

License No.

Date:

CHAPTER 13 SECURITY INSPECTION CHECKLIST Short Form

(All reg references proceeded by 0400-20-13)

Licensee Name:

License No.:

Address:

Location(s) Inspected:

Inspection Date:

Previous Inspection Date:

Inspection Overdue: yes no

Inspection: Announced Unannounced

In Compliance: yes no

Number of Violations:

Principal Inspector:

Accompanying Inspector(s):

Other Accompanying Personnel:

Licensee Contact:

Telephone No.:

RSO:

RSO Phone No.:

RSO Email:

LLEA:

LLEA Contact:

LLEA Address:

LLEA Phone No.

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Acronyms

C/A	Comprehensive Actions	RO	Reviewing Official
Ci	Curies	SGI	Safeguards Info
DOT	Department of Transportation	SGI-M	Safeguards Info – Modified Handling
IAW	in accordance with	SC	Security Zone
LVS	License Verification System	T & R	Trustworthy and Reliable
LLEA	Local Law Enforcement Agency	UA	Unescorted Access

Legend (same as SRPAR)

13					
.01	-				
(1)	-				
Chapter		(a)	-		
Rule		3.	-		
Paragraph		(i)	-		
Sub-paragraph				(I)	
Part					
Sub-Part					
Item					

All numbers and letters in this report form are equal the regulation reference in SRPAR Chapter 13, except Section I.

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Section I Interview (numbers and letters in this section do not refer to a SRPAR regulation)

1. Management and Administration

- a. Administrator
- b. RSO
- c. Is RSO as named on the license? Y N N/A

2. Summary of Licensed Program

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Y N N/A Does the current inventory meet the activity limits for radionuclides of concern as found in the table below?

Current inventory requiring increased controls:

	Radionuclide	Form	Quantity in Curies
1			
2			
3			
4			
5			
6			

Radionuclides of Concern:

Radioactive Material	Category 1 (TBq)	Category 1 (Ci)	Category 2 (TBq)	Category 2 (Ci)
Americium -241	60	1,620	0.6	16.2
Americium – 241/Be	60	1,620	0.6	16.2
Californium – 252	20	540	0.2	5.40
Cobalt – 60	30	810	0.3	8.10
Curium – 244	50	1,350	0.5	13.5
Cesium – 137	100	2,700	1	27.0
Gadolinium – 153	1,000	27,000	10	270
Iridium – 192	80	2,160	0.8	21.6
Plutonium – 147	60	1,620	0.6	16.2
Plutonium – 239/Be	60	1,620	0.6	16.2
Promethium – 147	40,000	1,080,000	400	10,800
Radium – 226	40	1,080	0.4	10.8
Selenium – 75	200	5,400	2	54.0
Strontium – 90	1,000	27,000	10	270
Thulium – 170	20,000	540,000	200	5,400
Ytterbium – 169	300	8,100	2	81.0

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Chapter 13-.08 (10 CFR 37, Appendix A)

<p>Section II</p> <p>Chapter 13, Rule .02</p> <p>Background Investigations and</p> <p>Access Authorization (AA) Program</p>

- **13-.02(1)** Personnel access authorization requirements for category 1 or category 2 quantities of radioactive material.
- **13-.02(2)** Access authorization program requirements.
- **13-.02(3)** Background investigations.
- **13-.02(7)** Access authorization program review.
- **Trustworthy and Reliable (T & R) Records**

.02(1) Personnel Access Authorization (AA) Requirements

(a) Personnel Access Authorization Requirements

Y N N/A (1-3) Licensee established, implemented, and maintains an access authorization program (before taking possession and currently).

.02(2) Access Authorization (AA) Program Requirements

(c) Informed Consent (CHANGE)

Y N N/A (1) Licensee obtains signed informed consent by subject prior to initiating a background investigation.

(Licensees Can Use Sample Consent Form NUREG 2155, Annex B)

(e) Determination Process

Y N N/A (5) Licensee maintains a list of individuals who have UA.

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.02(3) Background Investigations

(a) Initial Investigation.

- | | | | | |
|---|---|-----|-------|---|
| Y | N | N/A | 3. | Background investigations include: |
| | | | (ii) | Verification of true identify using official documentation and compares that information to personal information that was provided. |
| | | | (iii) | Licensee has documented the type, expiration, and identification number of the identification document, or maintains a photocopy. |
| | | | (iv) | Licensee certifies in writing that documentation was properly reviewed and maintains records for review during inspection. |
| | | | (v) | Employment history verification, including military service, includes the most recent 7 years |

(b) Grandfathering.

