

Activity: Access Control

1.0 Purpose: To provide a method to evaluate compliance to facility access control requirements.

2.0 Scope: This guideline has been developed for use in the review and evaluation of the administrative controls used to assure that the safety of plant personnel is adequately preserved. This guideline does not encompass the access to vital equipment normally addressed in the plant physical security program.

3.0 References:

3.1 ANSI/ANS-3.2, "Administrative Controls and Quality Assurance for the Operational Phase of Nuclear Power Plants"

3.2 INPO Good Practice OP-203, "Procedures for the Protection of Employees Working on Electrical and Mechanical Components"

3.3 INPO Good Practice OP-204, "Conduct of Operations"

3.4 INPO Good Practice OP-101, "Safe Work Procedure for Enclosed Volumes"

3.5 INPO Good Practice EPN-02, "Conduct of a Direct-Reading Dosimeter"

3.6 INPO Good Practice EPN-03, "Comparison of Dosimetry Results"

4.0 Guidelines:

4.1 In preparation for and during the conduct of this surveillance:

E Obtain and review implementing procedures, instructions and drawings governing this activity.

E Prepare a guide or checklist using the selected items from this guideline.

E Review past surveys, audits, surveillances and other evaluations/ assessments.

E Ensure that checklists include, where applicable, actual observations of performance, general plant conditions, radiological work practices, housekeeping, work document controls and use, and safety practices.

NOTE: Refer to Guideline A.1, "General Quality Surveillance Guidance," for specific details on the attributes listed above.

4.2 Key Controls

A. Review the Control Room Key Control Log to verify:

- 1) current list of authorized key users is available.
- 2) issuance made by authorized personnel to authorized users only.
- 3) time and date of issuance and return recorded.
- 4) log reviewed and signed by appropriate Control Room operating staff, as required by procedures.
- 5) keys have not been out for extended periods without justification.
- 6) Radiation Work Permit (RWP) numbers are logged for keys issued when access to radiologically controlled areas is required.

B. Verify that keys are properly identified and kept in a locked cabinet.

C. Verify that the status of the keys in cabinet agree with the key log.

- D. Verify that key switches associated with by-passed safety functions are incorporated in a key control system with similar attributes to 4.1.

4.3 Confined Space Control

- A. Observe the preparation activities associated with the entry into a confined space to verify that:

- 1) personnel associated with the entry are briefed on the hazards, the procedures, and the equipment to be used.
- 2) appropriate safety equipment is available and serviceable.
- 3) enclosed volume is properly isolated and tagged.
- 4) warning signs fixed at each entry point.
- 5) air volume testing by qualified personnel using calibrated equipment is performed as required.

6) RWP issued, if appropriate.

B. Observe the opening and initial entry to verify that:

- 1) enclosed volume is vented or drained to atmospheric pressure.
- 2) entry permission granted and properly documented.
- 3) ventilation equipment available as required.
- 4) air tests and radiological tests performed as per applicable procedures using calibrated equipment.
- 5) initial entry performed by chemistry and radiological protection technician is appropriate, with backup personnel standing by, and communication procedures established and understood.

C. Observe work in the confined space cleared for entry to verify that:

- 1) the requirements of the rescue operation plan are met.

- 2) communication with personnel inside the enclosed volume is properly maintained.
- 3) atmospheric retesting is performed as specified in schedule.
- 4) adequate ventilation is provided.
- 5) combustible and flammable materials are properly controlled.
- 6) serviceable safety equipment available.
- 7) adequate safety lighting provided.

D. Observe the closure of a confined space to verify that:

- 1) all tools, ms taken into contaminated area are properly bagged and taped.
- 3) protective clothing correctly donned.
- 4) dosimetry worn properly and in accordance with the RWP.

D. Observe an exit to verify that:

- 1) undressing and "step-off" pad procedures are correctly performed.
- 2) items transferred out of controlled area are properly bagged.
- 3) dosimetry devices surveyed and results documented on RWP.
- 4) frisking procedures are correctly implemented.
- 5) exiting personnel sign out on RWP.
- 6) final exit is through a portal monitor.

E. Review RWP implementing procedures to verify:

- 1) compliance to commitments and requirements.
- 2) compliance with administrative controls for preparation, issue, update, termination and records.

F. Review sample of workers records to verify that individuals meet dosage, respiratory protection and training requirements for radiation work.

5.0 Other Guidelines for Consideration:

5.1 A.1, "General Quality Surveillance Guidance"

5.2 R.1, "ALARA Program"

5.3 R.2, "Contamination Control"

5.4 R.3, "Respiratory Protection Equipment Usage"

5.5 R.4, "Dosimetry"

5.6 R.5, "Surveys"