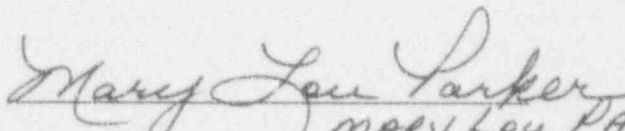
COUNTY OF PINELLAS

P.M. Beard, Jr. states that he is the Senior Vice President, Nuclear Operations for Florida Power Corporation; that he is authorized on the part of said company to sign and file with the Nuclear Regulatory Commission the information attached hereto; and that all such statements made and matters set forth therein are true and correct to the best of his knowledge, information, and belief.



P.M. Beard, Jr.  
Senior Vice President  
Nuclear Operations

Subscribed and sworn to before me, a Notary Public in and for the State and County above named, this ~~24~~ day of April, 1992.



MARY LOU PARKER  
Notary Public  
NOTARY Public  
No. CC174215

Notary Public, State of Florida at Large,  
My Commission Expires: \_\_\_\_\_

