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SAFEGUARDS AND SECURITY OVERSIGHT AND ASSESSMENTS IMPLEMENTATION GUIDE

[This Guide describes suggested nonmandatory approaches for meeting requirements. Guides are not requirements documents and are not to be construed as requirements in any audit or appraisal for compliance with the parent Policy, Order, Notice, or Manual.]



**U.S. Department of Energy
Washington, DC**

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Office of Health, Safety and Security

FOREWORD

This Department of Energy Guide is for use by all DOE elements subject to DOE O 226.1A.

Beneficial comments (recommendations, additions, and deletions) and any pertinent data that may improve this document should be sent by letter or by sending the self-addressed Standardization Document Improvement Proposal (DOE F 1300.3) to—

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Washington, DC, 20585

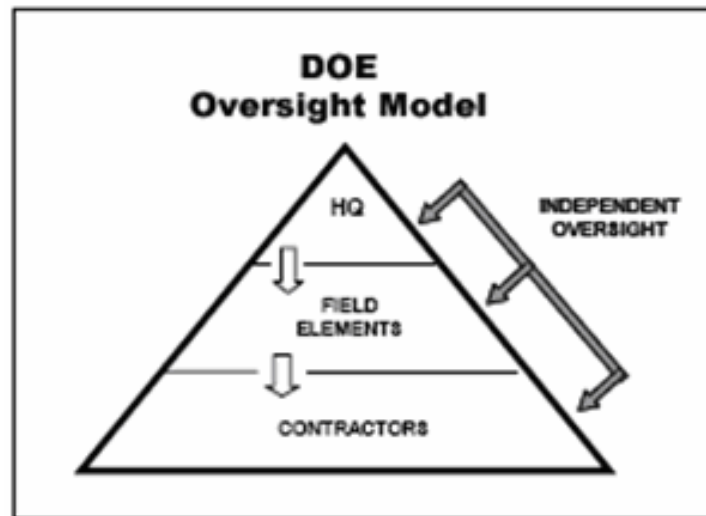
This Guide is intended to identify acceptable methods for implementing the safeguards and security provisions of DOE O 226.1A. DOE Guides, which are part of the DOE Directives System, provide supplemental information for fulfilling requirements contained in rules, regulatory standards, and DOE directives. Guides do not establish or invoke new requirements nor are they substitutes for requirements.

SAFEGUARDS AND SECURITY OVERSIGHT AND ASSESSMENTS IMPLEMENTATION GUIDE

1. INTRODUCTION.

- a. DOE P 226.1A, *DOE Oversight Policy*, dated 5-25-07, and DOE O 226.1A, *Implementation of DOE Oversight Policy*, dated 7-31-07, reflect Departmental organization responsibilities for integrated program office oversight practices to protect Departmental resources of safeguards and security interest. DOE O 226.1A requirements are intended to improve communications and coordination between the various oversight and operational elements involved with facility planning and operations and demonstrate continual improvement in management practices by incorporating robust oversight and assurance policies that protect the Department's security interests and assets and manage potential risk.

- b. Successful safeguards and security oversight and assurance programs should be designed for consistent, effective application across organizational boundaries and should reflect clear roles, responsibilities, and authorities. The DOE oversight model as reflected in DOE O 226.1A identifies the following major cohesive elements that are responsible for ensuring a comprehensive oversight program.



- (1) Headquarters line management, which provides direction and oversight to line management in the field and evaluates implementation of Headquarters expectations and effectiveness of field element line management;
- (2) field line management, which conducts direct oversight of contractor activities, work controls and procedures to meet mission objectives and contractual obligations; and
- (3) independent oversight performed by the DOE Office of Independent Oversight and other DOE or external organizations that are independent from DOE line management.

2. APPLICATION.

This Guide applies to DOE Headquarters and field element line managers and contractors responsible for implementing safeguards and security policies and procedures throughout the DOE complex. This Guide does not supersede, eliminate, or replace more rigorous oversight processes and controls but does identify potential assessment activities and sources of data collection from documentation the Department requires for meeting the intent of DOE O 226.1A.

3. MANAGEMENT OVERSIGHT PROCESSES.

An effective safeguards and security oversight program is based on integration of Headquarters, field, and contractor management that reflects effective lines of communication that flows from the Secretary of Energy to program offices, field offices, and sites. Oversight activities can include inspections, operational awareness activities, onsite reviews, assessments, surveys, self-assessments, and performance evaluations of Federal and contractor organizations.

