



*Entergy*

Nuclear Northeast

***INDIAN POINT  
ENERGY CENTER  
NON-LICENSEE EMPLOYEE  
IN-PROCESSING POLICY***



**Revision 7  
January 2006**

**INDIAN POINT ENERGY CENTER**  
**NON-LICENSEE EMPLOYEE IN-PROCESSING POLICY**

The following are our “**Expectations and Requirements**” for In-Processing (badging) of non-licensee employee personnel at the Indian Point Energy Center Nuclear Power Plants. These requirements apply to both outage and non-outage periods and are to ensure that the processing of personnel for unescorted access is completed in the most expeditious and cost effective manner. These requirements are mandatory and will be strictly enforced.

Each company, their employees and/or subcontractors requesting unescorted access to the IPEC facility **shall** comply with the requirements of this policy.

Failure to meet these requirements will result in individual delays and prohibitions with respect to starting and completing in-processing. The individual may be scheduled for the next in-processing day provided all requirements have been met.

The company the individual is employed by will be responsible for any costs arising from delays in granting unescorted site access due to any failure to provide the required information in a timely manner or an employee’s inability to successfully complete access requirements.

## **REQUIREMENTS**

1. Each company must submit **(one time only)**, *completed on company letterhead*, an "Access Authorization Letter of Compliance" **(Attachment 1)** and an "Access Authorization Signature Letter" **(Attachment 2)** to the site Supervisor Investigations/FFD. This must be completed **prior** to initiating unescorted access authorization requests, for their employees.
2. The Contractor shall determine the appropriate classification for unescorted access requested for each employee utilizing the matrix provided on **Attachment 3**.
3. Contractor will submit a “Contractor In-Processing Schedule Request” form **(Attachment 4)** when requesting in-processing for their employees. The IPEC Access Authorization department must receive a completed form no later than 2 working days (Wednesday at 3:00 p.m. for Monday in-processing, Friday at 3:00 p.m. for Wednesday in-processing, etc.) prior to the requested day for in-processing. Only individuals on the submitted forms shall be processed that day **(personnel may not be substituted on the start day of in-processing)**.
4. To determine the type of background investigation that will be required for each of their employees see **(Attachment 5)** of this package. Contractors **MUST** submit the appropriate completed Personnel History Questionnaire (PHQ) to the site Access Authorization Office **no more than 30 consecutive days or less than 5 business days prior** to their employees arriving on site. Failure to meet this expectation will result in extended delays in the granting of unescorted access authorization for that individual.

For individuals that had unescorted access within the past 365 days but not within the previous 30 consecutive days, the appropriate reinstatement PHQ **MUST be submitted no more than 30 consecutive days or less than 3 business days prior** to the individuals arrival on site for in-processing.

Copies of the PHQ’S to be used may be obtained from the site Access Authorization Office, from the IPEC Security Web page and the Entergy Web page.

