



**PMA/PORTS/16-0740**

**Safeguards and Security Program Plan for Oversight  
of the Material Control and Accountability and  
Protective Force Programs**

Revision 1

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## DEFINITIONS

<i>Assessment</i>	The act of reviewing, evaluating, inspecting, testing, checking, surveillance, auditing, and or otherwise determining and documenting whether items, processes, systems, or services meet specified requirements and are being effectively implemented. Assessment is synonymous with audit. The definition of audit in NQA-1-2004 is included within this definition as follows: a planned and documented activity performed to determine by investigation, examination, or evaluation of objective evidence the adequacy of and compliance with established procedures, instructions, drawings, and other applicable documents, and the effectiveness of implementation.
<i>Assessor (e.g., Auditor)</i>	An individual who by education, experience, and other credentials (e.g., training, qualification) has been selected by line management or the MCA assessor coordinator to perform an MCA or a portion of an MCA. Assessor is synonymous with auditor, and may be recognized as an SME.
<i>Compliance-Based Oversight</i>	Oversight processes that focus on review of the regulatory, DOE directive or other requirements, and look for evidence of compliance with those requirements.
<i>Conditions Adverse to Quality</i>	An all-inclusive term used in reference to any of the following: failure, malfunction, deficiency, defective item, problem, and nonconformance. CAQs are categorized as findings and observations.
<i>Finding</i>	CAQs that represent a departure from a written requirement. Corrective actions are required.
<i>Observation</i>	A work process or program improvement opportunity, or CAQs that, if left uncorrected, could lead to a finding. Corrective actions are recommended but not required.
<i>Performance-Based Oversight</i>	Oversight processes that focus on the performance of the work through review of activities in the field, and checking for how well performance objectives (e.g., scope, cost, schedule, and defined processes) are being met.
<i>Causal Analysis</i>	A logical evaluation of an event or issue that involves informal and formal analysis to determine the Apparent Cause(s) and/or Root Cause of the event or issue.
<i>Surveillance</i>	A review technique that uses observation or monitoring to provide confidence that on-going processes and activities are performed adequately and effectively in conformance with specified requirements and procedures. Surveillances include oversight conducted by ISSC management as described in Section 7.9 of EM-QA-001, <i>Office of Environmental Management (EM) Quality Assurance Program (QAP)</i> . Oversight conducted by ISSC personnel who may not be independent of the activity being evaluated is identified as surveillance. A surveillance is not limited to



process control or product acceptance as defined in American Society of Mechanical Engineers NQA-1.

## ACRONYMS

CAP	Corrective Action Plan
CAQ	Conditions Adverse to Quality
CFR	Code of Federal Regulations
DOE	Department of Energy
DUF <sub>6</sub>	Depleted Uranium Hexafluoride
e-mail	Electronic Mail
FSO	Facility Security Officer
IPT	Integrated Project Team
ISMS	Integrated Safety Management System
ISS	Infrastructure Support Services
ISSC	Infrastructure Support Services Contractor
MC&A	Material Control & Accountability
NQA-1	Nuclear Quality Assurance Standard Worker 1
ODSA	Officially Designated Security Authority
PMA	Portsmouth Mission Alliance, LLC
PORTS	Formerly Operating Portsmouth Gaseous Diffusion Plant
PPPO	Portsmouth/Paducah Project Office
QAP	Quality Assurance Program
RCA	Root Cause Analysis
S&S	Safeguards and Security
SNM	Special Nuclear Material
SSP	Site Security Plan

## EXECUTIVE SUMMARY

This Safeguards and Security (S&S) Program Plan for Safeguards Oversight of the nuclear Material Control and Accountability (MC&A) Program and Protective Force (PF) has been developed by Portsmouth Mission Alliance LLC (PMA). The United States Department of Energy (DOE) Portsmouth/Paducah Project Office (PPPO) awarded PMA the Infrastructure Support Services (ISS) contract, DE-EM0004062, for the formerly operating Portsmouth Gaseous Diffusion Plant (PORTS), located near Piketon, Ohio.

