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## INSPECTION PROCEDURE 81200.01

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### ACCESS AUTHORIZATION FOR DECOMMISSIONING NUCLEAR POWER REACTORS

PROGRAM APPLICABILITY: IMC 2202 Appendix A

#### 81200.01-01 INSPECTION OBJECTIVES

01.01 To verify that the licensee's implementation of its access authorization (AA) program is in accordance with the U.S. Nuclear Regulatory Commission (NRC) regulations, NRC-approved security plan, and (as applicable) the most recent revision of the NRC-endorsed Nuclear Energy Institute (NEI) 03-01, "Nuclear Power Plant Access Authorization."

01.02 To verify that the licensee's implementation of its AA program provides assurance that individuals granted unescorted access and who maintain unescorted access are trustworthy, reliable and do not constitute an unreasonable risk to public health and safety or the common defense and security.

01.03 To verify that the licensee's implementation of the behavioral observation component of its AA program provides assurance of continued reliability and trustworthiness of personnel with unescorted access.

01.04 To verify and assess that the licensee's implementation of the provisions of the insider mitigation program is effective in mitigating the passive insider and active insider.

01.05 To verify that the licensee's AA program supports the effective implementation of its physical protection program to protect against the design basis threat (DBT) of radiological sabotage.

#### 81200.01-02 INSPECTION REQUIREMENTS

##### General Guidance

Through verification of the inspection requirements within this inspection procedure, inspector(s) shall ensure that the licensee's security program associated with this procedure provides assurance that the program is designed and implemented in a manner that protects against the DBT of radiological sabotage. In preparing to complete this procedure, the inspector(s) should familiarize themselves with relevant documentation which may include, but is not limited to, the licensee's Physical Security Plan, site-specific and/or corporate implementing procedures, security post orders; all NRC-approved licensing actions (i.e., exemptions, license amendments, alternative measures) and security program reviews and audits. This documentation review should not only be used to gain an understanding of a licensee's implementation in a particular program area, but to also identify the licensee's progress during the transition from operating status to decommissioning. This information should be used as a factor in determining the

scope of the inspection activity to be conducted in each program area. The inspector(s) should consider conducting a review of past security inspection reports for the facility.

The inspector(s) are responsible for ensuring that inspection requirements for AA inspections are completed and evaluated to a level which provides assurance that licensees are meeting NRC regulatory requirements within the security program area being inspected. This guidance is being provided as a tool which: (1) recommends to the inspector(s) certain methods and techniques for determining licensee security program compliance and effectiveness related to an inspection sample or; (2) clarifies certain aspects of a regulatory requirement associated with a particular inspection sample. Where minimum sampling numbers are indicated per sample (i.e., at least three) intrusion detection system zones shall be tested, or at least 20-percent of the total personnel on a shift will be selected for weapons firing etc.), the inspector(s) should adhere as closely as possible to numbers identified in the guidance. The inspector(s) may expand the minimum number to aid in determining the extent of the condition, should compliance concerns arise. Completion of recommended actions contained in this guidance should not be viewed as mandatory. Should questions arise regarding procedural requirements or guidance, inspector(s) should consult with Regional management or the Office of Nuclear Security and Incident Response (NSIR), the program office, for clarification.

In assessing the Licensee's AA program, the inspector(s) must determine whether the licensee's program obtains sufficient information on which to base an initial determination to grant a person unescorted access and a person's trustworthiness and reliability to maintain unescorted access. The total accumulation of information about the person is the basis for the objective. A sound determination requires the assessment of all data provided by the applicant and developed through the investigation to determine whether the applicant has been truthful in providing the information necessary for the reviewing official to decide that the applicant is trustworthy and reliable and does not constitute a risk to the health and safety of the public, and the common defense and security including the risk of committing radiological sabotage.

In no case should a licensee make access decisions by exception through application of best effort. Best effort is limited to the effort applied to a specific past or present employer of the applicant or academic institution attended by the applicant and cannot be used to satisfy requirements for meeting a test to establish trustworthiness and reliability.

After the initial decision to grant unescorted access, the licensee must ensure that each person granted unescorted access is a part of an effective behavioral observation program designed to recognize behaviors that, if left unaddressed, could have an adverse effect on the public health and safety or the common defense and security. The program must also include insider mitigation attributes.

The fitness-for-duty (FFD) program is critically intertwined in the AA program. Therefore, the inspector(s) should include related portions of the FFD program as necessary to ensure that all pre-access activities are incorporated in the overall program and prevent the licensee from granting unescorted access prematurely.