- ✿ Contractors with an ENN approved self screening program ***MUST*** submit the applicable clearance verification letter for their employee's to the Access Authorization Supervisor **no more than 30 consecutive days or less than 2 work days prior** to their employees arriving on site for in-processing.
5. The respective company shall submit for each employee and/or subcontractor requiring unescorted access, an "Employment Verification Letter" (Attachment 6). This must be submitted to the site Access Authorization Supervisor **no more than 30 consecutive days or less than 2 work days prior** to an individual's arrival on site to start in-processing.
    - ✿ Contractors with an ENN approved self screening program ***MUST*** submit the applicable clearance verification letter for their employee's **no more than 30 consecutive days or less than 2 work days prior** to their employees arriving on site for in-processing.
  6. When a company will be in-processing more than five (5) individuals at a time, the respective company will designate a single point of contact to interface with the site Access Authorization Personnel.
  7. All individuals will be required to provide positive identification to in-processing personnel upon request. Identity shall be verified by comparing official **photo** identification (e.g., driver's license, passport, government identification, US military ID; State, Province, or county issued certificate of birth; etc. If the individual does not have an acceptable photo identification then they will be required to produce other forms of non photo identification such as non photo driver's license, union card, other government issued ID, US health insurance/prescription card, ATM card with pre-printed name and signature. **Failure to produce acceptable ID will result in the individual not being permitted to complete in-processing.**
  8. Individuals requiring psychological testing shall be administered one at the site as part of initial in-processing activities. The individual will be notified should it be determined that a psychological interview is required. An interview will be scheduled for the individual typically prior to their completion of in-processing. Any refusal to submit to a psychological interview will be deemed as a withdrawal of unescorted access request and individual will be directed to report to their employer. **Individuals who are not cleared by the Psychologist will not be permitted to complete in-processing.**
  9. Individuals requiring a Pre-Access Drug Screen (FFD Testing) must fully cooperate with the testing process. It is imperative that individuals be ready and able to promptly provide a urine sample when they report to the FFD testing facility to avoid unnecessary delays. Once an individual has entered the testing facility they will not be able to leave until the testing process has been completed. **Failure to stay in the testing facility may be considered a refusal to test, and a violation of the FFD Program resulting in denial of access.**

**Any deliberate attempt to evade the detection of substance abuse (subversion or adulteration) shall be deemed a violation of the Entergy Nuclear Northeast Fitness for Duty Program. A violation of this type will be considered an issue of trustworthiness and reliability and shall result in permanent denial of access to all Entergy facilities.**

Any individual pending results of the Pre-Access Drug Screening may be allowed to complete all other training and in-processing. Upon receipt of a negative test result, the individual may be cleared for unescorted access upon satisfying all other access requirements.

A first confirmed FFD violation, for a contractor shall result in immediate denial of access for a minimum of **3** years. After a 3 year period, submission of proof of rehabilitation and approval of the Medical Review Officer is required prior to consideration of application for unescorted access.

**NOTE: Individuals will be required to report all arrests. An ARREST is defined as (a) being taken in to custody by an authority of the law, including being taken to court or imprisoned; or (b) being charged with a criminal offense without being taken into custody; or (c) being convicted in a criminal proceeding for the violation of any law, regulation or ordinance (other than for convictions related to traffic citations or parking violations). An arrest includes any traffic violation involving alcohol/drugs.**

10. Any individual that has any drug/alcohol related criminal history, including DWI's and DUI's, previous denial of unescorted access for any reason at another licensee, or a record determined by the Supervisor Investigations/FFD to be suspect will be subject to additional inquiry prior to being granted unescorted access. Therefore this individual should arrive on site with the appropriate documentation (i.e. dispositions of court case, rehabilitation for drug and/or alcohol related problem, etc.) If the individual arrives on site without their information or needs additional documentation, they will be required to provide such information. (The individual will not be allowed to leave on the first day to obtain the information). If the information is not provided prior to the completion of in-processing the individual will be placed in a hold status until the requested information has been provided. Any individual placed in a hold status will not be granted access and instead directed to report to their employer. Upon receipt of the requested information Access Authorization Personnel will review and evaluate the information provided and make a determination as to the individual's eligibility for unescorted access.

If the individual fails to provide the requested documentation he/she will not be permitted to continue in-processing and will not be granted access to the IPEC site.

- **Any individual with a current felony charge pending disposition or resolution or convicted of a felony offense within the previous five years will not be granted access authorization until the charge is satisfactorily resolved.**
- **The denial will also continue as long as an individual is on active probation/parole as a result of the conviction.**

11. The individual must pass "General Employee Training – Plant Access Training" (GET-PAT) with a score of 80% or better prior to being granted unescorted plant access. To achieve access to radiological controlled areas, the individual must successfully pass "General Employee Training – Radiation Worker Training" GET-RWT with an 80% or better. Individuals who fail with a score of 60% or greater, may be remediated or allowed to re-test in accordance with training procedures. Individuals who fail a second time will be reported to their site sponsor/designee for further action.

