

## Security Objective

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Development of a program to perform maintenance and testing of systems that control physical access to protected systems located in a defined Physical Security Perimeter (PSP).

NIST Special Publication 800-53 (Rev. 4) PE-3

## WECC Intent

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The potential failure points and guidance questions give direction to registered entities for assessment of risk, while designing internal controls specific to NERC Reliability Standards and Requirements. The Registered Entity may use this document as a starting point in determining entity risk. It is not WECC's intent to establish a standard or baseline for entity risk assessment or controls design.

*Note: Guidance questions help an entity understand and document its controls. Any responses, including lack of affirmative feedback, will have no consequences on an entity's demonstration of compliance at audit.*

*\*Please send feedback to [ICE@WECC.org](mailto:ICE@WECC.org) with suggestions on potential failure points and guidance questions.*

## Potential Failure Points and Guidance Questions

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### CIP-006-6 R3

**Potential Failure Point (R3):** Failure to have a documented program to perform maintenance and testing of each Physical Access Control System (PACS) and locally mounted hardware or devices at the PSP at least once every 24 months.

1. How do you ensure maintenance occurs in the required period?
2. How do you ensure testing occurs in the required period?
3. How does your program track maintenance and testing?
4. How have you developed a process to update diagrams or drawings for PACS assets and locally mounted hardware that were changed out during maintenance?

**Potential Failure Point (R3):** Failure to have a documented program that outlines scope to perform maintenance and testing on each applicable device or system.

1. How does your program ensure all devices are included?

**Potential Failure Point (Part 3.1):** Failure to produce dated maintenance records or other documentation showing testing and maintenance.

1. How do you ensure accurate dates are recorded?

**Potential Failure Point (R3):** Failure to clearly define or communicate start and end dates used to establish periods for testing and maintenance.

1. How do you document maintenance?
2. How do you document testing?
3. How do you retain records so they are available to demonstrate the 24 months requirement?

**Potential Failure Point (R3):** Failure to design maintenance and testing activities that ensure PACS and locally mounted hardware or devices at the PSP function properly.

1. How does your program specify maintenance criterion for each PACS?
2. How does your program specify testing criterion for each PACS?
3. How do you ensure qualified personnel are performing the testing and maintenance to reduce the risk of implying a device works properly without knowing the parameters of test/fail with the specific device?