4. FEDERAL OVERSIGHT.

- a. The DOE Headquarters safeguards and security oversight process focuses on field elements and, to a limited extent, contractor activities. Headquarters line managers establish oversight programs and processes for Headquarters and provide appropriate guidance related to the development of these programs to the field elements. This can be accomplished through developing the organizational structure, assigning functional responsibilities and levels of authority, performing and assessing work, providing documentation via approved organizational charts and mission statements, establishing functional area points of contact, delegations of authority, position descriptions, standard operating procedures, developing budget requests and strategic plans. DOE M 470.4-1 Chg 1 *Safeguards and Security Program Planning and Management*, dated 8-26-05, integrates these elements into a cohesive summary of program direction, responsibilities and resources.
- b. DOE P 470.1, *Integrated Safeguards and Security Management (ISSM) Policy*, dated 5-8-01, DOE O 470.4A, *Safeguards and Security Program*, dated 5-25-07, DOE O 470.2B, *Independent Oversight and Performance Assurance Program*, dated 10-31-02, and the DOE 470.4-series safeguards and security manuals provide an overall approach to safeguards and security program management and oversight. In addition, other program management and oversight activities conducted to satisfy other DOE requirements should be utilized.
- c. To ensure that effective management practices are in place, Headquarters and field line managers should annually review and assess site security plans to ensure that
 - (1) roles and responsibilities are delineated,

- (2) strong accountability processes are identified, and
 - (3) protection strategies and vulnerabilities have been assessed and documented.
- d. Program offices can review safeguards and security management plans to ensure that roles and responsibilities are appropriately delineated from field to Headquarters.
- e. The budget review process and site surveys should be used to evaluate field management oversight of contractor facilities and to site conditions and trends. In some cases, valuable information may be gained by observing selected site and facility safeguards and security self-assessment activities.
- f. DOE line management safeguards and security quality assurance processes should focus on the implementation of ISSM into management practices to ensure that work is performed efficiently and securely.
- g. DOE line management should set expectations and communicate those expectations to contractors through formal contract mechanisms and direct communication.
- h. For contracts with safeguards and security interests, the primary resources are contractor requirements documents in the DOE 470-series directives. In most cases, field offices have established formal mechanisms that are tailored to local needs. These need not be modified if they include the existence of a formal, documented process, a record of incorporating new and revised safeguards and security directives into contracts in a timely manner, and effective monitoring of contractor implementation of new or revised requirements.
- i. Mechanisms outside the formal safeguards and security program structure that may be used include program reviews of contractor assurance system programs and processes for consistency with industry best practices.
- j. DOE managers should ensure that safeguards and security performance and/or award fee incentives are incorporated for improved program performance and that other incentives to the contractor do not have the unintended consequence of reducing safeguards and security performance.
- k. DOE Federal field elements should conduct safeguards and security oversight of DOE contractor activities as specified in the DOE 470-series directives and, if effectively implemented, should satisfy the requirements of DOE O 226.1A. These oversight activities ensure that Federal managers in the field maintain operational awareness and that site contractors continue cost-effective implementation of DOE requirements, related contract provisions, approved site security plans, approved management programs, work controls and procedures,

and mission objectives. Typical DOE field element oversight includes the following.

- (1) Implementing an ongoing oversight program consistent with DOE M 470.4-1—
 - (a) safeguards and security oversight by Federal field elements includes administration of the safeguards and security survey and corrective action programs,
 - (b) other planned and scheduled assessments of both contractor documentation and on-site observations or surveillances, and
 - (c) frequent scheduled interaction with contractor safeguards and security management.
 - (2) Implementing event driven oversight activities—
 - (a) investigating security incidents and
 - (b) evaluating the impact of failure of components of the protection program (for example, inoperative sensors in a system of alarms or evaluation of unanticipated operational conditions for security impact.)
 - (3) Conducting for-cause reviews.
 - (4) Ensuring that the safeguards and security program continues to be capable of supporting DOE programs and projects.
1. Department-wide operational awareness can be obtained through use and analysis of the Safeguards and Security Information Management System (SSIMS) and the Incident Tracking Analysis Capability (ITAC) database. In addition, participation in Headquarters management reviews and evaluations that address the effectiveness of safeguards and security program implementation should also be considered.

5. CONTRACTOR OVERSIGHT.

- a. DOE contractor oversight is the primary means to ensure implementation of DOE requirements and related contract provisions. Typical DOE contractor oversight consists of the following.
 - (1) Verifying that work is performed in accordance with DOE requirements and applicable contract provisions.
 - (2) Evaluating the effectiveness of safety management system implementation.