Personnel who require General Employee Training will be scheduled for training based on trainee experience. Experienced personnel will take the appropriate exam(s) after reviewing plant specific information.

12. Outage in-processing start days will be Monday and Wednesday for all initial/update personnel. Reinstate individuals may be processed Monday through Thursday but it is encouraged to process on Tuesdays and Thursdays in consideration of large volumes of initials on Monday and Wednesdays. Friday will be offered as an optional day for smaller groups of personnel **classified Priority (P) and Experienced (A) ONLY**. Hours of in-processing will normally be from 7:00 a.m. to 3:30 p.m. However, these times will be extended as needed to complete the in-processing activities. **Start times will be strictly enforced.** Once in-processing has started (orientation and directions being given), individuals arriving late **will not** be permitted to begin the process unless previous notification (such as car trouble) has been made to the Access Authorization Office and an alternative starting time has been established.

13. It is expected that individuals remain in the training building until they have completed all in-processing requirements for badging. If it is deemed essential for an individual to enter the plant prior to being issued a badge then, they will access the plant on a Visitor/Escort Badge after concurrence with Access personnel.

Only upon satisfactory completion of all applicable screening and training requirements will the individual be cleared for unescorted access and their Photo ID badge activated by Access Authorization for entry into the plant.

14. Contractor shall submit a "Revocation of Unescorted Access Letter" (**Attachment 7**) for each employee upon completion of assignment or when the individual no longer requires frequent and extended unescorted access to the IPEC facility for any reason. This letter shall be submitted within **3** business days from the time that the individual completes his/her assignment or has departed IPEC. Contractor shall **immediately** notify the IPEC site Security and Access Authorization Office of any for cause voluntary or involuntary termination of an employee granted access to IPEC.
15. All individuals leaving site upon completion of current job assignment **MUST** surrender their IPEC photo ID badge prior to exiting the site.

***If you have any questions or need further assistance, please call, Sharon Quinn at (914) 788-2193, Craig Worrall at (914) 788-2569 or Ed Hojnacki at (914) 788-2072.***

(MUST BE ON COMPANY LETTERHEAD)

**ACCESS AUTHORIZATION LETTER OF COMPLIANCE**

**DATE:**

Sharon Quinn  
Supervisor Investigations/ FFD  
Indian Point Energy Center  
P.O. Box 308  
Buchanan, NY 10511

Dear Ms. Quinn:

This is to inform you that company name will comply with all the requirements for unescorted access to the Indian Point Energy Center (IPEC) facility.

Each employee of company name, subsidiary, or subcontractor of this company who requires unescorted access to the IPEC Nuclear Power Plant will comply with the Entergy Nuclear Northeast (ENN) Access Authorization Program.

Company name shall submit an Access Authorization Signature letter to the IPEC site Access Authorization Department. This letter shall contain the name(s), title(s), and sample signature(s) of the company official(s) authorized to sign requests for unescorted access and cancellation of unescorted access.

Company name shall submit an Employment Verification letter, signed by an authorized official of this company, for each individual who requires access to the site.

Company name upon termination of employee, or completion of project, and within one (1) day shall submit a Revocation of Unescorted Access letter to the Access Authorization Supervisor.

Company name shall immediately notify the IPEC site Access Authorization Office of any for cause voluntary or involuntary termination of any employee who has access to IPEC. This company shall notify site security management prior to or simultaneous with the termination. Cause may be defined as substance abuse problem, drugs, alcohol or aberrant behavior. This, notification shall be by telephone or an in-person visit followed by a "Revocation of Unescorted Access" letter within the required time mentioned above.

In compliance with the ENN Access Authorization Program this company shall maintain required documentation as follows:

- a. Copy of this "Letter of Compliance";
- b. Current Access Authorization Signature letter;
- c. All current copies of Employment Verification letters;
- d. All copies of Revocation of Unescorted Access letters.

