

Illinois Emergency Management Agency



Security Lessons Learned
Gary Forsee
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Objectives

- Discuss transition from “IC’s” to 32 IAC Part 337
- Identify the most common security program citations
- Insight into the IEMA inspection process
- Highlight available resources and guidance



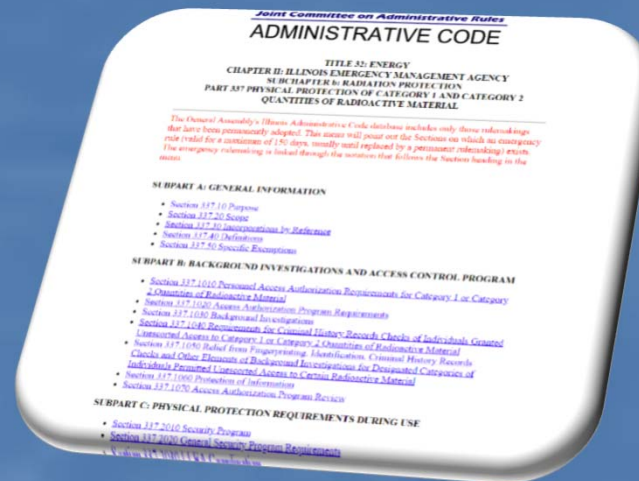
Security Lessons Learned

NRC Orders

Increased controls were mandated by Nuclear Regulatory Commission (NRC) via two orders:

- 2005: Requirement to implement access control program, surveillance program, and law enforcement response plan.
- 2007: Requirement to include fingerprinting for personal identity verification and FBI criminal history records check for all personnel approved for unescorted access to an irradiator room.

- 2005 - NRC Access Control Order
- 2007 - NRC Background Check Order
- March 2013 - 10 CFR Part 37
- Feb. 2016 - 32 Ill. Adm. Code Part 337

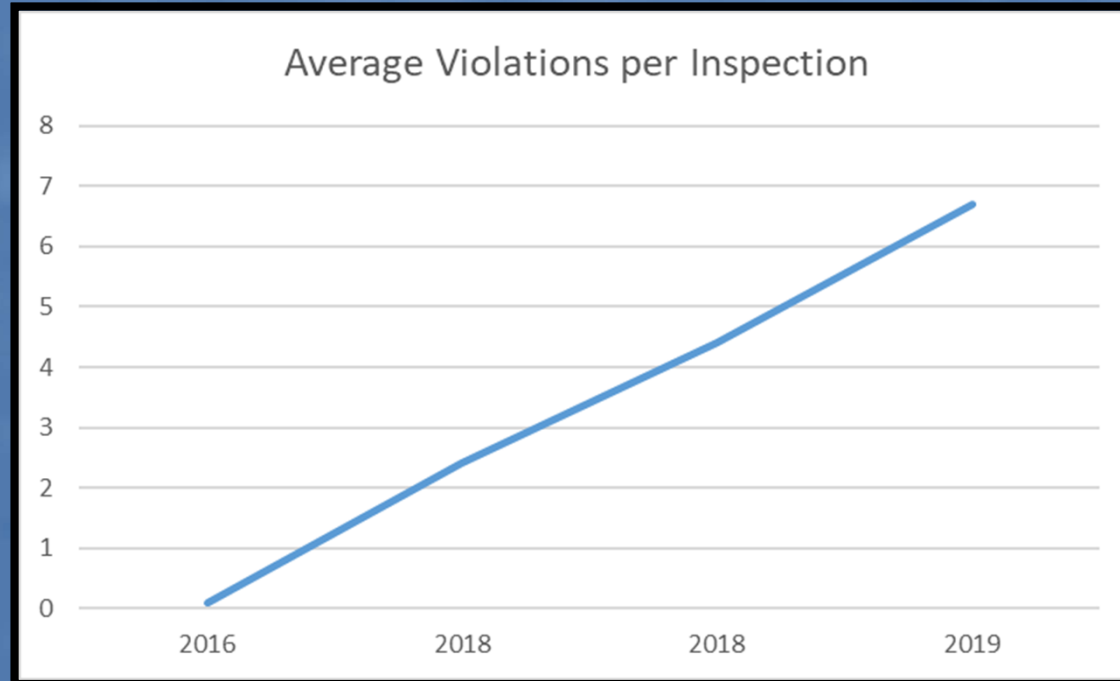


Security Lessons Learned

- Initial transition, Agency took a facilitating approach
- Three years post-implementation, all licensees have now had an inspection under 32 IAC Part 337
- Opportune time and opportune forum to recognize we have turned the page on implementation.
- As a result, the incidence of security violations has increased and exceeds the number observed for health & safety.



