

Section 701 Surveys and Reviews

Description

This section describes the programs and procedures in effect at Headquarters (HQ) to conduct Safeguards and Security (S&S) surveys and reviews. These activities are conducted to assure the Secretary of Energy, Departmental elements, and other government agencies that safeguards and security interests are being protected at the required level.

The Office of Information Security (HS-92) is responsible for the conduct of all surveys and reviews of HQ facilities. It is also responsible for conducting an annual survey of overall HQ security operations. The HQ Survey Team has been established within HS-92 to carry out these surveys and review activities.

Types and Frequencies of Surveys and Reviews:

Below are the types and frequencies of surveys and reviews conducted by the HQ Survey Team:

1. Initial Surveys--Conducted upon establishment of a new facility that will have an Importance Rating of A, B, C, or PP. See Attachment 1 to this section for a description of Importance Ratings.
2. Periodic Surveys--Conducted for already established facilities with an importance rating of A, B, or C, once every 12 months. Facilities with an importance rating of PP are surveyed once every 24 months. See the Self-Assessments subsection below for an alternative means of completing the Periodic Survey of DOE HQ.
3. Special Surveys--Conducted upon request for a specific, limited security purpose.
4. Termination Surveys--Conducted upon termination of a facility to ensure Departmental security interests have been returned, relocated, or disposed of properly.
5. Periodic Reviews--A documented review of Non-Possessing (NP) facilities conducted at least once every 5 years.

Headquarters Surveys:

An annual HQ S&S Survey is conducted by the HQ Survey Team with assistance from Headquarters Security Officers (HSOs) of selected HQ elements. The S&S Survey is conducted continuously from October 1 through August 31 each year.

HQ elements are permitted to conduct internal security self-assessments for their own individual purposes.

HQ Implementation Procedures

The HQ Survey Team maintains a list of all HQ facilities and a schedule for conducting required S&S Periodic Surveys and Reviews. Initial, Special, and Termination Surveys are conducted only when the HSO or Facility Security Officer (FSO) responsible for that facility sends a request via e-mail to the HQ Survey Team requesting such a survey. The HQ Survey Team will coordinate with the requesting HSO or FSO to facilitate the necessary survey or review.

The HQ Survey Team will establish a schedule for conducting the HQ S&S Survey. That schedule will be provided to the HSO Program Manager for further dissemination to all elemental HSOs. When the Survey Team is conducting an S&S topical/subtopical survey or review of a specific Headquarters Element, the HSO for that Element is expected to accompany the Team and participate as needed.

All applicable S&S topical and subtopical areas included on DOE Form (F) 470.8, *Survey/Inspection Report Form*, will be covered during HQ surveys, reviews and self-assessments. See the Forms/Samples/Graphic subsection below for a link to the DOE F 470.8.

NOTE: The current version of DOE F 470.8 includes Cyber Security as a topical area in Block 12. Cyber Security now falls under the purview of the Office of the Chief Information Officer. References to Cyber Security on DOE F 470.8 will likely be deleted during the next revision of the form.

The HQ Survey Team will issue an official report upon completion of all Initial and Periodic Surveys. The report will contain the following:

- A completed DOE F 470.8,
- An executive summary containing:
 - the scope, methodology, period of coverage, duration, and date of the exit briefing to management;
 - a brief overview of the facility, function, scope of operations, and contractual information;
 - a brief synopsis of major strengths and weaknesses that impact the effectiveness of the facility's overall S&S program, including identification of any topical areas rated less than satisfactory;
 - the overall composite facility rating with supporting rationale; and
 - reference to a list of findings identified during the survey, review, or self-assessment.
- A narrative for all rated topical and sub-topical areas to include:
 - a description of the facility's implementation of the program element;
 - the scope of the evaluation;
 - a description of activities conducted;
 - the evaluation results and associated issues;

- the identification of all findings, including new and previously identified open findings, regardless of source (e.g., former OA, IG, GAO), and their current corrective action status; and
- an analysis that provides a justification and rationale of the factors responsible for the rating.
- Attachments, including:
 - a copy of the current DOE F 470.2, *Facility Data and Approval Record (FDAR)*;
 - a listing of all active DOE F 470.1, *Contract Security Classification Specification (CSCS)* form(s), or DD F 254, *DOD Contract Security Classification Specification* form(s);
 - a listing of all new findings resulting from the survey/self-assessment;
 - a listing of all previous findings that are open, to include the current status of corrective actions;
 - a listing of team members including names, employer, and their assigned area(s) of evaluation; and
 - a listing of all source documentation used to support the survey/self-assessment conduct and results (e.g., GAO, IG, former OA, and similar assessment documentation).

Reports will be distributed by the HQ Survey Team to the applicable senior managers, personnel responsible for corrective actions, and other appropriate personnel.

If findings are identified in the report, they will be assigned to the specific HQ element where the deficiency was identified. The Element will then be required to submit a Corrective Action Plan (CAP), with applicable milestones, to the HQ Survey Team. A CAP must be submitted to the HQ Survey Team within 30 days after issuance of the finding. Actions taken to rectify the finding will be tracked through updates to the CAP until the deficiency is corrected. Additional information on developing and completing CAPs can be found in Section 702, Corrective Action Plans, of this Plan.

All open findings from previous surveys, reviews, and self-assessments will be reviewed by the HQ Survey Team during the next survey or review to validate the status of corrective actions and to evaluate their impact on the existing S&S program.

If, during the conduct of a survey, the HQ Survey Team identifies a vulnerability that places national security, classified information, or Departmental property at significant risk, the HQ element will be notified immediately.

