

Exelon Nuclear Unescorted Access Requirements

Frequently Asked Questions

What follows is an explanation of the processes required for a contractor to obtain unescorted access (photo security badge) at any of the Exelon Nuclear facilities.

This document is presented in a Frequently Asked Questions (FAQ) format to aid the new user toward understanding the requirements. Obtaining unescorted access to an operating nuclear facility may seem intimidating for some applicants the first time, but the process ensures that anyone granted access is qualified and does not pose a security threat in an operating nuclear power facility. The process gets much easier after the first time.

1. What is Unescorted Access?

Unescorted Access is a privilege granted by a nuclear power plant operator (“Licensee”) to qualified persons who have a need to enter the protected area of a nuclear station without escort. Some areas of the station require greater levels of security access than others. But in order to move freely (without a badged escort) within the “Protected Area” of a nuclear power station, one must have Unescorted Access.

2. Why does a contractor employee need Unescorted Access to work in an operating nuclear power station?

Depending on the scope of work and its location at the nuclear station, a contractor may require its employees to have unescorted access in order to perform various construction or maintenance activities. Only a Licensee can grant unescorted access to its station. The contractor must request unescorted access from the Licensee for each employee.

3. How can you tell if someone has Unescorted Access inside a nuclear plant?

Persons with unescorted access wear an Exelon-issued photo ID badge that must be worn so that it is visible on the upper, front portion of their body. This badge permits access past certain locked doors or gates. Visitors wear a special badge without a picture that designates the wearer as a visitor. Nuclear station visitors must be escorted by someone with unescorted access.

4. How long does it take for a person to be granted Unescorted Access?

Currently, for a person who has never obtained unescorted access, the process takes around four working days. For persons who have previously had unescorted access within the last twelve months, the re-qualifying process can take anywhere from two days to less than two hours.

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5. What is the Protected Area?

Nuclear stations have layers of protection (fences, barriers) designed to provide progressive levels of security. To enter the Protected Area (“PA”) of a nuclear station, you must pass through a Security gatehouse with X-ray and other equipment designed to detect contraband and keep out unauthorized persons. The PA includes the Powerblock (turbine building, reactor building/containment, auxiliary building) where reactivity occurs and electricity is generated. Additionally, the PA may include office buildings, lunchrooms, warehouses, fabrication shops, etc. Some sites have a large PA with expansive grounds and many buildings while other sites have a small PA footprint with most support buildings outside. Parking lots are outside the Protected Area. To work or move alone freely in a PA, an individual must have unescorted access.

6. How does a contractor worker obtain unescorted access at Exelon?

First, that person must work for an employer that has a contract with Exelon Nuclear to provide services within a PA. Next, the person must provide important information directly to Exelon, including

- a) Valid, not expired, Government-issued Photo Identification Card (Driver’s License, Passport, etc.).
- b) Background Investigation which includes previous employers, credit check, reference check, criminal history, drug and alcohol history which is captured on a Personal History Questionnaire (“PHQ”).
- c) Fitness for Duty Screening (Drug and Alcohol Test)
- d) Minnesota Multi-Phase Personality Inventory or MMPI (a 567-Question psychological test)
- e) Fingerprint submittal to the FBI.
- f) Biometrics (electronic scan of hand)

7. What type of photo identification is required?

Valid, not expired, Government-issued Photo Identification Card (Driver’s License, Passport, etc.). Damaged (i.e., cracked, delaminated) identification cards are not acceptable.

8. What is a PHQ?

PHQ is short for Personal History Questionnaire. It’s a confidential disclosure form between you and Exelon Corporate Security that asks questions about you and your past to help independent investigators verify your identity and your history. The PHQ includes your

- a) Criminal History (if any). Include arrest date, crime charged, city/state of occurrence, whether misdemeanor or felony, and any penalties, punishment, or fine. You must also indicate if you are currently on Parole, Work Release, or Probation. You must provide details of all occurrences whether convicted or not.

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- b) Past Nuclear History where you may have been denied unescorted access. You must indicate if you have ever been denied access to any nuclear power plant for any reason.
- c) Drug / Alcohol Violations from the past. You must indicate if you have ever violated an employer's drug/alcohol policy; falsified a drug test; used, possessed, or sold illegal drugs; other drug-related questions
- d) Name, address, citizenship, height, weight, hair color, eye color
- e) Citizenship status
- f) Birth date/place
- g) Social security number
- h) Driver's license number/state
- i) Four personal references (not related to you) and their address / day phone number (can be coworkers)
- j) Military service information (if applicable)
- k) School (if attending school during a period of unemployment)
- l) Places of residence for last five years (includes dates at location)
- m) Credit reference (list one creditor or bank account)
- n) Personal references (non-family) who can attest to your character
- o) Military service in the last three years (if any)
- p) Education (in lieu of employment history for young persons just starting out)
- q) Residence locations for the past five years
- r) Union affiliation (if applicable), Local number, phone number
- s) Employment history (including date hired/released, company name, address, phone number, jobsite location (city, state), reason for leaving (include details if fired) for the last 3 years; not employed history for any continuous period greater than 30 days and a reference who can verify (a relative is OK) that you were not employed. (Your union, if you have one, may be able to help here.)
- t) Other Forms you must sign:
 - 1) A Consent Form authorizing Exelon's investigative agents to verify information on your PHQ with banks, schools, governmental agencies, etc.
 - 2) Arrest Reporting Program Disclosure Statement, which says you promise to report any and all arrests to Exelon Corporate Security.
 - 3) Fitness for Duty Statement, promising that you will abide by the requirements of the Fitness for Duty program.
 - 4) PADS Consent Form, which authorizes Exelon's investigators obtain, retain, and transfer information needed to secure your unescorted access.
 - 5) Fair Credit Reporting Act Disclosure and Authorization Statement
 - 6) Request Pertaining to Military Records (as applicable)

