OFFICE OF INDEPENDENT OVERSIGHT
OFFICE OF SECURITY EVALUATIONS
APPRAISAL PROCESS GUIDE

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Office of Health, Safety and Security
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Preface

The Office of Security Evaluations (HS-61) has prepared the Safeguards and Security Appraisal Process Guide, as part of a continuing effort to enhance the quality and consistency of safeguards and security appraisals. This guide should be used along with the Office of Independent Oversight (HS-60) Appraisal Process Protocols that describes the overall philosophy, scope, and general procedures applicable to all Independent Oversight appraisal activities, as dictated in DOE Orders 470.2B, *Independent Oversight and Performance Assurance Program*, and 226.1, *Implementation of Department of Energy Oversight Policy*. In addition to providing information regarding the roles and responsibilities for conducting safeguards and security appraisals and on the goals and scope of these appraisals, the Safeguards and Security Appraisal Process Guide provides additional planning techniques and a detailed set of tables that describe the necessary steps to successfully conduct each phase of a safeguards and security appraisal activity.

The two process documents, along with HS-61's topic-specific Inspectors Guides, provide a comprehensive set of guidance and tools that better enable HS-61 inspectors to evaluate safeguards and security program effectiveness across the Department of Energy (DOE) complex.

Although the process guide is primarily germane to HS-61, it is made available to the field through the HSS home page to assist in the conduct of field surveys or self-assessments. A loose-leaf format was selected so that inspectors can remove and copy sections for ready reference.

HS-61 anticipates making periodic revisions to this guide in response to changes in DOE program direction and guidance, insights gained from Independent Oversight activities, and feedback from customers and constituents. Therefore, users of this process guide are invited to submit comments and recommendations to the Office of Security Evaluations.

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Acronyms

CAT	Composite Adversary Team
DOE	U.S Department of Energy
ESS	Engagement Simulation System
GTN	Germantown
HSS	Office of Health, Safety and Security
HS-60	Office of Independent Oversight
HS-61	Office of Security Evaluations
HS-62	Office of Cyber Security Evaluations
ODC	Oversight Document Center
PPM	Protection Program Management
QRB	Quality Review Board
SNM	Special Nuclear Material

Definitions

Access Control: The process of limiting access to the resources of a system only to authorized users, programs, processes, or other systems.

Classified Information: Any information that requires protection against unauthorized disclosure in the interests of the national defense and security or foreign relations of the United States pursuant to U.S. statute or Executive Order. The term includes Restricted Data, Formerly Restricted Data, and National Security Information, each of which has degrees of importance denoted by the classifications Top Secret, Secret, and Confidential.

Classified Information and Control: The process of correctly identifying and protecting the Department of Energy's sensitive information, including classified National Security Information (NSI), Restricted Data (RD), Unclassified Controlled Nuclear Information (UCNI), and Official Use Only (OUO) information.

Classified Materials: Any document, electronic media, chemical substances, metals/oxides (including special nuclear material or SNM), fabricated or processed items, or machinery and equipment that have been classified by proper authority.

Classified Matter Protection and Control: A program designed to protect classified information from unauthorized disclosure. Such programs include: the proper marking, storage, reproduction and destruction of classified materials; the control and accountability of Top Secret documents, classified removable electronic media, certain Sigma information, and special access program materials; and training programs for users and custodians.

Corrective Action Plan (CAP): A document that provides, for each finding or deficiency addressed, a thorough analysis of the underlying causal factors to determine whether systemic program weaknesses exist, steps to address the cause(s) of the finding, detailed descriptions of the corrective action(s) to resolve each finding and prevent recurrence, and a general outline for the conduct of the proposed independent corrective action effectiveness review. For each corrective action, the document shows the responsible person(s) and organizations, the date of action initiation, key milestones, the date of expected completion of the action, how actions will be tracked to closure, deliverable(s) that will signify completion, and the mechanism(s) for verifying closure. A corrective action plan may also provide a detailed discussion of longer-term enhancements and upgrades, as well as descriptions of actions taken and compensatory measures already in place.

Detection: The positive assessment that a specific object is the cause of an alarm.

Diversion: The transfer of nuclear material from its authorized use and/or location.

Draft Inspection Reports contain inspection observations, issues, analyses, and ratings. Draft inspection reports are provided to managers as appropriate to allow timely discharge of their respective duties and responsibilities.

Findings: Findings are used to indicate significant deficiencies or safety issues that warrant a high level of attention on the part of management. If left uncorrected, such findings could adversely affect the DOE mission, the environment, the safety or health of workers or the public, or national security. Findings

may identify aspects of a program that do not meet the intent of DOE policy. Findings are clearly identified in the appraisal report, define the specific nature of the deficiency and whether it is localized or indicative of a systemic problem, and identify which organization is responsible for corrective actions. Findings require resolution by management through a formal corrective action process.

Force-on-Force Exercises: A scheduled inspection event that tests the integrated capability of the protective force to implement emergency plans and procedures under simulated combat conditions.

Integrated Safeguards and Security Management (ISSM): A formal, organized process for planning, performing, assessing, and improving the secure conduct of work in accordance with risk-based protection strategies as defined in DOE Policy 470.1, *Integrated Safeguards and Security Management (ISSM) Policy*. These systems are institutionalized through DOE directives and contracts. The ISSM system framework encompasses all levels of activities and documentation related to safeguards and security management throughout the DOE complex and includes all topical areas of safeguards and security (e.g., personnel, physical, information, and cyber security, and nuclear safeguards) and related cross-cutting areas (e.g., export control, classification, foreign visits and assignments, and foreign travel). [470.1]

Material Control and Accountability (MC&A): A program designed to provide an information and control system for SNM, and encompass those systems and measures necessary to establish and track nuclear material inventories, control access, detect loss or diversion of nuclear material, and institute administrative controls that ensure the integrity of the overall MC&A program.

National Security Interests: Activities performed at DOE or DOE contractor, subcontractor, consultant, or other facilities or installations that involve classified matter, special nuclear materials, nuclear weapons, nuclear weapons components and devices, critical infrastructure, or government property of high value or that would impact DOE program continuity, or otherwise are deemed important.

Personnel Security: A defined set of policies, procedures, and activities established to ensure that granting an individual access to classified matter or special nuclear material would not endanger the common defense and security, and would be clearly consistent with the national interest. Within the scope of Independent Oversight appraisals, personnel security includes the personnel security clearance, safeguards and security awareness, foreign visits and assignments and human reliability programs.

Physical Security Systems: The combination of personnel, equipment, hardware and software, structures, plans and procedures designed to protect personnel; prevent or detect unauthorized access to facilities, material, and documents; protect against espionage, sabotage, damage, and theft; and respond to any such acts should they occur.

Protection Program includes all aspects of the DOE's activities directed toward protection of national security interests and DOE property. Any adverse impacts on the health and safety of the public resulting from implementation or failure of elements of the protection program are also included.

Protection Program Management: Processes and activities related to staffing, budget, direction and control intended to ensure that DOE security interests are provided the appropriate degree of protection from theft, sabotage, and other hostile acts that have the potential to significantly impact the national security or the health and safety of DOE and contractor employees, the public and the environment.
Protection Program Topic Areas include protection program management, personnel security, physical

security systems, protective force, classified matter protection and control, and material control and accountability. These subject areas are used at DOE sites and facilities to implement local programs for the protection of classified and sensitive unclassified information, special nuclear material, government property and employees.

Protective Forces: Federal and contractor security officers, security police officers, Officer of Secure Transportation Federal Agents assigned protective duties involving safeguards and security interests.

Sensitive/Unclassified Information: Unclassified but sensitive data requiring protection in accordance with the Privacy Act (official use only information) and the Atomic Energy Act (unclassified controlled nuclear information) because of the loss or harm that could result from inadvertent or deliberate disclosure.

Theft: The removal of government property and/or materials from a DOE or DOE contractor-operator facility without permission or authorization and contrary to law, or the unauthorized removal of SNM.

Threat: A possible event that can, if it occurs, exploit a vulnerability. Threats include both hazards and the triggering of flaws.

Section 1 – Introduction

Introduction

The Office of Security Evaluations (HS-61) is responsible for the independent evaluation of the effectiveness of safeguards and security policies and programs throughout the Department, including protection of special nuclear material (SNM), protection of classified and sensitive information, and foreign visits and assignments. The office conducts appraisals, develops and validates reports that identify findings, strengths, weaknesses, and opportunities for improvement. It also performs follow-up reviews to ensure corrective actions are effective and that complex-wide issues and generic weaknesses in safeguards and security are appropriately addressed. The programs evaluated generally include the following functional areas:

- Protection Program Management (PPM)
- Personnel Security
- Physical Security Systems
- Nuclear Material Control and Accountability
- Classified Matter Protection and Control
- Protective Force
- Classification and Information Control.

In addition, specific Independent Oversight responsibilities for the Office of Security Evaluations include:

- Performing periodic appraisals of safeguards and security programs that include performance testing at U.S. Department of Energy (DOE) sites possessing significant amounts of SNM, classified information, or other national security interests

- Maintaining the Composite Adversary Team (CAT) used to perform force-on-force performance exercises

- Performing special reviews of specific or cross-cutting safeguards and security topics of interest to the Department.

Roles and Responsibilities

To ensure that planning, conduct, closure, and follow-up activities are effectively accomplished, key functions and tasks are assigned to various positions.

Director, Office of Security Evaluations

The Director, HS-61, directs and oversees the inspection process. The Director provides all pertinent information to the designated Inspection Team Leader, assuring that the Inspection Team Leader tasks the appropriate personnel to serve on the various inspection topic teams. The Director reviews ongoing plans to ensure that they address all identified concerns. During the inspection, the Director monitors progress, provides guidance, participates on the Quality Review Board (QRB), and meets with site/facility management as appropriate. After the inspection, the Director may provide briefings to the Secretary, Under Secretary, Deputy Secretary, Lead Program Secretarial Officers, Congressional committees, or other groups who have a legitimate interest in inspection results.

The Director may also choose to assume the role of Inspection Team Leader; this more commonly occurs

during major efforts, such as comprehensive inspections. In the absence of the Director, the Deputy Director, HS-61, fills this role and meets these responsibilities.