All documentation shall be available for audit by ENN personnel it's representatives, and the NRC. The records shall be maintained at:

Address:

City

State

Zip

Company Official

Title

Date

Telephone Number

(MUST BE ON COMPANY LETTERHEAD)

**ACCESS AUTHORIZATION SIGNATURE LETTER**

**DATE:**

Ms. Sharon Quinn  
Supervisor Investigations/FFD  
Indian Point Energy Center  
P.O. Box 308  
Buchanan, NY 10511

Dear Ms. Quinn:

Be advised that the below-named individual(s) are authorized to sign access authorization requests and cancellation of, unescorted access requests for this company.

<b>NAME (printed)</b>	<b>Title</b>	<b>Sample Signature</b>	<b>Phone No.</b>

IPEC Access Control personnel shall be notified as soon as possible of any changes in authorized signature list.

Respectfully submitted,

Signature Company Official

Title

## EMPLOYEE UNESCORTED ACCESS CLASSIFICATION

EMPLOYEE CLASS	EMPLOYEE STATUS	REQUIRED FOR ACCESS
P-1	Individual has current IPEC training and <b><u>is currently OR has been</u></b> in another licensee or an ENN approved CBOP within the past 30 days.	<ul style="list-style-type: none"> <li>◆ Contractor/Vendor In-Processing Schedule Request</li> <li>◆ Request for Unescorted Access Form from IPEC Sponsor</li> <li>◆ Employment verification letter</li> <li>◆ Complete site paperwork</li> <li>◆ Issuance of photo ID badge</li> </ul>
P-2	Individual has current IPEC training but <b><u>has not</u></b> been in another licensee's or an ENN approved CBOP for more than 30 days but less than 365 days.	<ul style="list-style-type: none"> <li>◆ Contractor/Vendor In-Processing Schedule Request</li> <li>◆ Request for Unescorted Access Form from IPEC Sponsor</li> <li>◆ Employment verification letter</li> <li>◆ Reinstatement Background Screening</li> <li>◆ Complete site paperwork</li> <li>◆ FFD Testing</li> <li>◆ Issuance of photo ID badge</li> </ul>
A-1	Individual requires IPEC training but <b><u>is currently OR has been</u></b> in another licensee or an ENN approved CBOP within the past 30 days.	<ul style="list-style-type: none"> <li>◆ Contractor/Vendor In-Processing Schedule Request</li> <li>◆ Request for Unescorted Access Form from IPEC Sponsor</li> <li>◆ Employment verification letter</li> <li>◆ Complete site paperwork</li> <li>◆ Applicable site GET training/testing</li> <li>◆ Issuance of photo ID badge</li> </ul>
A-2	Individual requires IPEC training and <b><u>has not</u></b> been within another licensee's or an ENN approved CBOP within the past 30 days but within the past 365 days.	<ul style="list-style-type: none"> <li>◆ Contractor/Vendor In-Processing Schedule Request</li> <li>◆ Request for Unescorted Access Form from IPEC Sponsor</li> <li>◆ Employment verification letter</li> <li>◆ Reinstatement/Transfer Background Screening</li> <li>◆ Complete site paperwork</li> <li>◆ FFD Testing (results received)</li> <li>◆ Applicable site GET training/testing</li> <li>◆ Issuance of photo ID badge</li> </ul>
I	Individual <b><u>never had or has not been</u></b> granted unescorted access within the past 365 days.	<ul style="list-style-type: none"> <li>◆ Contractor/Vendor In-Processing Schedule Request</li> <li>◆ Request for Unescorted Access Form from IPEC Sponsor</li> <li>◆ Employment verification letter</li> </ul>

		<ul style="list-style-type: none"><li>◆ Initial/Update Background Screening</li><li>◆ Complete site paperwork</li><li>◆ Psychological Evaluation</li><li>◆ Fingerprinting</li><li>◆ FFD Testing (results received)</li><li>◆ Applicable site GET training/testing</li><li>◆ Issuance of photo ID badge</li></ul>
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**P=PRIORITY**

