



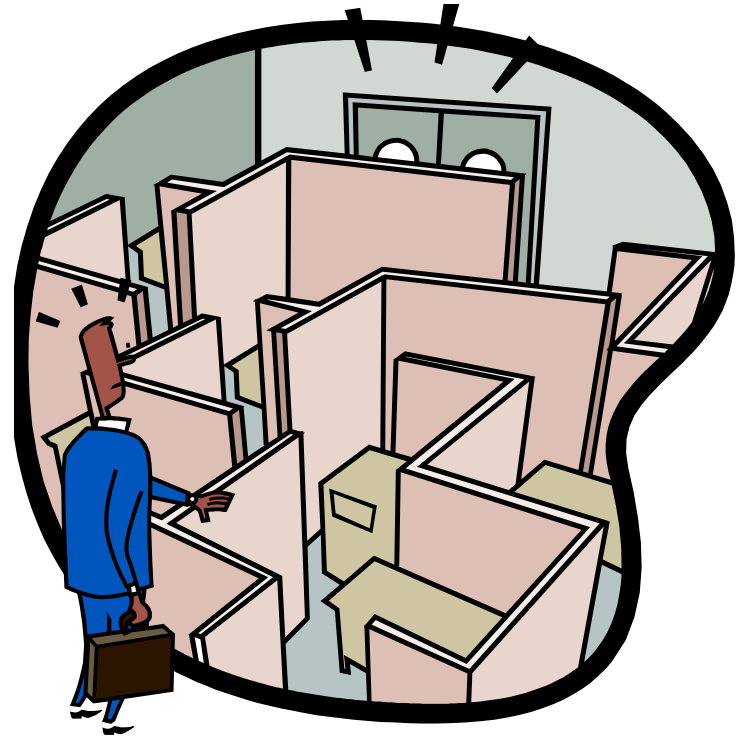
# Access Authorization

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# Scope

- Basis for access authorization
- NRC-approved reviewing official
- Safeguards Information (SGI)
- Elements of a good program



# Recent Issues

- Physical security plans aren't updated to include compensatory measure (CM) commitments nor new regulations
  - Elements of a background check to help determine trustworthiness and reliability (T&R)
  - FBI fingerprint-based criminal history record checks
- Reviewing official (RO) retires leaving no RO
- Personnel assuming RO responsibilities without being approved by NRC

# Background

- 2002-2004 Compensatory Measures (CM)
- September 2006 SGI Order EA-06-203 issued
  - New regulation issued 2009 - 10 CFR 73.21, 22, and 23
- April 2007 Order EA-07-074 issued
  - New regulation issued 2011 - 10 CFR 73.57(g)

# Access to Safeguards Information

- General Performance 10 CFR 73.21
- 10 CFR 73.22
  - Need to know
  - Federal Bureau of Investigation (FBI) criminal history records check using the procedures set forth in 10 CFR 73.57
  - T&R based on background check per 10 CFR 73.2 “...employment history, education, and personal references.”

# **Access to Safeguards Information – Modified Handling (SGI-M)**

- Need to know
- 10 CFR 73.23
  - Need to know
  - FBI criminal history records check using the procedures set forth in 10 CFR 73.57
  - T&R based on background check per 10 CFR 73.2 “...employment history, education, and personal references.”

# Who Grants Access to SGI or SGI - M?

- Per Order EA-06-203 the NRC-approved reviewing official (RO) is the only person to grant access to SGI or SGI-M



# Physical Access

- Unescorted access to special nuclear material (SNM) and/or vital area
  - EA-07-074
  - 10 CFR 73.57
- T&R Determined by RO
- The RO determines who must be fingerprinted before allowing unfettered access



# Who Grants Access to the SNM or Vital Area?

- Per Order EA-07-074, the NRC-approved reviewing official is the only one to grant unescorted access
- The access is granted based on T&R determined by the results of fingerprint based criminal history records check and various background checks committed to in the CMs.
  - Found in either the CM Implementation plan or the physical security plan

# **NRC-approved Reviewing Official**

- The only person that can grant access to SGI or unescorted access
- Determine T&R based on FBI fingerprint results and background checks outlined in regulations, security plan, or CM implementation plan
- Establish and maintain a system to protect the personal information collected

## **Elements of a Good Program**

- A procedure to assure that certain prohibited information is not used as the basis for the denial of unescorted access
- Specific procedures for the conduct of fingerprinting
- A procedure for correction or completion of criminal record information
- A procedure for protection of information
- A procedure for official review.

# Common Questions

- Can the same fingerprints I sent in for individual access be used to become a RO?
- If I'm an RO at one facility, and move to another facility, do I have to resubmit fingerprints?