- | | | | | |
|---|---|-----|----|--|
| Y | N | N/A | 2. | If licensee grandfathered individual T&R'd under Part 73 or Security Order requiring fingerprints, then they document that, and subject the individual to the reinvestigation requirement. |
|---|---|-----|----|--|

(c) Reinvestigation.

- | | | | | |
|---|---|-----|----|--|
| Y | N | N/A | 1. | Licensee conducts reinvestigations on a 10 year frequency that consists of fingerprinting and an FBI criminal history records check. |
|---|---|-----|----|--|

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T and R Records

Y N N/A T&R records licensee should have for each individual granted unescorted access (unless grandfathered) includes:*

Verification of Applicant's True Identity. (.02(3)(a)2.)

Signed Consent Form; (.02(2)(c)1.)

Verification that applicant Meets All Background Screening Elements including:

Verification of 7 years work experience; (.02(3)(a))

Verification of Education for the claimed period; (.02(3)(a)4.)

Verification of Character & Reputation Determinations; (.02(3)(a)5.)

Developed references. (.02(3)(a)6.)

Fingerprint & Criminal History Records Received, Reviewed, and Approved; (.02(6)(e))

Documented Basis Documented; (.03(2)(d)5.)

Security Training; (.03(2)(c))

Included on List Authorized for Unescorted Access. (.02(2)(e))

** Due to Grandfathering authorized by .02(3)(b), T&R Records for long term (i.e., >3 years) employees who were originally T&R'd IAW the ICs may simply consist of a review of the individual's work history with the licensee, a fingerprint and criminal history records check, and a documented basis.*

Note: The licensee can accept T&R reviews conducted by a Security Service Provider (e.g., contract security guard company) provided the Security Service Provider provides written verification that background screening has been performed that meet the elements of § 37.25(a)(2) through (a)(7) (i.e., background screening without fingerprinting)

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Section III	Chapter 13-.03
PHYSICAL PROTECTION DURING USE	

- **.03(1) Establishment of a security program.**
- **.03(2) General security program requirements (Development and maintenance of a plan, implementing procedures, training, protection of information)**
- **.03(3) LLEA coordination and notification**
- **.03(4) Establishment of security zones (Permanent and temporary, access control, Category 1 quantities)**
- **.03(5) Monitoring, detection, assessment, and response.**
- **.03(6) Maintenance, testing, and calibration. (Intrusion alarms, communication equipment, other components)**
- **.03(7) Requirements for mobile devices.**
- **.03(8) Security program review.**
- **.03(9) Reporting of events (LLEA, NRC Operations Center)**

.03(1) Security program.

(b) General performance objective

Y	N	N/A	1.	Licensee has established, implemented, and maintains a security program that is designed to monitor and, without delay, detect, assess, and respond to an actual or attempted unauthorized access to Cat. 1/2 quantities.
---	---	-----	----	---

.03(2) General security program requirements.

(b) Implementing Procedures

Y	N	N/A	1.	Licensee has developed and is maintaining written procedures that document how the requirements of this subpart and the security plan will be met.
---	---	-----	----	--

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(d) *Protection of Information*

Y N N/A 6. Licensee maintains a list of individuals who have access to the security plan or implementing procedures.

.03(3) LLEA Coordination

(a) *Licensee coordinates with LLEA*

Y N N/A 1. Information provided to LLEA includes:
Description of facility and security measures;
Cat. 1 or Cat. 2 quantities of Radioactive Material.

Y N N/A 2. Notification that the licensee will request a timely armed response in the event of actual or attempted theft, sabotage, or diversion

(d) *Refresh Coordination With LLEA Every 12 Months*

Y N N/A Licensee coordinates with LLEA every 12 months, or when changes adversely affect potential vulnerability to theft, sabotage, or diversion.