The ISS contractor (ISSC) Officially Designated Security Authority (ODSA), in conjunction with Facility Security Officers (FSOs) from the other prime contractors, has established the PORTS security posture as described in the PORTS Site Security Plan (SSP), PMA/PORTS-16-0754..

The prime contractors to be assessed under this plan include:

- Fluor-BWXT Portsmouth LLC (FBP), as the decontamination and decommissioning (D&D) prime contractor, contract DE-AC30-10CC0017, responsible for the management of both the PORTS MC&A program and the PF, and
- BWXT Conversion Services LLC, contract DE-AC30-11CC40015, responsible for managing the Depleted Uranium Hexafluoride (DUF<sub>6</sub>) Conversion Plants located in Paducah, Kentucky and Piketon, Ohio. This plan addresses only assessment and/or surveillance of its DUF<sub>6</sub> Piketon Plant Safeguards, Security, and Emergency Preparedness program.

This plan, considered an implementing document of the PORTS SSP, describes processes the ISSC security staff will use to assess prime contractor performance related to the accountability, control and protection of Category III and IV quantities of Special Nuclear Material (SNM) as applicable and as authorized at PORTS by DOE.

Performance of work under this plan will assess compliance by prime contractor personnel with the SSP, SSP implementing documents (e.g., plans, policies, procedures, and protocols), and DOE directives as applicable in the following topical areas:

Protective Force:

- Management
- Training
- Duties
- Equipment and Facilities

MC&A:

- Program Management
- Material Accountability
- Materials Control
- Measurement

- Physical Inventory

Each custodial prime contractor maintains an issues resolution and tracking process in accordance with DOE directives. Each prime contractor FSO has input into his/her respective issues resolution and tracking process related to S&S issues tracking. As an oversight activity, the ISSC assessments and/or surveillances results will flow into the D&D or DUF<sub>6</sub> Piketon Plant contractor issues resolution and tracking programs through the respective FSO. Issues attributable to program areas under the responsibility of the ISSC will be documented and tracked to closure in accordance with PMA-2607, *Incident Reporting and Issues Management Program*.

The status of S&S findings, observations, and recommendations tracked by the prime contractor FSOs will be reviewed monthly by the ISSC and may be subject to review during monthly DOE Security Integrated Project Team (IPT) meetings. Such status reviews may include trending data in order to identify negative trends prior to such issues becoming more significant and potentially resulting in increased risk to DOE-regulated security assets or interests.

This program plan may be updated annually or when significant changes occur. This plan is in addition to and supplements the annual prime contractors' S&S self-assessment programs.

## **1. INTRODUCTION AND CONTRACT REQUIREMENTS STATEMENTS**

This plan defines the PORTS ISSC ODSA responsibility and processes for conducting scheduled and random oversight assessments and/or surveillances on the custodial contractors (e.g., D&D, and DUF<sub>6</sub> Piketon Plant contractors) of the MC&A programs, and PF at PORTS.

This responsibility is described in the ISS contract, number DE-EM0004062, under the section numbers and requirements statements included below.

Section 3.2.1.1, Protection Program Management and Administration, states the ISSC shall develop, implement and maintain the site S&S Program for all DOE interests on-site. This includes all applicable areas of S&S with the exception of PF and MC&A. The ISSC shall only provide safeguards oversight of the MC&A program and S&S programmatic oversight of the Protective Force.

Section 3.2.1.2, S&S Planning and Procedures, states the ISSC shall routinely review S&S project plans and security interest areas through random assessments and/or surveillances to ensure that they are current and reflect actual operating conditions at the covered location. The reports of the random assessments and/or surveillances shall be provided on a quarterly basis.

Section C.3.2.2, PF, states the ISSC shall develop a S&S Program Plan establishing the site security posture and stipulating the ODSA's responsibility for the assessment and/or surveillance of the PF to ensure an effective program for the S&S interests at the PORTS to include compliance with the SSP and the execution of security plans for the various security interest areas.

Section 3.2.6, MC&A, states the ISSC shall perform assessments and/or surveillances of the custodial contractors to ensure compliance with the site S&S plans, procedures and protocols which shall have established accountability and physical protection programs including, for affected contractors, a plan for Category III and IV quantities of SNM.

