

SECURITY TRAINING

Effective Date: 09/24/2019

PROGRAM APPLICABILITY: IMC 2200, Appendix A

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 objective's 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. 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 implement, 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 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.

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.

Three requirements have been included in this IP for inspector(s) to verify that the licensees designated in NRC Order EA-13-092, "Guidelines on the Use of Firearms by Security Personnel in Protecting U.S. NRC Regulated Facilities, Radioactive Material, and Other Property"

(74 FR 46800; September 11, 2009), as revised in, “Revision of Guidelines on Use of Firearms by Security Personnel (79 FR 36100; June 25, 2014), have established and implemented processes to comply with the requirements set forth in the order. Section 02.12, “Firearms Preemption Authority,” within this procedure is only applicable to those NRC-licensed facilities that are specifically identified in the order. During the initial inspection of the firearms preemption authority inspection requirements, the inspector(s) should ensure that all inspection requirements are included in the inspection activity. During subsequent inspections, inspector(s) should conduct a sample of the inspection requirements.

Note: Calvert Cliffs is currently required by Order EA-13-092 to conduct preemption firearms background checks. However, the Commission is amending this order to remove Calvert Cliffs that will exempt them from this requirement. Calvert Cliffs has been granted authority from the State of Maryland to possess covered firearms and devices; therefore, they no longer require preemption authority from the NRC. Calvert Cliffs should not be subjected to the preemption authority inspection requirements identified within this IP.

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 the individual's 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 sites 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 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 Firearms Preemption Authority

- a. Verify the licensee has completed satisfactory firearms background checks, as required by NRC Order EA-13-092, for members of the security organization who are required to possess, use, or have access to covered firearms and devices as a part of their assigned duties and responsibilities. (NRC Order EA-13-092)

Specific Guidance

For the inspection of this requirement, the inspector(s) should review a sample of firearms background check records for members of the licensee or contracted security organization who are required to possess, use, or have access to firearms and devices. The inspector(s) should verify and consider (as applicable) the following items listed below, which are defined in the NRC Order EA-13-092, to ensure the licensee has completed satisfactory firearms background checks: (1) a satisfactory firearms background check means a "proceed" response has been received by the licensee, from the Federal Bureau of Investigation (FBI), and through the NRC; (2) ensure the licensee has subjected all individuals who are required to possess, use or have access to covered firearms or devices as part of their assigned duties and responsibilities, to a firearms background check and; (3) ensure licensees are conducting firearms background check re-investigations at least once every 5 years, following the initial or most recent satisfactory firearms background check. For re-investigations, a satisfactory firearms background check must be completed by midnight of the last day of the month of expiration. The licensee may continue the individual's access to firearms pending completion of the re-investigation, not to exceed midnight of the last day of the month of expiration. The licensee may conduct periodic firearms background checks at a periodicity shorter than 5 years, at its discretion.

For licensee or contracted security personnel required to possess, use, or have access to covered firearms and devices, who have a break in employment or transfer between

employers or to employment in another State that requires preemption authority, the following should be verified: (1) for individuals being hired by the licensee who have had a break in employment of greater than 7 consecutive calendar days (1 week) a new satisfactory firearms background check or reinvestigation must be completed prior to allowing the individual to possess, use, or have access to covered firearms or devices; and, (2) for individuals who transfer between employers (different corporate entities) or between States, where preemption authority is necessary to possess, use, or have access to covered firearms or devices, firearms background checks are not transferrable. A new satisfactory firearms background check must be completed on these individuals prior to allowing them to possess, use, or have access to covered firearms and devices.

- b. Verify that the licensee has established and implemented a process that addresses the removal of individuals from duties who require these individuals to possess, use, or have access to covered firearms or devices when disqualifying information is received and the licensee and individual's responsibilities to report such events or occurrences. (NRC Order EA-13-092)

Specific Guidance

For this inspection requirement, the inspectors(s) should review licensee procedures, documentation, and any training materials regarding the process for reporting and actions taken upon the identification of disqualifying information associated with firearms background checks. Consistent with NRC Order EA-13-092, the term "without delay" means that the licensee shall, beginning at the time of notification, remove the individual from armed duties and reconstitute the minimum staffing level within the timeframe specified in NRC-approved security plans.

Consistent with NRC order EA-13-092, the notification to NRC Headquarters Operations Center is to be made by telephone within 72 hours after removing an individual from armed duties as a result of the discovery of any disqualifying status or event. Notification timeliness shall commence from time of discovery by the licensee or time of reporting by the individual. The licensee is not required to notify the NRC if the individual has disclosed the disqualifying event or status to the licensee.

The licensee's process should include some form of instruction or information that is provided to each individual regarding the identification of events or status that would disqualify the individual to possess, use, or have access to covered firearms and devices as well as his or her responsibility to notify the licensee promptly of the occurrence of any such event or status. The information provided to these individuals should also address the appeal process. Consistent with NRC Order EA-13-092, individuals who require access to firearms shall notify the licensee's security management within three working days of the occurrence or existence of any disqualifying event or status.

The inspector(s) should verify that the licensee's process addresses the following: (1) the removal of individuals from duty "without delay" when disqualifying information has become known or when a "satisfactory" firearms background check has not been completed; (2) the process for licensee notification to the NRC upon removal of an individual from duty resultant from disqualifying information; and (3) the process for individual notification of disqualifying events or status.

- c. Verify that the licensee retains a copy of the information received from the FBI regarding the status of individual firearms background checks for a minimum of 5 years after the information is superseded through periodic reinvestigation or termination of an individual's access to firearms. (NRC Order EA-13-092)

Specific Guidance

This inspection requirement should be conducted in conjunction with inspection requirement 02.12.a of this procedure. For this inspection requirement, the inspector(s) should review a sample of records the licensee has received from the FBI that identify the status (i.e. "proceed," "denied," or "delayed") of the individual to possess, use, or have access to covered firearms and devices. Per the NRC Order EA-13-092, the licensee is required to retain this information for 5 years after the information has been superseded by a reinvestigation or 5 years after termination of an individual's access to specific covered firearms and devices. The licensee's procedure or process for preemption authority should address records retention consistent with the order requirements.

02.13 Reviews.

Events and Logs. Review and evaluate licensee event reports, safeguards log entries, and corrective action documents for the previous 12 months, or since the last inspection, which are associated with the training program and follow up, if appropriate. (10 CFR 73.55(b)(10) and 10 CFR 73.71)

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, App. B, Sec. VI, I)

Problem Identification and Resolution. Verify that the licensee is identifying issues related to the security training program at an appropriate threshold and entering them in the corrective action program. Verify that the licensee has appropriately resolved the issues regarding regulatory requirements for a select sample of problems associated with the security training program. Refer to IP 71152, "Problem Identification and Resolution," for additional guidance. (10 CFR 73.55(b)(10))

Specific Guidance.

Before commencement of the inspection, the inspector(s) should review all licensee event reports relating to security training to determine if the licensee is capturing security training issues and properly reporting them. For the inspection of this requirement, 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 that the licensee provide a copy of 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 corrective action program.

81000.07-03 RESOURCE ESTIMATE

The resource estimate for this section is approximately 27 hours of direct inspection. The sample size for this procedure is 38.

END

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

Attachment 1 – Revision History for IP 81000.07, “Security Training”

Commitment Tracking Number	Accession Number Issue Date Change Notice	Description of Change	Description of Training Required and Completion Date	Comment Resolution and Closed 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