

efficiency bulletin

Sept. 30, 2016

Efficiency Bulletin: 16–26a Standardizing Nuclear Access Processing and Requirements

Standardize nuclear unescorted access process requirements for supplemental workers and licensee employees to U.S. nuclear facilities and reduce time to obtain nuclear access.

Addressees: Chief nuclear officers, NEI APCs and INPO APCs

Issue: IP-01, Standardizing Nuclear Access Processing and Requirements

Summary of Efficiency Opportunity

- Desired end-state—Standardize nuclear plant access requirements for utility and supplemental workers and reduce time to obtain access.
- Value proposition (vision of excellence)—Reduce unnecessary burden through enforcement of adherence to industry standards, best practices, and efficiencies in technology or automation.
- Why it is important?—Improved economic performance could be achieved with standardizations and minimal changes.
- Industry benchmark value—The number of days to process a supplemental worker for nuclear plant access should decline.
- Measure of effectiveness—Indicators for the average number of days to process supplemental workers for nuclear access should decline.
- Maximum benefit is obtained when this efficiency opportunity is implemented in conjunction with efficiency bulletins EB 16-26b, "Standardization of In-Processing Training"; EB 16-26c, "Implement Common NANTeL Radiation Worker Training"; and EB 16-26d, "Supplemental Supplier Contracts/Use of NANTeL and EPRI STEs."

Color Code: Red
Due: January 2017

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NUCLEAR ENERGY INSTITUTE

The Nuclear Energy Institute is the nuclear energy industry's policy organization.

This bulletin and additional information about nuclear energy are available at nei.org.

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Relevant Standards

- 10 CFR Part 26, Fitness for Duty Programs
- 10 CFR Part 73.56, Personnel Access Authorization Requirements for Nuclear Power Plants
- 10 CFR Part 73.57, Requirements for Criminal History Checks of Individuals Granted Unescorted Access to a Nuclear Facility or Safeguards Information
- NEI 03-01, Nuclear Power Plant Access Authorization Program
- NEI 03-04, Guideline for Plant Access Training

Guidance

The objective of this initiative is to process workers for nuclear plant access in the most efficient manner and remove unnecessary burden. Each utility shall use their change management process to address the changes conveyed by this initiative. The following changes and enhancements to Access Authorization have been established by this initiative:

- Each utility and contractor/vendor (C/V) is committed to providing the correct personal history questionnaire (PHQ) to applicants who are processing for unescorted access (UA) as defined in NEI 08-06.

Processing Type (PADS Code)	Type of PHQ
Initial (INI) <i>Never had unescorted access or had UA more than 3 years ago</i>	Initial PHQ
Update (UPD) <i>Last UA between one year and three years ago</i>	Updated PHQ
Reinstate 31-365 Days (R1Y) <i>Last UA between 30 days and one year</i>	Reinstatement 31-365
Reinstate 30 days or Less (R30) <i>Last UA 30 days ago or less</i>	Reinstatement 30 days of less

- Utilities and contract vendors should only require information that is needed to satisfy “gaps” since last unescorted access.
- Providing workers improper documentation to complete (i.e. an initial PHQ longer than 25 pages) due to convenience or not taking advantage of 08-06 standardization will result in unnecessary administrative burdens.
- All utilities, contractors and vendors should establish an expectation that workers will be identified and approved by the “Job Sponsor” 14 days in advance of arrival; as well as enforce the expectation that the PHQ will be submitted 10 days in advance. In an effort to maximize efficiencies gained with the implementation of this efficiency bulletin on training standardization, completion of these items in advance of arrival will reduce processing and nuclear badging delays.