This plan and its requirements are not intended to supersede the custodial contractors' contractual requirements to conduct and document self-assessment programs, to track and resolve identified issues or findings, to conduct Enforcement review, causal analysis, determine extent of condition, and/or to perform effectiveness reviews and trending analysis of self-assessment or independent assessment findings required to meet DOE directives. The ISSC will review and concur on other prime contractor FSOs' S&S topical area self-assessments.

Implementation of this plan will aid in providing assurance an effective oversight program is maintained for the S&S interests of MC&A operations concerning Category III and IV quantities of SNM authorized for the processing, storage or disposition by

DOE at PORTS, and PF management and operations in compliance with the SSP, applicable procedures, and DOE directives for safeguarding national security assets and interests.

## 1.1 Scope

This plan applies to all PORTS DOE prime contractor personnel performing S&S, PF, and MC&A duties under the oversight of the DOE PPPO at the PORTS.

Performance of work under this plan will assess compliance with the SSP, SSP implementing documents (e.g., plans, policies, procedures, and protocols), and DOE directives as applicable as listed on DOE form, F-470.8, *Survey/Inspection Report Form*, and below:

Protective Force:

- Management
- Training
- Duties
- Equipment and Facilities

MC&A:

- Program Management
- Material Accountability
- Materials Control
- Measurement
- Physical Inventory

## 1.2 Purpose

The purpose of this plan is to establish an objective evaluation process for conducting scheduled and random S&S oversight assessments and/or surveillances on the D&D and DUF6 Contractors of the site-wide MC&A programs, and PF.

The ISSC scheduled and random assessments and/or surveillances of the MC&A or PF activities and operations will be performed in conjunction with the D&D and DUF6 plant assessment schedule, when feasible, in order to allocate the appropriate resources required in an efficient manner and to address safety, security, programmatic, and operational considerations. This correlative and integrated approach will further minimize potential impacts to S&S program operations, as well as, provide confidence to the line management involved that on-going processes and activities are performed adequately and effectively, as prescribed in their respective and specific S&S program procedures.

Random assessments and/or surveillances will be conducted as determined appropriate based on operating conditions, results, and trends.

The basis of the assessments and/or surveillances are defined in PMA-4335, *Security Surveys, Self-Assessments, and Review Programs Process*.

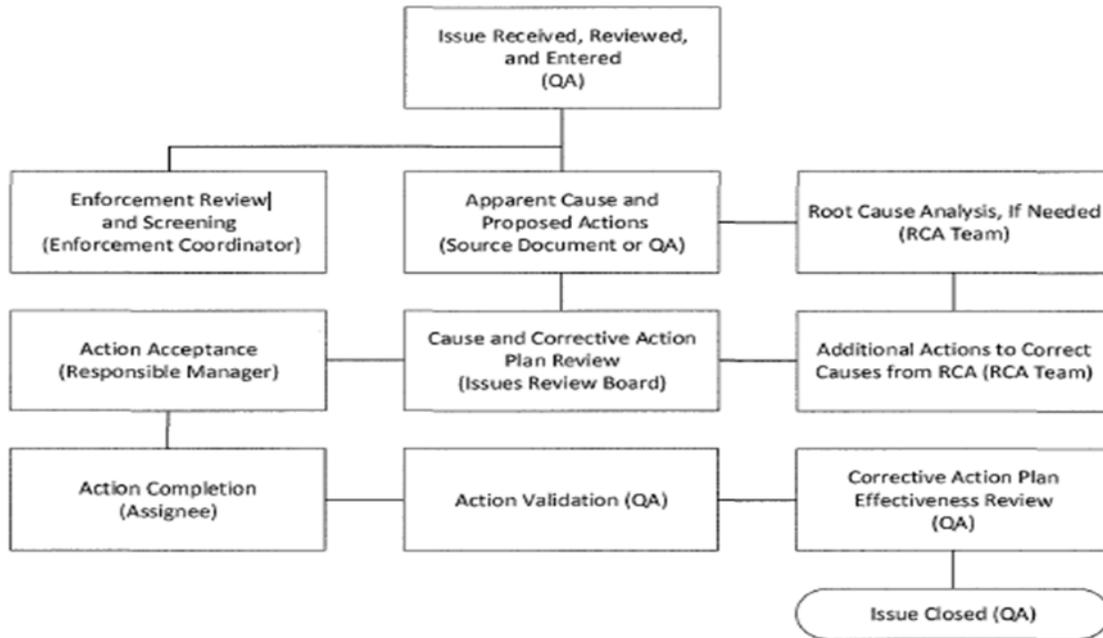
The basis of the assessments and/or surveillances are defined in PMA/PORTS-77, *Quality Assurance Program Plan*; PMA/PORTS-15-0721, *Calendar Year 2016 Integrated Oversight Plan for the Portsmouth Gaseous Diffusion Plant, Piketon, Ohio*; and PMA/PORTS-55, *Integrated Safety Management System Plan*.