The inspector(s) should review remaining elements of the program to ensure that records are appropriately maintained and protected and that access reviews are sufficiently independent to ensure a person who has been denied unescorted access has an opportunity to present any additional information on the access decision. Licensee procedures should include a description of the access denial review process that demonstrates how determinations made through the process provide final results.

The inspector(s) should review the documentation from a representative sample of AA decisions to identify: (1) cases in which unescorted access was not terminated due to failure to report arrests; (2) cases in which persons testing positive for alcohol or controlled dangerous substances continued to be authorized unescorted access or were returned to unescorted access status after an initial removal; and (3) the rate of for-cause referrals for other than suspected alcohol abuse.

One hour has been allocated within the resource estimate of this inspection procedure (IP) for the inspector(s) to conduct physical protection program status verifications. The purpose of the status verification is to ensure that the implementation of the licensee's physical protection program is maintained in accordance with regulations, licensee security plans and implementing procedures. The inspector(s) should conduct observations of physical protection program elements other than those inspected within this procedure.

#### 02.01 Implementing Procedures

- a. Verify that the licensee implements procedures to ensure that personnel denied unescorted access after January 1, 1997, are included in a common industry database. (Title 10 of the *Code of Federal Regulations* (10 CFR) 73.56(o)(6)(i), 10 CFR 73.56(o)(6)(ii), and NEI 03 01 Section 12.4)

##### Specific Guidance.

When inspecting this requirement, the inspector(s) should review the licensee's procedures to verify that the licensee has established a method to share AA information with other licensees. Specifically, the inspector(s) should verify that the licensee has procedures that outline the implementation of an information sharing mechanism to share information with other licensees pertaining to individuals who have been denied unescorted access as a result of not meeting or maintaining the trustworthiness and reliability criteria for unescorted access in accordance with 10 CFR 73.56.

- b. Verify that the licensee implements procedures to ensure that individuals performing background investigations have met criteria that are consistent with requirements for persons undergoing background investigations. (10 CFR 73.56(k)(1), 10 CFR 73.56(k)(2), NEI 03-01 Section 11.2, and NEI 03-01 Section 11.3)

##### Specific Guidance

To inspect this requirement, the inspector(s) should review the licensee's procedures to verify that the licensee implements measures to determine the trustworthiness and reliability of personnel (background screeners and access authorization program personnel) who collect and process information that will be used by a reviewing official to make unescorted access or unescorted AA determinations consistent with 10 CFR 73.56(k)(i) and (k)(ii). At a minimum, the licensee's procedures should address the following: (1) verification of the individual's true identity; (2) performance of a local criminal history through a State or local court; (3) the conduct of a local credit history evaluation; (4) the conduct of an employment history evaluation covering the last 3 years; and (5) the conduct of a character and reputation evaluation.

- c. Verify that the licensee implements procedures to ensure that persons granted unescorted access are aware and remain aware of their responsibility to report arrests and are notified in writing of their responsibilities. (10 CFR 73.56(f)(2), 10 CFR 73.56(g), and NEI 03-01 Section 10.2)

Specific Guidance

To inspect this requirement, the inspector(s) should review the licensee's procedures to verify that the licensee has an established legal action reporting program that includes, at a minimum, the following: (1) requirements for individuals with or who have applied for unescorted access or unescorted AA to report promptly any legal actions such as arrests, criminal charges, convictions, or proceedings; (2) a method for notifying an individual in writing of his or her obligation to report legal action; and (3) actions that recipients of a legal action report are required to take upon receipt of a report. The legal action reporting program excludes minor civil actions or misdemeanors such as parking violations or speeding tickets.

- d. Verify, by reviewing procedures and records, that the licensee has implemented a method to ensure that all individuals who maintain unescorted access to the protected area (PA), including supervisors and escorts, are subject to a behavioral observation program and receive behavior observation training. (10 CFR 73.56(f)(1), 10 CFR 73.56(f)(2), 10 CFR 26.33, NEI 03-01 Section 10, and NEI 03-01 Section 10.1)

Specific Guidance

When inspecting this requirement, the inspector(s) should review the licensee's implementing procedures, training records, AA records, etc., to determine that the licensee maintains a behavioral observation program, and that all personnel with

unescorted access to the PA is included in the program and receives the appropriate initial and requalification behavioral observation training in accordance with 10 CFR 73.56(f).