.03(4) Security Zones

(a) *Licensee Uses Security Zone*

Y N N/A Licensee uses or stores material in a permanent or temporary security zone (SZ)

(c) *Limited Access To Security Zone*

Y N N/A Security zones limit unescorted access only to approved individuals by:

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1. Isolating material with a **continuous** physical barrier that allows access only through the established access control points; or
2. Direct control by approved individuals at all times; or
3. A combination of continuous physical barriers and direct control

.03(5) Monitoring, detection, and assessment

(a) Monitoring and detection

- | | | | | |
|---|---|-----|-------|--|
| Y | N | N/A | 1. | Licensee maintains the capability to continuously monitor and detect without delay all unauthorized entries into the Security Zone. |
| Y | N | N/A | 3. | Licensee can detect unauthorized removal of the radioactive material from the security zone. This detection capability must provide: |
| | | | (i) | Cat. 1: Immediate detection of any attempted unauthorized removal of the radioactive material from the SZ by: |
| | | | (I) | Electronic sensors linked to an alarm; or |
| | | | (II) | Continuous monitored video surveillance; or |
| | | | (III) | Direct visual surveillance. |
| | | | (ii) | Cat. 2: Weekly verification through physical checks, tamper indicating devices, or other means. |

(c) Personnel communications and data transmission

- | | | | | |
|---|---|-----|----|--|
| Y | N | N/A | | Electronics or personnel for monitoring, detection, and assessment are able to: |
| | | | 1. | Maintain continuous capability among site security systems; and |
| | | | 2. | Provide alternative communication and data transmission in the event of loss of primary communications or data transmission. |

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.03(6) Maintenance, testing, and calibration.

(a) Maintenance and Testing

Y N N/A Licensee implements maintenance and testing program for intrusion alarms and communication components, the systems are maintained in an operable condition, and are inspected and tested at the manufacturer's suggested frequency.

(b) Records

Y N N/A Maintenance and testing records are maintained for 3 years.

.03(7) Requirements for mobile devices.

Y N N/A (a) For mobile devices, licensee has two independent physical controls that form tangible barriers to secure the material from unauthorized removal when the device is not under direct control and constant surveillance by the licensee.

.03(8) Security program review.

(a) Continuous Effectiveness of the Security Program

Y N N/A Licensee performs an annual review of the content and implementation of the RAM security program, and takes comprehensive actions to correct non-compliances.

.03(9) Reporting of events.

Y N N/A (a) Licensee immediately notifies LLEA after determining that an actual or

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attempted theft/sabotage/diversion occurred.

Y N N/A (b) Following LLEA notification, notifies LLEA NRC at (301) 415-5100 ASAP, and no later than 4 hours.

Y N N/A (c) Licensee assesses any suspicious activity related to **possible** (*not actual*) theft/sabotage/diversion and makes similar notifications to LLEA and NRC.

Section IV

Chapter 13-.04 Physical Protection In Transit

- .04(1) Additional requirements for transfer of category 1 and category 2 quantities of radioactive material.

.04(1) Transfer of Cat. 1 & Cat 2 quantities

(a) Verification

Y N N/A Prior to transferring a Cat. 1 or Cat. 2 quantity, the licensee verifies with the NRC license verification system or the license issuing authority, that the transferee's license authorizes receipt of the type, form, and quantity of RAM, AND, IF Cat. 1 quantity, the receipt address is authorized. (verification not required for inter-organizational transfers).

Section V

Chapter 13-.06 Records

NA

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Inspection Notes and Observations Not Previously Documented:

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Section VI

Attachments

Attachment 1 :

Category 1 and Category 2 Radioactive Materials

Table 1 – Category 1 and Category 2 Threshold

The terabecquerel (TBq) values are the regulatory standard. The curie (Ci) values specified are obtained by converting from the TBq value. The curie values are provided for practical usefulness only.

Difference: The radioactive material and thresholds are the same; however, the rule provides the Ci value to 3 figures.

Radioactive Material	Category 1 (TBq)	Category 1 (Ci)	Category 2 (TBq)	Category 2 (Ci)
Americium -241	60	1,620	0.6	16.2
Americium – 241/Be	60	1,620	0.6	16.2
Californium – 252	20	540	0.2	5.40
Cobalt – 60	30	810	0.3	8.10
Curium – 244	50	1,350	0.5	13.5
Cesium – 137	100	2,700	1	27.0
Gadolinium – 153	1,000	27,000	10	270
Iridium – 192	80	2,160	0.8	21.6
Plutonium – 147	60	1,620	0.6	16.2
Plutonium – 239/Be	60	1,620	0.6	16.2
Promethium – 147	40,000	1,080,000	400	10,800
Radium – 226	40	1,080	0.4	10.8
Selenium – 75	200	5,400	2	54.0
Strontium – 90	1,000	27,000	10	270
Thulium – 170	20,000	540,000	200	5,400
Ytterbium – 169	300	8,100	2	81.0

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Attachment 2:
Reminders

New Procedures & Documents The Licensee Must Maintain

...