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9. What will automatically prevent me from getting Unescorted Access?

- a) If your initial drug/alcohol screen (on your first day) indicates a positive test for alcohol or controlled substances you will be denied access for a minimum of three years for first offense and permanent if second offense.
- b) If you have had a non-nuclear positive drug/alcohol test within the last three years, you may not apply for unescorted access until three years from the date of the incident with no drug/alcohol arrests since that time.
- c) If you have been convicted of a crime and are unable to produce the court documentation that dispositions your offense and punishment.
- d) Other

10. Might other incidents from my past keep me from obtaining unescorted access?

Yes. Some serious convictions and judgments or behavior that would indicate that you are not trustworthy; a history of drug or alcohol abuse; and other concerns could require Exelon to deny you unescorted access.

11. If I was ever arrested in the past, what type of documentation do I need to provide to Exelon?

- a) On the first day of hire you must bring with you all arrest documentation and/or final court dispositions for any arrest occurring within the last five years.
- b) If additional documentation is required (due to the seriousness of the arrest/conviction), it must be submitted by the start of Day 2 of in-processing.
- c) On a case-by-case basis, you may be required to provide final court dispositions for arrests that occurred more than five years ago.

12. Will the confidential information I provide to Exelon Security be shared with my employer?

No. Confidential information disclosed to Exelon Security for the purpose of obtaining unescorted access is not shared with employers.

13. Will I be required to submit to Psychological Testing?

Yes. Exelon requires initial applicants to take the MMPI (Minnesota Multi-Phase Personality Inventory). This is a 567 – question test evaluated by mental health professionals and used by many industries to provide a personality profile.

14. What if my some of my responses to the MMPI raise a red flag?

A small percentage of test-takers provide responses that require them to meet with an Exelon-chosen psychologist for a personal, evaluation of the test results. The psychologist then provides an evaluation to Exelon of your suitability (or non-suitability) for unescorted access.

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15. If the Psychologist determines I am not suitable, is there an appeals process?

Yes, you would be sent a letter from Exelon Nuclear Security describing what actions you would be required to complete before being re-considered for unescorted access.

16. Am I required to provide my fingerprints as part of the process?

Yes. Exelon uses a special machine that electronically scans your fingerprints. Your prints are then electronically submitted to the Nuclear Regulatory Commission where they are forwarded to the FBI for analysis. This process normally takes about two days. Sometimes fingerprints are difficult to read and must be re-scanned and re-submitted to the NRC/FBI.

17. What other types of consent or disclosure must I provide to Exelon?

- a) **You are required to sign an Exelon Nuclear Screening Consent Form.** This form authorizes Exelon or its agents to conduct a background investigation for the purpose of authorizing entrance into nuclear power plants. By signing this form, you grant all persons who have relevant information about you the authority to disclose it to Exelon or its agents. The information is considered confidential and on a need-to-know basis.
- b) **You are required to sign an Exelon Access Authorization and Arrest Reporting Program Disclosure Statement.** This form requires you to report any arrest (criminal charges, convictions, or proceedings, including misdemeanors and felonies, even suspended sentences).
- c) **You are required to sign an Exelon Fitness for Duty (FFD) Program Disclosure Statement.** This form requires that you will comply with Exelon's FFD program. The requirements are defined on the form.
- d) **You are required to sign an Exelon PADS Consent Form.** This allows Exelon to obtain, retain, and transfer your personal information necessary from outside **sources** to grant you unescorted access to a nuclear power plant. The NRC requires that this information be used by the utility to determine that an individual is trustworthy, reliable, and fit for duty prior to granting and while maintaining unescorted access. This information is also made available to other nuclear utilities where you might seek unescorted access at a later date.
- e) **You are required to sign a Fair Credit Reporting Act Disclosure and Authorization Statement.** This authorizes Exelon to obtain a credit report concerning your prior employment, military record, education, credit worthiness, credit standing, credit capacity, character, general reputation, personal characteristics, criminal background record, or mode of living.

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- f) **You must sign a Request Pertaining to Military Records if you have served in the Armed Services.** This allows Exelon to validate your military service and the terms of your discharge from service.

