



The new Minnesota rules for the enhanced physical security of radioactive materials became effective August 17, 2015 and take the place of the Increased Control orders previously issued by the Commissioner of Health and/or the NRC to certain Minnesota licensees. To assist licensees in complying with the changes, we will be providing checklists for you to use in implementing the requirements of Chapter 4731.8000-4731.8140.

2 – Implementing Your Security Plan and Maintenance and Testing of System Components

- 1. **“The licensee must develop and maintain written procedures that document how the requirements of Chapter 4731.8050–4731.8090 and the security plan will be met.” 4731.8055**

How you intend to establish, implement and maintain your security program **MUST** be set out in writing, through formal procedures, that cover all aspects of the program. The initial version of the procedures, as well as any revisions that are made over time, must be approved **IN WRITING** by the individual with overall responsibility for your security program (typically the Reviewing Official). Copies of procedures that are revised and/or discontinued need to be maintained for three years. Training on security plan procedures is required for those individuals who have responsibility for implementing the plan.
- 2. **“Each licensee ...must implement a maintenance and testing program to ensure that [security system components] are maintained in operable condition...” 4731.8075**

Obviously, if a part of your security system fails to operate as designed, it has little use to your security efforts. Your maintenance and testing program should include intrusion alarms, communication systems, video cameras, locking devices, and any other associated physical components of your security system **IF** these components are used to secure the affected materials or detect the unauthorized access to those materials. Testing and maintenance should be performed in accordance with the manufacturer’s suggested methods and frequency. If the manufacturer has no such recommendations, then testing should be done annually, not to exceed 12 months between checks. The testing and maintenance must be documented, with records maintained for three years.
- 3. **“Each licensee must be responsible for the continuing effectiveness of the security program.” 4731.8085**

You must periodically review the operation and effectiveness of your security program, and this must be done on at least an annual basis. If you identify any portions of your plan or program that do not meet the requirements of the security rules, you must take prompt corrective action to address those deficiencies, and then reassess that portion of your program to ensure the effectiveness of your corrective actions. Like with most other requirements, you must document your annual reviews, any corrective actions and outcomes, and retain the records for three years.