Inspection Team Leader

The Inspection Team Leader is responsible for all aspects of an inspection or follow-up review, including the following:

1. Manages all phases of the inspection.
2. Provides continuity throughout the inspection process.
3. Ensures that inspection activities remain properly focused.
4. Keeps Office of Health, Safety and Security (HSS) and Office of Independent Oversight (HS-60) management informed of progress and significant appraisal results.
5. Ensures effective communications within the inspection team and between the inspection team and line management personnel.

In short, the Inspection Team Leader is responsible for keeping the inspection process on track.

After the closeout of the inspection, the Inspection Team Leader ensures that the inspection report is finalized, Headquarters briefings are scheduled and conducted, and corrective action plans are reviewed.

Deputy Inspection Team Leader

The Deputy Inspection Team Leader provides support to the Inspection Team Leader during all phases of the inspection. A primary responsibility of the Deputy Inspection Team Leader is to assume the duties of the Inspection Team Leader if the Inspection Team Leader is absent, thus ensuring continuity of the inspection process.

Various logistical and administrative duties are typically assigned to the Deputy Team Leader, such as preparing document request lists, the inspection plan and the notification memorandum, obtaining site points of contact, identifying documents for shipment to the site, and the preparation of the final appraisal reports.

During the conduct phase of the inspection, the Deputy Team Leader may act as a topic team member or topic lead. The Deputy Team Leader assists the Inspection Team Leader in conducting the daily inspection team meetings, in preparing daily reports to management, and participating in daily meetings with site managers.

In cases where inspection scope is limited or narrow, such as some special inspections or follow-up reviews, a Deputy Inspection Team Leader may not be required.

Field Support Manager

The Field Support Manager is the point of contact for all inspection administrative and logistical support. This includes arrangements with the inspected site's point of contact for office space, telephone service, classified and unclassified storage, reproduction and destruction, fax service, and communication between the site and DOE Headquarters. The Field Support Manager makes arrangements for computer support, including ensuring that Independent Oversight's classified computers are certified and accredited in a timely manner. The Field Support Manager supervises the inspection team's administrative staff on site, ensures

the availability of necessary support, ensures control and accountability of classified documents and classified removable electronic media, and oversees the preparation of the draft inspection report, final report, and memoranda.

Topic Leaders

A topic leader is assigned to each topic team participating in an inspection or a special review. The topic leader is responsible for managing the efforts of the topic team and for keeping the Inspection Team Leader informed of salient topic team activities during the inspection. In particular, the topic lead is the focal point for the topic team and is responsible for coordinating and focusing the activities of the team, ensuring that deliverables are prepared and provided according to the schedule, promoting integration with other topic teams, and acting as spokesperson during meetings and briefings.

Performance Test Director

A Performance Test Director is assigned to each appraisal where a large scale force-on-force performance test will be conducted. The Performance Test Director is responsible for planning the force-on-force performance test with the responsible site Test Director to ensure the ability to effectively, realistically, and safely evaluate the ability of the site protective force to execute their assigned emergency duty responsibilities. The Performance Test Director is responsible to ensure that performance tests are planned consistent with the "Protective Force Protocols for ESS [Engagement Simulation System] Supported Performance Tests and Exercises." The Test Director will be supported by a Test Coordinator and Safety Officer. The Performance Test Director develops performance test objectives and scenarios and coordinates with the Core CAT Leader to arrange the necessary support for planned performance tests.

Safety Officer

A Safety Officer is used to support all force-on-force exercises conducted during HS-61 inspections. The Safety Officer is responsible for evaluating safety aspects of proposed performance test scenarios and coordinating activities with the responsible site safety personnel to define the scope of work associated with the performance tests, analyze related workplace and environmental hazards, and identify engineering and administrative controls to mitigate the identified hazards. In association with these duties, the Safety Officer walks down the exercise areas with site personnel, evaluates the site exercise safety procedures, and oversees exercise safety planning efforts. The Safety Officer is responsible to raise any significant safety concerns to the Performance Test Director and Inspection Team Leader. The Safety Officer will observe force-on-force exercises and evaluate the effectiveness of the site in ensuring conformance with established safety controls.

The Safety Officer may also be asked to support other inspection topic teams, such as the physical security systems team, when safety related issues are identified. The Safety Officer will ensure that either the testing activities are covered under an existing site health and safety plan or that the site develops one in conformance with established safety controls. The HS-61 Safety Officer will develop a supplemental safety plan to control the performance tests when a critical performance test activity requires work by HS-61 Federal or contractor support personnel that is not consistent with the site's health and safety procedures and the risks of this work are viewed by the Safety Officer to be acceptable. These types of performance tests must be formally approved by the Director of HS-61 prior to the commencement of the performance tests to ensure that the benefit of the performance test is worth the increased occupational risk. Site personnel must also be given the opportunity to review the safety plan and to identify concerns. All concerns will be shared

with the HS-61 Director prior to his review and approval of the supplemental safety plan.

Table 1 summarizes the roles and responsibilities of key staff members in the appraisal process.

Table 1. Summary of Staff Inspection Roles

DIRECTOR, OFFICE OF SECURITY EVALUATIONS
- Directs and oversees the safeguards and security inspection process   - Recommends inspection schedules   - Designates Inspection Team Leaders and Deputies

INSPECTION TEAM LEADER	DEPUTY INSPECTION TEAM LEADER
- Manages the inspection/review - Recommends topic team members - Conducts pre-planning and planning activities - Establishes priorities and resolves issues - Monitors topic teams - Keeps HSS and HS-60 management informed of appraisal activities and emerging results	- Assists in the pre-planning effort - Coordinates logistics requirements - Prepares correspondence - Coordinates personnel support activities - May serve on or lead a topic team - Assists in preparation of the inspection report - Prepares the inspection after-action report

FIELD SUPPORT MANAGER	TOPIC TEAM LEAD
- Responsible for inspection administrative/logistical support - Provides for computer support, fax, telephones, and office space - Point of contact for onsite inspection support - Ensures control and accountability of classified documents - Supervises administrative staff - Prepares memoranda	- Leads and manages the topic team - Leads and coordinates the topic planning effort - Makes team assignments and coordinates topic team data collection activities - Prepares team schedule (comprehensive inspections only) - Briefs Inspection Team Leader and HS-61 Director - Validates data collected with site points of contact

PERFORMANCE TEST DIRECTOR	SAFETY OFFICER
- Responsible for developing performance tests of protective force emergency duties - Develops test objectives and test scenarios - Coordinates with CAT Team Leader and inspection staff to ensure sufficient support for conducting and evaluating force-on-force exercises	- Coordinates efforts with site personnel to evaluate safety aspects of performance test - Oversees the safety of the performance test and communicates concerns to team management

Section 2 – Safeguards and Security Appraisals

Introduction

Within the Independent Oversight appraisal program, HS-61 has been charged with the conduct of disciplined and consistent evaluations of the implementation of the safeguards and security program at DOE facilities that store and use SNM, and/or classified and sensitive unclassified information. The foundations for these evaluations are outlined in the Office of Independent Oversight Appraisals Process Protocols, and these foundations are further defined in this guide within the context of safeguards and security appraisals.

Safeguards and Security Appraisals Scope and Type

Appraisals are designed to determine the adequacy of safeguards and security policies and programs, the adequacy of policy and program implementation, and their effectiveness in protecting DOE's national security interests. The appraisals examine the effectiveness of safeguards and security protection programs in various topical areas, including but not limited to those listed below. In addition, HS-61 appraisals may be conducted in conjunction with other functional Independent Oversight activities, most frequently cyber security inspections managed by the Office of Cyber Security Evaluations (HS-62).

- Protection Program Management
- Personnel Security
- Classified Matter Protection and Control
- Classification and Information Control
- Physical Security Systems
- Protective Force
- Material Control and Accountability

The Office of Security Evaluations conducts a variety of Independent Oversight appraisals, including: inspections, follow-up reviews, special studies, and special reviews. While the basic approach for conducting safeguards and security appraisals is common, the scope will determine which type of appraisal will be utilized to meet the specific Independent Oversight goal. Additionally, the schedules and sequencing of appraisal activities will vary based upon the type of appraisal conducted.

Inspections

The most frequent type of appraisal activity conducted by HS-61 is inspections, specifically comprehensive safeguards and security inspections that include all of the program elements listed above. These types of inspections are conducted on a routine cycle (consistent with HS-60's prioritization methodology) at sites that are a higher priority due to risk management considerations associated with the possession of SNM; classified and sensitive unclassified information; and other chemical, radiological, or biological materials that could be attractive to terrorist organizations. Inspections that are focused on a subset of the security disciplines may also be conducted at sites with lesser security assets. Inspections at DOE/National Nuclear Security Administration sites with Category I quantities of SNM also include large scale performance tests of the protective force response capabilities.

Special Studies and Special Reviews

Special studies conducted by HS-61 focus on cross-cutting safeguards and security topics and program issues. For these types of appraisals, specific issues with broad applicability to DOE can be analyzed. Special studies may include multiple sites allowing HS-61 personnel the opportunity to gather sufficient data to allow broad conclusions related to adequacy of security policies and implementation with applicability to the entire DOE complex. Special Studies may be conducted in one or more of the safeguards and security disciplines.

Special reviews are typically conducted at the request of the Secretary or other senior DOE managers, often on a "rapid response" basis. Alternatively, Independent Oversight may conduct a special review on its own initiative if a need to do so is perceived.

Follow-up Inspections

Comprehensive inspections routinely follow up on security concerns identified in previous inspections to ensure the implementation of effective corrective actions by the inspected organizations. HS-61 may conduct appraisals at a site or series of sites to monitor the implementation of corrective actions to address compliance and performance problems and identified causal factors. These type of appraisals are more commonly conducted when serious performance concerns are identified during an inspection or special review that highlights areas of elevated risks to the Department's security assets.

Because the approach undertaken by HS-61 for all appraisals is similar, the following sections of this guide will focus on the conduct of a comprehensive safeguards and security inspection. The activities related to the conduct of the other types of appraisal activities are nearly identical with the exception of the security topics that are evaluated and the schedule/sequencing of inspection activities. Inspection Team Leaders, Topic Team Leaders, and subject matter experts need to tailor these baseline inspection methodologies to other types of safeguards and security appraisals to be conducted.