- (3) Observing hands-on work and implementation of procedures and processes at the worker level.
 - (4) Implementing a contractor self-assessment program.
 - (5) Implementing a comprehensive and integrated contractor assurance system in accordance with the site safeguards and security plan and the site security plan.
- b. In addition to meeting requirements of the DOE 470-series directives for annual comprehensive self-assessments, topical self-assessment and quality assurance reviews, the contractor should identify and provide increased testing and performance assurance for critical protection design elements.
- c. Through implementing these and other internal oversight functions and by appropriate participation in external oversight activities (i.e., Federal inspections, reviews, assessments and surveys) contractors can ensure a strong safeguards and security program. Specifically, these internal oversight functions should be able to:
- (1) identify improvements in management of programs and projects;
 - (2) ascertain where operational and/or security risks exist;
 - (3) identify and correct performance/compliance trends before they become significant issues;
 - (4) prioritize resource decisions;
 - (5) define performance metrics and performance targets to assess performance, including benchmarking of key functional areas with other DOE contractors and industry and research institutions; and
 - (6) ensure timely and appropriate communication to the Contracting Officer should issues or concerns be identified.
- d. Contract provisions should address policies and procedures related to facility access for conduct of oversight programs, consistent with applicable laws and requirements.
- e. To establish and maintain qualification standards for personnel with oversight responsibilities, contractors should prepare job-task analyses for each safeguards and security position based upon the job description for each position. When compared to the qualification and training of the incumbent for each position, needed training and competencies can be identified and training plans developed. In some cases, additional position-specific requirements may be established in site security plans. These would generally be site-specific requirements intended to mitigate an identified weakness in other elements of

the security design. Training and certification programs that are available to Federal and contractor staff are offered by the DOE National Training Center and address program planning and management, physical protection, protective force, information security, nuclear material control and accountability, and personnel security.

- f. Safeguards and security performance measures and indicators should be established and periodically reviewed within the contractor organization. These may be explicitly related to contract performance requirements and/or may establish continuous improvement goals.

6. INDEPENDENT OVERSIGHT.

- a. The Office of Independent Oversight conducts safeguards and security inspections and issues reports to the Secretary of Energy, DOE line management, and other interested parties (e.g., Congress or other Federal/State agencies).
- b. Independent Oversight determines both the effectiveness and implementation of safeguards and security management and policy. Findings against site contractors, DOE field management, Headquarters management, and/or the office of primary interest, for the S&S directive in question identify incomplete requirements or ineffective guidance.
- c. Activities include site visits and document reviews (e.g., site plans, site manager, and the contractor manager guidance and direction procedures and records), performance tests and observation of actual work in determining the status of safeguards and security programs at DOE facilities.
- d. Assessments can be conducted more frequently for sites and facilities that have demonstrated weak security programs and need assistance in resolving specific program deficiencies, management systems, or assurance systems. Implementation of the independent oversight program is described in DOE O 470.2B.
- e. The Office of Security Evaluations within the Office of Independent Oversight is responsible for safeguards and security inspections.
- f. Departmental programs and activities are also reviewed and audited on an ongoing basis by the Department's Office of Inspector General, which conducts independent audits, inspections, investigations, and other reviews to identify operational efficiencies and cost savings in Department programs.
- g. External oversight can be provided by the U.S. Government Accountability Office or through ad hoc reviews by independent technical or scientific experts or commissions.

7. RESOLVING DEFICIENCIES.

- a. The DOE 470-series directives establish the formal methodology within the safeguards and security program for formulating and conducting corrective actions, for identifying and implementing effective compensatory measures while implementing the identified corrective action, monitoring progress toward full implementation of the corrective action, and establishing the effectiveness of the corrective action, as actually implemented.
- b. If actions to bring site/facility processes into compliance with safeguards and security policy requirements are judged to be too costly or to be an inefficient solution to the root cause of the identified deficiency, a deviation from specific policies might be appropriate. The process for obtaining relief from safeguards and security policy requirements is contained in DOE M 470.4-1 Chg 1.

8. LESSONS LEARNED.

Programs may wish to publish unclassified, non-sensitive safeguards and security lessons learned within the overall site lessons learned activity, while retaining the more usual safeguards and security methods of disseminating lessons learned for sensitive or classified issues. The SSIMS system provides a classified means of disseminating both identified weaknesses at DOE sites and the measures taken to correct those observed weaknesses. Independent Oversight reports and other similar reports are routinely distributed to DOE and contractor managers and contain not only findings, but discussion of the observations that led to the finding, as well as opportunities for program improvements. Most of these, by their nature are useful as lessons learned, but will more than likely contain classified information.

