

United States Department of Energy National Nuclear Security Administration International Nuclear Security

**Critical Group Identification** 

September 2023

Jason Davenport IB3 Global Solutions



Sandia National Laboratories is a multimission laboratory managed and operated by National Technology & Engineering Solutions of Sandia, LLC, a wholly owned subsidiary of Honeywell International, Inc., for the U.S. Department of Energy's National Nuclear Security Administration under contract DE-NA0003525. SAND2023-09046PE



#### **U.S. Nuclear Regulatory Commission definition of Critical Group**

- Reg Guide 5.77 defines them as, any individual who performs job functions that are critical to the safe and secure operation of the licensee's facility. This includes any individual who has been granted UA or certified UAA access and performs one or more of the following job functions:
  - any individuals who have extensive knowledge of facility defensive strategies or who design and/or, implement the plant's defense strategies.
  - any individuals in a position to grant an individual unescorted access or to certify an individual unescorted access authorization.
  - any individuals assigned a duty to search for contraband (e.g., weapons, explosives, incendiary devices).
  - any individuals who have access, extensive knowledge, or administrative control over plant digital computer and communication systems and networks as identified in 10 CFR 73.54.
  - any individual identified in 10 CFR 73.56(i)(1)(v)(B)(5).





#### Good practices for identifying Critical Group employees:

- Identify critical components/areas for your facility.
- Identify the critical activities for your facility.
- Identify the personnel and positions who have the most Access, Authority, and Knowledge.
  - Some questions to consider when conducting your review:
    - Who works on those components?
    - Who has access to those areas?
    - ▶ Who has key roles and responsibilities for critical activities?





#### **Transportation Activity Analysis**

Access	Authority	Knowled	» Origination Site
			Site Operators/ Facility Staff
			Facility Management
			Facility Regulators
			Site Security Management
			Site Security Operators/ Guards
			Site Support Staff
			Temporary Contractors/ Laborers

Legend:



**High Security Threat Potential** 

Medium Security Threat Potential

Low Security Threat Potential





#### Employee identification, enrollment, and tracking

- Identification: Supervisors of staff members who meet the threshold to be considered part of a Critical Group are responsible for reporting those staff members to the Access Authorization department.
- Enrollment: At the time of initial hiring, if the staff member's job scope meets the criteria, they must be enrolled into the Critical Group.
- Tracking: Good practices for tracking Critical Group members include a review of
  - Personnel Escort requests to see if an individual requires continued access.
  - Access logs to determine who and when employees and or subcontractors access a critical area.
  - Having a Performance Metric process for ensuring your processes and programs are being effective.





#### **Critical Group identification challenges:**

- Proper understanding on the reporting requirements.
- Failure to report an individual performing critical group work.
- Job scope/job description changes, department transfers.
- Manual vs. automated processes.





# Comments or questions?



