



Minnesota Department of Health
Radioactive Materials Unit

Chapter 4731.8000-4731.8140
Compliance Checklist # 1



Minnesota
Department
of Health

The Minnesota Department of Health, Radioactive Materials Unit has completed the new rules for the enhanced physical security of radioactive materials, which are found in Chapter 4731.8000–4731.8140. These rules became effective August 17, 2015 and take the place of the Increased Control orders previously issued by the Commissioner of Health and/or the NRC to certain Minnesota licensees. To assist licensees in complying with the changes, we are providing “Part 37 Compliance Checklists” with information on changes between the new rules and the previously issued orders, and what licensees should consider for implementation. 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. 4731.8015**

The previous orders required a written designation of a “T&R 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.
- 2. Preparation of written procedures to be followed to implement the unescorted access authorization program. 4731.8015**

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
 - The appropriate response to security alarms.
- 3. Scheduling background checks and fingerprinting for current employees who have previously been granted unescorted access. 4731.8020**

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 August 17, 2015. Reinvestigations should be completed within ten years of the date the individual was given unescorted access to the material. For example, if an employee’s initial unescorted access was granted in February 2006, they should have a reinvestigation done in February 2016.

If you have any questions about the new security rules, please contact the Radioactive Materials Unit at: health.ram@state.mn.us or 651-201-4400.