9. REFERENCES.

- a. DOE O 210.2, *DOE Corporate Operating Experience Program*, dated 6-12-06.
- b. DOE O 225.1A, *Accident Investigations*, dated 11-26-97.
- c. DOE P 226.1A, *Department of Energy Oversight Policy*, dated 5-25-06.
- d. DOE O 226.1A, *Implementation of Department of Energy Oversight Policy*, dated 7-31-07.
- e. DOE O 414.1C, *Quality Assurance*, dated 6-17-05.
- f. DOE O 442.1A, *Department of Energy Employee Concerns Program*, dated 6-6-01.
- g. DOE P 470.1, *Integrated Safeguards and Security Management (ISSM) Policy*, dated 5-8-01.

- h. DOE O 470.2B, *Independent Oversight and Performance Assurance Program*, dated 10-31-02.
- i. DOE O 470.4A, *Safeguards and Security Program*, dated 5-25-07.
- j. DOE M 470.4-1 Chg 1, *Safeguards and Security Program Planning and Management*, dated 8-26-05.
- k. DOE M 470.4-2 Chg 1, *Physical Protection*, dated 8-26-05.
- l. DOE M 470.4-3 Chg 1, *Protective Force*, dated 8-26-05.
- m. DOE M 470.4-4 Chg 1, *Information Security*, dated 8-26-05.
- n. DOE M 470.4-5, *Personnel Security*, dated 8-26-05.
- o. DOE M 470.4-6 Chg 1, *Nuclear Material Control and Accountability*, dated 8-26-05.
- p. DOE M 470.4-7, *Safeguards and Security Program References*, dated 8-26-05.

Table 1. DOE O 226.1A Implementation Methodologies for Safeguards and Security

Requirement	Assessment Activities
Evaluate contractor performance	<ul style="list-style-type: none"> • Conduct site surveys to determine compliance and performance to DOE requirements. • Review budget requests to identify forecasts of significant changes in operations, projected operational constraints, and resource impacts that affect mission-related goals. • Review performance objectives and statements of work. • Review self-assessment reports and corrective action plans.
Ensure compliance with Departmental requirements that apply to line managers	<ul style="list-style-type: none"> • Review and approve security plans, adjudicate issuance of security clearances, operate classified and sensitive information identification and protection programs, and operate employee concerns programs and other such functions. • Participate in internal and external reviews (i.e., Independent Oversight, Inspector General, General Accounting Office, and other Ad Hoc reviews). • Review of access authorizations and security clearances, including Human Reliability Program compliance. • Review mission statements and roles, responsibilities, and authorities documentation that outlines safeguards and security management.
Communicate expectations to contractors	<ul style="list-style-type: none"> • Ensure contract documents include requirements and expectations for work performance, including performance indicators and metrics, objectives, and criteria with established milestones.
Review field activities to evaluate effectiveness of oversight and maintain awareness of site conditions and trends	<ul style="list-style-type: none"> • Review Site Safeguards and Security Plans and Site/Facility Security Plans to ensure roles and responsibilities are clearly delineated. • Review and conduct analysis of the information contained within the SSIMS and ITAC databases for open deficiencies/incidents and trends of program weaknesses. • Review site survey reports.
Constitute Central Technical Authorities (CTAs) for core nuclear safety functions	<ul style="list-style-type: none"> • Ensure CTAs are made aware of security incidents and issues that may affect nuclear safety.

**Table 1. DOE O 226.1A Implementation Methodologies for Safeguards and Security
(cont'd)**

Requirement	Assessment Activities
Document performance expectations	<ul style="list-style-type: none"> • Review Site Safeguards and Security Plans annually to ensure contract provisions include provisions for implementation of safeguards and security policy. • Review work practices to ensure security events, such as interruption, disruption, or compromise do not affect mission. • Incorporate risk management into work practices via the Site Safeguards and Security Plan or Site Security Plan.
Ensure compliance with requirements applicable to DOE line management	<ul style="list-style-type: none"> • Review site security plans and site safeguards and security plans to ensure all security elements as outlined in DOE O 470.4A are addressed. • Review access authorizations and security clearances. • Review site survey reports. • Review SSIMS and ITAC data for trending analyses.
Implement integrated approach for safety and security management	<ul style="list-style-type: none"> • Participate in appropriate S&S Steering Groups and/or Quality Panels • Participate on Quality Review Board. • Implement Integrated Work Management System approach for safety and security processes.
Conduct regular assessment of site assurance system and operational activities	<ul style="list-style-type: none"> • Request support from the Office of Security Assistance. • Participate in site surveys. • Implement corrective actions based on results of inspections and operational reviews.