- e. Verify that the licensee implements procedures and processes that address obtaining and explaining informed consent, to include the withdrawal of consent, for individuals subject to background investigations required for unescorted access and unescorted AA. (10 CFR 73.56(d)(1) and NEI 03-01 Section 7.1)

Specific Guidance

When inspecting this requirement, the inspector(s) should review the licensee's implementing procedures and/or AA records to verify that the licensee has established a method to obtain informed consent to conduct background investigations on individuals applying for unescorted access/unescorted AA and maintaining unescorted access. The inspector(s) should also verify that these measures include explaining informed consent and the withdrawal of consent to individuals applying for unescorted access/unescorted AA and maintaining unescorted access.

- f. Verify that the licensee's procedures provide details on behavioral observation training. (10 CFR 73.56(f)(2)(ii), 10 CFR 73.56(f)(2)(iii), 10 CFR 73.56(f)(2)(iv), 10 CFR 73.56(f)(2)(v) and NEI 03-01 Section 10.1)

### Specific Guidance

When inspecting this requirement, the inspector(s) should review the licensee's implementing procedures and/or behavioral observation training material to ensure that the training addresses the detection and reporting of behavior or activities that constitute an unreasonable risk to the health and safety of the public and common defense and security, including the potential threat to commit radiological sabotage. The licensee's procedures and/or training materials should address unusual interest in or predisposition towards security and/or involvement in operations activities outside the scope of normal work activities. The training should also address the individual's responsibilities for reporting behavioral observation concerns in accordance with 10 CFR 73.56(f)(3). The inspector(s) should also verify that the licensee has established a method that demonstrates that individuals have completed this training in accordance with 10 CFR 73.56(f)(iii) and 10 CFR 73.56(f)(iv). (e.g., comprehensive examination for initial training and either refresher training or comprehensive examination for nominal annual requalification)

- g. Verify that the licensee's procedures describe how it protects personal information maintained in the licensee's personnel information management system. (10 CFR 73.56(m) and NEI 03-01 Section 14)

### Specific Guidance

When inspecting this requirement, the inspector(s) should review the licensee's procedures to verify that licensee's procedures address the protection of personal information used by the licensee to process the applications of individuals seeking unescorted access or unescorted AA. The licensee's procedures should address specific measures for the protection of this information during the time the information is being used for the determination process as well as once unescorted access has been granted and the personal information is then being maintained in accordance with 10 CFR 73.56(o)(2)(i). Licensees or their contractors and vendors who implement the unescorted AA programs in accordance with these criteria should retain the records on which the AA is based or denied for the duration of the unescorted access and for 5 years following access denial or access termination from the authorizing licensee's program.

## 02.02 Granting Unescorted Access, Reinvestigations, and Maintaining Authorization

- a. Verify that the licensee implements adequate provisions to obtain sufficient information to determine the true identity of applicants for unescorted access. (10 CFR 73.56(d)(3), NEI 03-01 Section 7.3, and NEI 03-01 Supplemental Guidance)

### Specific Guidance

The inspector(s) should review licensee's procedures, records, and practices to verify that the licensee demonstrates measures to validate an individual's true identity. Those measures should include the following minimum requirements: (1) a process to validate that the social security number that the individual has provided is his or hers and, in the case of foreign nationals, validate the claimed non-immigration status that the individual has provided is correct; and (2) a method to determine whether the results of the fingerprinting confirm the individual's claimed identity, if such results are available.

- b. Verify that the licensee conducts employment and education verifications and suitable inquiries within the required time constraints. (10 CFR 73.56(h)(4), NEI 03-01 Sections 7.4, NEI 03-01 Section 8.1, and NEI 03-01 Section 8.2)

Specific Guidance

The inspector(s) should review the licensee's procedures, records, and practices to confirm that the licensee demonstrates methods to verify employment and education and perform suitable inquiries of applicants requesting initial unescorted access or unescorted AA in accordance with 10 CFR 73.56(h)(4). Additionally, the inspector(s) should examine the licensee's processes to confirm that the licensee demonstrates methods to verify employment and education, and performs suitable inquiries of individuals who have previously been granted unescorted AA, but whose access had been terminated or interrupted for a for a period of time.