Safeguards and Security Appraisal Goals

The goals of safeguards and security appraisals include: determining the adequacy of protection provided to SNM, and classified and sensitive unclassified information by the inspected organization; determining the effectiveness of DOE safeguards and security policy; assessing the impact of identified deficiencies; and providing opportunities for improvement that are intended to strengthen the implementation of the safeguards and security program.

Safeguards and Security Appraisal Approach

The HS-60 Appraisal Process Protocols identifies four functional activities for all Independent Oversight appraisals: planning, data collection, closure, and follow-up. HS-61 completes these functional activities during a series of inspection phases. The HS-61 inspection phases are pre-planning (completed at Headquarters), planning and initial data collection (first onsite visit), data collection (second onsite visit), performance testing and report preparation/closure (third onsite visit), and follow-up (completed at Headquarters).

Although these activities are closely allied with the inspection phases, appraisal activities may overlap significantly between the inspection phases. For example, planning (particularly for performance testing)

can extend into all of the onsite phases of an inspection. Similarly, analysis can begin at Headquarters and continue throughout all the phases of an inspection.

In order to show how this overlap occurs, Table 2 illustrates the inspection phases for a comprehensive safeguards and security inspection and representative activities completed during each phase.
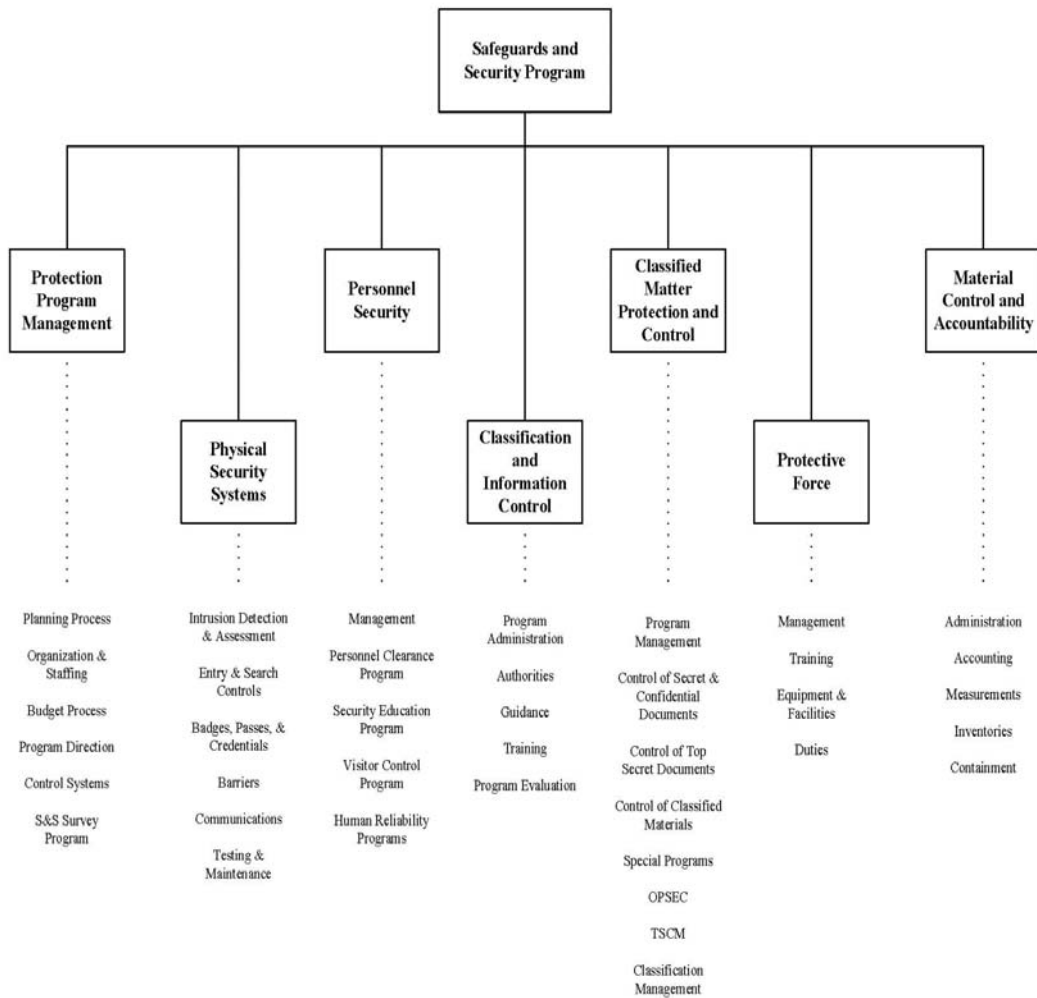

Figure 2. Inspection Content

Table 2. Major Inspection Phases and Activities

Comprehensive Safeguards and Security Inspection Phases and Activities

Pre-planning Phase (At Headquarters)
- Assign inspection responsibilities
- Analyze available site security information (e.g., surveys, deviations, and security incidents)
- Interface with HSS security policy, assistance, and enforcement offices
- Develop inspection focus
- Request and review documents from site
- Make logistics arrangements
- Conduct Headquarters interviews

Planning and Initial Data Collection Phase (First Onsite Visit)
- Review documents
- Meet with site representatives
- Prepare for onsite activities
- Begin onsite data collection and validate data

Data Collection Phase (Second Onsite Visit)
- Conduct onsite data collection activities
- Implement performance tests
- Validate data

Performance Testing and Inspection Report Writing Phase (Third Onsite Visit)
- Conduct large scale performance tests
- Complete data collection and validation of data
- Develop draft inspection report
- Provide draft report to site for factual accuracy
- Provide out-briefing for site managers

Follow-up Phase (At Headquarters)
- Receive site comments on inspection report at Headquarters
- Prepare final inspection report
- Brief senior Headquarters managers
- Review and comment on corrective action plans

Section 3 – Appraisal Process Planning

Introduction

The thoroughness and quality of planning significantly affects all other inspection activities. Planning involves gathering and analyzing large amounts of information from many sources, making decisions based on the analysis, and preparing inspection activities based on the decisions. Due to the limited amount of time available on site to collect the data necessary to characterize the status of the programs being inspected, planning must focus on determining what program elements to examine and how best to inspect those elements. Planning also includes identifying support requirements for all phases of the inspection.

This section discusses HS-61's planning activities that are completed during specific phases of an inspection. Table 3 summarizes these major planning events.

Table 3. Major Planning Events

Pre-planning (At Headquarters)
- Review facility information
- Identify potential problem areas and inspection focus areas
- Request documents from the site and review those provided prior to first site visit
- Select samples and develop plans for limited-scope performance tests
- Coordinate and integrate topic schedules

Planning and Initial Data Collection (First Onsite Visit)
- Receive site in-briefing
- Review and analyze documents
- Refine topic focus
- Integrate planning efforts between topic teams
- Continue developing limited-scope performance tests
- Begin planning for force-on-force exercises
- Select additional samples, when required
- Revise plans using the results of interviews, observations, and limited-scope performance tests
- Integrate with other topic teams
- Keep Inspection Team Leader informed

Data Collection (Second Onsite Visit)
- Revise plans, as necessary, using the results of data collection activities
- Continue planning of force-on-force exercise
- Integrate with other topic teams
- Keep Inspection Team Leader informed

Pre-planning Activities

Pre-planning activities are conducted at Headquarters under the supervision of the Inspection Team Leader and Deputy, and are aimed at laying the basic groundwork necessary to allow the inspection team to conduct

its planning tasks efficiently. A key element of the pre-planning phase is frequent communications within the inspection team and with line management and support organizations.

The Inspection Team Leader conducts an orientation meeting for all inspection team members via teleconference near the end of pre-planning activities that includes a short presentation of past inspection results by the facility officer or another member of the inspection team, the time and location of the inspection in-briefing, site training requirements, and logistical and administrative information. Appendix A describes the Headquarters pre-planning steps and the individuals responsible for completing each step. Experience has shown that the pre-planning steps must be completed in sufficient time to ensure the overall success of the planning effort.

As the major product of the pre-planning phase of the appraisal, HS-61 develops an inspection plan that describes the team's general scope and approach to conducting the appraisal, defines any specific focus areas, lists team members, and establishes basic ground rules for conducting the overall inspection. In those cases where HS-61 conducts joint inspection activities with other Independent Oversight offices, a joint inspection plan will be developed by the Inspection Team Leader with input from the other office's Topic Team Leader and concurred upon by the other Independent Oversight Office Directors. Although the inspection team is not limited to evaluating specific areas in the inspection plan, every effort is made to identify areas of emphasis during the inspection. A copy of the inspection plan, once approved by HS-60, is sent to the inspected organization.

Team Planning Activities

While pre-planning activities are being completed at Headquarters, Topic Team Leaders begin some detailed inspection planning activities. Further, the entire topic team will become more involved in detailed planning during the Planning and Initial Data Collection Phase of the inspection, and some of these actions will continue during the other onsite phases of the inspection. Table 4 lists a number of specific topic team planning activities. Activities are neither strictly sequential nor independent of one another. Rather, they represent a series of interrelated efforts, and team members typically work on several tasks at once.

These planning activities represent a cross-section of those necessary to prepare for a comprehensive inspection and can be applied to any appraisal activity. Topic teams should modify the tasks to fit unique site-specific or appraisal-specific needs. The activities have been consolidated into nine major tasks; an explanation of each task follows.

Task 1: Review and Analyze Documentation

To develop a basic understanding of the program elements at the facility, the topic team normally begins by reviewing all available documents pertaining to the program and topic to be inspected. Documents reviewed include those obtained from Headquarters program offices as well as those requested from the DOE field element and facility to be inspected. The objective of the document review is to understand the nature of the facility to be inspected, the unique characteristics of the topic and subtopics, and the environment in which they operate.

Table 4. Team Planning Activities

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1.  Review and analyze documentation
2.  Identify site security interests, threats, and vulnerabilities
3.  Characterize the topic
4.  Coordinate and integrate with other topic teams
5.  Select final scope
6.  Select and prioritize data collection activities
7.  Identify sample sizes (as required)
8.  Assign tasks and schedule activities
9.  Prepare performance tests/safety plans (as required)
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Special attention should be given to reviewing program-related issues contained in site security plans, previous inspection reports and policy issues, security incident reports, recent field element survey reports, and data contained in the Safeguards and Security Information Management System. Other documents that may contain pertinent information include Government Accounting Office and Inspector General reports.

