
INSPECTION PROCEDURE 81000.07

SECURITY TRAINING

Effective Date: January 1, 2025

PROGRAM APPLICABILITY: IMCs 2200 A, 2562

81000.07-01 INSPECTION OBJECTIVES

- 01.01 To verify and assess the licensee has developed and is implementing or is prepared to implement its nuclear security training program in accordance with the U.S. Nuclear Regulatory Commission (NRC) requirements, NRC-approved security plans, and any other applicable requirement.
- 01.02 To assess security-personnel knowledge, skills, and abilities to conform with the licensee training and qualification (T&Q) plan, regulatory requirements, and any other applicable NRC requirement.
- 01.03 To verify required security equipment assigned to security personnel meets the objectives outlined in the licensee's T&Q plan, NRC regulatory requirements, and any other applicable requirement.
- 01.04 To verify that the licensee's physical protection program associated with this sample is designed and implemented, or is prepared to implement, to meet the general performance objectives of Title 10 of the *Code of Federal Regulations* (10 CFR) 73.55(b).

81000.07-02 INSPECTION REQUIREMENTS

General Guidance

This inspection procedure (IP) was developed to ensure the operational program established for implementation at a plant licensed in accordance with 10 CFR Part 50 or 10 CFR Part 52 meets all NRC requirements and objectives for operational program readiness. Note that this inspection is conducted as licensees activate the operational program in accordance with IMC 2200, Appendix A, "Security Construction Inspection Program," or IMC 2562, "Light-Water Reactor Inspection Program for Restart of Reactor Facilities Following Permanent Cessation of Power Operations." For reactors under construction, this IP is applicable to all power reactors under construction that are subject to oversight under the NRC's Construction Reactor Oversight Process (cROP). For restart of reactor facilities following termination of an operating license, this IP is applicable for transitioning from a decommissioned or extended shutdown reactor facility to an operational power reactor facility subject to the Reactor Oversight Process (ROP). Therefore, verification through observation of activities may not be possible. In such cases, the inspector(s) should review the appropriate licensee procedures and conduct inspections of all associated areas to ensure program compliance upon implementation.

Through verification of the inspection requirements within this IP, inspector(s) shall ensure that the licensee's physical protection program associated with this sample is designed and implemented, or is prepared to be implemented, to meet the general performance objectives of 10 CFR 73.55(b).

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 security plans, site-specific and/or corporate implementing procedures, security post orders, and security program reviews and audits. Specifically, the inspector(s) should apply additional attention to recent security plan changes that could be relevant to the inspection activity.

The inspector(s) are responsible for ensuring that every sample in the IP is completed and evaluated to a level which provides assurance that licensees are meeting NRC regulatory requirements within the security program area being inspected. The guidance within this procedure is being provided as a tool which: (1) recommends to inspector(s) certain methods and techniques for determining licensee security program compliance and effectiveness related to an inspection requirement or; (2) clarifies certain aspects of a regulatory requirement associated with a particular inspection requirement. Where minimum sampling numbers are indicated (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.), inspector(s) should adhere as closely as possible to the numbers identified in the guidance. Inspector(s) may expand the minimum number to aid in determining the extent of the condition, should compliance concerns arise. Completion of other recommended actions contained in this guidance should not be viewed as mandatory and is only intended to assist inspector(s) in determining whether an inspection sample has been adequately addressed. 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.

The inspector(s) should determine the licensee's approach to training. The approach should be detailed in the licensee's T&Q plan. However, if it is not readily apparent from the T&Q plan, the inspector(s) should meet with appropriate licensee management and security training personnel to determine the approach that the licensee employs to train and qualify security personnel. With the exception of firearms, the inspector(s) should also ascertain whether the licensee, upon implementation of their operational program, will conduct qualification and re-qualification activities in the classroom, on shift, or a combination of the two.

In some instances, it may be beneficial to culminate this inspection effort with interviews of security personnel to determine whether personnel have the requisite knowledge. This may allow for independent verification of some aspects of training data collected during the inspection. When conducting interviews, the inspector(s) should avoid distracting the officer from his primary duties. The inspector(s) should also be sensitive to allegations and the processes to ensure proper handling. Whenever possible, and as appropriate, interviews should be conducted at the duty location.

The inspector(s) shall not handle licensee weapons that are assigned to post. If the inspector(s) have questions about the functionality or accuracy of the weapon(s) system, the inspector(s) shall ask the licensee to demonstrate the function of the weapon(s) system. If the inspector(s) determine a need to handle a weapon, the inspector(s) shall request that a qualified member of the security organization transfer the weapon to the range, armory, or any other place the licensee deems safe for the inspector(s) to handle the weapon(s). The inspector(s) shall confirm

with the licensee that the weapon(s) are in a cleared and safe condition before the inspector(s) handles the weapon(s).

One hour has been allocated within the resource estimate of this 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 to determine overall security program operational readiness. The inspector(s) should conduct observations of physical protection program elements, other than those inspected within this procedure, to ensure continued operational readiness.

An additional 3 hours have been allocated within the resource estimate of this inspection procedure for the inspector(s) to verify that licensees who have been approved for standalone preemption authority meet the requirements of 10 CFR 73.15.

02.01 T&Q Plan and Implementing Procedures

- a. **Verify that the licensee has established, maintains, implements, and follows an NRC-approved T&Q plan that describes how the criteria set forth in 10 CFR Part 73, Appendix B, Section VI will be implemented. (10 CFR 73.55(c)(4), 10 CFR Part 73, App. B, Sec. VI, A.3.)**

Specific Guidance

To inspect this requirement, the inspector(s) should review the licensee's NRC approved security plans to verify that the licensee has established, maintains, and implements, and follows a T&Q plan that describes how the criteria set forth in 10 CFR Part 73, Appendix B, will be implemented. Specifically, the T&Q plan must describe how the minimum T&Q requirements will be met and include the process by which all individuals will be selected, trained, equipped, tested, and qualified.

The licensee must identify, in the T&Q plan, the critical tasks that must be performed to provide a specified security function and the minimum level of knowledge, skills, and abilities required by assigned personnel to ensure that the intended function can be performed. Those areas of knowledge, skills, and abilities required by security personnel to carry out their assigned duties and responsibilities must be identified and accounted for in the site-specific security training program and implementing procedures. The security training program must contain a list of elements that support each critical task and identify specific knowledge, skills, and abilities to be met for each qualification. In addition to reviewing the T&Q plan, the inspector(s) should also meet with appropriate licensee management and security training personnel to determine the approach that the licensee employs to train and qualify security personnel.

- b. **Verify that the licensee has established measures to ensure armed members of the security organization participate in weapons range activities at the periodicity required by 10 CFR Part 73, Appendix B, Section VI. (10 CFR Part 73, App. B, Sec. VI, E.1.(f))**

Specific Guidance

For the inspection of this requirement, the inspector(s) should review the licensee's security plans, implementing procedures, and training records to verify that the licensee

requires armed members of the security organization to participate in weapons range activities on a nominal 4-month periodicity. Performance may be conducted up to 5 weeks before or 5 weeks after the scheduled date. The next scheduled date must be 4 months from the originally scheduled date.