- c. Verify that the licensee requires applicants to undergo professionally accepted and standardized psychological evaluations as required. (10 CFR 73.56(e), NEI 03-01, Section 7.8)

Specific Guidance

When inspecting this requirement, the inspector(s) should review the licensee's procedures, records, and practices to confirm that the licensee has methods in place to ensure that a psychological assessment is completed before an individual is granted unescorted access or certified unescorted AA. The inspector(s) should also review the psychological assessment that the licensee uses and determine if the assessment is designed to evaluate the possible adverse impact of any noted psychological characteristics on an individual's trustworthiness and reliability. While reviewing the psychological assessment, the inspector(s) should confirm that the licensee's psychological assessment includes, at a minimum: (1) a standardized, objective, professionally accepted psychological test that provides information to identify indications of disturbances in personality or psychopathology that may have adverse implications for an individual's trustworthiness and reliability; (2) a licensed psychiatrist or psychologist established the predetermined thresholds of the test that will be applied in interpreting the results of the psychological test to determine whether an individual must be interviewed by a licensed psychiatrist or psychologist; and (3) the assessment is conducted in accordance with the applicable ethical principles for conducting such assessments established by the American Psychological Association or American Psychiatric Association.

- d. Verify that a clinical interview by a licensed psychiatrist or psychologist is conducted for individuals who provide indication of disturbances in personality or psychopathology during the psychological assessment that may have implications on trustworthiness and reliability. (10 CFR 73.56(e)(4) and NEI 03 01 Section 7.8)

Specific Guidance

For the inspection of this requirement, the inspector(s) should review the licensee's procedures, records, and practices to confirm that clinical interviews are performed by a licensed psychiatrist or psychologist for individuals whose scores on the psychological assessment is outside of the predetermined thresholds that are indicative of

disturbances in personality or psychopathology that may have implications for an individual's trustworthiness and reliability.

- e. Verify that the licensee's reviewing official reviews and evaluates all of the background information required by 10 CFR 73.56 in making AA decisions for individuals applying for unescorted access or unescorted AA. (10 CFR 73.56(h)(1), NEI 03-01 Section 6.1 and NEI 03-01 Supplemental Guidance, Section 6)

Specific Guidance

No inspection guidance.

- f. Verify that the licensee reviews credit history summaries for the entire period identified on personal history questionnaires that are provided. (10 CFR 73.56(d)(5), NEI 03-01 Section 7.5, and NEI 03-01 Supplemental Guidance, Section 7.5)

Specific Guidance

When inspecting this requirement, the inspector(s) should review the licensee's procedures, records, and practices to confirm that the licensee conducts full credit history evaluations of individuals applying for unescorted AA. The licensee's procedures, records, and practices should identify that a full credit evaluation includes, but is not limited to, an inquiry to detect the potential fraud or misuse of social security numbers or other financial identifiers and review an evaluation of all of the information that is provided by a national credit-reporting agency about an individual's credit history. Additional provisions should be included in the licensee's AA program that stipulate methods to perform a credit history review of foreign nationals and U.S. citizens who have resided outside of the U.S. and do not have established credit history that covers at least the most recent 7 years in the U.S. The licensee's credit history evaluation should also include a comparison between the data produced from an individual's credit report to the information the individual submitted on his or her personal history questionnaire.

- g. Verify that the licensee appropriately implements the standard of best effort while conducting employment history evaluations. (10 CFR 73.56(d)(4) and NEI 03-01 Section 7.4.2)

Specific Guidance

The inspector(s) should review the licensee's procedures, records, and practices to confirm that the licensee has methods in place to implement the standard of best effort. Specifically, the licensee's procedures, records, and practices should identify that employment history evaluations are completed on a best effort basis, by questioning an individual's present and former employers, and by determining the individual's activities while unemployed. In no case should a licensee make access decisions by exception. Best effort is limited to the specific effort applied to a specific past or present employer of the applicant and cannot be used for the cumulative satisfaction of the requirements for meeting a test to establish trustworthiness and reliability.

- h. Verify that the licensee appropriately implements the requirements for submitting fingerprints, including the restrictions on requesting name searches

(10 CFR 73.56(d)(3), 10 CFR 73.57(b), NEI 03-01 Section 7.7, and NEI 03-01 Supplemental Guidance, Section 7.7)

Specific Guidance

When inspecting this requirement, the inspector(s) should review the licensee's procedures, records, and practices to confirm that the licensee is submitting fingerprints in accordance with requirements and exceptions set forth in both 10 CFR 73.56(d)(3) and 10 CFR 73.57(b).