Task 2: Identify Security Interests, Threats, and Vulnerabilities

Document reviews and discussions with other topic teams should provide answers to three important questions:

- What security interests need to be protected?
- What threats are to be protected against?
- How does the program element (topic) function to provide the necessary degree of protection?

Determining the facility's security interests and the mission of the inspected program is usually straightforward. Documentation provides information regarding the amount, category, and location of classified interests, which can be used to prioritize the various security interests and focus the detailed planning.

Identifying and understanding threats to the inspected program helps establish parameters for a number of data collection activities. Understanding the security interests and threats permits identification of critical program element vulnerabilities and development of data collection activities to characterize the facility program's effectiveness.

Task 3: Characterize the Topic

Before deciding how to inspect a particular topic, the topic team must understand the nature of that topic. Examples of information that help define the nature of a topic include the location of activities selected for inspection and distances between activities; how activities are organized; how personnel assigned program responsibilities are trained, managed, and supervised; and how required elements of any protection program are implemented. Another method of characterizing the topic is to tour areas of the site to understand the environment in which the topic is being implemented and to identify data collection requirements.

Questions, issues, and discrepancies often surface during document review; for example, documents provided by the facility may be out of date or inconsistent with one another. The topic team should identify

any discrepancies or questions and discuss them with the points of contact at the earliest opportunity during the planning meeting. In many cases, the points of contact can answer questions and explain inconsistencies.

Task 4: Coordinate With Other Topic Teams

Integration and coordination among topic teams is crucial to the overall inspection planning process. The results of individual topic team planning activities can provide the information necessary to reach an initial conclusion regarding how a facility intends to protect SNM and classified information, and to manage their safeguards and security responsibilities.

There are several major objectives of inter-team coordination. First, topic teams can coordinate efforts so that activities complement each other. For example, if valid conclusions are to be drawn regarding the protection of classified information at a specific facility location, all topic teams must collect data at the same location. It would be of little use to inspect physical security systems at one location, control of classified documents at a different location, and the protective force at yet another location.

Second, effective integration can prevent topic teams from interfering with each other. Several topic teams may want to concentrate their activities at the same location. In such cases, coordination of data collection activities, particularly performance tests, avoids undue disruption of the inspected facility and streamlines data collection. All topic teams should be aware of what all other topic teams are doing, where they are doing it, and how it will affect their own activities.

An additional integration aspect worthy of particular mention is coordination with the PPM topic team. The nature of the PPM topic mandates integration with all topic teams. Information developed by the PPM topic team may affect how the results of inspection activities in other topics are viewed. Similarly, results in other topic areas will have some bearing on how the adequacy of PPM is viewed.

Task 5: Select Final Scope

Once the information gained from document reviews, discussions with HS-61 facility officers, and coordination with other topic teams is reviewed, the topic team must decide where to focus its inspection efforts. Since most topics are fairly large and complex, it is not feasible to comprehensively review every facet of the topic. Consequently, the scope of the topic is customized to the resources available and the need to ensure that sub-topical elements that have performed poorly in the past or that require closer scrutiny are evaluated thoroughly. The underlying principle is that the quality of the inspection takes precedence over the quantity of areas reviewed.

The topic team must clarify the broad focus of their inspection activities. Then, they should discuss issues arising from the data reviewed and begin to make decisions that will select the final scope and focus of their inspection activities before they begin planning individual data collection efforts.

Task 6: Select and Prioritize Data Collection Activities

Data collection activities are the essential activities of the inspection process. The data collection methods and techniques that are chosen, and the skill with which they are applied, determine the quality and quantity of information available for evaluation.

Once the topic team has narrowed the inspection focus and finalized the subtopics to be inspected, they must

select appropriate data collection methods. Data collection tools and their applications are detailed in the topic-specific Inspectors Guides. Methods are selected to yield the most accurate, realistic, and useful data for the particular application.

In addition, data collection priorities must be established. The topic team should attempt to schedule data collection activities for the entire data collection period to avoid wasting collection time if events run smoothly. However, when events do not run smoothly, data collection priorities allow the topic team to delete less important activities and concentrate on gathering essential data required to determine program effectiveness.

Task 7: Identify and Select Sample Sizes and Configurations

Sample size and configuration are important planning points that must be determined for many data collection activities. Since inspectors usually cannot review every document or observe every activity related to their topic, they must examine a sample of the population to form conclusions about the entire population under review.

Similarly, the sample tested must be representative of the system involved, and the components of the sample must have qualifications or conditions in common. For example, a sample of Top Secret documents could only be representative of documents in a Top Secret document system, and could not be used to draw conclusions about a Secret or Sensitive document system.

Planning for each data collection activity should include a determination of how many items will be examined, and how they will be selected. The topic team should know essentially what will constitute the sample before data collection begins. However, in certain tests, the topic team must not inform the inspected facility of the identity of the samples until the inspection activity or performance test actually begins. This approach ensures that the test is conducted in an unbiased manner.

Task 8: Assign Tasks and Schedule Activities

All data collection tasks should be assigned and scheduled to ensure the effective use of the time available for onsite data collection. Scheduling provides the basis for logistical planning and is accomplished best during the latter phases of the planning meeting, when the entire topic team is present and inspection priorities are fresh in their minds.

The topic lead is responsible for assigning specific data collection (and data collection planning) tasks to team members. Usually these tasks are assigned by mutual consent, based on the strengths of each team member. Assignments should be recorded in writing. Additional guidelines include:

- Although the skill mixture among team members will vary, assignments should be made to take advantage of each team member's skills and areas of expertise.

- Workloads should be evenly distributed; inspectors assigned major tasks should be assigned fewer tasks.

- Whenever possible, inspectors should work in pairs during data collection. Although time limitations may require individuals to work alone, two inspectors should be assigned to each task where there is a reasonable potential for disagreement, conflict, or poor performance.

- A person new to the specific subtopic or system should always be paired with an experienced inspector. First-time inspectors should be scheduled to participate or observe as many data collection activities as possible, instead of being required to complete a specific task from start to finish.

- When inspecting facilities with several quasi-independent systems, it is normally more efficient to form smaller teams of inspectors, with each smaller team reviewing one or more aspects of the system.

- Scheduling should always provide time for daily validation sessions, analysis of data collected, and inspection team meetings.

A detailed and realistic schedule should be worked out for all inspection activities, but all involved should understand that the schedule may change to accommodate situations encountered during the inspection. The schedule may begin as an outline of data collection activities, locations, and general times (morning, afternoon, evening). Specific times and locations for each event will be worked out during detailed planning by team members.

Task 9: Prepare Performance Test Plans

To promote safety and realism in performance testing, formal protocols for the planning and conducting of certain performance tests have been developed and are detailed in the topic-specific Inspectors Guides.

A sample performance test plan format, intended as a convenient guide for describing proposed tests and as a quick reference during the actual conduct of the test, is provided below. The format can be adapted to fit test requirements at varying levels of complexity. The most complex format contains:

- **Objective:** Identifies the portion of the program the test is to measure and briefly describes what the test is designed to accomplish.

- **System Description:** Provides a succinct characterization of the system. This helps team members understand system parameters and serves as a quick refresher that can be reviewed immediately before beginning the test.

- **Sampling Technique:** Explains how the sample to be tested will be selected and handled, and serves as a record of these actions for future reference.

- **Scenario:** Describes how the performance test will be conducted. The scenario may include specific points that must be covered to serve as a reminder to personnel performing the test. Frequently, for less complex performance tests, the system description and sampling technique are discussed together under this heading instead of in separate sections.

- **Evaluation Criteria:** Provides the applicable references—DOE order, directive, or standard—that will be used to determine whether requirements are met.

- **Safety Plan:** If the performance test has safety implications, a detailed safety plan is required.

- **Additional Controls:** In some cases, specialized coordinators, such as a range officer or radiological control personnel, may be required.

This format should not be considered mandatory. In some cases, facility contractors have developed acceptable formats that their personnel are used to, and it may be convenient to use the local format. Whichever format is used should provide sufficient detail to plan and conduct the test and to serve as a reference and record of what was accomplished.

Planning and Initial Data Collection Phase

Most of the topic team tasks discussed above are completed during the Planning and Initial Data Collection Phase of an inspection, which is conducted during the first onsite visit. In order to assist topic team members in the completion of these tasks and other elements of the Planning and Initial Data Collection Phase, Appendix B describes the steps required to be completed by inspection team personnel during this inspection phase.

Post-Planning Activities

Although detailed inspection planning takes place during the Planning and Initial Data Collection Phase, plans for topic team data collection activities may need subsequent revision as initial data collection activities may have identified areas requiring additional or modified information collection methods. Therefore, plans should not be considered "final," and topic team members should be prepared to continue the planning process, as required.

Section 4 – Conducting Appraisals

Introduction

The conduct phase is the onsite data gathering period, primarily conducted during the second week of a comprehensive inspection. Although some data collection occurs during the planning meeting, the bulk of it occurs during the conduct phase. It is a period of intense and varied activity for the entire inspection team and many site personnel involved in the inspection. This stage of the inspection is crucial, because the inspectors collect most of the information they need to determine whether the protection programs meet requirements and are effective.

This section discusses the goals and scope of inspection conduct, administrative requirements, data collection methods, and data validation procedures. Appendix C describes the steps required to be completed by inspection team personnel during the conduct phase of a comprehensive inspection.

Goals

The goal in conducting the inspection is to accomplish all planned data collection activities in a fair, impartial, professional manner and to validate the technical accuracy of the data collected.

Scope of the Onsite Inspection

The inspection team's activities normally begin with a meeting between topic team members and points of contact. This meeting provides the opportunity to:

- Review follow-up items from the planning meeting

- Receive reports from the points of contact regarding support arrangements

- Discuss any issues that may have developed since the planning meeting

- Work out details of the inspection schedule (for example, escorts for inspectors, and points of contact for each activity)

- Identify and discuss any additional actions.

Data collection activities generally follow the plans and schedules developed during the planning meeting. Inspectors normally focus on accomplishing planned activities; however, data collection activities can be adjusted to accommodate changing conditions. For example, inspection results may necessitate reduced or expanded activities in planned areas of emphasis and investigation of areas not originally identified for review. Problems or potential problems that become apparent during the course of the inspection should not be ignored simply because they were not included in formal planning.

