

ATTACHMENT 71130.01

INSPECTABLE AREA: Access Authorization (AA) Program (Behavior Observation only)

CORNERSTONE: Physical Protection

INSPECTION BASES: Completing this inspection program element provides reasonable assurance that the required Behavior Observation Program meets stated objectives. Failure of overall program can compromise the licensee's ability to protect against the insider threat of radiological sabotage.

LEVEL OF EFFORT: Inspection of Access Authorization Behavior Observation Program is conducted annually.

71130.01-01 INSPECTION OBJECTIVE

Verify that the licensee is properly implementing the behavior observation portion of their personnel screening and Fitness-For-Duty (FFD) program.

71130.01-02 INSPECTION REQUIREMENTS

02.01 Inspection Planning

Determine the number of supervisors, managers and escorts to interview. The number selected should nominally include five supervisors/managers, including contractors, and five designated escorts. Defining the number of persons to be interviewed is only intended to approximate a level of effort and establish a baseline sample size considered appropriate to this cornerstone activity. A minimum of three different disciplines (e.g., Operations, Maintenance, Radiation Protection) should be selected. The sample may be targeted toward those supervisors who have not identified any member of their staff to be tested for cause or who were involved in incidents.

If there were no individuals identified by supervisors to be tested for cause, the inspector should concentrate on this area when interviewing supervisors/managers to determine their understanding of the Behavior Observation Program and if they are having daily or more frequent contact with individuals they are supervising.

Request the licensee make available for review: 1) event reports and safeguards log entries, 2) semi-annual FFD reports and licensee condition reports, 3) behavioral observation FFD program indoctrination procedures for new supervisors and escorts, and 4) all other procedures that pertain to the Behavior Observation FFD Program.

02.02 Conducting the Inspection

- a. Review and evaluate licensee event reports and safeguards log entries for the previous twelve months or since the last inspection which are associated with the Access Authorization (AA) and FFD Behavior Observation Program and follow up, if appropriate.
- b. Through interviews, determine the knowledge level of supervisors, managers (including contractor supervisors), and other appropriate staff concerning:
 - 1. Their FFD/AA responsibilities and authorities specified in the program procedures.
 - 2. Techniques for recognizing drug use, possession, and sale.
 - 3. Techniques for recognizing indications of alcohol and aberrant behavior by employees.
 - 4. When “for cause” testing is indicated and to whom to report the information.
 - 5. Procedures to follow for reporting concerns to management or security personnel.
 - 6. Compliance with program requirements if individuals are called out after duty hours.
 - 7. Their knowledge of reports that have been made to plant or corporate management under the Behavior Observation Program.
- c. Interview at least three individuals who perform escort duties and determine if they are knowledgeable and understand their responsibilities concerning the Behavior Observation Program. All individuals should, as a minimum, be able to recognize aberrant behavior and know to whom to report concerns. Should discrepancies be identified, an inspector may increase the number of interviews to six.
- d. During the review of the semiannual FFD reports and licensee condition reports, note the number of for-cause tests administered and/or the number of incidents that would require for-cause testing in accordance with 10 CFR 26.24(a)(3). Confirm through interviews that supervisors are thoroughly familiar with the for-cause testing criteria established in 10 CFR 26.24(a)(3) and the licensee’s FFD policies and procedures. Also confirm through interviews that supervisors understand Behavior Observation Program requirements and have frequent contact with individuals they are supervising.
- e. Verify, through review of procedures and records, that the licensee has implemented a method for new supervisors and escorts to receive behavior observation training in accordance with 10 CFR 26.22.
- f. While conducting the review of the implementing procedures evaluate whether any identified procedure changes reduce the effectiveness of any of the security plans.

02.03 Identification and Resolution of Problems. Verify that the licensee is identifying problems related to the Behavior Observation FFD Program at an appropriate threshold and entering them in the corrective action program. Verify that the licensee has appropriately resolved the concerns regarding regulatory requirements for a selected sample of problems associated with access authorization, if applicable. See Inspection Procedure 71152, "Identification and Resolution of Problems," for additional guidance.

71130.01-03 RESOURCE ESTIMATE

Between approximately 10 and 14 hours of inspection effort per site are allocated annually for this inspection procedure. Sample size for this procedure is 22.

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