- i. Verify that the licensee implements provisions for conducting criminal history and credit history reevaluations within 3 years of the date they were last completed and psychological reassessments within 5 years of the date they were last completed for individuals who perform one or more job functions that are critical to the safe and secure operation of the licensee's facility as identified in 10 CFR 73.56(i)(1)(v)(B). (10 CFR 73.56(i)(1)(v)(B) and NEI 03-01 Section 7.8.2(a))

Specific Guidance

When inspecting this requirement, the inspector(s) should review the licensee's procedures, records, and practices to confirm that the licensee implements provisions for conducting criminal history and credit history reevaluations within 3 years of the date they were last completed and psychological reassessments within 5 years of the date on which the individual was last psychologically assessed. These individuals include:

1. Individuals who have extensive knowledge of protective strategies and design and/or implementation of the plant's protective strategies, including:
  - (a) Site security supervisors
  - (b) Site security managers
  - (c) Security training instructors
  - (d) Corporate security managers
2. Individuals in a position to grant an applicant unescorted access or unescorted AA, including site AA managers.
3. Individuals assigned a duty to search for contraband or other items that could be used to commit radiological sabotage.
4. Individuals who have access, extensive knowledge, or administrative control over plant digital computer and communication systems and networks as identified in 10 CFR 73.54, including:
  - (a) Plant network systems administrators.
  - (b) Information technology personnel who are responsible for securing plant networks (see Regulatory Guide 5.77, "Insider Mitigation Program," for specific guidance regarding information technology personnel).
5. Individuals qualified for and assigned duties as: (1) armed security officers; (2) armed responders; (3) alarm station operators; (4) response team leaders; (5)

armorers as defined in the licensee's or applicant's Physical Security Plan; (5) reactor operators, and (6) senior reactor operators and non-licensed operators (e.g., fuel handlers).

- j. Verify that the licensee reinvestigates all personnel having unescorted access to NRC-licensed facilities. (10 CFR 73.56(h)(6)(i), NEI 03-01 Section 9, and NEI 03-01 Supplemental Guidance, Section 9)

Specific Guidance

No inspection guidance.

- k. Verify that the licensee reviews and evaluates Federal Bureau of Investigation (FBI) criminal history records before authorizing unescorted access (10 CFR 73.57(b), 10 CFR 73.56(d)(7), NEI 03-01 Section 7.7, and NEI 03-01 Supplemental Guidance, Section 7.7)

Specific Guidance

The inspector(s) should review the licensee's procedures, records, and practices to confirm that the licensee reviews and evaluates an individual's Federal Bureau of Investigation criminal history records prior to authorizing unescorted access and considers the information contained in the records in determining the individual's suitability for unescorted access in accordance with 10 CFR 73.57(b).

- l. Verify that the licensee implements AA categories and processes for determinations regarding initial unescorted access, updated unescorted access, and reinstatement of unescorted access. (10 CFR 73.56(h), NEI 03-01 Section 6.2, NEI 03-01 Section 6.3, NEI 03-01 Section 6.4, and NEI 03-01 Section 6.5)

Specific Guidance

When inspecting this requirement, the inspector(s) should review the licensee's procedures to verify that the licensee has established methods for granting unescorted access and certifying unescorted AA for individuals applying for initial unescorted access. Additionally, the inspector(s) should review the licensee's procedures to verify that the licensee has established methods to grant or deny unescorted access or unescorted AA to individuals who have previously been granted unescorted AA, but whose access had been terminated or interrupted for a period of time.

- m. Verify, through a review of records, that the licensee effectively implements a pre-access drug and alcohol testing program for persons requesting unescorted access and a random drug and alcohol testing program for persons maintaining unescorted access. (10 CFR 26.65, 10 CFR 26.67, and NEI 03-01 Section 8.3)

Specific Guidance

No inspection guidance.

- n. Verify that the licensee has provisions in place to reassess and reevaluate information received by/or provided to the licensee on the day of discovery, that may have an effect on the trustworthiness or reliability of a person with unescorted AA. (10 CFR 73.56(g)(1) and NEI 03 01 Section 6.7)

Specific Guidance

No inspection guidance.

- o. Verify that the licensee establishes criteria in accordance with the regulations for verifying the trustworthiness and reliability of individuals who collect process or have access to background information. (10 CFR 73.56(k) and NEI 03-01 Section 11.2)

Specific Guidance

When inspecting this requirement, the inspector(s) should review the licensee's procedures to verify that the licensee has established methods for ensuring that background screeners and access authorization program personnel who provide data management services or perform evaluations of personal information gathered and used as part of the process to screen applicants for unescorted access/unescorted AA under 10 CFR 73.56 (k)(1) and (k)(2)(i-ii) are determined to be trustworthy and reliable to meet the intent of the regulations.

