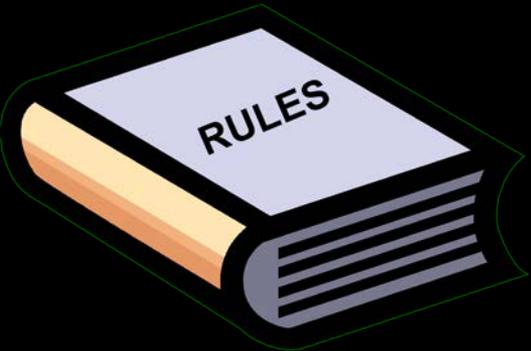


Welcome to

Security Regulations Update
Informational Meeting





To start:

- NRC implemented 10 CFR Part 37 on March 20, 2013 and rescinded the Increased Control Orders
- Full compliance for NRC licensees was March 19, 2014
- Agreement states have until March 19, 2016 to implement compatible requirements



And so this is what we have done:

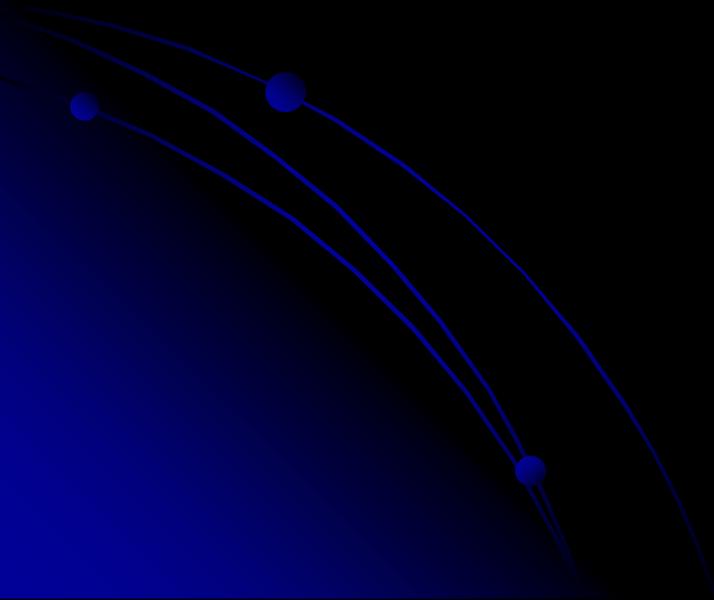
- Increased Controls orders were already implemented into 12VAC5-481, Virginia Radiation Protection Regulations. Specifically, 12VAC5-481-451
- These regulations are being revised

In short:

- 12VAC5-481-451 has been revised to be compatible with NRC's 10 CFR Part 37
- RMP licensing and inspections actions after March 19th will review compliance with these updated requirements



WHAT THIS REVISION MEANS TO YOU



Regulations Side by Side

12VAC5-481-451 (old)

12VAC5-481-451. Increased controls and fingerprinting.

A. Radionuclides of concern.

Radionuclide	Quantity of concern (TBq) ^{1,2}	Quantity of concern (Ci) ^{1,2}
Am-241	0.6	16
Am-241/Be	0.6	16
Cf-252	0.2	5.4
Cm-244	0.5	14
Co-60	0.3	8.1
Cs-137	1	27
Gd-153	10	270
Ir-192	0.8	22
Pm-147	400	11,000
Pu-238	0.6	16
Pu-239/Be	0.6	16
Ra-226	0.4	11

12VAC5-481-451 (new)

12VAC5-481-451. Increased controls and fingerprinting.

A. Any licensee who possesses or uses an aggregated quantity of category 1 or category 2 radioactive material equal to or in excess of those in subdivision 1 below, must establish a physical protection program that meets all requirements detailed in this subsection.

1. Radionuclides of concern.

Radionuclide	Category 1 (TBq) ^{1,2}	Category 1 (Ci) ^{1,2}	Category 2 (TBq) ^{1,2}	Category 2 (Ci) ^{1,2}
Am-241	60	1,620	0.6	16.2
Am-241/Be	60	1,620	0.6	16.2
Cf-252	20	540	0.2	5.4
Cm-244	50	1,350	0.5	13.5
Co-60	30	810	0.3	8.1
Cs-137	100	2,700	1	27
Gd-153	1,000	27,000	10	270
Ir-192	80	2,160	0.8	21.6
Pm-147	40,000	1,080,000	400	10,800
Pu-238	60	1,620	0.6	16.2
Pu-239/Be	60	1,620	0.6	16.2