18. Will my picture be taken?

Yes. Your picture is taken using a digital camera. The photograph is reproduced on a special identification badge that grants you unescorted access. The photo is kept on file and is reused if you seek unescorted access at a later date (assuming your appearance has not changed).

19. What does “biometrics” mean?

Your security badge works only for you when entering a nuclear station. Your right hand is scanned electronically during in-processing using sophisticated software that links your hand to your badge only. When you enter the PA, you must use your badge and then allow your hand to be “read” electronically to ensure that your body belongs to your badge. Your badge will not grant anyone else access into the PA because everyone else’s hand geometry is different than yours.

20. Are the results of Exelon’s investigation into my work or personal history shared with my employer?

No, other than to notify the employer that you will or will not be granted unescorted access. All elements of your PHQ are confidential and between you and Exelon Corporate Security.

21. What if there are gaps in my employment history?

You will not be granted unescorted access until the gaps (as defined earlier) in your employment history are closed. A gap is defined as any period of continuous unemployment 30 days or more.

22. What if a past employer is no longer in business?

The investigative agencies have means of determining the status of employers and will disposition extinct businesses on a case-by-case basis.

23. Will I have an opportunity to work with someone from Exelon if there are questions about my work history, credit report, or other aspects of the investigation?

Yes, provided you demonstrate a good-faith effort to provide information and comply with the requirements of the program.

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24. If I know I was arrested and /or convicted in the past, should I bring my court disposition papers with me on the first day of In-Processing?

Yes. Having all of your court documentation with you on your reporting day makes the process work much smoother and means you can get to work faster. If you don't have your court documentation with you on the first day, you will have to go get it before you can proceed in the process.

25. Are there other requirements to obtain unescorted access?

Yes, everyone must take a training course annually called NGET (Nuclear General Employee Training), which consists of lesson plans dealing with Security, Fitness for Duty, and Radiation Worker Training. All three elements include written (or computer-based) tests that require you to answer 80% of the questions correctly. In addition, there is another course called NEIT (Nuclear Employee Initial Training), which is on a three-year-cycle, that explains many of the safety and work rules for working in an operating nuclear plant. This course also has a test with an 80% pass requirement.

26. Does it get easier to obtain unescorted access after the first time?

Yes. Once you have established yourself in the system, you are only required to provide updated employment and arrest information (if any) since your last date of unescorted access.

Matrix of Security Requirements to Obtain Unescorted Access

How Long Since Last Granted Unescorted Access ↓	Initial Personal History Questionnaire & Disclosure Forms	Update/Reinstate PHQ & Disclosure Forms	Fitness for Duty Pre-Access Drug Test	Fitness for Duty Drug Test – Random Generator	MMPI (567-Question Psych Eval Test	Fingerprint Submittal	Personal Access Data System (PADS) Consent Form	Picture / Biometrics
W/in last 5 days	No	Yes	No	No	No	No	Yes	No
5-30 days	No	Yes	Yes	Yes	No	No	Yes	Yes
31-365 days	No	Yes	Yes	No	No	No	Yes	Yes
366 days – 3 yrs	No	Yes	Yes	No	Yes	Yes	Yes	Yes
>3 yrs or never	Yes	No	Yes	No	Yes	Yes	Yes	Yes

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27. Can I apply for unescorted access if I am not an American citizen?

Yes

28. My personal references all work at jobs during the day. Will they be contacted at home during the evening or on weekends?

Yes.

29. The PHQ asks me to list one creditor. Could I be denied unescorted access because I recently filed for bankruptcy?

The incidence of individuals being denied unescorted access due to bankruptcy is very rare.

30. Twenty years ago, I was arrested at age 19 for disorderly conduct. The charge was dismissed and my lawyer told me it would not appear on my record. Do I have to disclose this arrest on my PHQ?

Yes, all arrests of any kind must be reported from the age of 18 onward even if dismissed.

31. Is it true that I have to disclose on my PHQ that I was issued a traffic ticket for failure to wear a seat belt while driving my car?

Yes.

32. My lawyer told me that I do not need to disclose on my PHQ any arrests that were not considered felonies. Is that true?

No. All arrests after the age of 18 must be reported, whether misdemeanor or felony. Even arrests that you may have been told would be expunged from your record.

33. Does the HIPPA law protect me from having to disclose previous positive drug test results on my PHQ?

No. Federal law requires that you disclose any previous positive drug or alcohol tests if you want unescorted access to a nuclear station.

34. I was arrested at age 16 for underage drinking. Do I need to disclose this arrest on my PHQ?

No. Arrests that occurred before the age of 18 need not be disclosed.

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35. I received a traffic ticket for having an expired license plate while driving my wife's car. Must this event be disclosed on my PHQ as an arrest?

Yes. The only motor vehicle tickets you do not need to report are speeding tickets and parking tickets.

36. Do I need to provide court-issued documentation to Exelon to show how my arrest was dispositioned by the court?

Yes. On your reporting day, you must provide court-issued documentation for the disposition of any arrest (including motor vehicle violations mentioned earlier) within the last five years.