- c. **Verify that the licensee has established measures that do not allow any individual to perform any security function, assume any security duties or responsibilities, or return to security duty until that individual satisfies the T&Q requirements of 10 CFR Part 73, Appendix B, Section VI, and the NRC-approved T&Q plan. This includes facilities personnel who perform security tasks. (10 CFR Part 73, App. B, Sec. VI, A.6.)**

Specific Guidance

To inspect this requirement, the inspector(s) should review the licensee's security plans, procedures, and training records to verify that the licensee does not allow any individual to perform any security function, assume any security duties or responsibilities, or return to security duty until that individual satisfies the T&Q requirements of 10 CFR Part 73, Appendix B and the NRC-approved T&Q plan. Specifically, the inspector(s) should review samples of training records for the following personnel: members of the security organization, members of the security organization who have returned to duty after an extended leave (e.g., illness or military deployment), and facility personnel who have been trained and qualified to perform security tasks. While reviewing these records, the inspector(s) should look for T&Q plan and implementing procedure compliance regarding the fulfillment of applicable T&Q requirements as outlined in 10 CFR Part 73, Appendix B. Dependent upon the individual's security duties, the T&Q requirements to be inspected may include:

1. employment suitability and qualification (e.g., education, age, criminal history, physical, and medical requirements);
2. position-specific duty T&Q;
3. requalification;
4. weapons T&Q; and,
5. inclusion into the site's critical group.

- d. **Verify that the licensee has established measures to ensure that firearms T&Qs are conducted by a certified firearms instructor. (10 CFR Part 73, App. B, Sec. VI, E.1.(b)(1))**

Specific Guidance

For the inspection of this requirement, the inspector(s) should review the licensee's security plans, implementing procedures, and T&Q records to verify that the licensee's firearms T&Qs are conducted by certified firearms instructors. Firearms instructors must be trained and certified by a State or nationally recognized entity for each weapon type (i.e., handgun, rifle, shotgun) for which the individual will be providing instruction. Firearms instructors must follow the recertification criteria set by the certifying entity, but recertification must occur at least every 3 years. A certified firearms instructor must train and qualify members of the security organization for the use and maintenance of each assigned weapon to include, but not be limited to, marksmanship, assembly, disassembly, cleaning, storage, handling, clearing, loading, unloading, and reloading. Examples of a recognized entity may be the National Rifle Association's (NRA's) Law

Enforcement Firearms Instructor courses and those offered by a Federal, State, or State-certified local law enforcement agency.

- e. **Verify through the observation of weapons course demonstrations that weapons T&Qs are conducted in accordance with 10 CFR Part 73, Appendix B requirements and the licensee's NRC-approved T&Q plan and implementing procedures. (10 CFR Part 73, App. B, Sec. VI, F.1.)**

Specific Guidance

To inspect this requirement, the inspector(s) should select a sample of personnel for a firearms demonstration, which includes all assigned firearm types. Firearms activities should be coordinated with the licensee prior to the inspection. The inspector(s) should select armed personnel who have demonstrated a range of proficiency. Firearms training records should denote shooting proficiency qualification scores. The inspector(s) should ensure that marginal shooters are included in the sample.

For this inspection effort, the size of the sample of personnel subject to this demonstration should be no more than 20 percent of the total personnel on shift who maintain firearms qualifications with the firearms selected for the demonstration. For example, five would be the sample size for a shift of 23 to 27 personnel, while six would be the sample size for a shift of 28 to 32 personnel.

Prior to observing the actual demonstration of weapons qualification courses, the inspector(s) should review the licensee's courses of fire as identified in the licensee's T&Q plan and implementing procedures. While observing the courses of fire, the inspector(s) should determine if the licensee is conducting the courses as identified in their security plans and implementing procedures.

While observing the weapons demonstration, the inspector(s) should adhere to the licensee's range safety guidelines. The inspector(s) should also be considerate of the licensee's range instructor(s) responsibilities during range activities.

The inspector(s) should be careful to minimize distracting the instructor(s) attention away from their range responsibilities to prevent any safety issues.

02.02 Initial Training

- a. **Verify that, before being permitted to perform any security-related duty or responsibility, personnel have been trained, equipped, and qualified to perform each assigned security-related job task or duty. (10 CFR Part 73, App. B, Sec. VI, C.1.)**

Specific Guidance

To inspect this requirement, the inspector(s) should review security plans, implementing procedures, and a sample of training records for individuals assigned security tasks to determine that prior to performing assigned security-related job tasks or duties, security personnel have been trained, equipped and qualified. If the licensee qualifies facility personnel (e.g., warehouse personnel) to perform security-related job tasks or duties, review a sample of records to determine whether there has been adequate training, qualification and certification prior to performance.

- b. Verify that each individual who is assigned duties and responsibilities identified in the NRC-approved security plans are trained and qualified in the use of all equipment or devices required to effectively perform all assigned tasks. (10 CFR Part 73, App. B, Sec. VI, C.1.(b)(3))**

Specific Guidance

For the inspection of this requirement, the inspector(s) should review the licensee's security plans, implementing procedures, and observe daily security operations activities to develop an understanding of the applicable equipment and devices that individuals use to perform their assigned security tasks. The inspector(s) should then review training records and lesson plans to ensure that individuals are trained and qualified in the use of the equipment prior to being assigned the security task(s) for which the equipment is used.

For example, if the licensee's NRC-approved security plans identify that all armed responders shall be equipped with a gas mask, then the inspector(s) should select a sample of armed responder's training records to verify that those armed responders have been trained and qualified in the use of the gas mask.

- c. Verify that the licensee's security training program for armed and unarmed individuals includes a qualification demonstration which incorporates written exams and hands-on performance, as prescribed in 10 CFR Part 73, Appendix B, Section VI. (10 CFR Part 73, App. B, Sec. VI, D.1.)**

Specific Guidance

To inspect this requirement, the inspector(s) should review the licensee's security plans, implementing procedures, and related training documentation to verify that the licensee's T&Q program for armed and unarmed individuals includes a qualification demonstration which incorporates written exams and hands-on performance. Individuals assigned security duties and responsibilities must demonstrate the required knowledge by completing an initial written examination on security duties as identified in the NRC-approved T&Q plan. A minimum score of 80 percent is required to demonstrate an acceptable understanding of assigned duties and responsibilities, to include the recognition of potential tampering involving both safety and security equipment and systems. The licensee must administer the written examination before assigning security-related duties. Individuals assigned security duties and responsibilities must demonstrate the ability to perform their assigned duties and responsibilities through practical hands-on performance of required tasks. The hands-on performance demonstration must ensure that theoretical applications and associated learning objectives for each required task are considered, and that each individual demonstrates the knowledge, skills, and abilities required to effectively perform the task. Elements or critical tasks categorized as M (must-perform), must be performed annually and are not subject to the Systematic Approach to Training analysis process.