02.03 Behavioral Observation Program and Insider Threat Mitigation

- a. Verify that the licensee's program to allow off-site employees to maintain unescorted access contains provisions for initial and annual re-qualification of behavior observation training for both those employees and their supervisors. (10 CFR 73.56(f)(2)(i) and NEI 03-01 Section 6.6.4(e))

b.

Specific Guidance

No inspection guidance.

- c. Verify that the licensee reassesses and re-approves personnel access lists for vital areas (VAs) at the prescribed frequency to confirm that personnel on the VAs access list have a continued need to access VAs. (10 CFR 73.56(j))

Specific Guidance

The inspector(s) should review the licensee's procedures, records, and practices to confirm that the licensee reassess and reapproves personnel access lists for VAs at the prescribed frequency to confirm that personnel on the VA access list have a continued need to access VAs. Specifically, the licensee's access list for VAs must include: (1) only individuals who have a continued need for access to those specific VAs in order to perform their duties and responsibilities; (2) must be approved by a cognizant licensee or applicant manager or supervisor who is responsible for directing the work activities of the individual who is granted unescorted access to each VA; and (3) the list is updated and re-approved no less than every 31 days.

- d. Verify that the licensee screens individuals on personnel access list to ensure that they have a “continued need” for access to VAs, not just a possibility of needing unescorted access at some undefined time in the future. (10 CFR 73.55(g)(1)(i)(D) and 10 CFR 73.56(j))

Specific Guidance

No inspection guidance.

- e. Verify that the licensee implements provisions for conducting and reviewing annual supervisory reviews. (10 CFR 73.56(i)(1)(iv), NEI 03-01, Section 10.3)

Specific Guidance

No inspection guidance.

- f. Verify that the licensee’s behavioral observation program ensures the ability to recognize and report behaviors or activities adverse to the safe operation and security of the facility. (10 CFR 73.56(f)(1) and NEI 03-01, Section 10)

Specific Guidance

The inspector(s) should review the licensee’s related behavioral observation program procedures, records, and lesson plans to confirm that the licensee ensures that its program ensures the ability to recognize and report behaviors or activities adverse to the safe operation and security of the facility. The licensee’s procedures and/or training materials should also address recognizing and reporting unusual interest in or predisposition towards security and/or involvement in operations activities outside of the scope of normal work activities.

- g. Verify that the licensee’s procedures include a method to validate the implementation of the licensee’s behavior observation program for off-site employees who maintain unescorted access. (10 CFR 73.56(f)(1) and NEI 03-01 Section 10, and NEI 03-01 Section 13)

Specific Guidance

No inspection guidance.

- h. Verify that the licensee documents behavioral observation program training and refresher training. (10 CFR 73.56(o)(3)(i) and NEI 03-01 Section 10.1)

Specific Guidance

No inspection guidance.

02.04 Information Sharing

- a. Verify that the licensee implements measures to ensure that shared information which may have an adverse effect on an individual’s trustworthiness and reliability, is updated

or provided to other licensees or industry entities in a timely fashion so informed AA decisions can be made. (10 CFR 73.56(o)(6)(i) and NEI 03-01 Section 12.8)

#### Specific Guidance

When inspecting this requirement, the inspector(s) should review the licensee's procedures, records, and practices to confirm that the licensee implements measures to ensure that shared information which may have an adverse effect on an individual's trustworthiness and reliability is updated or provided to other licensees or industry entities in a timely fashion. Specifically, the inspector(s) should review the licensee's AA program to confirm that the licensee has methods in place to ensure if/when shared information is developed about an individual; the licensee who acquired the information shall correct or augment the data and ensure it is shared with other licensees. If the information has implications for adversely affecting an individual's trustworthiness and reliability, the licensee who discovered or obtained the information, informs the reviewing official of any licensee AA program under which the individual is maintaining his or her unescorted AA or unescorted access status of the updated information on the day of the discovery.

- b. Verify that the licensee or entity ensures that violations, within its respective FFD program, are identified to any licensee having taken credit for the activities of the licensee in violation and to any licensee who may attempt to take credit for the activities of the licensee in violation. (NEI 03-01 Section 12.8)

#### Specific Guidance

When inspecting this requirement the inspector(s) should review the licensee's process for the sharing of FFD information related to AA to ensure that a process exists to inform other licensees or entities (whom may have taken credit for/used this licensee's/entity's FFD program information) of violations within their respective FFD program.