Security Lessons Learned



- As we focus on 'security culture', 'security compliance' should now be well established.



Common Citations

- That having been said, the Agency's goal remains one of facilitating compliance and assisting in the development of robust radiological source security.
- To that end, I want to walk through the most commonly cited violations.
 - (1) physical security requirement
 - (9) documentation and procedural requirements
 - Largely mirrors NRC RIS 2018-01



Common Citations

- Access Authorization Programs - *32 Ill. Adm. Code 337.1020*
 - *Develop, implement and maintain procedures which address approval, denial and terminating access authorization; notifying such individuals and documenting the basis for approval/denial.*
- Written Security Plan – *32 Ill. Adm. Code 337.2020*
 - *Develop a written security plan specific to its facilities and operations*
 - *Approved by the person in charge of the overall security of the licensee*



Common Citations

- Security Plan Implementing Procedures - *32 Ill. Adm. Code 337.2020(b)*
 - *Develop and maintain written procedures that document how the physical protection requirements of Subpart C and the security plan will be met.*
- Reviewing Official – *32 Ill. Adm. Code 337.1020(b)*
 - *The Reviewing Official, (formerly the T & R official) is subject to a full background screening including fingerprinting. The licensee is required to submit all RO names under oath and affirmation that the individual is deemed trustworthy and reliable.*



Common Citations

- Background Checks & Consent - *32 Ill. Adm. Code 337.1020(a,c and h)*
 - *Conduct full background checks on individuals seeking unescorted access. A signed consent form required prior to conducting the background check. Maintain both a current list of individuals approved, as well as previously approved individuals.*
- Annual Reviews – *32 Ill. Adm. Code 337.1070 and 2080*
 - *Licensees shall conduct annual reviews of the access authorization program and the physical security program.*



Common Citations

- LLEA Coordination- *32 Ill. Adm. Code 337.2030*
 - *Licensees shall document coordination with LLEA on at least a 12 month frequency, which includes providing LLEA with a description of facilities, quantities of radioactive material, description of security measures and request for a timely response.*
- Annual & Refresher Training – *32 Ill. Adm. Code 337.2020*
 - *Documented initial and annual refresher training on the security plan commensurate with duties*



Inspection Process

- In office review:
 - Review NSTS Inventory and annual reconciliations
 - Identify previous violations
 - Identify incidents or documented issues
 - Review RO determinations, license conditions and authorizations
- On Site:
 - Pre-licensing Inspection
 - Determine the security program management structure



Inspection Process

- On Site (continued):
 - Reconcile inventory
 - Determine extent of access to Cat 1 & 2 material
 - Test physical components of the security system
 - Assess T&R'd individuals knowledge of the security plan & regs
 - Checklist Items:
 - Assess document security, access and retention
 - Review implementing procedures and compare against observations
 - Record review (training, annual reviews, consent forms, T&R determinations, testing)



Inspection Process

- Checklist Items (continued)
 - Line item review of all applicable 32 IAC Part 337 requirements
- Inspection expectations:
 - Average 4 hours depending on scope of program
 - Failures in physical protection measures require immediate address
 - Generally conducted in concert with radiation safety inspection
 - Two separate letters, depending on the role of the Reviewing Official



Available Guidance

- NRC Guidance documents are available:
 - NUREG 2155: “Implementation Guidance for 10 CFR Part 37, “Physical Protection of Category 1 and Category 2 Quantities of Radioactive Material”, Jan. 2015
<http://www.nrc.gov/reading-rm/doc-collections/nuregs>
 - NUREG 2166: *“Physical Security Best Practices for the Protection of Risk-Significant Radioactive Material”*, May 2014
<http://www.nrc.gov/reading-rm/doc-collections/nuregs>
 - Nuclear Regulatory Commission RIS 2018-01. Published 1/22/18, errata 3/1/18.



Summary

- Generally, the physical aspects of security systems are in place and well understood
- Violations are largely limited to administrative records and documented plans
- Updating your programs using the aforementioned regulations and guidance will help ensure all radioactive sources are secured from malevolent use. As always, please contact the Agency if you have any questions regarding the security of radioactive material.



Questions



Contact Information

Gary Forsee, Supervisor
Radioactive Materials Inspection & Enforcement
Illinois Emergency Management Agency
217.785.9929
Gary.Forsee@illinois.gov

www.ready.illinois.gov