- d. Verify that the licensee has established measures to administer an annual written examination on armed duties for armed security personnel that include those elements listed in the NRC-approved T&Q plan. (10 CFR Part 73, App. B, Sec. VI, D.1.(b)(3)).**

Specific Guidance

For the inspection of this requirement, the inspector(s) should review the licensee's security plans, implementing procedures, and associated training documentation to verify that the licensee administers an annual written examination on armed duties for armed security personnel. The examination must include a minimum score of 80 percent to demonstrate an acceptable understanding of assigned duties and responsibilities. Additionally, the examination is expected to include, at a minimum, the following elements:

1. the role of security personnel in supporting safe operations of the facility;
 2. the use of deadly force, including the guidelines used in the application, escalation, and de-escalation of force;
 3. 10 CFR Part 73 requirements for the protection of safeguards information;
 4. the authority of private security personnel;
 5. knowledge of who has the power of arrest and the authority to detain;
 6. the authority to search individuals and seize property;
 7. offsite law enforcement response;
 8. tactics and force that an adversary group might use to achieve its objectives; and
 9. response force deployment, tactical movement, withdrawal, and use of support fire.
- e. **Verify that armed security personnel achieve at least a minimum score of 80 percent on written examinations to ensure that personnel assigned armed duties demonstrate an acceptable level of knowledge of such duties. (10 CFR Part 73, App. B, Sec. VI, D.1.(b)(3))**

Specific Guidance

No inspection guidance.

- f. **Verify that the licensee trains each armed member of the security organization in the use-of-force, to include the use of deadly force, as authorized by applicable State or Federal law. (10 CFR 73.55(k)(3) and 10 CFR Part 73, App. B, Sec. VI, E.1.(e))**

Specific Guidance

To inspect this requirement, the inspector(s) should review security plans, implementing procedures, and associated training documentation (to include lesson plans and training records) to verify that armed members of the security organization are trained in the use-of-force, to include deadly force. The licensee must ensure that all armed members of the security organization are instructed on the use-of-force continuum, including the use of deadly force, as authorized by applicable State law. Each member of the security organization, commensurate with his or her assigned duties, must thoroughly understand the proper use-of-force within the force continuum. The inspector(s) should also interview a sample of those personnel responsible for the use-of-force to ensure that the requisite knowledge is maintained throughout the security organization.

- g. Verify that the licensee's T&Q program for security personnel ensures that security personnel are trained in recognizing obvious indications of tampering consistent with their assigned duties and responsibilities. (10 CFR 73.55(i)(5)(vii) and 10 CFR Part 73, App. B, Sec. VI, D.1.(b)(1))**

Specific Guidance

No inspection guidance.

- h. Verify that the licensee's NRC-approved T&Q plan includes the weapons training requirements as prescribed in 10 CFR Part 73, Appendix B, Section VI. (10 CFR Part 73, App. B, Sec. VI, E.1.(d))**

Specific Guidance

For the inspection of this requirement, the inspector(s) should review the licensee's security plans, implementing procedures, and associated training documentation (e.g., lesson plans) to verify that the licensee's NRC-approved T&Q plan includes the weapons training requirements as prescribed in 10 CFR Part 73, Appendix B, Section VI. The NRC-approved T&Q plan must include, but is not limited to, the following areas:

1. mechanical assembly, disassembly, weapons capabilities, and fundamentals of marksmanship;
2. weapons cleaning and storage;
3. combat firing, day and night;
4. safe weapons handling;
5. clearing, loading, unloading, and reloading;
6. firing under stress;
7. zeroing duty weapon(s) and weapons sighting adjustments;
8. target identification and engagement;
9. weapon malfunctions;
10. cover and concealment; and
11. weapons familiarization.

- i. Verify that appropriate armed members of the security organization perform daylight and night fire qualification courses for all enhanced weapons employed by the licensee that are not described in 10 CFR Part 73, Appendix B, Section VI. (10 CFR Part 73, App. B, Sec. VI, F.4.(d))**

Specific Guidance

For the inspection of this requirement, the inspector(s) should review security plans, implementing procedures, and associated training documentation (to include courses of fire and a sample of training records) to verify that armed members of the security organization meet the licensee's daylight and night fire weapons qualification courses, as outlined in 10 CFR Part 73, Appendix B, Section VI, for all enhanced weapons not described in 10 CFR Part 73, Appendix B, Section VI. All armed personnel assigned duties and responsibilities involving the use of enhanced weapons must be qualified on each enhanced weapon prior to being assigned duties to employ those weapons.

- j. **Verify that armed members of the security organization meet the daylight and night fire qualification requirements outlined in 10 CFR Part 73, Appendix B, Section VI for each firearm that is applicable to the member's assigned duties and responsibilities prior to being assigned the duty. (10 CFR Part 73, App. B, Sec. VI, F.3.(a) and 10 CFR Part 73, App. B, Sec. VI, F.3.(b))**

Specific Guidance

For the inspection of this requirement, the inspector(s) should review security plans, implementing procedures, and associated training documentation (to include courses of fire and a sample of training records) to verify that armed members of the security organization meet the licensee's daylight and night fire weapons qualification courses, as outlined in 10 CFR Part 73, Appendix B, Section VI, and the licensee's NRC-approved T&Q plan. All armed personnel assigned duties and responsibilities involving the use of weapons must be qualified on each weapon type that the individual will be assigned.

For licensees who use multiple sighting systems, all armed members of the security organization must qualify with the weapon's primary sighting system and successfully complete familiarization training with applicable weapons using each secondary sighting system (i.e., optics, thermal scope, iron sights) as required to implement the site's protective strategy. The inspector(s) should verify that the qualifying score for annual daylight qualification courses must be an accumulated total of 70 percent with the handgun and shotgun, and 80 percent with the semiautomatic rifle. Verify that the qualifying score for annual night fire qualification courses must be an accumulated total of 70 percent with the handgun and shotgun, and 80 percent with the semiautomatic rifle.

- k. **Verify that, before they are assigned armed response duties, that armed members of the security organization qualify with an accumulated total of 80 percent of the maximum obtainable score on the annual tactical qualification. (10 CFR Part 73, App. B, Sec. VI, F.3.(c))**

Specific Guidance

For the inspection of this requirement, the inspector(s) should review a sample of training records associated with the annual tactical qualification course to verify that armed personnel successfully qualify with a minimum passing score of 80 percent, prior to being assigned armed response duties.

- l. **Verify, through observation, that the licensee conducts an annual tactical qualification course that simulates site-specific conditions under which assigned personnel are required to carry out their assigned duties. (10 CFR Part 73, App. B, Sec. VI, F.2)**

Specific Guidance

To inspect this requirement, the inspector(s) should review security plans, implementing procedures, and associated training documentation (to include the tactical course of fire and training records) to verify that the licensee has developed, conducts, and maintains an annual tactical qualification course that simulates site-specific conditions under which

assigned personnel are required to carry out their duties in accordance with the licensee's protective strategy.

