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UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

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MEMORANDUM FOR: Reactor Safeguards Licensing Branch

FROM: Robert A. Clark, Chief
Reactor Safeguards Licensing Branch
Division of Operating Reactors, NRR

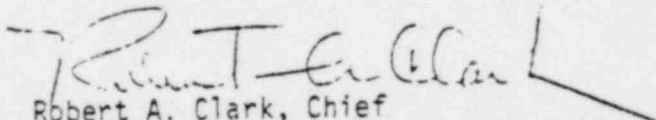
SUBJECT: CHANGING OF HARD KEY/LOCKS UPON EMPLOYEE
TERMINATION - REVIEW GUIDELINE NUMBER 7

10 CFR 73.55 requires that all keys, locks, combinations and related equipment used to control access to protected and vital areas be controlled to reduce the probability of compromise. The rule also requires that whenever there is evidence that any key, lock, combination may have been compromised, it shall be changed. The rule proceeds to require that upon termination of employment of any employee, the keys, locks, combinations and related equipment to which the employee had access shall be changed.

The objective of changing keys, locks, combinations and related equipment upon termination of an employee is to reduce the probability of compromise. For a hard (metal) key and lock system, the objective of reducing the probability of compromise of the keys and locks can be met by a program that changes hard keys and locks on a periodic basis and upon termination of an employee for other than favorable reasons.

The following describes an acceptable method of changing hard keys, locks and related equipment to which a terminated employee had access:

- (1) If an employee is terminated under other than favorable conditions, all keys, locks and related equipment to which he had access shall be changed.
- (2) The keys, locks and related equipment to which a terminated employee had access need not be changed if:
 - (a) The termination was under favorable conditions and the licensee documents this fact, and
 - (b) The licensee periodically (at least once each 12 months) changes or rotates all hard keys and locks for the protected area barrier and all access doors to vital areas.


Robert A. Clark, Chief
Reactor Safeguards Licensing Branch

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