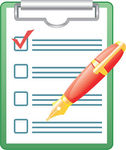
****Virginia Department of Health

Radioactive Materials Program

**12VAC5-481-451**

**Compliance Checklist # 4**

The Virginia Department of Health, Radioactive Material Program has completed the new rules for the enhanced physical security of radioactive materials, which are found in **12VAC5-481-451**. These rules will be effective January 1, 2015. To assist licensees in preparing for the changes, we will be providing periodic “Part 37 Compliance Checklists” with information on changes between the new rule and the old rule. This checklist focuses on requirements for your training program.

**# 4 – Training**

1. **Individuals who have been determined to be trustworthy and reliable shall also complete the security training required … before being allowed unescorted access to category one or category two quantities of radioactive material. *451 B 2 a (2)***

Training on the licensee’s security plan must be completed **BEFORE** you grant unescorted access.

1. **Each licensee shall conduct training to ensure that those individuals**

**implementing the security program possess and maintain the knowledge, skills, and abilities to carry out their assigned duties and responsibilities effectively. *451 C 2 c (1)***

If you have an employee who you are relying on to implement some aspect of your security plan you must conduct training for those employees on their responsibilities, to include:

* The licensee’s security program and procedures
* Purposes and functions of the security measures employed;
* The responsibility to report promptly to the licensee any condition that causes or may cause a violation of regulatory or license condition requirements;
* The responsibility of the licensee to report promptly to the local law enforcement agency (LLEA) any actual or attempted theft, sabotage, or diversion of material; and
* The appropriate response to security alarms.

1. **Refresher training must be provided at a frequency not to exceed twelve months and when significant changes have been made to the security program. *451 C 2 c (3)***

Just like the rule says, every 12 months or when significant changes are made to the program.

1. **The licensee shall maintain records of the initial and refresher training for three years from the date of the training. The training records must include dates of the training, topics covered, a list of licensee personnel in attendance, and related information.** ***451 C 2 c (4)***

Like most other rules, all training records must be kept for three years.

If you have any questions about the new security rules, please contact:

Radioactive Materials Program | 109 Governor Street, 7th Floor | Richmond, VA  23219

Telephone (804) 864-8150 | Fax: (804) 864-8155