- c. Verify that the licensee implements a method to share information pertaining to individuals who have unescorted access or unescorted AA with other licensees or entities who are required to maintain AA programs in accordance with 10 CFR 73.56. (10 CFR 73.56(o)(6) and NEI 03 01 Section 12)

#### Specific Guidance

The inspector(s) should review the licensee's procedures, records, and practices to confirm that the licensee has methods in place to share information pertaining individuals who have unescorted access or unescorted AA with other licensees and entities who are required to maintain AA programs. Specifically, the inspector(s) should review the licensee's AA program to confirm that the licensee has methods in place to ensure the following:

1. Licensees who are authorized to add or manipulate data, within an information-sharing mechanism that is shared with other licensees, ensures that the data linked information about individuals who have applied for unescorted AA, as specified in licensee AA program documents, is retained.

2. If the shared information used for determining an individual's trustworthiness and reliability changes or new or additional information is developed about the individual, the licensee who is acquiring this information shall correct or augment the data contained within the information-sharing mechanism. If changed, additional, or developed information that has implications for adversely affecting an individual's trustworthiness and reliability, the licensee who discovered or obtained the information, informs the reviewing official of any licensee AA program under which the individual is maintaining his or her unescorted AA or unescorted access status of the updated information on the day of the discovery.
  3. The receiving licensee's reviewing official evaluates the information and takes appropriate actions, which may include denial or unfavorable termination of unescorted AA or unescorted access.
  4. If the information-sharing mechanism is unavailable and notification of change or updated information is required, the licensee takes manual actions to ensure that the information is shared, and the data is updated in the information-sharing mechanism as soon as reasonably possible.
  5. Records that are maintained in the database are available for NRC review.
- d. Verify that the licensee denies access to the PA for personnel who have been denied access based on NRC requirements. (10 CFR 73.56(h)(3) and NEI 03 01 Section 12.7)

Specific Guidance

No inspection guidance.

- e. Verify that the licensee ensures that personnel, with unescorted access or unescorted AA, who are in a licensee's, contractor's or vendor's FFD follow-up program are identified to any subsequent licensee or entity to enable continuation of the follow-up activities by the receiving licensee or entity. (10 CFR 26.69(e)(1) and NEI 03 01 Section 12.5)

Specific Guidance

The inspector(s) should review the licensee's procedures, records, and practices to confirm that the licensee has methods in place to ensure that personnel with unescorted access or unescorted AA, who are in a licensee's, contractor's, or vendor's FFD follow-up program, are identified to any subsequent licensee or entity to enable continuation of the follow-up activities by the receiving licensee or entity. Specifically, the inspector(s) should review the licensee's AA program to confirm that when the licensee imposes FFD treatment and/or a follow-up testing plan that the licensee ensures that information documenting the treatment and/or follow-up testing plan is identified to any subsequent licensee or entity who seeks to grant authorization to the individual.

- f. Verify that the licensee implements a method to share information pertaining to the access denial of individuals with other licensees and entities who are required to maintain AA programs in accordance with 10 CFR 73.56. (10 CFR 73.56(o)(6) and NEI 03-01 Section 12.4)

Specific Guidance

No Inspection guidance.

- g. Verify that the licensee implements backup manual procedures and processes for sharing information. (10 CFR 73.56(o)(6)(ii) and NEI 03-01 Section 12.9)

Specific Guidance

When inspecting this requirement, the inspector(s) should review licensee's procedures, records, and practices to confirm that the licensee maintains backup manual procedures and processes for sharing information. Specifically, the inspector(s) should review the licensee's AA program to confirm that, in the event of a failure of the primary information sharing method occurs, that the licensee maintains a backup process of manual information exchange is available for short-term use.