The licensee's tactical qualification course should include the following elements:

1. combined use of handguns (if carried) and shoulder-fired weapons employed during a contingency event;
2. firing from a reasonable and representative facsimile of licensee defensive positions, elevations, and distances;
3. appropriate levels of stress and physical demands (e.g., engaging targets while on the move);
4. proper cover and concealment tactics while engaging multiple targets, moving targets, and decision-making targets;
5. the ability to transition from one type of firearm to another (in the event of a weapons malfunction or change in deployment technique);
6. the ability to recover from simulated weapon malfunctions (e.g., dummy rounds);
7. adherence to the safe handling of firearms during simulated courses of fire;
8. firing at multiple targets, loading, and reloading while wearing a protective mask (gas mask);
9. non-dominant (support) hand shooting; and
10. use of the minimum quantity of combined handgun and shoulder-fired weapon ammunition necessary to demonstrate the ability to effectively implement the licensee's protective strategy.

Qualification standards should be based on the percentage derived from the number of targets successfully engaged and the successful completion of the course within the specified time. To determine the qualifying score, the licensee should establish a basis for the maximum achievable score/percentage for the weapons operation and marksmanship aspect of the course (e.g., 100/100 percent). A point value should be assigned to each target consistent with the total number of targets within the course that equals the maximum achievable score/percentage (e.g., 25 targets at 4 points each equals 100/100 percent). The licensee should then establish a basis for the maximum allowable time to successfully complete the course. For this aspect of the qualification criteria, the licensee should use known timelines consistent with the implementation of its protective strategy for movement, tactics, and the negotiation of obstacles within the course. The standard should also include reasonable consideration for the time duration of firing engagements (target exposure time), range equipment operations (delays in target system operations), and safety (any measure instituted to increase safety). The standard for the maximum allowable time to successfully complete the course could be associated with a percentage of score or a pass/fail in the form of a time limitation. Each licensee must document its methodology for determining that successful completion of its tactical qualification course demonstrates acceptable proficiency. The expectation for the qualification criteria of this course must not be less than the minimum total of 80 percent and a time that is less than the maximum allowable time limit as identified in the licensee's NRC-approved T&Q plan and implementing procedures. For specific guidance on the above-mentioned required tactical qualification course elements, the inspector(s) should reference Regulatory Guide 5.75, "Training and Qualification of Security Personnel at Nuclear Power Reactor Facilities."

02.03 On-the-Job (OJT) Training

- a. **Verify that the licensee's T&Q program includes OJT training performance standards and criteria to ensure that each individual demonstrates the requisite knowledge, skills, and abilities needed to effectively carry out assigned duties and responsibilities before the individual is assigned the duty or responsibility. (10 CFR Part 73, App. B, Sec. VI, C.2.(a))**

Specific Guidance

For the inspection of this requirement, the inspector(s) should review the licensee's security plans, implementing procedures, and associated training documentation (to include a sample of individual training records) to verify that the licensee's T&Q program includes OJT performance standards and criteria for each individual assigned security duties and responsibilities. OJT performance standards and criteria must ensure that each individual demonstrates the requisite knowledge, skills, and abilities for effective performance of assigned duties and responsibilities. The licensee must implement OJT to ensure that individuals have a basic level of hands-on experience in nuclear security functions before they are considered qualified and assigned duties and responsibilities. Licensees may consider the use of a formalized OJT checklist to identify those duties and responsibilities associated with each duty position and job task. Typically, qualified security training instructors and field training officers and/or subject matter experts designated by the security training staff conduct the OJT. A qualified security supervisor must attest to all OJT and the records must be retained consistent with 10 CFR 73.70, "Records."

- b. **Verify that the licensee's T&Q program includes, at a minimum, 40 hours of contingency-based OJT for individuals assigned duties and responsibilities to implement the Safeguards Contingency Plan before the individual is assigned the duty or responsibility. (10 CFR Part 73, App. B, Sec. VI, C.2.(b))**

Specific Guidance

For the inspection of this requirement, the inspector(s) should review the licensee's security plans, implementing procedures, and associated training documentation (to include a sample of individual training records) to verify that the licensee's T&Q program includes, at a minimum, 40 hours of contingency-based OJT for individuals assigned duties and responsibility to implement the Safeguards Contingency Plan (e.g., response team leaders, alarm station operators, armed responders, and armed security officers designated as a component of the protective strategy). The OJT must be developed in a manner that will require each individual to demonstrate their ability to apply the knowledge, skills, and abilities required to effectively implement the site protective strategy. OJT contingency activities and drills must include, but not limited to, hands-on application of knowledge, skills, and abilities related to:

1. response team duties;
2. use-of-force;
3. tactical movement;
4. cover and concealment;
5. defensive positions;
6. fields-of-fire;
7. re-deployment;

8. communications (primary and alternate);
9. use of assigned equipment;
10. target sets;
11. table top drills;
12. command and control duties; and,
13. licensee protective strategy.

The 40 hours of contingency-based OJT does not mean an additional 40 hours for each position, as a member of the security organization progresses in roles and responsibilities (e.g., armed security officer promoted to response team leader). Each progression in roles and responsibilities should have additional licensee specified OJT hours that do not have to add up to 40 hours.

OJT training must be documented by a qualified training instructor and attested to by a security supervisor.

02.04 Firearms Familiarization Training

- a. **Verify that the licensee has established measures to conduct annual firearms familiarization training for armed security personnel in accordance with the NRC-approved T&Q plan. (10 CFR Part 73, App. B, Sec. VI, E.1.(c))**

Specific Guidance

To inspect this requirement, the inspector(s) should review security plans, implementing procedures, and associated training documentation (to include courses of fire and training records) to verify that the licensee has established measures to conduct annual firearms familiarization training for armed security personnel. Firearms familiarization, at a minimum, must include the following:

1. firearms handling drills;
2. clearing, loading, unloading, and reloading procedures for each firearm;
3. training for engaging potential targets when obstacles such as smoke, fencing, doors, and walls are encountered during a contingency event;
4. drills that demonstrate the ability to transition from one firearm type to another;
5. drills that demonstrate the ability to recover from simulated weapon malfunctions (e.g., dummy rounds);
6. cover and concealment drills;
7. non-lethal weapons training and drills; and,
8. cleaning and maintenance procedures for each fire.

02.05 Daylight and Night Fire Qualification

- a. **Verify that the licensee's daylight and night fire weapons qualifications results are documented and retained as a record. (10 CFR Part 73, App. B, Sec. VI, F.1.(b))**

Specific Guidance

No inspection guidance.