Access Authorization Procedures & Documents

Photocopy of ID, or record of Type, Expiration, ID No. of ID

Written certification that applicant's ID was properly reviewed

Signed Consent Form

Documented basis for concluding an individual is T&R and can be granted access to the security plan and implementing procedures

Documented basis for concluding an individual is T&R and can be granted unescorted access to the security zone.

List of individuals authorized to access sensitive information

List of individuals authorized for unescorted access to the security zone(s)

Security Plan

Implementing Security Procedures

Procedures for the Protection of Sensitive Information

LLEA Information (coordination documents)

Procedures for Shipping (e.g., Notifications and Coordination)

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Attachment 3
Chapter 13 Time Requirements

Time Requirements: Immediate

- Must maintain capability to continuously monitor and detect without delay all unauthorized entries into security zones.”
- Immediately Detect Attempts to remove Cat. 1 Material
- Prompt measures must be taken to ensure an individual who no longer needs unescorted access is prevented from gaining access
- Individuals who no longer require access must be removed ASAP from access authorization list.

Time Requirements: 4 Hours

- Following LLEA notification, notifies DRH ASAP and no later than 4 hours.

Time Requirements: 3 Days

- Notify DRH within 3 days, if
 - LLEA has not responded to a coordination request in 60 days, OR
 - LLEA notifies licensee that the LLEA does not plan to participate in coordination activities

Time Requirements: 4 & 7 Days

- Advanced Notification to DRH & Governors of Cat. 1 Shipment:
 - 4 Days – Phone or Email
 - 7 Days if Mailed
- When no longer required, Remove individual from access authorization list ASAP, but no later than 7 working days

Time Requirements: Weekly

- Perform Weekly Verifications to ensure Cat. 2 Material is Present

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- Verification through physical checks, tamper indicating devices, etc.

Attachment 3 (cont.)

Time Requirements: 10 Days

- Time licensee allows individual to challenge FBI & Criminal History Records Check: 10 days
- If a previous employer, educational institution, etc. fails to provide information within 10 business days (or unwilling or unable), licensee can document that and attempt to obtain the information from an alternate source.

Time Requirements: 90 Days

- Licensee notified DRH in writing at least 90 days before aggregating \geq a Cat. 2 quantity.

Time Requirements: 12 Months

- Security Refresher training (or when significant changes occur)
- LLEA Coordination (or when significant changes occur)
- Alarm Testing (If there is no manufacturer's suggested frequency)

Time Requirements: Annually

- Each licensee shall periodically (at least annually) review:
- The access control program content and implementation, AND
- The security program content and implementation.

Time Requirement 365 Days

- Fingerprinting not required if individual returns to same facility within 365 days, and termination was under favorable conditions.
- 1 Year – Prior to Background Screening Adverse Action, Must Notify Individual and Provide Opportunity to Correct Record. Record of Confirmation of receipt Must be Maintained by Licensee for 1 Year

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- Licensee does not base final T&R determination based on information received from FBI regarding an arrest more than 1 year old with no disposition, or an arrest that resulted in dismissal of the charge.

Attachment 3 (cont.)

Time Requirement 3 Years:

- Maintain for 3 Years:
- Implementing Security Procedures after no longer needed, and superseded portions
- Training, Initial and Refresher
- Information protection procedures
- List of individuals approved for access to the security plan or implementing procedures.
- Alarm System maintenance and testing activities
- Results of annual review of the security program
- Efforts to verify that a receiving licensee is authorized to receive material
- Transportation: documentation for preplanning and coordination
- Copy of the advance notifications and revisions

Time Requirement 5 Years

- Fingerprinting, and the identification and criminal history records checks not required for individual favorably adjudicated under comparable U.S. Government criminal history records check within the last 5 years

Time Requirement 7 Years

- Background Investigations – 7 Years, or time since 18th Birthday, whichever is shorter

Time Requirement 10 Years

- Reviewing Official Recertification
- T&R Recertification

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Attachment 4
Inspection Meeting Form

Inspection Meeting

Licensee: _____

License No.: _____

Date of Meeting: _____

Type of Meeting: Entrance Exit

Please Print

Name:

Title:

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Date:

Attachment 5:
Revisions

Revision		
Draft 1	Convert NRC Part 37 references to DRH Chapter 13	December 15, 2017
Draft 2	Convert Word document to fillable PDF	January 23, 2020