Key to Color Codes:

Red: NSIAC initiative – full participation required for viability

Blue: Action expected at all sites, but is not needed for broad industry viability

Green: Utility discretion to implement, consistent with its business environment

Additional key aspects:

- The approval of the request by the “Job Sponsor” is an essential component which establishes a valid need for unescorted access.
- The request and approval have to be complete before an electronic personal history questionnaire (ePHQ) can be distributed to the worker.
- Timely submittal of a PHQ will promote identification of certain variables that may require additional vetting or scrutiny from Access Authorization including:
 - protocol required for foreign nationals
 - previous UA/UAA denial
 - PDI (Potentially Disqualifying Information).
- All utilities should maximize efficiency by using an ePHQ method of transmitting PHQs or demonstrate commitment to evaluate ePHQ for future implementation.
 - More than half of the industry uses an ePHQ platform to process PHQs.
 - A number of sites have initiated plans to implement within next 18 months.
 - Efficiencies gained through ePHQ include:
 - elimination of legibility issues
 - elimination of omissions in required data fields or signature lines
 - reduction in the number of times a PHQ is handled, scanned or faxed
 - timeliness of submittal to background investigation agencies.

Recommended Industry Actions

- Assess and implement site change management plans.

Change Management Considerations

An important aspect to the In-Processing DNP Initiative is the changes to retraining/requalification frequencies (especially to Plant Access Training) and the elimination of Site Specific Training.

Industry Activities

- Industry webinar on Oct. 6, 2016 to provide background for initiative, INPO discussion, and an open forum to clarify expectations and ask questions. Webinar information can be found at <https://web.inpo.org/Pages/Nuclear-Promise-Issues.aspx>

Company Actions

Items listed below are not all-inclusive.

- Review content contained in current utility Site Specific Fitness for Duty/Behavior Observation Program and Plant Access Training (PAT) for any NRC commitments, confirmatory orders or corrective actions. Information that is not contained within Generic NANTeL FFD and PAT will need to be communicated through a new strategy (Hand-out/Tri- Fold) or assessed with Regulatory Affairs/Licensing to change the commitment.
- Changes in PAT retraining frequencies will impact the “expiration date” protocol currently embedded into Access Authorization/Fitness for Duty applications. Currently this is the annual retraining frequency. Must ensure NIT (Nuclear Information Technology) is engaged to review the logic associated with granting UA and the changes to retraining frequencies.

- Changes in Plant Access Training retraining frequencies will also impact the date entered into PSCS (physical security computer system). Effective Jan. 2, 2017, new retrain frequencies will be mandated and, therefore, training retraining frequencies for Licensee employees, INPO and NRC will be 48 months and for supplemental personnel will be 24 months.
- Assess and revise utility Access Authorization/FFD Program documents and procedures as applicable.
- Those utilities who have not implemented an ePHQ method of transmitting PHQs should demonstrate a commitment to evaluate ePHQ for future implementation to reduce challenges associated with hardcopy processing.
- The 10-day personal history questionnaire submittal expectation needs to be reinforced with outage management, Labor and vendor representatives. Untimely receipt of PHQs and backgrounds will have an adverse impact on processing workers for nuclear badge access. However, the expectation to receive PHQs 10 days in advance does not outweigh the priority for in-processing emergent/critical workers whose services are considered high-priority.

Guidrails

- Consider a self-assessment to evaluate effectiveness of changes.

Report Your Site's Results

Report implementation of this improvement opportunity, including the date of completion. Send this information along with your company point of contact to EfficiencyBulletin@NEI.org.

Industry Contacts

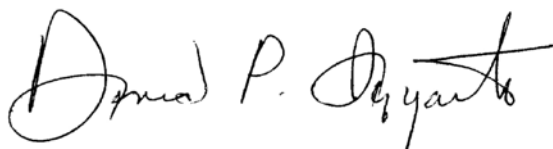
- Industry champion for this issue: Teddy Reed, 704-471-5851, teddy.reed@duke-energy.com
- NEI contact: Dave Kline, 202-739-8174, dk@nei.org
- On the web: www.nei.org/bulletin1626a

Industry Approval:

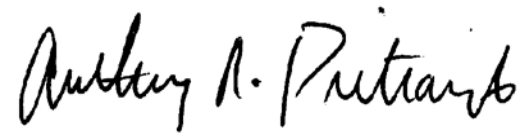
Bill Pitesa, CNO Lead



David P. Igyarto, Institute of Nuclear Power Operations



Anthony R. Pietrangelo, Nuclear Energy Institute

A handwritten signature in black ink that reads "Anthony R. Pietrangelo". The signature is written in a cursive style with a large initial 'A' and 'P'.