- b. Verify that the licensee conducts daylight and night fire qualification courses for each type of firearm employed at the site and that each qualification course is in accordance with standards established by law enforcement or an equivalent nationally recognized course. (10 CFR Part 73, App. B, Sec. VI, F.4.)**

Specific Guidance

For the inspection of this requirement, the inspector(s) should review security plans, implementing procedures, and associated training documentation (to include daylight and night fire qualification courses) to verify that the licensee's daylight and night fire qualification courses are in accordance with standards established by law enforcement or an equivalent nationally recognized course. Armed personnel must qualify by achieving the standards and scores established by a Federal or State-approved law enforcement qualification course or an equivalent nationally recognized course. Examples of the latter include courses recognized by the NRA, the U.S. Department of Defense (DoD), and the International Association of Law Enforcement Firearms Instructors (IALEFI). Once the qualification courses have been designed, licensees may submit them to the recognized entity for certification before the courses are implemented. The licensee may use current qualification courses developed and certified by the above-listed entities; however, such courses may not be modified. When using the qualification courses that have been developed and certified by a recognized entity, the weapons operating system must be similar to that for which the course was designed (e.g., a revolver course must not be used to qualify armed security officers on the use of a semiautomatic handgun).

- c. Verify that enhanced weapons qualification courses are conducted in accordance with applicable standards established by law enforcement courses or an equivalent nationally recognized course for these weapons. (10 CFR Part 73, App. B, Sec. VI, F.4.(d))**

Specific Guidance

For the inspection of this requirement, the inspector(s) should review security plans, implementing procedures, and associated training documentation (to include daylight and night fire qualification courses) to verify that the licensee's daylight and night fire qualification courses for enhanced weapons are in accordance with standards established by law enforcement or an equivalent nationally recognized course. Armed personnel must qualify by achieving the standards and scores established by a Federal- or State-approved law enforcement qualification course or an equivalent nationally recognized course. Examples of the latter include courses recognized by the NRA, DoD, and IALEFI. Once the qualification courses have been designed, licensees may submit them to the recognized entity for certification before the courses are implemented. The licensee may use current qualification courses developed and certified by the above-listed entities; however, such courses may not be modified. When using the qualification courses that have been developed and certified by a recognized entity, the weapons operating system must be similar to that for which the course was designed (e.g., a revolver course must not be used to qualify armed security officers on the use of a semiautomatic handgun).

02.06 Tactical Qualification

- a. **Verify that the licensee has established measures to conduct tactical weapons qualification for armed security personnel in accordance with the NRC-approved T&Q plan. (10 CFR Part 73, App. B, Sec. VI, F.2)**

Specific Guidance

To inspect this requirement, the inspector(s) should review security plans, implementing procedures, and associated training documentation (to include courses of fire and training records) to verify that the licensee has established measures to conduct an annual tactical weapons qualification for armed security personnel.

- b. **Verify that the licensee's tactical weapons qualification course describes the performance criteria needed to include the site-specific conditions (such as lighting, elevation, fields-of-fire) under which assigned personnel shall be required to carry out their assigned duties in accordance with the NRC-approved T&Q plan. (10 CFR Part 73, App. B, Sec. VI, F.2)**

Specific Guidance

For the inspection of this requirement, the inspector(s) should review the tactical weapons qualification course to ensure site-specific conditions (such as lighting, elevation, fields-of-fire) under which assigned personnel shall be required to carry out their assigned duties are reflected in the tactical weapons qualification course. Specifically, the course should be representative of the site's protective strategy (e.g., fighting positions should be representative of the fighting positions used by armed security officers on site, to include weapons ports, elevations, and engagement distances). For licensees that use multiple weapons systems, the course should be designed to include engagements with primary weapons systems and each secondary weapons system (i.e., optics, thermal scope), as required to implement the site's protective strategy.

02.07 Requisite Knowledge and Performance

- a. **Verify that security personnel possess adequate knowledge to carry out their assigned duties and responsibilities, including response procedures, use of deadly force, and armed response tactics. (10 CFR Part 73, App. B, Sec. VI, A.4.)**

Specific Guidance

To inspect this requirement, the inspector(s) should interview a sample of security personnel and/or facility personnel (if applicable) to determine if they possess adequate knowledge to carry out their assigned duties and responsibilities, including response procedures, use of deadly force, and armed response tactics. Observe a sample of security personnel and/or facility personnel (if applicable) performing their routine duties and/or participating in training activities, if scheduled during the inspection.

If the licensee is not conducting certain routine duties or training at the time of the inspection, the inspector(s) can request the licensee to demonstrate a sample of these activities. Routine duties may include, but **are** not limited to, alarm station operations; personnel and package searches; vehicle searches; access control operation (owner

controlled area, protected area, and vital areas); escort of personnel and vehicles; security patrol; alarm response and assessment; contingency response; testing and maintenance of security equipment; or physical fitness requirements.

02.08 Re-qualification

- a. **Verify that armed and unarmed individuals are re-qualified annually in accordance with 10 CFR Part 73 Appendix B, VI. and the NRC-approved T&Q plan. (10 CFR Part 73, App. B, Sec. VI, D.2 and 10 CFR Part 73, App. B, Sec. VI, A.7)**

Specific Guidance

No inspection guidance.

- b. **Verify that armed members of the security organization re-qualify with each assigned weapon at least annually in accordance with NRC requirements and the NRC-approved T&Q plan. (10 CFR Part 73, App. B, Sec. VI, F.5 and 10 CFR Part 73, App. B, Sec. VI, A.7)**

Specific Guidance

No inspection guidance.

02.09 Training Documentation

- a. **Verify that the licensee maintains training documentation in accordance with regulations and requirements. (10 CFR 73.55(b)(4)(i) and 10 CFR Part 73, App. B, Sec. VI, H.)**

Specific Guidance

In the review of training documentation, the inspectors should select a sample of training records which include newly hired security personnel. The inspector should ensure that training records reflect successful completion and certification of on duty tasks specified in the licensee's NRC-approved T&Q plan. The inspector should also determine from records that response personnel meet the physical and psychological criteria for armed status.

02.10 Medical Qualifications

- a. **Verify that armed and unarmed individuals assigned security duties and responsibilities are subject to a medical physical examination that is designed to measure the individual's physical ability to perform assigned duties and responsibilities. (10 CFR Part 73, App. B, Sec. VI, B.2.(a)(2))**

Specific Guidance

To inspect this requirement, the inspector(s) should review a sample of the licensee's T&Q records to verify that all individuals who are performing security functions for the security organization are subject to a physical examination. The purpose of this physical examination is to verify that an individual is physically capable to perform assigned duties and responsibilities as identified in NRC-approved security plans and implementing procedures. Physical examinations should be commensurate with

assigned duties, and the licensed health professional administering the examination should have knowledge of the assigned security duties. Personnel not assigned to the security organization who are performing watchperson-type duties required to implement the physical protection program (i.e., personnel performing material searches and personnel assigned to perform vehicle escort duties) must also have physical examinations. In such cases, physical examinations should be limited to the physical attributes required to perform the specific security function. Licensees and licensed health professionals should consider the physical demands associated with security duties when certifying the individual's physical capability to perform them.

