

# Alabama Department of Public Health

Office of Radiation Control

## Rule 420-3-26-.15 Compliance Checklist # 1

---

The Alabama Department of Public Health, Office of Radiation Control has completed the new rules for the enhanced physical security of radioactive materials, which are found in Rule 420-3-26-.15 of the Alabama Administrative Code. These rules are required to be fully implemented by March 19, 2016 and will take the place of the Increased Control Orders previously issued by the Office of Radiation Control to certain Alabama licensees.

To assist licensees in preparing for the changes, we will be providing periodic Rule 420-3-26-.15 Compliance Checklists with information on changes between the new rules and the previously issued orders, and what licensees should be considering as we move closer to the implementation date. This first checklist will focus on requirements for your unescorted access authorization program.

---

### # 1 - Your Unescorted Access Authorization Program

---

#### 1. Designation of “Reviewing Official”, including requirement for that individual to have background check and fingerprinting. 420-3-26-.15(8)

The previous orders required a written designation of a Reviewing Official who was responsible for making the final determination of an employee's trustworthiness and reliability for unescorted access. The new rules require that this person, now called the Reviewing Official, undergo the same background check and fingerprinting as employees having unescorted access to materials **AND** the Reviewing Official **MUST** also be granted unescorted access.

#### 2. Preparation of written procedures to be followed to implement the unescorted access authorization program. 420-3-26-.15(9)

Document the processes to be followed to ensure you are meeting all the requirements, which include:

- Signed consent from individuals undergoing a background check and fingerprinting
- Review process for denial of unescorted access
- Background checks conducted at 10-year intervals
- Review of information from the previous 7 years
- Maintenance of records generated as part of background checks
- Training of individuals prior to granting unescorted access
- Periodic review of the access authorization program

#### 3. Scheduling background checks & fingerprinting for current employees who have previously been granted unescorted access. 420-3-26-.15(9)

The previous orders did not specify a time frame for reinvestigations. In the new rules, background investigations and fingerprinting are required to be re-done every 10 years. This does **NOT** mean that all reinvestigations of current employees will be due in ten years from the implementation date of March 19, 2016. Reinvestigations should be completed within ten years of the date of the most recent background investigation. For example, if an employee's initial background investigation was completed in June 2009, they should have a reinvestigation done in June 2019.

---

If you have any questions about the new security rules, please contact one of the following individuals:

David Turberville: [david.turberville@adph.state.al.us](mailto:david.turberville@adph.state.al.us)  
Cornelius Maryland: [neil.maryland@adph.state.al.us](mailto:neil.maryland@adph.state.al.us)

Myron Riley: [myron.riley@adph.state.al.us](mailto:myron.riley@adph.state.al.us)  
Phone: 334-206-5391 or 1-800-582-1866