Significant changes to planned activities should be discussed with the topic leads and approved by the Inspection Team Leader before being implemented. All changes should be discussed and coordinated with the points of contact to avoid scheduling conflicts and other potential problems.

Protection of Classified Information

Inspectors usually must handle classified documents and sensitive unclassified information during the course of an inspection. This information may be provided by HS-61, screened as part of the inspection process, borrowed from the facility being inspected, or generated by the inspectors. Additionally, most inspectors use classified word processing equipment during the inspection.

Inspectors are required to comply fully with all applicable DOE and local security requirements, especially those concerning classified computers, documents, and discussions. The Field Support Manager will arrange with the site to provide for appropriate site-specific guidance and instructions to the team on these matters. All team members must comply with the policy and guidance issued.

The Field Support Manager is normally in charge of controlling classified matter in the custody of the inspection team. Documents generated by team members must be reviewed for classification by a designated team member who is an Authorized Derivative Classifier.

Relations with Site and Headquarters Personnel

The cooperation and assistance of line organization personnel—whether representing DOE Headquarters, the DOE field element, or facility contractor organizations—is crucial in conducting a successful inspection. Inspectors should maintain the highest standards of conduct when dealing with points of contact, supervisors, security managers, and other personnel during the course of inspection activities. Professional conduct and relationships with personnel, points of contact, and trusted agents are covered in more detail in the HS-60 Appraisal Process Protocols.

Data Collection

Five standard data collection mechanisms are utilized by inspection team personnel to gather the information necessary to identify strengths and weaknesses in site safeguards and security programs, including review of site documents; interviews with line managers, safeguards and security and other support personnel; observations of work activities and conditions; knowledge tests; and performance tests.

Document Reviews

All protection programs rely on detailed documentation to ensure that they are effective and properly administered. The lack of well-developed, comprehensive policies and procedures is often the first indication an inspector receives that the program may be deficient. Therefore, reviewing documentation 1) determines whether written policies and procedures are consistent with DOE requirements; 2) provides a baseline picture of how the program operates; and 3) may reveal weaknesses that need further exploration.

The team may request that certain information be made available at the site, ready for team use at the beginning of the inspection visit. Documentation continues to be reviewed throughout the data collection phase. Often, inspectors must request additional documents during data gathering to develop a complete picture of facility programs and how they function. Requests for additional documentation should be made to the appropriate point of contact. If difficulties are encountered, the Inspection Team Leader should make a follow-up request directly to facility management.

Documents of interest are usually 1) policy documents on how the protection programs are supposed to function; and 2) records indicating whether facility programs comply with requirements.

Policy documents normally include, but are not limited to, security plans, policies, and procedural guides.

Records of interest include administrative records, document control records, records indicating completion of required reviews or actions, training records, equipment maintenance/calibration records, and inventory records.

Observations

Observations allow inspectors to see how site personnel actually do their jobs, and to evaluate their performance of duties under normal conditions. Such observations provide the best data on whether site personnel follow established procedures, and whether they properly operate any equipment for which they are responsible.

Observations should be made at as many key points in the program as practical. Observing personnel at work is an opportunity for adding to data being gathered or helping to validate data already collected.

Although observation of personnel performing their duties would seem to be an ideal inspection tool, it is not necessarily simple:

- The team members must decide how much time they can allocate for observation. Will an hour spent watching a specific task yield an hour's worth of usable data? In many instances, the answer to such a question will be "no," since not all activities associated with the program being inspected occur on a predictable schedule.

- The presence of an inspector may influence the behavior of the individual being observed, and produce erroneous data. This may be particularly true if the individual's supervisor or other site representatives are present.

- The results of observation, frequently subjective, may lead to disagreement between the inspection team and site personnel on what was actually observed and may be difficult to validate.

For these reasons, observation as a data collection method is generally confined to rounding out the inspection team's overall understanding of how routine tasks are carried out, or to evaluate performance in specific areas.

Interviews

Interviews actually begin during the planning phase, when inspected personnel and points of contact are asked to provide information on certain aspects of the facility's security program. Interviews also provide an important continuing source of information about the protection programs during the inspection.

Any person associated with the program being inspected is a potential interview candidate. Although interviews are often used to confirm or round out the inspector's knowledge, they are most effective in determining perceptions and individual understanding of policies, procedures, and duties.

HS-61 uses both formal and informal interview techniques. For formal interviews, topic teams prepare a series of questions based on review of documentation during the planning meeting. The questions are then asked during scheduled interviews with DOE Headquarters, the DOE field element, and facility contractor representatives. Whenever possible, HS-61 Federal staff should be present at management interviews; an HS-61 manager should be present for interviews of senior managers. Interview techniques are discussed in some detail in the HS-60 Appraisal Process Protocols.

Knowledge Tests

The key to successful program implementation is how well personnel know and perform their duties. Job knowledge is normally assessed by interviewing personnel involved in the topic or subtopic during the inspection.

There is a certain body of knowledge, some Department-wide and some site-specific, that people associated with any program must possess. Formal knowledge tests are an effective way to determine whether personnel possess this knowledge. Oral, written, or combined oral-written tests are most often used.

When knowledge tests are given, a representative sample of the appropriate population should be tested. Questions and answers should be carefully validated before the test is administered to ensure that the test is properly constructed to achieve its intended purpose. Inspectors should understand that knowledge tests indicate only whether personnel are knowledgeable in certain areas, not whether they can apply that knowledge or perform related duties.

Performance Tests

Performance testing is one of the most valuable data collection methods used during the inspection. In contrast with knowledge testing, performance testing is designed to determine whether personnel have the skills and abilities to perform their duties, whether procedures work, and whether equipment is functional and appropriate. A performance test is a test in which elements of a protection program—personnel, procedures, or equipment—are tested to determine whether they can actually perform or produce what is required.

Virtually any skill, duty, procedure, or item of equipment can be performance tested. Performance tests may vary in complexity from the simple duplication of a classified document to more complicated and elaborate tests involving large scale force-on-force performance tests using ESS/Multiple Integrated Laser Engagement System equipment.

Some tests can be conducted under completely normal conditions, where the subject is unaware of the testing. Other tests must be conducted under artificial conditions, although maximum realism is always a primary consideration.

To promote safety and realism in performance testing, HS-61 has established formal protocols for planning and conducting certain performance tests. These are detailed in the topic-specific Inspectors Guides.

Before any performance test is conducted, all test activities must be coordinated with site representatives. In tests where the subjects are aware that they are participating in a test, all participants should be briefed in detail concerning the actions expected of them; topic team members responsible for conducting the performance test should exercise careful control of all activities during the test; and test results should be

validated as soon as possible after the test is completed. Performance tests that introduce new, controversial, or more hazardous activities must be briefed to the Inspection Team Leader prior to execution.

A sample performance test plan format, intended as a convenient guide for describing proposed tests and as a quick reference during the actual conduct of the test, is provided below. The format can be adapted to fit test requirements at varying levels of complexity. The most complex format contains:

- **Objective:** Identifies the portion of the program the test is to measure and briefly describes what the test is designed to accomplish.

- **System Description:** Provides a succinct characterization of the system. This helps team members understand system parameters and serves as a quick refresher that can be reviewed immediately before beginning the test.

- **Sampling Technique:** Explains how the sample to be tested will be selected and handled and serves as a record of these actions for future reference.

- **Scenario:** Describes how the performance test will be conducted. The scenario may include specific points that must be covered to serve as a reminder to personnel performing the test. Frequently, for less complex performance tests, the system description and sampling technique are discussed together under this heading instead of in separate sections.

- **Evaluation Criteria:** Provides the applicable references—DOE order, directive, or standard—that will be used to determine whether requirements are met.

- **Safety Plan:** If the performance test has safety implications, a detailed safety plan is required.

- **Additional Controls:** In some cases, specialized coordinators, such as a range officer or radiological control personnel, may be required.

This format should not be considered mandatory. In some cases, facility contractors have developed acceptable formats that their personnel are used to, and it may be convenient to use the local format. Whichever format is used should provide sufficient detail to plan and conduct the test and to serve as a reference and record of what was accomplished.

Major ESS-enhanced performance tests of a facility's tactical response capabilities are typically conducted during comprehensive inspections. These efforts require extensive planning, coordination, and resource requirements. These efforts will be managed by a Performance Test Director and supported by a Senior Controller and Safety Officer. The Performance Test Director is responsible for coordinating the exercise with site security personnel and arranging for participation by members of the Department's CAT and exercise evaluators. Such major performance tests will be conducted using the protocols established in the "Protective Force Protocols for ESS Supported Performance Tests and Exercises."

Other Methods

While these five basic methods of data collection described above will satisfy most inspection data collection needs, team members may use any legitimate method to most effectively collect needed information. Other methods, such as the use of surveys or questionnaires for example, may be used when appropriate.

Data Collection Forms

Collected data must be recorded in a common manner so that it can be properly analyzed and archived. On a routine basis, inspectors are required to record pertinent data on the HS-61 Data Collection Form. A copy of the Data Collection Form format is provided in Appendix F. The form accommodates a discussion of collected data, including its importance, its impact on the program being evaluated, and necessary follow-up activities. The form can be modified as more data is collected or its impact changes. The goal of the Data Collection Form is to retain important information on the activities of the topic team and the results of data collection activities, including performance tests, which is needed to substantiate the derivation of the conclusions of the final inspection report. In addition to supporting information used to derive key conclusions, information to be included in Data Collection Forms includes key documents reviewed, performance test plans and results, and lists of key site personnel interviewed. All Data Collection Forms must be completed in an electronic file format, and will be archived by HS-61 for future reference. Completed forms must be reviewed for classification, as appropriate.

Integration

Information sharing among topic team members and between topic teams is imperative. Information collected by one team member may have a direct impact on a line of investigation being pursued by another. Information collected by one topic team may become more significant when combined with information collected by another topic team. It is absolutely essential for the PPM topic team to be aware of the data being collected by other topic teams. Consequently, a conscious and deliberate effort at timely information integration is a necessity. Integration is conducted both formally and informally. Informal integration is expected on a daily basis between topic team members and between topic teams. Inspectors are expected to make a deliberate effort to share information they have collected with other team members who may find it useful, and to seek out needed information from team members who may have it. More formal integration is achieved through team meetings called by the Inspection Team Leader and by reading the Data Collection Forms.

