

Rule 420-3-26-.15 Frequently Asked Questions

The following are questions (with answers) that have been asked previously:

1. If a T&R Official has already been through the fingerprint and background check process, is it necessary for that individual to undergo a new check/fingerprinting to be named the Reviewing Official?

ANSWER: No, that person may be named as the Reviewing Official, but must have the background check re-evaluated within ten years from the date of the original check.

2. If a background check and fingerprinting is performed by another licensee for a new employee, may that be sufficient to consider someone eligible for unescorted access at my facility?

ANSWER: The short answer is “YES”; but you as the licensee must ensure that you have received sufficient information from that other licensee to be able to document your decision to grant that person access at your facility.

3. We use the TWIC system for verification of our employee’s trustworthiness and reliability. Are we still able to use this method under the new rules?

ANSWER: Yes, with the understanding that a TWIC certification must be renewed every 5-years to remain valid and current.

4. Will the security inspections be conducted separate from our regular health and safety inspections?

ANSWER: The inspections of a licensee’s compliance with the new security rules will be conducted at the same time, and as part of, the regular inspections conducted based on the priority for your license category.

5. The NRC has issued inspection guidance for how to conduct security inspections. Will Alabama be developing an independent guidance document?

ANSWER: The intent will be to follow the methodology developed by the NRC, allowing for any unique situations that may be present at Alabama licensed locations. Alabama may develop its own version of security inspection guidance in the future, but there are no plans to work on that as yet.

(NOTE: NRC’s inspection guidance available at: <http://pbadupws.nrc.gov/docs/ML1403/ML14030A144.pdf>)

6. Are we required to test our alarms every three months or every year?

ANSWER: The requirement to test components of the security system is at the manufacturer’s suggested frequency, or no less than every twelve months if there is no such recommendation.

7. If I have materials located in the same room, but they are separated in different safes or other devices so that no single safe/storage device holds a category 1 or category 2 quantity of materials, would these be considered co-located?

ANSWER: No, as long as the storage room had a secure locking device and each individual safe and/or storage container had its own individual secure locking device.