- b. Verify that the licensee obtains and retains a written certification from a licensed physician who states that the physical examination disclosed no physical condition that would preclude an individual's ability to participate in physical fitness tests or meet the physical fitness attributes or objectives associated with assigned duties. (10 CFR Part 73, App. B, Sec. VI, B.4.(a)(1))**

Specific Guidance

No inspection guidance.

02.11 Physical Fitness Test

- a. Verify that the armed members of the security organization demonstrate physical fitness for assigned duties and responsibilities by performing a practical physical fitness test. (10 CFR Part 73, App. B, Sec. VI, B.4.(b))**

Specific Guidance

To inspect this requirement, the inspectors(s) should review a sample of the licensee's training records to verify that armed members of the security organization demonstrate physical fitness for assigned duties and responsibilities by performing a practical physical fitness test as described in the site's NRC-approved security plans and implementing procedures.

- b. Verify that the practical physical fitness test is described in the licensee's NRC-approved T&Q plan and that the test includes strenuous activity, physical exertion, levels of stress, and exposure to elements as they pertain to an individual's assigned security duties during both normal and emergency operations. (10 CFR Part 73, App. B, Sec. VI, B.4.(b)(1), 10 CFR Part 73, App. B, Sec. VI, B.4.(b)(2), and 10 CFR Part 73, App. B, Sec. VI, B.4.(b)(3))**

Specific Guidance

For the inspection of this requirement, the inspector(s) should review the licensee's T&Q plan, implementing procedures, and physical fitness test to verify that the test includes strenuous activity, physical exertion, levels of stress, and exposure to elements as they pertain to an individual's assigned security duties during both normal and emergency operations. The physical fitness test must include elements that simulate site-specific, scenario-specific, or task-specific conditions and actions associated with the required performance standards. To ensure the effectiveness of the physical protection program, these simulated elements should equate to the normal and emergency conditions that

could be encountered. The inspector(s) should also review the methodology that the licensee used to determine that the test meets the above-mentioned requirements.

- c. **Verify that the physical fitness qualification of each armed member of the security organization is documented by a qualified instructor and attested to by a security supervisor. (10 CFR Part 73, App. B, Sec. VI, B.4.(b)(4))**

Specific Guidance

No inspection guidance.

02.12 Reviews

- a. **Events and Logs. Review and evaluate the licensee's physical security event log and corrective action documents.**

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 training program was included in a review as required by the regulation. (10 CFR 73.55(m), and 10 CFR Part 73, Appendix B, Section VI, I)

Identification and Resolution of Problems. Verify that the licensee is identifying issues related to the security training program at an appropriate threshold and entering them in the licensee's problem identification and resolution program. Verify that the licensee has appropriately resolved the issues regarding regulatory requirements for a selected sample of problems associated with the security training programs. (10 CFR 73.55(b)(10))

Specific Guidance

Before the inspection, the inspector should determine if a security event report (SER), in accordance with 10 CFR 73.1205 has been submitted to the NRC by the licensee. Closeout of SERs is performed under section 03.02 of IP 71153; however, the inspector should assess if additional follow-up under this IP is warranted for the conditions or corrective actions associated with the SER.

The inspector(s) should review and evaluate licensee physical security event log entries documented in accordance with 10 CFR 73.1210, since at least the last inspection, that are associated with the security training program. If discrepancies or deficiencies are identified during this review, the inspector(s) should follow up as necessary.

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 security training program. The inspector(s) should ensure that the reviews have been conducted in accordance with the requirements of 10 CFR 73.55(m). The inspector(s) should also request a copy of any report that was developed and provided to licensee management for review. The inspector(s) should review the report to identify any findings that were identified via the review or audit to ensure the findings were entered in the site's problem identification and resolution program.

The inspector(s) should review a sample of entries in the licensee's problem identification and resolution program associated with the security training program. The

intent of this review is to verify that the licensee is identifying deficiencies at the appropriate threshold, tracking deficiencies for trending, and correcting deficiencies commensurate with their security significance. Inspectors can follow up on select samples in accordance with this procedure to ensure corrective actions are commensurate with the significance of the issue. Refer to IP 71152, "Problem Identification and Resolution," section 03.01 for additional guidance.

02.13 Training Documentation

- a. **Verify that the licensee maintains training documentation in accordance with regulations and requirements. (10 CFR 73.55(b)(4)(i), 10 CFR Part 73, Appendix B, Section VI, H.)**

Specific Guidance

In the review of training documentation, the inspectors should select a sample of training records which include newly hired security personnel. The inspector should ensure that training records reflect successful completion and certification of on duty tasks specified in the licensee's NRC-approved T&Q plan. The inspector should also determine from records that response personnel meet the physical and psychological criteria for armed status.

02.14 Medical Qualifications

- a. **Verify that armed and unarmed individuals assigned security duties and responsibilities are subject to a medical physical examination that is designed to measure the individual's physical ability to perform assigned duties and responsibilities. (10 CFR 73, Appendix B, Section VI, B.2.(a)(2))**

Specific Guidance

To inspect this requirement, the inspector(s) should review a sample of the licensee's training and qualification records to verify that all individuals who are performing security functions for the security organization are subject to a physical examination. The purpose of this physical examination is to verify that an individual is physically capable to perform assigned duties and responsibilities as identified in NRC-approved security plans and implementing procedures. Physical examinations should be commensurate with assigned duties, and the licensed health professional administering the examination should have knowledge of the assigned security duties. Personnel not assigned to the security organization who are performing watchperson-type duties required to implement the physical protection program (i.e., personnel performing material searches and personnel assigned to perform vehicle escort duties) must also have physical examinations. In such cases, physical examinations should be limited to the physical attributes required to perform the specific security function. Licensees and licensed health professionals should consider the physical demands associated with security duties when certifying the individual's physical capability to perform them.

- b. **Verify that the licensee obtains and retains a written certification from a licensed physician who states that the physical examination disclosed no physical condition that would preclude an individual's ability to participate in physical fitness tests or meet the physical fitness attributes or objectives associated with assigned duties. (10 CFR Part 73, Appendix B, Section VI, B.4.(a)(1))**

Specific Guidance

No inspection guidance.

02.15 Physical Fitness Test

- a. **Verify that the armed members of the security organization demonstrate physical fitness for assigned duties and responsibilities by performing a practical physical fitness test. (10 CFR Part 73, Appendix B, Section VI, B.4.(b))**

Specific Guidance

To inspect this requirement, the inspectors(s) should review a sample of the licensee's training records to verify that armed members of the security organization demonstrate physical fitness for assigned duties and responsibilities by performing a practical physical fitness test as described in the site's NRC-approved security plans and implementing procedures.