This plan directly implements the DOE Integrated Safety Management System (ISMS) Core Function of "*Provide Feedback and Continuous Improvement*," and Quality Assurance Program criteria "3. *Quality Improvement*, and 9. *Management Assessment*". The provision of timely and effective feedback will afford line management with opportunities for continuous improvement and will cultivate operational excellence in self-identifying potential observations, findings, and recommendations to include the associated corrective action. Results from the ISSC assessment and/or surveillance activities will be formally documented and made available to the FSO or designee (e.g., line management) of the assessed contractor.

This plan further defines the ISSC process for documenting, tracking, and managing findings, observations, recommendations, and/or proficiencies identified during the ISSC random S&S assessments and/or surveillances. The ISSC assessment or surveillance report when finalized will be provided to the appropriate custodial contractor FSO, and line manager as applicable, responsible for the assessed area. The custodial contractor FSO, and line manager as applicable, will be responsible for incorporating any identified findings, observations, and recommendations into the established D&D or DUF<sub>6</sub> Plant assessment tracking system, for conducting enforcement review, causal analysis, determining extent of condition, developing and completing corrective actions to address the identified issues, and/or for completing effectiveness reviews and trending analysis. The ISSC assessors may serve as an available resource to better clarify or define any findings, observations, recommendations, and/or proficiencies identified. As with any assessment activity, documented results are open for review during future assessment activities.

Each prime contractor manages the tracking and resolution of issues such as findings, observations, and recommendations in accordance with established procedures. A typical DOE-compliant issue resolution and tracking process is depicted in Figure 1.

Figure 1. A Typical DOE-Compliant Corrective Action Program Process



## 2. TRACKING AND TRENDING ANALYSIS

Each prime contractor has a contractual obligation to establish and implement a self-assessment program that provides issues in the form of findings, observations, and recommendations that are documented, evaluated, tracked to closure, and trended for systemic causes and lessons learned.

As dictated by formal contractual direction from the DOE PPPO, the ISSC will review and concur on other prime contractor FSO’s S&S topical area self-assessments. Findings, must be tracked until closed and monitored on an established schedule to ensure that the corrective actions are implemented in a timely and effective manner. Since each prime contractor is required to track its corrective actions to closure, the ISSC will oversee each prime contractor FSO’s corrective actions through a review of the required monthly report. The ISSC will track its deficiencies and associated corrective actions from self-assessments until closed utilizing the ISSC Commitment Tracking System. The monthly DOE Security IPT meetings will be one mechanism used to update DOE on the status and trending of self-assessments, findings, Corrective Action Plans (CAP), and CAP closure activities by its prime contractor FSOs.

From the monthly reports provided by the D&D and the DUF6 Piketon Plant contractor FSOs, the ISSC ODSA will conduct tracking and trending analyses of deficiencies to determine if systemic and systematic causal factors underlie multiple self-assessment or survey findings.

In the event systemic and systematic causal factors are identified, site prime contractor FSOs may be directed to revise an associated CAP(s) to address these identified systemic and systematic causal factors.

By contract the ISSC ODSA must provide DOE a quarterly status report of scheduled and random S&S assessments and/or surveillances, which will include tracking and trending analyses of deficiencies. The monthly S&S survey and self-assessment status report provided by each prime contractor FSO, on or before the 2<sup>nd</sup> day of each month will make this task less onerous.