The inspection team leader will hold a special team integration meeting at the end of data collection activities to ensure that all topic teams have the essential information they need for report writing.

Validation

Validation is the process inspectors use to verify the accuracy of the information they have obtained during data collection activities. It is the most critical element of the onsite inspection. Validation is a continuous process to ensure that:

- All data collected by the inspectors is factually correct and can be used to evaluate the effectiveness of the program.

- Points of contact and site management are aware of the data that has been collected. They must either acknowledge its accuracy, provide correct information, request that further data be collected, or provide mitigating information. Representatives of responsible Program Offices, DOE field element, and facility contractor may participate in validations.

Information to be validated should be presented as thoroughly, accurately, and concisely as possible. The purpose of validation is to ensure that points of contact agree with the accuracy of the information collected and understand its potential implications and impacts.

Daily Validation

Inspectors are required to validate inspection results with their points of contact on a daily basis. The exact method of validation depends on the topic team, the points of contact, and the schedule of events. Even if the points of contact accompany the inspectors on every inspection activity and validate observations on the spot, a daily validation meeting is required. Usually, a short meeting is held at the end of the day to validate the day's events. At times, particularly if activities extend late into the evening, the daily validation meeting may be held the following morning. However, any such delay should be discussed with the Inspection Team Leader since this could cause facility management to receive reports of potential problems before the points of contact know the issues involved.

Major Deficiency Identification

When serious or potentially serious deficiencies are identified during an inspection, they are to be brought to the attention of the Inspection Team Leader and the appropriate DOE field element and facility personnel (usually managers) as soon as possible. Once enough data is collected to be reasonably sure that a significant or potentially significant deficiency exists—particularly a rating-impacting deficiency—it is to be identified and formally communicated to site managers in sufficient detail to ensure that it is fully understood. This formal communication is achieved through the use of the Issue Form, a copy of which is provided in the HS-60 Appraisal Process Protocols (electronic copies may be obtained from the Field Support Manager). The topic team is responsible for completing the form, which is submitted to and signed by the Inspection Team Leader, who forwards it to the DOE field element/facility. The responsible field element or facility organization is required to respond to the issue paper in writing, and may also request a meeting to discuss or further clarify the deficiency and its potential impact.

Deficiencies identified in this manner may or may not ultimately result in formal findings, depending on the individual circumstances. The Inspection Team Leader will communicate significant deficiencies to the HS-61 Director, who will, when appropriate, inform the HS-60 Director. As necessary, the HS-60 Director will inform senior Departmental managers.

Summary Validation

A summary validation is held after data collection activities are completed. Ideally, the summary validation is conducted at the working level, attended by members of the topic team and points of contact for the program; however, summary validations are often attended by senior managers and representatives of interested Headquarters organizations. At the summary validation, all significant information, including items validated previously, are validated again. This is the final validation activity before inspection report preparation. Although actual (or even potential) ratings should not be discussed, the validation process

should ensure that the issues and their impacts are fully understood so that there will be no surprises in the report.

Report Review

The final validation steps involve factual accuracy reviews of the draft inspection report and the final draft inspection report. When a draft report has been reviewed by the QRB and tentatively approved by the HS-60 Director, it is provided to the DOE field element for a same-day factual accuracy review. The final report is similarly provided, with the responsible organizations having ten working days to provide written comments to HS-61.

Section 5 – Appraisal Closure

Introduction

After data collection, the data must be assimilated, compiled, and analyzed in order to report the results. The inspection closure process usually takes place during the last week of the inspection visit and includes a number of tasks to ensure that all pertinent information is accurate, reported in a standardized format, and appropriate for the intended audience.

This section discusses the tasks involved in inspection closure, including data review, analysis of results, determination of findings, assignment of ratings, and integration with other topics. These tasks form the basis for the inspection report. Other closure tasks include preparing briefing materials, reporting policy issues, and accomplishing various administrative actions. Appendix D describes the steps required to be completed by inspection team personnel during the closure phase of a comprehensive inspection.

Goals

The goals of inspection closure are to:

- Identify and clearly report the inspection results, including both strengths and weaknesses

- Determine the individual and cumulative impact of inspection results on the ability of the protection program to accomplish its mission requirements

- Assign rating(s) that accurately reflect the actual performance of the program(s) (for inspections where ratings are assigned)

- Report inspection results to local management

- Produce a report that clearly and objectively represents the current status of protection programs

- Brief Headquarters management and other appropriate parties

- Complete all routine and special tasks that may be assigned by the Inspection Team Leader.

Data Review

Data review consists of sorting out and logically grouping all validated data collected for each topic and subtopic during any phase of the inspection. Although the topic teams are generally aware of most of this data, not all team members will be familiar with all data collected. Consequently, the topic teams must review all pertinent data to develop a comprehensive picture of how effectively the protection program meets requirements.

Topic teams generally arrange the collected data according to positive or negative features to aid in clearly identifying strengths, weaknesses, and positive or negative trends. Proper organization and thorough review of all inspection data are essential to completing the analysis and preparing the report.

Integration

Data gathered and developed by one topic team often affects other topics being inspected. To take this interdependency into account, topic teams continue their integration activities until all pertinent information has been shared. This integration normally consists of a discussion of inspection results among topic teams regarding how information developed by one team influences the adequacy of the performance observed in another topic area.

Each topic team should consider information obtained through integration, along with its own data, during data analysis. When necessary, the inspector who observed the data to be integrated may prepare draft input for use by another topic team.

Analysis of Results

Culmination of the continuous process of analyzing collected information occurs during the closure phase, when all data is critically reviewed—a review that results in conclusions regarding the effectiveness of the evaluated program.

A discussion of the analysis process is contained in the HS-60 Appraisal Process Protocols.

Determining Findings

Each topic team is responsible for determining which inspection results are designated as findings; findings usually identify aspects of the program that do not meet the intent of DOE policy. Although any program element or system not in compliance with DOE policy or not meeting DOE performance standards may be identified as a finding, topic teams are expected to exercise judgment. Minor and non-systemic items are omitted.

Findings are presented in a manner that identifies both the specific problem and the reference (DOE order requirement). If multiple findings address specific aspects of a single standard, the topic team should determine whether the potential findings should be "rolled up" and reported as a single finding. This "rollup" may be appropriate if the single finding statement can clearly and completely convey the problems. Findings should always be worded to express the specific nature of the deficiency, clearly indicate whether the deficiency is localized or indicative of a trend, and clearly identify the organization responsible for the deficiency. Typically, the impact is presented in the discussion of the finding, which also may include a summary of site compensatory measures, mitigating factors, and current and planned corrective actions.

Ratings

HS-61 assigns ratings based on a thorough analysis of inspection results and their implications. The HS-61 inspectors are responsible for assigning ratings; however, inspectors are required to defend the validity of the ratings with the inspection Team Leader, the Director, HS-61, and the QRB. This layered "check and balance" concept of operation assures the highest degree of confidence that the ratings are fair and objective.

For comprehensive inspections, HS-61 normally assigns ratings at the topic level. However, ratings may be assigned for sub-topical or cross-topical elements of a program where special reviews, major performance tests, or site conditions merit such an evaluation. This rating system provides the necessary flexibility to allow use of the most appropriate rating structure for each individual situation encountered.

The Office of Independent Oversight uses a three-tier rating system that is intended to provide line management with a tool for determining where resources might be applied toward improving cyber security. It is not intended to provide a relative rating between specific facilities or programs at different sites because these reviews use a sampling technique to evaluate management systems and programs. The rating system helps to communicate performance information quickly and simply. The three ratings and the associated management responses are:

- Significant Weakness: Indicates senior management needs to immediately focus attention and resources necessary to resolve programmatic and/or technical weaknesses identified. A Significant Weakness rating within the management, operational, or technical category would normally reflect a number of significant findings that degrade a program's overall effectiveness and/or that are longstanding deficiencies that have not been adequately addressed. A Significant Weakness rating would, in most cases, warrant immediate action and compensatory measures as appropriate.

- Needs Improvement: Indicates a need for improvement and a significant increase in attention to programmatic and/or technical weaknesses. This rating is anticipatory and provides an opportunity for line management to correct and improve performance within the management, operational, or technical category before it results in a significant weakness.

- Effective Performance: Indicates effective overall performance in a cyber security program. There may be specific findings or deficiencies within the management, operational, or technical category that require attention and resolution, but that do not degrade the overall effectiveness of the system or program.

Report Preparation

The inspection report is the formal product of the inspection process and is intended for dissemination to appropriate managers at DOE Headquarters, field elements, and facility contractors. It is the only published record of the activities and results of an inspection. The report should reflect a balanced view of program strengths and weaknesses.

Each topic team is responsible for writing the report appendix documenting the inspection of its topic area. The information contained in an appendix includes a discussion of the current status of the topic, inspection results, conclusions drawn from those results, a topic rating, and identified opportunities for improvement.

Typically, one individual is assigned to write the main body (or Front End) of the report, which, drawing on information provided in the topical appendices, summarizes the results of the inspection, analyzes and draws conclusions about the effectiveness of the evaluated safeguards and security program, and indicates an overall program rating.

A typical report format for a comprehensive inspection is provided in Appendix A. Additional site-specific report format guidance, if different from that provided in Appendix A, is provided by the Inspection Team Leader before preparing the report.

Initial Draft Report

Each topic team produces an initial draft appendix for its topic. The Team Leader and Deputy Team Leader are expected to review early initial draft appendix reports and to provide feedback to ensure they are of sufficient quality to submit to the QRB. Concurrently, the assigned writer begins drafting the main body of the report. When team members, including the topic lead, are satisfied with the initial draft, it is provided (on electronic media) to the Administrative Support Manager for formatting, reproduction, and control, and is then submitted to the QRB.

Quality Review Board

The QRB normally consists of several managers and senior personnel from HSS (e.g., HSS Deputy Director for Operations, Director HS-60, and Director HS-61) and its Independent Oversight support contractors. They review each draft report appendix to ensure that it is readable and logical, and that it contains adequate, balanced information to support findings, conclusions, and ratings. The QRB may require topic teams to revise portions of their appendices. Each draft appendix must be reviewed and accepted by the QRB before the draft report appendix is released to the Department's Chief Health, Safety and Security Officer for final review and released for validation with line management personnel.

