



INCREASED SECURITY CONTROL EVALUATION GUIDANCE

This Guide is not intended to, and does not, create any rights or privileges, substantive or procedural, which are enforceable by person. The publication of this guide, or any version thereof, does not place any limitation of the otherwise lawful prerogatives or discretion of the Division of Environmental Health, Radiation Protection Section.

TOPIC/AREA	DISCUSSION
BACKGROUND	<p>This material is intended for N.C. Radioactive Material Licensees required to demonstrate compliance with the N.C. Regulations for Protection Against Radiation, the N.C. General Statutes, and the conditions of their specific licenses regarding increased controls for certain radioactive materials in certain quantities.</p> <p>Use of the guidance, recommendations, and tools associated with this material is not mandated or required in any way. Any consideration or use is voluntary on the licensee's part. While it is hoped the material is useful to the licensee in achieving and maintaining compliance, consideration or use by the licensee has inherent effect on compliance status.</p> <p>The purpose of this material is to enhance the licensee's ability to efficiently and effectively -</p> <ul style="list-style-type: none"> • implement controls intended to further the security of certain types and quantities of radioactive material, • determine an implementation method which demonstrates compliance with the specified requirements, • document a "comprehensive program" intended to comply with specified requirements, and • interact with the NC Radiation Protection Section in matters related to compliance with the specified requirements. <p>An intended outcome is that licensees can incrementally "build" an accumulative and Comprehensive IC Compliance Program through the use of the following documents – Increased Security Controls Evaluation Tool, Increased Security Controls Evaluation Tool Worksheet, and Increased Security Controls Evaluation Tool Guidance (this document). An example of a completed Increased Security Control Evaluation Tool Worksheet for a single IC Compliance Program element is available.</p> <p>The diversity of licensee organizations (size, type, and structure) affected requires that any guidance be general in nature and adaptable to their varied needs. Licensees are encouraged to consider adapting the materials to their specific needs in order to achieve the above listed outcomes.</p>
REVIEW AND BE FAMILIAR WITH THESE DOCUMENTS:	<ul style="list-style-type: none"> • Increased Controls for Licensees that Possess Sources Containing Radioactive Material Quantities of Concern (The "IC") • Questions and Answers (Q&As) Regarding Increased Controls (IC) and Implementation for Licensees That Possess Sources Containing Radioactive Material Quantities Of Concern • Implementing Guidance for Licensees that Possess Radioactive Material Quantities Of Concern (this document contains a useful <i>definitions</i> page)
CONSIDER DOCUMENT CONTROL	<ul style="list-style-type: none"> • It is important that all actions and activities involving your IC Program be conducted in accordance with <i>Information Protection</i> considerations. A review of this information as supplied on page 6 of the above referenced Implementing Guidance is recommended. At each stage of any IC Program activity (including evaluations, reviews and audits) the licensee must make determinations related to <i>Information Protection</i>.



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BECOME FAMILIAR WITH TERMS AND DEFINITIONS	<ul style="list-style-type: none"> • In order to assure consistent use and understanding of terms, frequent referencing of the above Q&As and Implementing Guidance is recommended throughout this process. (As an example, the term <i>escorting</i> is vague when used in general conversation, but is clearly defined in the Implementing Guidance as <i>maintaining line of sight</i>.)
CONSIDER EXISTING OPPORTUNITIES	<ul style="list-style-type: none"> • For many licensees developing and evaluating their IC Program will involve a diversity of staff, disciplines, and departments that have not directly collaborated in the past. Consider all staff and department functions of your organization and the potential existing policy and procedures useful in achieving overall IC compliance. Consider these components of your Comprehensive IC Compliance Program, <ul style="list-style-type: none"> ➤ Development ➤ Implementation / Operations ➤ Administrative / Documentation ➤ Continuity of Operations / Resources / Long Term Maintenance • Using the Increased Security Controls Evaluation Tool and Increased Security Controls Evaluation Tool Worksheet, evaluate the applicability and appropriateness of existing policy and procedures for achieving compliance with specific elements of an overall IC program. Determine what modifications of existing policy and procedures may be required in order to fully demonstrate specific IC compliance. When necessary identify requirements for new or separate policy and procedures necessary to fully demonstrate compliance with a specific IC element.
DEVELOP A COMPREHENSIVE IC COMPLIANCE PROGRAM	<ul style="list-style-type: none"> • Consider development of a separate “stand alone” Comprehensive IC Compliance Program. This document will list the IC compliance elements (generally outlined in the Increased Security Controls Evaluation Tool) and through cross reference identify existing policy(s) or procedure(s) evaluated as meeting the IC compliance requirements (via use of the Increased Security Controls Evaluation Tool Worksheet). The cross reference should clearly include (and document), <ul style="list-style-type: none"> ➤ The specific element of the existing policy and procedure that addresses a specific IC compliance element (in terms presented in the IC documents). ➤ A methodology for allowing review of cross referenced policy and procedures with a focus on IC compliance elements. This may include a description of documentation practices, physical location of documentation, special coding, and identification of persons trained and knowledgeable in accessing the IC compliance documentation. <p>The accumulative collection of the incrementally established IC compliance program elements “builds” a Comprehensive IC Compliance Program. This process maximizes the efficient use of existing policy and procedures (which need not be publicly identified as components of the Comprehensive IC Compliance Program), while allowing access to the</p>



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	<p>comprehensive program to remain selectively controlled.</p> <p><i>Identified in the Increased Security Control Evaluation Tool are approximately 50 Comprehensive IC Compliance Program elements, a licensee may evaluate each of these elements separately (or in groups as appropriate) against the Increased Security Control Evaluation Tool Worksheet to create a Comprehensive IC Compliance Program.</i></p> <p><i>The first round of evaluations will most likely identify required revisions to existing policies and procedures, as the revisions are made the associated Increased Security Control Evaluation Tool Worksheet is updated and the final collection of worksheets will document the status of the licensee's Comprehensive IC Compliance Program at any given time.</i></p> <p><i>An example of a completed Increased Security Control Evaluation Tool Worksheet for a single IC Compliance Program element is available.</i></p> <p>Once a comprehensive IC compliance program is established, maintenance of the program should be considered, including –</p> <ul style="list-style-type: none"> • notification when cross referenced policy and procedures are revised, • documented periodic review, revision and approval by persons responsible for compliance of the IC requirements to include, <ul style="list-style-type: none"> - assurance the reviewed Comprehensive IC Compliance Program elements address the IC compliance requirements and, - the document allows for authorized third party evaluation of the administrative and operational elements in an effective manner.
RESOURCE CONSIDERATIONS:	<p>Radioactive material licensees identified as requiring the implementation of IC requirements must assure appropriate types and levels of resources are available to achieve, maintain, and document compliance. For these licensees, the ability to demonstrate compliance with the IC requirements represents this agency's most critical element in the evaluation of capacity to safely and securely maintain the radioactive materials license. This agency is committed to enforcing the IC requirements and will implement actions to assure only licensees with a strong commitment to all aspects of an IC compliance program remain licensed.</p> <p>It is the licensee's responsibility to evaluate their resource requirements to achieve and maintain IC compliance. Consideration of resource issues while using the Increased Security Controls Evaluation Tool is recommended. The licensee's lack of ability to maintain their radioactive materials license due to inadequate IC compliance should be considered when actual or anticipated resource shortfalls are identified. Mechanisms should be established to inform the appropriate organizational resource administrators of IC compliance program status and requirements.</p>