02.05 Personnel Information Management

- a. Verify that the licensee implements a personnel information management system to protect personal and confidential information. (10 CFR 73.56(m) and NEI 03-01 Section 14)

Specific Guidance

When inspecting this requirement, the inspector(s) should review the licensee's procedures, records, and practices to confirm that the licensee implements and maintains a personnel information management system to protect personal and confidential information. Additionally, and where applicable, this includes the licensee's obtaining a release (consent) form from non-citizens prior to querying the Department of Homeland Security Systematic Alien Verification for Entitlement (DHS-SAVE) database. This is applicable to unescorted and escorted access whether the licensee is or has used the DHS-SAVE database. The DHS-SAVE database is administered by the United States Citizenship and Immigration Services (USCIS) of DHS. The NRC has entered into a memorandum of understanding with USCIS for the use of the DHS-SAVE database by its licensees. The SAVE database enables NRC licensees, opting to use SAVE, to verify the legal status of non-citizens seeking access to NRC-licensed facilities. The NRC security Order, AA, enclosures 3 and 4, January 7, 2003, recommended the use of a federal database to verify the immigration status of non-citizens accessing the PA of nuclear power plants. The DHS-SAVE database fulfills this recommendation.

- b. Verify that the licensee's information management system protects information stored or transmitted in electronic format. (10 CFR 73.56(m) and NEI 03-01 Section 14)

Specific Guidance

No inspection guidance.

- c. Verify that the licensee's information management system prohibits unauthorized access to the information and prohibits modification of the data without proper authorization. (10 CFR 73.56(m) and NEI 03-01 Section 14)

### Specific Guidance

No inspection guidance.

#### 02.06 Reviews

Events and Logs. Review licensee event reports, safeguards log entries and corrective action program entries for the previous 12 months (or since the last inspection) that concern the AA program, and follow up, if appropriate.

Security Program Reviews. Verify that the licensee is conducting security program reviews in accordance with 10 CFR 73.55(m) and that the licensee's AA program was included in a review as required by the regulation. (10 CFR 73.55(m) and Security Plan)

Identification and Resolution of Problems. Verify that the licensee identifies problems with the AA program and its integration with the FFD program in an appropriate manner and enters the problems in its corrective action program. Verify that the licensee has appropriately resolved the regulatory requirement issue for a selected sample of problems with AA. (10 CFR 73.55(b)(10))

### Specific Guidance

The inspector(s) should review safeguards log entries, licensee condition reports, licensee corrective action program entries, etc., for the previous 12 months to determine whether the licensee has experienced issues with the implementation of its AA program. The inspector(s) should follow-up on issues identified to ensure the licensee has taken appropriate corrective actions to prevent re-occurrence of issues identified.

For the inspection of this requirement, the inspector(s) should review the documented results of the security program reviews or audits performed by the licensee to ensure the continued effectiveness of its AA program. The inspector(s) should ensure that reviews have been conducted in accordance with requirements of 10 CFR 73.55(m). The inspector(s) should also request that the licensee provide a copy of the report that was developed and provided to licensee management for review. The inspector(s) should review the report to identify any finding that was identified via the review or audit to ensure the finding was entered in the licensee's corrective action program.

#### 81200.01-03 PROCEDURE COMPLETION

The decommissioning security inspection program for power reactor facilities that have permanently shutdown emphasizes a balanced look at a cross section of licensee activities important to the conduct of safety and security at decommissioning sites. Licensee decommissioning security programs and procedures should be assessed to ensure that they afford a comparable level of quality, rigor, and effectiveness as those in existence during reactor power operations. The decommissioning security inspection program also provides Regional Administrators flexibility in the application of inspection resources to deal with issues and problems at specific plants. Therefore, all inspection requirements need not be completed for

every particular inspection. However, the inspector(s) should perform a minimum of 50 percent of the applicable inspection requirements within this inspection procedure to ensure the objectives of this inspection procedure are met.

#### 81200.01-04 RESOURCE ESTIMATE

The resource estimate for this inspection procedure is approximately 24 hours of direct on-site inspection effort every 3 years. Inspection hour estimates are based on current experience and will be reviewed and revised periodically. It is expected that actual inspection hours will vary from site to site and from the estimate depending on the level of security at a specific decommissioning site. Inspection hours shall be pre-planned, tailored to the particular licensee, and scheduled. The sample size for this procedure is 1.

END

Attachment 1: Revision History for IP 81200.01

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Commitment Tracking Number	Accession Number Issue Date Change Notice	Description of Change	Description of Training Required and Completion Date	Comment Resolution and Closed Feedback Form Accession No. (Pre-Decisional Non-Public Information)
	ML13234A305 10/21/14 CN 14-025	Initial issuance. Commitments for last 4 years researched and none found.	N/A	ML14164A182
	ML20009E484 05/07/20 CN 20-024	Revising agency transparency to bring into alignment with language of operating reactors	N/A	ML20009E485