DOE Field Element Comments

When each appendix is reviewed and accepted by the QRB and approved by the Department's Chief Health, Safety and Security Officer, it is sent to the inspected DOE field element for review. The field element staff and, at their discretion, facility contractor staff are allowed a brief period (typically four hours) to review the draft report for factual accuracy. They may provide written comments concerning any portion of the report that they believe to be in error.

If the Program Office has representatives on site, they may also be provided the opportunity to participate in the field element review.

Final Draft Report

Upon receiving DOE field element comments, the topic teams recommend any appropriate changes to the draft report; the Inspection Team Leader authorizes any changes merited by field element comments. When all such changes have been made, the final draft of the report is prepared and is normally provided to the manager of the DOE field element at or immediately following the inspection out-briefing.

Additional Team Responsibilities

Topic teams must accomplish several additional inspection-related activities, as required, during the inspection closure process:

- Preparing policy issue papers if the topic team encountered any issues that should be brought to the attention of DOE Headquarters elements

- Preparing a one-page executive summary of the inspection results for the Secretary

- Preparing inspection data to be maintained by HS-61 at Headquarters for future reference

- Returning all site items (for example, documents, access credentials, dosimeters, and special clothing).

Process Improvement

HS-61 continuously strives to improve its processes and increase the effectiveness of its oversight activities. Immediate feedback from inspection team members provides important input to the improvement process. Information is solicited from team members regarding possible improvements to any aspect of the inspection process. Typically, this is accomplished in a round-table discussion conducted after the initial draft report sections have been completed but before significant numbers of team members have been released to depart the site. The Inspection Team Leader determines the time and agenda for the round-table discussion, and assigns a staff member (often the Deputy Inspection Team Leader) to chair the discussion and record significant results. While the round-table discussion is the common method for soliciting process improvement information, the Inspection Team Leader may determine that priorities require other, perhaps less formal, methods to be used to collect this data. The imperative is that all team members have the opportunity to provide input, and that all input is recorded and provided to managers for consideration.

Out-briefing

HS-61 typically provides an out-briefing to managers of inspected organizations before departing a site. The out-briefing is normally scheduled for the last day on site, but may be scheduled differently if necessary to accommodate the availability of critical managers. When necessary, the briefing is scheduled for a later date.

The briefing is usually given by the Team Leader. The HS-61 Director designates the topic leads and other team members who will be required to attend, if any. The manager of the DOE element being inspected generally determines the site personnel who will attend. Typically, managers and primary safeguards and security staff from the DOE field element and the facility contractor will attend, along with any present representatives of the responsible Program Office.

Briefing content generally includes summaries of the status—including major strengths and weaknesses—of each topic area inspected and of the overall safeguards and security program, and the ratings assigned to each.

Section 6 – Appraisal Follow-up

Introduction

Upon completion of the onsite inspection activities, a number of tasks remain to close out an inspection. These include conducting any necessary briefings, preparing and issuing a final inspection report, assessing corrective action plans, and preparing to follow corrective actions. This section deals with those tasks, which are normally conducted at Headquarters. Appendix E describes the steps required to be completed by inspection team personnel during the follow-up phase of a comprehensive inspection.

Goals

The goals of the inspection follow-up phase are to appropriately disseminate an accurate account of inspection results through briefings and a final report, review proposed corrective actions for adequacy in addressing deficiencies, and address any policy issues to the appropriate Headquarters element.

Headquarters Briefings

Depending upon the nature and results of an inspection, it may be necessary to brief the Secretary, Deputy Secretary, and/or Under Secretary on significant issues. The (one-page) executive summary of inspection results is submitted to the Secretary (Deputy Secretary, Under Secretary, as appropriate); if requested, the senior official will also be briefed, normally by the HS-60 and/or HS-61 Director(s). Other senior Headquarters managers may attend at the discretion of the senior official being briefed. HS-61 will be prepared to brief the significant inspection results and their implications, but the specific focus of the briefing may be prescribed by the official being briefed.

Final Report

The Program Office and DOE field element have ten working days from their receipt of the final draft report to provide written consolidated comments to HS-61. Upon receipt, the HS-61 staff will review the comments and determine the appropriate responses. One or more topic team members will review the comments for their report section. When necessary, topic team members not located in the Washington area may be contacted by telephone or fax. If comments are received during a subsequent appraisal activity at another site, comments may be reviewed at that location by available team members.

HS-61 will publish a final report after receipt of the Program Office/DOE field element comments. The final report will be distributed to the Office of the Secretary, the Program Office, support offices, and the DOE field element. The report will be circulated broadly across DOE operating organizations to share information coming out of the inspection to promote the sharing of lessons learned.

Corrective Action Plan Review

Sites should follow the requirements established by DOE Order 470.2B, and guidance in the HS-60 Appraisal Process Protocols in developing corrective action plans in response to findings identified in HS-61 appraisal reports. These plans should assign responsibility to an individual and contain interim and final milestones as appropriate. Corrective action plans should address the root cause of the finding and

compensatory measures that should be implemented if a solution cannot be implemented in a short time. Key decision points should be identified, as appropriate.

The Inspection Team Leader and Deputy Team Leader have the responsibility to ensure that both interim and final corrective actions plans are received and provided to topic leaders for review. A consolidated set of comments will be prepared based upon the expectations established in DOE Order 470.2B for corrective action plans.

Corrective Action Tracking and Follow-Up

Program Offices and DOE field elements are responsible for entering corrective actions into the Safeguards and Security Information Management System, updating corrective action status, and closing findings. HS-61 will monitor corrective action progress and conduct appropriate follow-up through subsequent inspections and follow-up reviews.

Section 7 – Records Management

Introduction

Independent Oversight final appraisal reports provide a formal, permanent record of the results of Independent Oversight activities. However, much of the detailed information regarding conduct of appraisal activities, results of data collection efforts, and the deliberations and analyses of team members is not specifically included in the final reports. While Independent Oversight's goal is to include sufficient detail in each report to fully justify its conclusions and enable the report to stand on its own, there is a need to retain some documentation that provides additional detail regarding various aspects of an appraisal activity. Consequently, it is Independent Oversight's policy to archive certain types of information associated with appraisal activities to enable an accurate response to potential queries for additional detail.

Records Retention Requirements

Records associated with each appraisal activity are assembled and archived for a period of ten years from the date of the final report of the activity. At a minimum, the archives contain the following types of information, in either electronic or hard copy form:

- Inspection Plan

- Correspondence pertinent to the appraisal

- Daily Reports/Summaries of appraisal activities (if produced)

- Lists of individuals formally interviewed

- Supporting evidence (e.g., Data Collection Sheets)

- Performance test plans and results (e.g., CAT operations order, scenario outcome summary, safety plans, trusted agent agreements, evaluator work sheets, etc.)

- Lists of key documents that were reviewed

- Issue Forms

- Initial and final draft reports provided to field element/program office for comment

- Site/field element/program office comments

Final Report

Other information in addition to that identified above may be necessary to fully document an appraisal activity. Subordinate Independent Oversight Directors will identify, in their individual office Appraisal Process Protocol document, the types of records to be collected and archived, including the minimum set of records listed above.

Appendix A – Headquarters Pre-Planning Activities

Tasks	Responsible Person(s)	Days Due Prior to First Site Visit
Develop announcement memo to Operations/Site Office Manager and program office	Inspection Team Leader/Deputy Inspection Team Leader	90
Develop team resource list (including the identification of topic team leaders, principal writers, and the derivative classifier)	Inspection Team Leader/Deputy Inspection Team Leader	60
Obtain lists of topical points of contact and provide to Topic Team Leaders, and identify admin point of contact and Computer Systems Security Officer and provide to Admin Coordinator	Deputy Inspection Team Leader	60
Prepare the document request list needed from the site that will be forwarded to the site via email	Deputy Inspection Team Leader (input from the Topic Team Leaders)	60
Coordinate computer support requirements	Field Support Manager	60
Contact site point of contact concerning requirements for the workspace, fax, shredder, safe, lock smith [to set our own combination on the safe] pagers, badges, and STU III telephone service. Also contact the point of contact regarding the scheduling of site security, computer security, and safety training	Field Support Manager (with support from the Deputy Inspection Team Leader as necessary)	60
Draft the Inspection Plan and transmittal memorandum	Deputy Inspection Team Leader	30
Develop logistics requirements and forward to the site via email	Field Support Manager	30

Tasks	Responsible Person(s)	Days Due Prior to First Site Visit
Review and assemble documents maintained in the Oversight Document Center that need to be sent to the site	Deputy Inspection Team Leader (with input from the Topic Team Leaders)	30
Coordinate the development of overtime projections	Deputy Inspection Team Leader and HS-61 Administrative Assistant	30
Prepare memo that provides team members with information on the conduct of the inspection and internal logistics (hotel, cars, and maps) and information (fax, E-mail, or mail) signed by the Team Leader	Field Support Manager	30
Coordinate preparation and transmission of 277's to pass security clearance information, and when required, approval for access to SIGMAs	HS-60 HSO	2 weeks
Conduct pre-planning activities (contacting site points of contact, making team data collection assignments, etc.)	Topic Team Leaders	2 weeks
Prepare in-brief slides	Inspection Team Leader/Deputy Inspection Team Leader	2 weeks
Team Conference Call	Inspection Team Leader/Deputy Inspection Team Leader	2 weeks
Coordinate with Oversight Document Center the transmission of on-hand documents to the site	Deputy Inspection Team Leader (with input from Topic Team Leaders)	2 weeks

Appendix B – Planning and Initial Data Collection Activities

Step	Responsible Person(s)	Remarks
Assemble at badge office for in-processing, badge coding, or to obtain badges	All	
Participate in the in-brief, meet points of contact, and refine schedule	All	
Complete site security, cyber, and safety training	All	May occur either before or after the in-brief.
Move to designated workspace	All	
Begin planning and data collection activities, and , as necessary, prepare limited-scope performance test plans and coordinate safety plans with the safety officer	Topic Teams	Prepare Data Collection Forms and issue papers as necessary.
Begin development of force-on-force performance test plan and supporting documentation	Force-on-Force Test Director	
Complete setup of workspace 1. Coordinate approval of computer security plan and accreditation of computers 2. Contact the lock smith and have the combination for classified container changed 3. Obtain onsite supplies 4. Coordinate setup of fax and STU III telephone service	Field Support Manager (and team)	

Step	Responsible Person(s)	Remarks
5. Receive document request documents (classified and unclassified) 6. Setup files, document, and post personnel sign out sheet, office end-of-the-day check sheets, and team placards 7. Issue room keys, pagers, and dosimeters (when required) 8. Transmit workspace telephone listing to Headquarters		
Users sign work station copies of the computer security plan, and post copy of the plan at the work station	All	Usually occurs on Tuesday or Wednesday.
Verify receipt of all requested documents with Topic Teams	Deputy Inspection Team Leader	Completed during the first or second team meeting.
Prepare evening bullets (transmit to HSS Headquarters) and participate in the team meeting	All	Topic Team Leaders use the meeting to convey significant information to Inspection Team Leader, the Deputy, and other topic teams. Inspection Team Leader and Field Support Manager provide information to topic teams.
Conduct end-of-the-day security checks	Field Support Manager	Each topic team is expected to do an initial security check.
Conduct the morning meeting with site managers	Inspection Team Leader/Deputy Team Leader	Used to inform site managers of the results of the previous day's activities, and to resolve any concerns or problems.