**A=ACCELERATED**

**I=INITIAL**

IPEC CONTRACTOR IN-PROCESSING SCHEDULE REQUEST

LAST NAME	FIRST NAME	SOCIAL SECURITY #	EMPLOYEE CLASS	REQUESTED DATE OF IN-PROCESSING
1				
2				
3				
4				
5				
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**TYPES OF BACKGROUND INVESTIGATIONS**

**INITIAL** – Scope of BI must cover the individual’s activities for the previous three (3) years or back to the individual’s eighteenth birthday, whichever is shorter as required by NEI 03-01.

**UPDATE** – an individual’s unescorted access has been interrupted for more than 365 days. Scope of BI must cover the individual’s activities since and including the last date of favorable unescorted access termination.

**REINSTATEMENT of UAA (31-365 days)**– individual who last held unescorted access, which was terminated under favorable conditions within the past 365 days. Scope of BI must cover the period of time since the last unescorted access was held.

**REINSTATEMENT of UAA (30 days or less)** –individuals who last held unescorted access that was terminated under favorable conditions within the past 30 days. No additional BI is required.

**NOTE: If an individual has been continuously employed with the same contractor, during interruptions of unescorted access greater than 30 days, then a current employment verification letter alone shall satisfy the requirements of a Reinstatement BI.**

(MUST BE ON COMPANY LETTERHEAD)

EMPLOYMENT VERIFICATION LETTER

DATE:

Ms. Sharon Quinn  
Supervisor Investigations/FFD  
Indian Point Energy Center  
P.O. Box 308  
Buchanan, NY 10511

Dear Ms. Quinn:

The individual listed below is an employee of \_\_\_\_\_ (COMPANY NAME) \_\_\_\_\_.  
To the extent of our knowledge, this employee is trustworthy and reliable and does not possess any adverse character traits or exhibit any indications of aberrant behavior that would constitute an unreasonable risk to health and safety of the public, including the potential to commit radiological sabotage.

Employee Name: \_\_\_\_\_ Social Security #: \_\_\_\_\_

Date of Birth: \_\_\_\_\_ Date of Employment with Company: \_\_\_\_\_

Address: \_\_\_\_\_ Home Phone: \_\_\_\_\_

<b>SUITABLE INQUIRY/EMPLOYMENT HISTORY QUESTIONS</b>
Has this individual any record of disciplinary action(s); ever tested positive for drugs or ever used alcohol, resulting in on duty impairment; ever been subject to treatment for substance abuse (except self-referral); ever been removed from activities as a result of a fitness for duty problem; or ever been denied unescorted access at a nuclear power plant or denied employment in accordance with a fitness for duty policy?
<b>CIRCLE ONE:            NO            YES</b>
<b>IF YES EXPLAIN:</b>

I, therefore request that when this individual satisfactorily completes all the applicable provisions established in the Entergy Nuclear Northeast Access Authorization Program and in accordance with NEI 03-01 that this employee be granted clearance for unescorted access to the IPEC facility.

Very truly yours,

Company Representative Signature & Title

(MUST BE ON COMPANY LETTERHEAD)

**REVOCATION OF UNESCORTED ACCESS LETTER**

DATE:

Sharon Quinn  
Supervisor Investigations/FFD  
Indian Point Energy Center  
PO Box 308  
Buchanan, NY 10511

Dear Ms. Quinn:

RE: **Revocation of Unescorted Access**

**EMPLOYEE NAME**

**SOCIAL SECURITY #**

**REASON CODE**

**REASON CODES:**

- 01 Laid off-Eligible for Rehire
- 02 Terminated from Company
- 03 Terminated for Cause (Comment Required)
- 04 Transferred to Another Site
- 05 Temporary Suspension (Comment Required)
- 06 Unescorted Access No Longer Required

Comments:

Very truly yours,

Company Representative's Signature & Title