All findings identified during a survey, review, or self-assessment, will be documented in the associated report, even if that finding was closed/rectified during the survey, review, or self-assessment. (See Section 702, Corrective Action Plans, for additional information on this issue.)

The survey, review, or self-assessment report will include a formal rating, which summarizes the effectiveness and adequacy of the security program at the facility being

examined. The following rating system will be used:

- Satisfactory: The element being evaluated meets protection objectives.
- Marginal: The element being evaluated partially meets protection objectives.
- Unsatisfactory: The element being evaluated does not meet protection objectives.

NOTE: The phrase "Does Not Apply" (DNA) may be used in lieu of a rating.

Notifications and Actions for Less Than Satisfactory Composite Ratings:

The following actions are required in response to less than satisfactory S&S Periodic and HQ Surveys composite ratings:

1. Marginal Ratings--Within 15 working days of the determination of a marginal composite rating, notification must be made to line management that includes:
 - a statement identifying the vulnerability and rationale for the rating; and
 - a description of the corrective actions/compensatory measures taken to date; and a statement acknowledging physical validation of the adequacy of items listed in above sub-bullet.
2. Unsatisfactory Ratings--Within 24 hours of determination of an overall composite rating of unsatisfactory, the Director, Office of HQ Security Operations (HS-90) must coordinate with the appropriate HQ elements to take the following actions:
 - suspend the activity and/or recommend suspension of the facility clearance pending remedial action; and
 - provide justification for continuing operations to the HQ Cognizant Security Authority.

The Director, HS-90 must evaluate those immediate interim corrective actions being undertaken and ensure they mitigate the identified risks or vulnerabilities.

Possible Incidents of Security Concern:

If the results of a survey or self-assessment identify an incident of security concern, it must be reported in accordance with Chapter 11, Incidents of Security Concern, of this Plan.

Points of Contact

For the names and contact information for those who occupy the positions identified in this section, please call (301) 903-9990 or (301) 903-1163.

Forms/Samples/Graphics

Facility Importance Ratings (see Attachment 1 to this Section)

DOE F 470.1, *Contract Security Classification Specification*, (for a copy of this form go to <http://energy.gov/cio/downloads/contract-security-classification-specification-cscs>)

DOE F 470.2, *Facility Data and Approval Record*, (for a copy of this form go to <http://energy.gov/cio/downloads/facility-data-and-approval-record-fdar>)

DOE F 470.8, *Survey/Inspection Report Form*, (for a copy of this form go to <http://energy.gov/cio/downloads/surveyinspection-report-form>)

DD 254, *DOD Contract Security Classification Specification*, (for a copy of this form go to <http://www.dtic.mil/dtic/pdf/formsNguides/dd0254.pdf>)

References

Safeguards and Security Survey and Self-Assessment Guide and Toolkit, 2003

ATTACHMENT 1

Facility Importance Ratings (Extracted from DOE Order 470.4B)

Facility importance ratings are used to identify the protection importance of facilities. Each facility's assigned importance rating must be recorded on DOE Form 470.2, *Facility Data and Approval Record*. Importance rating criteria are as follows.

- a. "A" Importance Ratings. Ratings assigned to those facilities that meet any of the following criteria:
 - (1) engaged in administrative activities considered essential to the direction and continuity of the overall DOE nuclear weapons program, as determined by the Departmental element;
 - (2) authorized to possess Top Secret or possess SAP matter or designated as Field Intelligence Elements;
 - (3) authorized to possess Category I quantities of SNM (including facilities with credible roll-up quantities of SNM to a Category I quantity); or
 - (4) authorized to operate critical infrastructure programs determined to be essential by DOE line management.

- b. "B" Importance Ratings. Ratings assigned to those facilities that meet any of the following criteria:
 - (1) engaged in activities other than those categorized as "A" and authorized to possess Secret (S)/Restricted Data (RD) and/or weapon data matter;
 - (2) authorized to possess Category II quantities of SNM; or
 - (3) authorized to possess certain categories of biological agents.

- c. "C" Importance Ratings. Ratings assigned to those facilities that meet any of the following criteria:
 - (1) authorized to possess Categories III and IV quantities of SNM or other nuclear materials requiring safeguards controls or special accounting procedures; or
 - (2) authorized to possess classified information or matter other than the type categorized for "A" and "B" facilities.

- d. "D" Importance Ratings. Ratings assigned to those facilities that provide common carrier, commercial carrier, or mail service and are not authorized to store classified information or matter, or nuclear material during nonworking hours. (Carriers who store classified information or matter, or nuclear material must be assigned an "A," "B," or "C" importance rating).

- e. "E" (Excluded Parent) Importance Ratings. Ratings assigned to a corporate tier parent of a contractor organization that has been barred from participation in the activities related to a contract with DOE.

- f. “PP” (Property Protection) Importance Ratings. Ratings assigned to those facilities for which a special standard of protection must be applied. Basic considerations include physical protection to prevent or deter acts of arson, civil disorder, riots, sabotage, terrorism, vandalism, and theft or destruction of DOE property and facilities. These special standards are applied when a facility has:
- (1) Government property of a significant monetary value (more than \$5 million, exclusive of facilities and land values);
 - (2) nuclear materials requiring safeguards controls or special accounting procedures other than those categorized as types “A,” “B,” or “C”;
 - (3) responsibility for DOE program continuity;
 - (4) national security considerations; or
 - (5) responsibilities for protection of the health and safety of the public and employees.
- g. “NP” (Non-Possessing) Importance Ratings. Ratings assigned to those facilities that have authorized access to classified information or matter, or SNM at other approved locations. Non-possessing facilities do not themselves possess any classified information or matter, or SNM.