Step	Responsible Person(s)	Remarks
Meet with site managers and topical points of contact to provide a summary of initial inspection results	Inspection Team Leader and Topic Team Leaders	
Prepare workspace for departure of inspection team 1. Prepare documents for return to GTN (if required) 2. Store/return room keys, dosimeters, and pagers 3. Identify and destroy unwanted papers	Field Support Manager	

Appendix C – Data Collection Activities

Step	Responsible Person(s)	Remarks
Assemble at badge office for in-processing, badge coding, or to obtain badges	Topic Team Leaders	Only required for team members that did not participate during first onsite phase.
Complete site security, cyber, and safety training	Topic Team Leaders	Only required for team members that did not participate during first onsite phase
Continue data collection activities and conduct limited-scope performance tests	Topic Teams	Prepare Data Collection Forms and issue papers as necessary.
Continue development of force-on-force test plan and supporting materials	Performance Test Director	
Re-setup of workspace 1. Receive additional document request materials (classified and unclassified) 2. Re-issue room keys, pagers, and dosimeters (when required)	Field Support Manager (and team)	
Prepare evening bullets (transmit to HSS headquarters) and participate in the team meeting	All	Topic Team Leaders use the meeting to convey significant information to Inspection Team Leader, the Deputy, and other topic teams. Inspection Team Leader and Field Support Manager provide information to topic teams.
Conduct end-of-the-day security checks	Field Support Manager	Each topic team is expected to do an initial security check.

Step	Responsible Person(s)	Remarks
Conduct the morning meeting with site managers	Inspection Team Leader/Deputy Team Leader	Used to inform site managers of the results of the previous day's activities, and to resolve any concerns or problems.
Meet with site managers and topical points of contact to provide a summary of initial inspection results	Inspection Team Leader and Topic Team Leaders	
Prepare workspace for departure of inspection team 1. Prepare documents for return to GTN (if required) 2. Store/return room keys, dosimeters, and pagers 3. Identify and destroy unwanted papers	Field Support Manager	

Appendix D – Closure Activities

Step	Responsible Person(s)	Remarks
Prepare for briefing to the Inspection Team Leader and Deputy	Topic Team Leaders	Usually conducted on Saturday morning, also attended by the designated writer of the executive summary and upfront section of the inspection report.
Draft topic appendices for the inspection report	Topic Team Leaders	Process can begin during any phase of the inspection, but typically begins in earnest no later than Thursday of the Performance Testing and Report Writing Phase of the inspection.
Administratively prepare draft inspection report for Quality Review Board (QRB)	Field Support Manager (and team)	Ensure correct format, line, and page numbering and the production of sufficient copies for the QRB members' use. Can occur as early as Saturday and continue the next Monday and Tuesday.
Draft report appendices are reviewed by the QRB	HSS Deputy Director for Operations, Director HS-60 and 61, Inspection Team Leader, and other senior HSS advisors	Topic teams meet with QRB to receive comments and revise their appendix as necessary. Occurs on Monday and Tuesday of the last week of the Performance Testing and Report Writing Phase.
Conduct a summary topic validation meeting with site points of contact	Topic Team Leaders	Occurs Tuesday or Wednesday of the last week of the Performance Testing and Report Writing Phase.
Topical appendices are provided to the Director HSS as necessary for review on Tuesday or Wednesday of the last week of the Performance Testing and Report Writing Phase.	Field Support Manager	Topic teams respond to Director's comments and revise the appendix as necessary.

Step	Responsible Person(s)	Remarks
Draft appendices are provided to the site for an initial factual accuracy review (the executive summary and upfront section of the inspection are also provided to the site for a factual accuracy review at the appropriate time)	Field Support Manager	Sites normally have 4 hours to complete the factual accuracy review on Tuesday or Wednesday of the last week of the Performance Testing and Report Writing Phase. Topic teams are expected to discuss their response to site comments. In some cases, topic teams meet with site points of contact to discuss significant disagreements. The draft appendices are accompanied by a non-disclosure statement to ensure that the draft will not be shared with unauthorized individuals or organizations.
Post draft activities 1. Development of a list of acronyms, individuals contacted, and documents reviewed 2. Classification review of all sections of the inspection report 3. Preparation of briefing bullets 4. Covers are obtained for the draft report	Topic Team Leaders Designated Classifier Topic Team Leaders Field Support Manager	These steps occur on Tuesday and Wednesday of the last week of the Performance Testing and Report Writing Phase. The Inspection Team Leader and Deputy use these bullets to prepare the closeout briefing of inspection results.
Prepare one-page unclassified summary of inspection results	Inspection Team Leader, Deputy Inspection Team Leader, and designated writer	Drafted on Wednesday and used by the Director HSS to brief the Secretary, other senior DOE Managers, and external stakeholders as is necessary and appropriate.

Step	Responsible Person(s)	Remarks
Conduct a Lessons Learned discussion	Designated Inspection Team Member	Conducted on Wednesday, the results are used to provide feedback to inspection managers on ways to improve the inspection process. The results are provided in writing to the Director HS-61.
Prepare transmittal memorandum of draft report	Deputy Inspection Team Leader	Work on the memorandum can begin anytime during the last week of the Performance Testing and Report Writing Phase. The memorandum is addressed to the applicable Operations/Site Office Manager with copies to other HQ and field personnel as appropriate. The memorandum includes the suspense dates for the 10-working-day review by the site and program office, the submission of interim corrective actions plans within 30-calendar-days from the date of the final report, and the submission of final corrective action plans 60-calendar-days from the date of the final report.
Finalize the draft report	Field Support Manager	Includes quality assurance checks and reproduction of copies for distribution at the site. Additional copies of the draft report are distributed by the Oversight Classification Center located in Germantown the week following the closeout briefing. Appropriate classified document control forms accompany all copies of the draft report.
Conduct closeout briefing and provide Operations/Site Office with a copy of draft report	Inspection Team Leader	Conducted on the last day of the Performance Testing and Report Writing Phase.

Step	Responsible Person(s)	Remarks
Prepare workspace for departure of inspection team 1. Prepare documents (classified and unclassified), and classified electronic media for return to Headquarters 2. Store/return room keys, dosimeters, and pagers 3. Identify and destroy unwanted papers 4. Return unused supplies 5. Return site classified and unclassified documents	Field Support Manager	

Appendix E – Inspection Follow-Up Activities

Step	Responsible Person(s)	Due Date
Submit overtime sheets	Topic Team Members	5 days after inspection closeout briefing
Review site and program office comments, and incorporate as appropriate into draft report	Inspection Team Leader, Deputy Inspection Team Leader, and Topic Team Members	10 days after inspection closeout briefing
Conduct a technical edit of the draft report	Edit team (coordinated by the Deputy Inspection Team Leader)	10 days after inspection closeout briefing
Prepare distribution memorandum for the final report	Inspection Team Leader/Deputy Inspection Team Leader	10 days after inspection closeout briefing
Receive final report covers	Deputy Inspection Team Leader	10 days after inspection closeout briefing
Conduct final classification review and submit final report to management for approval	Director HS-61/Deputy Inspection Team Leader	10 days after inspection closeout briefing
Coordinate reproduction and distribution of final report	Deputy Inspection Team Leader	After management approval of the final report.
Complete re-filing of all documents	Deputy Inspection Team Leader and Oversight Document Center	30 days after inspection closeout briefing
Review interim corrective action plans	Designated Facility Officer and Topic Team Members	30 days after final inspection report is issued
Develop HS-61 response to the interim corrective action plans	Designated Facility Officer and Topic Team Members	10 days after receipt of plans from site.

Step	Responsible Person(s)	Due Date
Receive and review final corrective action plans	Designated Facility Officer and Topic Team Members	60 days after final inspection report is issued
Develop HS-61 response to the final corrective action plans	Designated Facility Officer and Topic Team Members	10 days after receipt of the final corrective action plans.

Appendix F – Data Collection Form

(CLASSIFICATION)

DATA COLLECTION FORM

(INTERIM/FINAL)

(U) Date: _____   **(U) Team Member(s)**_____

(U) Site-Year-Topic-Sequence Number _____
(U) (example: SRS-08-PPM-001)

(U) Data Point: *Identify* the sub-topical element and *provide* a short conclusion of the results of data collection.

(U) Results: (*Bullet statements* of strengths and weaknesses.)

Strengths: (U)

Weaknesses: (U)

Narrative (U) (*Briefly* summarize **all** of the data collected on a sub-topic or on an aspect of a sub-topic. This *is not a verbatim* account of data collection results. *Identify* findings using the standard format and include the appropriate reference(s).

   System Description: (U) (Description of the organization [identification of organization(s), number of staff, and training] that has the responsibility to implement this sub-topic or sub-topical element, and all supporting procedures, including if up to date and comprehensive.)

   Implementation: (U) (Assessment of the effectiveness of **each** major sub-topic process/element)

(U) Impact: *Briefly* discuss the impact of any identified weaknesses on the implementation of this sub-topic and any impact on the overall safeguards and security topic.

(U) Need for Additional Information: *Briefly* state the need to collect additional information and what data collection activity will be conducted to meet this need. If none, then so state.