- b. **Verify that the practical physical fitness test is described in the licensee's NRC-approved T&Q plan and that the test includes strenuous activity, physical exertion, levels of stress, and exposure to elements as they pertain to an individual's assigned security duties during both normal and emergency operations. (10 CFR Part 73, Appendix B, Section VI., B.4.(b)(1), (2), & (3))**

Specific Guidance

For the inspection of this requirement, the inspector(s) should review the licensee's T&Q plan, implementing procedures, and physical fitness test to verify that the test includes strenuous activity, physical exertion, levels of stress, and exposure to elements as they pertain to an individual's assigned security duties during both normal and emergency operations. The physical fitness test must include elements that simulate site-specific, scenario-specific, or task-specific conditions and actions associated with the required performance standards. To ensure the effectiveness of the physical protection program, these simulated elements should equate to the normal and emergency conditions that could be encountered. The inspector(s) should also review the methodology that the licensee used to determine that the test meets the abovementioned requirements.

- c. **Verify that the physical fitness qualification of each armed member of the security organization is documented by a qualified instructor and attested to by a security supervisor. (10 CFR Part 73, Appendix B, Section VI., B.4.(b)(4))**

Specific Guidance

No inspection guidance.

02.16 Suspicious Activity Reporting Training

- a. **Verify that the licensee has developed and implemented a process for the identification and reporting of suspicious activities. (10 CFR 73.1215)**

Specific Guidance

Inspector(s) should review licensee-specific training materials associated with reporting of suspicious activities. Inspector(s) should verify that licensee training materials provide responsible security personnel with descriptions of the applicable procedures, reporting process, and points of contact.

Licensees have the best knowledge and understanding of their facilities and the local population and environment in which their facilities are situated. The NRC staff views licensees as best positioned to assess whether wrong, abnormal, or unusual activities or behaviors are suspicious relative to their facility and warrant reporting.

02.17 Firearms Background Checks for Armed Security Personnel

- a. **Verify licensees that have applied for stand-alone preemption authority or for combined preemption authority and enhanced weapons authority have an established firearms background check plan. The firearms background check plan must be part of their NRC-approved T&Q plan for security personnel whose official duties require access to covered weapons. (10 CFR 73.17(b)(1))**

Specific Guidance

To inspect this requirement, the inspector(s) should review the licensee's security plans to verify that the licensee has a firearms background check plan. Security personnel whose official duties require access to covered weapons includes, but is not limited to:

1. security officers using covered weapons to protect a Commission-designated facility, radioactive material, or other property;
2. security officers undergoing firearms training on covered weapons;
3. security firearms-training instructors conducting training on covered weapons;
4. armorers conducting maintenance, repair, and testing of covered weapons;
5. individuals with access to armories and weapons storage lockers containing covered weapons;
6. individuals conducting inventories of enhanced weapons;
7. individuals removing enhanced weapons from the site for repair, training, and escort-duty purposes; and
8. individuals whose duties require access to covered weapons, whether the individuals are employed by a security contractor who provides security services to the licensee. (10 CFR 73.17(b)(2)(i)-(viii)).

b. Verify the licensee's firearms background check plan contains the following objectives: (10 CFR 73.17(3))

Specific Guidance

1. completing firearms background checks for all security personnel whose duties require, or will require, access to covered weapons;
2. establishes a process for completing initial, periodic, and break-in-service firearms background checks;
3. defines training objectives and modules for security personnel who are subject to firearms background checks;
4. completing the initial and periodic training for security personnel whose official duties require access to covered weapons;
5. maintains records of completed firearms background checks, required training, and any other supporting documents;
6. maintaining records of a decision to remove security personnel from duties requiring access to covered weapons, due to the identification or occurrence of any Federal or State disqualifying status condition or disqualifying event;
7. implementing procedures for notifying the NRC of the removal of security personnel from access to covered weapons, due to the identification or occurrence of any Federal or State disqualifying status condition or disqualifying event. (10 CFR 73.17(b)(3)(i)-(vii)).

c. Verify the licensee has conducted a satisfactory firearms background check for all security personnel whose official duties require access to covered weapons. (10 CFR 73.17(b)(4)(i))

Specific Guidance

In accordance with 10 CFR 73.17(b)(4)(ii), security personnel may continue to have access to covered weapons pending the results of the initial firearms background check.

d. Verify the licensee removes, without delay, from duties requiring access to covered weapons, any security personnel who received a "denied" or "delayed" National Instant Criminal Background Check System (NICS) response. If the licensee removes any security personnel who are on duty, verify the licensee fills the vacated position within the timeframe as specified in its physical security plan. (10 CFR 73.17(b)(8)(i) and (ii))

Specific Guidance

For this inspection requirement, the inspector(s) should review a sample of records the licensee has received from the Federal Bureau of Investigation (FBI) that identify the status (i.e., "denied," or "delayed,") of the individual to possess, use, or have access to covered firearms and devices.

- e. **Verify the licensee completes a new satisfactory firearms background check for any security personnel that have had a break-in-service greater than one week; or if the security personnel transferred from a different licensee. (10 CFR 73.17(b)(9)(i) and (ii))**

Specific Guidance

In accordance with 10 CFR 73.17(b)(9)(iii) a break-in-service means the security personnel's cessation of employment with the licensee or its security contractor, notwithstanding that the previous licensee completed a satisfactory firearms background check on the individual within the last five years.

In accordance with 10 CFR 73.17(b)(10), (11), and (12) the inspector(s) should note that changes in the licensee's ownership or its security contractor services are not considered a break-in-service for current security personnel whose duties require access to covered weapons. Licensees are not required to conduct a new firearms background check for these security personnel.

With regard to accomplishing the requirements for other background (e.g., criminal history records) checks or personnel security investigations under the NRC's access authorization or personnel security clearance program requirements, the licensee may not substitute a satisfactory firearms background check in lieu of completing these other required background checks or security investigations.

Additionally, if a licensee has completed initial satisfactory firearms background checks pursuant to an NRC order issued before April 13, 2023, then the licensee is not required to conduct a new initial firearms background check for its current security personnel. However, the licensee must conduct initial firearms background checks on new security personnel and periodic and break-in-service firearms background checks on current security personnel.

02.18 Firearms Background Check Requirements

- a. **Verify the licensee's firearms background check for security personnel include a check of the individual's fingerprints against the FBI's fingerprint system; and a check of the individual's identifying information against the FBI's National Instant Criminal Background Check System (NICS). (10 CFR 73.17(d)(1) and (2))**

Specific Guidance

No inspection guidance.

02.19 Firearms Background Check Submittals

- a. **Verify the licensee retains a copy of all NRC Form 754s submitted to the NRC for one year subsequent to the termination or denial of an individual's access to covered weapons. (10 CFR 73.17(e)(4))**

Specific Guidance

For this inspection requirement, the inspector(s) should review a sample of NRC Form 754s that were submitted to the NRC for active and terminated security personnel.

02.20 Periodic Firearms Background Checks

- a. **Verify the licensee completes a satisfactory periodic firearms background check at least once every 5 calendar years for security personnel whose continuing duties require access to covered weapons. (10 CFR 73.17(f)(1))**

Specific Guidance

No inspection guidance.