Minor Changes

- Looks different
- Two quantity categories now
- New terminology
- Procedural requirements are part of the security plan
- New annual requirements (LLEA coordination and security plan review and training)
- Alarm testing requirement & details on alarms

Notable Changes

- Background checks
 - 7 years prior for ALL (employment length no longer matters)
 - Re-investigation every 10 years
 - Informed consent needed
 - Verification of identity
 - Provide personal info
- Security Plan

Notable Changes (cont)

- Verify license of recipient for all shipments
 - Additional training requirements for staff in security aspect of program and instruction to staff on plans
 - Reviewing Official (formerly T&R Official) now has to have unescorted access to material (fingerprinting by authorized agency) *and* can be changed in-house
- 



Regulatory Review, Subsection by Subsection

PARTS AND PIECES

12VAC5-481-451

Subsection A

General Provisions

Previously [same;
Subsection A]

Definitions [12VAC5-
481-10]

RAMQc Table [Same;
Subsection A]

- All new definitions from 10 CFR Part 37 (Reviewing Official, Security zones, etc.) are included in 12VAC5-481-10
- 10 CFR 37 Appendix A is included under this subsection, not a separate Appendix; table includes Curies values to 3 decimals now

12VAC5-481-451

Subsection B

Background
Investigations and
Access Control Program

Subsection B 1 has now
become B 1 through 4

Information protection is
still covered under B 6

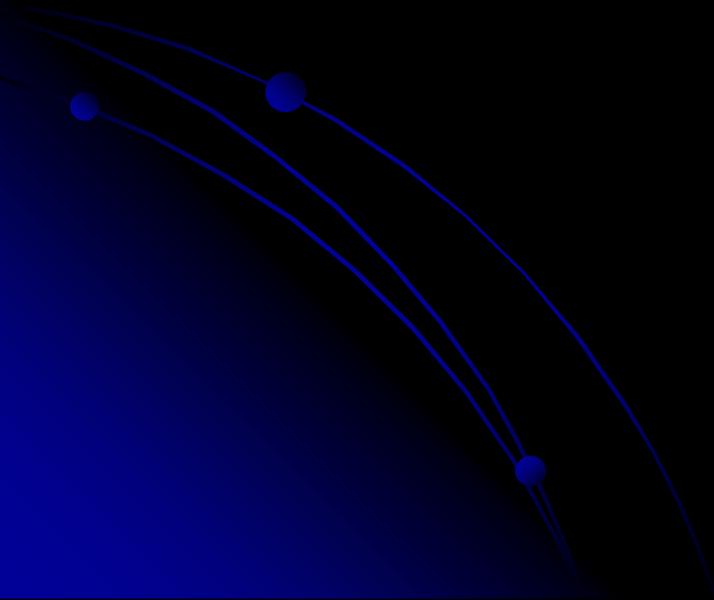
Subsection C is included
in this new Subsection B

- Reviewing Official needs to be fingerprinted by licensed entities and have *unescorted* access to material
- Need signed consent form for personal history check
- 3 year record retention
- Review 7 years instead of 3 with no difference due to length of employment
- Security training
- Reinvestigation every 10 years
- Problems with info request

12VAC5-481-451

Subsection B

Continued

- Verify person's identity
 - Require independent verification
 - Grandfathering allowed
 - Provides relief for individuals (ex: FedEx drivers)
 - Licensee can change Reviewing Official with oath and affirmation; no agency involvement
 - Individual can address errors
 - Written access control program and review of program annually
- 