# NRC Process

- Determines T&R based on current criminal history
- Submits fingerprints to FBI
  - Fingerprints received from licensee along with nomination letter
- Reviews results to determine T&R
- Issues approval letter

## Example of Request

- By way of this letter, [FACILITY NAME] is nominating [NAME] as the a NRC-approved reviewing official.
- [NAME] was previously granted access to SGI associated with licensed activities at this facility.
- Mark as Official Use Only – Security Related Information
- New finger print cards are to be included with the letter

# Where to Send the Information

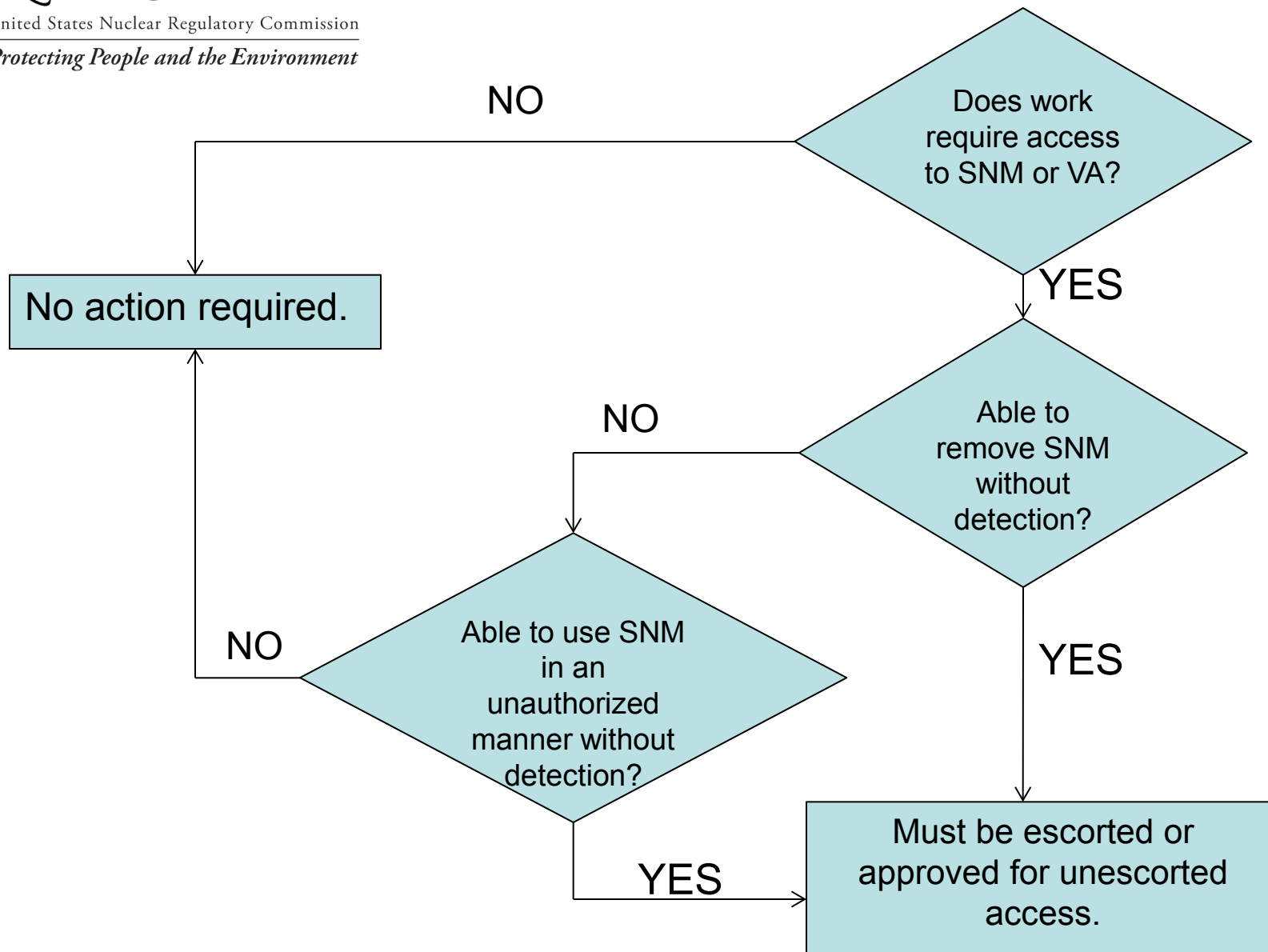
- Send written requests to ADM/DFS/FSB, Facilities Security Specialist, TWFN/3B408
  - Fingerprints (Form FD-258)
  - Information regarding payment and current fees can be found at: <http://www.nrc.gov/site-help/e-submittals.html>
- For more details refer to 10 CFR 73.57(d)

# Unescorted Access

- An individual who is granted “unescorted access” could exercise physical control over the special nuclear material possessed by the licensee, such that the special nuclear material could be **used** or **removed** in an unauthorized manner without detection, assessment, or response by systems or persons designated to detect, assess or respond to such unauthorized use or removal.



# Access Approval



# Key Things to Remember

- Only the NRC-approved reviewing official can grant access to SGI or access to the facility
- If you are an RO, be sure to nominate someone else before you leave your facility
- Recommended to have at least two ROs at each facility

# Questions