- b. **Verify the licensee completes the periodic firearms background check within the same calendar month as the initial, or most recent, firearms background check with an allowance period to midnight (local time) of the last day of the calendar month of expiration. The licensee may conduct periodic firearms background checks at an interval of less than once every 5 calendar years, at its discretion. Security personnel may be assigned duties requiring access to covered weapons while the results of the periodic firearms background check are pending. (10 CFR 73.17(f)(2)(3) and (4)(i))**

Specific Guidance

No inspection guidance.

- c. **Verify the licensee removes security personnel from duties requiring access to covered weapons if the satisfactory completion of a periodic firearms background check does not occur before the expiration of the allowance period. (10 CFR 73.17(f)(4)(ii))**

Specific Guidance

No inspection guidance.

- d. **Verify the licensee removes any security personnel without delay, from duties requiring access to covered weapons, when the NICS response is either a “denied” or “delayed” during a periodic firearms background check. (10 CFR 73.17(f)(5))**

Specific Guidance

No inspection guidance.

02.21 Notification of Removal

- a. **Verify, as applicable, that the licensee notifies the NRC Headquarters Operation Center by telephone within 72 hours if any security personnel had to be removed from duties requiring access to covered weapons due to the identification or occurrence of any Federal or State disqualifying status condition or disqualifying event that would prohibit them from processing, receiving, or using firearms or ammunition. (10 CFR 73.17(g)(1))**

Specific Guidance

No inspection guidance.

02.22 Security Personnel Responsibilities

- a. **Verify that security personnel assigned duties requiring access to covered weapons notify licensee management within 72 hours of the identification or occurrence of any Federal or State disqualifying status condition or disqualifying event that would prohibit the individual from possessing, receiving, or using firearms or ammunition. (10 CFR 73.17(h))**

Specific Guidance

No inspection guidance.

02.23 Training for Security Personnel Subject to Firearms Background Checks on Disqualifying Status Conditions and Disqualifying Events

- a. **Verify the licensee’s firearms background check plan includes the following training modules for security personnel assigned to official duties requiring access to covered weapons. (10 CFR 73.17(j)(1)(i), (ii), (iii), and (iv))**
 1. Federal disqualifying status conditions or disqualifying events specified in 27 CFR 478.32.
 2. Applicable State disqualifying status conditions or disqualifying events. (10 CFR 73.17(j)(1)(ii))
 3. The responsibility of security personnel subject to a firearms background check and assigned to official duties that require access to covered weapons to promptly notify their employing licensee of the occurrence of any disqualifying status condition or disqualifying event. (10 CFR 73.17(j)(1)(iii))
 4. Information for appealing an adverse firearms background check (i.e., a “denied” or “delayed” NICS response) from the FBI. (10 CFR 73.17(j)(1)(iv))
- b. **Verify the licensee conducts annual refresher training on these modules for personnel assigned official duties requiring access to covered weapons. (10 CFR 73.17(j)(2))**

Specific Guidance

For this inspection requirement, the inspector(s) should review a sample of licensee training records for personnel assigned official duties requiring access to covered weapons.

02.24 Appeals and Resolution of Adverse Firearms Background Checks

- a. **Verify during an appeal or resolution of adverse firearms background check the licensee does not assign security personnel to any official duties that require access to covered weapons when a “denied” or a “delayed” NICS response is**

received or during the pendency of an appeal to the FBI of a “denied” or “delayed” NICS response. (10 CFR 73.17(p)(1)(i) and (ii))

Specific Guidance

For this inspection requirement, the inspector(s) should review a sample of firearms background checks that include a “denied” or “delayed” response. The inspector(s) should ensure that the licensee did not assign the security personnel any duties that would require access to covered weapons.

- b. Verify the licensee provides the NICS Transaction Number (NTN) or NTNs associated with the adverse firearms background check to the affected individual. It is the affected individual’s responsibility to initiate an appeal or resolution of a “delayed” or “denied” NICS response. Upon the individual satisfactorily resolving a “denied” or “delayed” NICS response, the licensee may assign security personnel to official duties requiring access to covered weapons. (10 CFR 73.17(p)(2) and (3))**

Specific Guidance

For this inspection requirement, the inspector(s) should review a sample of appeals and the resolution of any adverse firearms background checks.

02.25 Protection of Information

- a. Verify the licensee has established and maintains a system of files and procedures to protect these records and any enclosed personally identifiable information (PII) from unauthorized disclosure. (10 CFR 73.17(q)(1))**

Specific Guidance

No inspection guidance.

- b. Verify the licensee does not disclose these records or PII to persons other than the subject individual, their representative, or to those with a need to have access to the information in performing assigned duties in the process of granting access to covered weapons. No individual authorized to have access to this information may disseminate the information to any other individual who does not have a need to know. In accordance with 10 CFR 73.17(q)(3), the licensee may disclose the record or PII to an appropriate Federal or State agency in the performance of its official duties, in the course of an administrative or judicial proceeding, or in response to a Congressional inquiry. (10 CFR 73.17(q)(2))**

Specific Guidance

No inspection guidance.

- c. **Verify that prior to transferring a firearms background check record to another licensee, the licensee meets one of the following criteria: (1) a written request to transfer the individual's record to the licensee identified in the written request; and (2) verification from the gaining licensee of the individual's name, date of birth, social security number, and sex. (10 CFR 73.17(q)(5)(i) and (ii))**

Specific Guidance

For this inspection requirement, the inspector(s) should review a sample of any firearms background check records that have been transferred to another licensee.

81000.07-03 RESOURCE ESTIMATE

The resource estimate for this section is approximately 30 hours of direct inspection effort on site. For a site **that** has preemption authority, the resource estimate is approximately 38 hours of direct inspection effort.

81000.07-04 PROCEDURE COMPLETION

Inspection of all 38 inspection requirements will constitute completion of this IP. The sample size for this procedure is 38. For a site **that** has preemption authority, the sample size is 58.

END

Attachment 1: Revision History for IP 81000.07, "Security Training"

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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 Iosad Feedback Form Accession No. (Pre-Decisional, Non-Public Information)
N/A	ML12110A440 09/07/12 CN 12-020	Researched commitments made in the last four years and found none. IP developed to support security construction inspections under IMC 2200.	Training to be conducted during the July 2013 annual Security Counterpart Meeting.	N/A
N/A	ML19225B665 09/24/19 CN 19-030	This document has been revised to provide minor clarification in guidance for inspectors and to address preemption requirements. Upon completion of a SUNSI review, the staff determined that this document is decontrolled.	N/A	ML19225B663
N/A	ML24260A230 12/13/24 CN 24-043	This document has been revised to remove EA-13-092 Firearms Preemption Authority requirements now that the order has been codified. All 10 CFR 73.17 code requirements have been added and updated to incorporate suspicious activity reporting and to complete the 5-year periodic review for this document.	N/A	ML24260A228