12VAC5-481-451

Subsection C

Physical Protection
Requirements During
Use

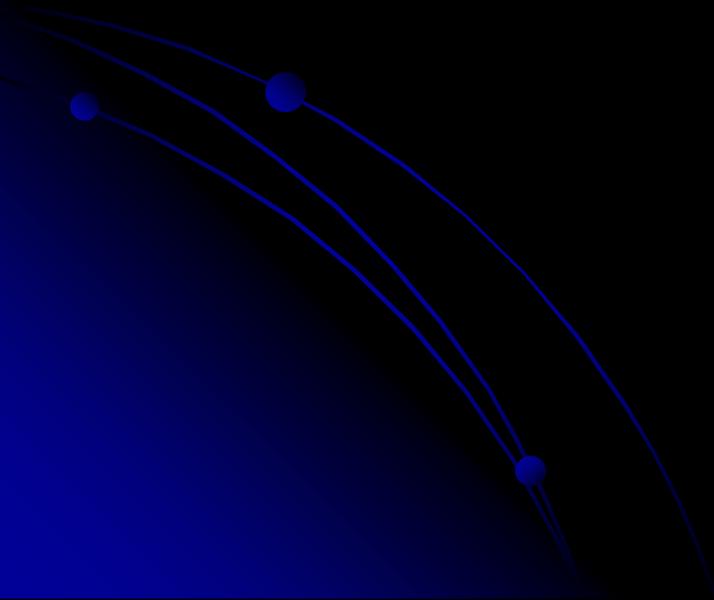
Previously B 2, B 3, B 5,
B 6

- Requires a security plan approved by responsible individual (previously a documented plan with no required approval) and instructions provided
- No pre-arranged plan with LLEA, just coordination (initially info) required annually
- Introduction of security zones
- Written security implementation plan and annual reviews

12VAC5-481-451

Subsection C

Continued

- No longer a notification required for source exchange of Category 1 sources
 - Details on monitoring and detection system
 - Testing frequency for system in maintenance program for system
 - Relief for disabling mechanism (mobile) to meet health & safety requirements
 - Security plan training
 - LLEA event reporting
- 

12VAC5-481-451

Subsection D

Physical Protection In
Transit

Previously B 3

- Source position information not required to be exchanged (shipping)
- License verification (through some means including LVS) for ALL shipments
- No-Later-Than-Arrival time used for notification when shipping and notification of change in this time
- Loss/Theft event notifications to LLEA, state, etc

12VAC5-481-451

Subsection D

Continued

- Drivers on the road required to have access to procedures
 - Does not require training or T&R verification of common carrier drivers
 - Start investigation upon lost or missing material for Category 1 sources or after No-Later-Than-Arrival time
 - Cancellation notice to states for shipments
- 

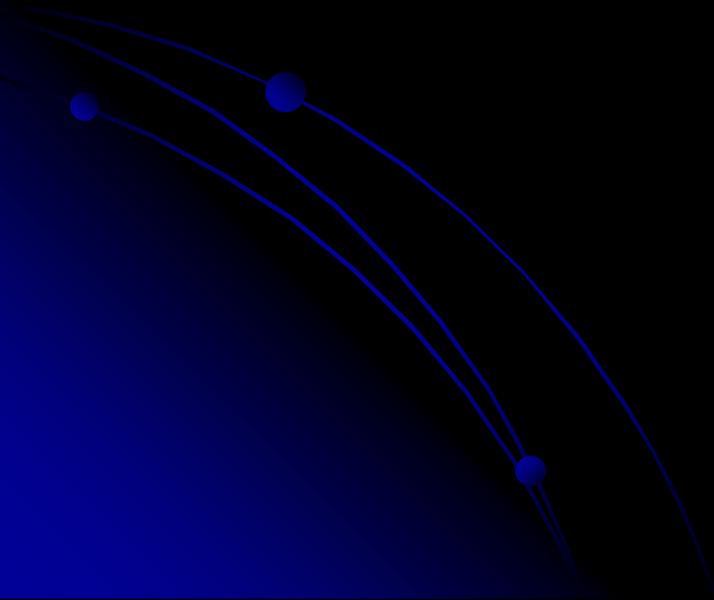
12VAC5-481-451

Subsection E

Records

Previously B 6

- Electronic records and prevention of tampering or loss of records
- When you terminate the license and are no longer under RMP authority, records are not required to be retained



**THANK YOU FOR YOUR
ATTENTION**



ANY QUESTIONS?

CONTACT INFORMATION

Radioactive Material Program

804-864-8150

804-864-8155 (fax)

Charles Coleman CHP (Central)

Charles.Coleman@vdh.virginia.gov

804-864-8156

Patsy Hayden (Central)

Patsy.Hayden@vdh.virginia.gov

804-864-8183

Kimberly Gilliam (Southwest)

Kimberly.Gilliam@vdh.virginia.gov

276-669-2431

Mike Welling, Director

Mike.Welling@vdh.virginia.gov

804-864-8168

Asfaw Fenta (Central)

Asfaw.Fenta@vdh.virginia.gov

804-864-7943

Anthony Sands (Central)

Anthony.Sands@vdh.virginia.gov

804-864-8157

Beth Schilke (Southeast)

Beth.Schilke@vdh.virginia.gov

757-886-2835