### **3. ASSESSMENT AND/OR SURVEILLANCE PROCESS**

#### **3.1 Preparation**

The ISSC assessment and/or surveillance methodology will not supplant the self-assessment/performance testing process of the MC&A and PF operations conducted by the D&D and DUF6 Contractors, but will synergistically ensure the compliant implementation of S&S requirements stated in DOE directives, the SSP, and SSP implementing documents. The ISSC assessments and/or surveillances will be performed in conjunction with the D&D and DUF6 Contractors' FSOs' assessment schedule, when feasible.

The scheduled S&S assessments and/or surveillances will be scheduled in the Integrated Oversight Plan to the extent practical, and all S&S assessments and/or surveillances, both scheduled and random, will be logged in the Oversight Activity Log. The ISSC will provide a unique identifying number to the assessment and/or surveillance evaluation document, will place a copy of the document in the electronic file cabinet being shared with prime contractor FSOs, and will provide an electronic copy of the document by email if requested.

The assessment and/or surveillance plan will be appropriate for the type of assessment and/or surveillance and scope (e.g. compliance-based). An electronic mail (e-mail) notification is considered acceptable in advance of the assessment and/or surveillance conducted by the ISSC Security Organization.

Notification to and/or coordination with the D&D and DUF6 Contractors' FSOs of the upcoming MC&A or PF assessment and/or surveillance should be made within 10 calendar days before the planned start of the assessment and/or surveillance. The conduct of the assessment and/or surveillance is preferred to be in conjunction with the custodial contractor's schedule of assessments and/or surveillances, in order to minimize resource requirements and operational impacts.

The D&D and/or DUF<sub>6</sub> Contractor FSO or designee (e.g., line management) as applicable performing the activity to be evaluated, during the assessment and/or surveillance, will be contacted to set up times to observe work, or to perform

interview(s). Activities identified in the scope will be evaluated against the established criteria. A copy of the ISSC final assessment and/or surveillance results, including evaluation criteria, will be provided to the D&D and DUF<sub>6</sub> Contractors' FSO or designee (e.g., line management).

### **3.2 Conducting the Assessment and/or Surveillance**

Based on formal contractual direction from the DOE PPPO, the ISSC will conduct scheduled or random MC&A and PF operations assessments and/or surveillances of the D&D and DUF<sub>6</sub> Contractors in accordance with this document, PMA-4335, *Security Survey, Self-Assessment, and Review Programs Process*, the SSP; and PMA-2607, *Incident Reporting and Issues Management Program*.

The format of scheduled or random MC&A and PF operations assessments and/or surveillances of the D&D and DUF<sub>6</sub> Contractors by the ISSC will be in accordance with PMA- 2602, *Oversight Activity – Management Conformity Assessment*; PMAF-2604, *Oversight Activity – Management/Independent Conformity Assessment Report*; and PMAF-4317, *Security Performance Oversight Activity Report*, as appropriate. Causal analysis performed by the ISSC will be conducted in accordance with PMA-2608, *Causal Analysis*.

Observations will be conducted of the activity in process (in the field or in the office), and interviews will be conducted as necessary to determine the adequacy of alignment between the written requirements and actual practices. Special attention will be paid to points in the process where information (e.g., paper, e-mail, verbal) is transferred between personnel and/or functional groups. Input from knowledgeable personnel will be solicited as necessary to get additional information or to clarify questions.

Pursuant to PMA-2607, *Incident Reporting and Issues Management Program*, conditions adverse to quality (CAQs) that are identified during the assessment and/or surveillance of MC&A or PF operations, will be immediately brought to the attention of the personnel responsible for the activity. Even if CAQs are corrected immediately by the organization, they will still be included in the final assessment and/or surveillance report to ensure the D&D and DUF<sub>6</sub> Contractors FSO or designee (e.g., line management) have an opportunity to evaluate the extent of the condition and to ensure the root cause is addressed.

### **3.3 Close-Out**

A close-out meeting with the assessed organization FSO or designee (e.g., line management) may be held to ensure that the conclusions drawn by the ISSC assessment and/or surveillance team are clearly communicated. ISSC assessment and/or surveillance team members will communicate issues as they are identified to communicate preliminary results to the D&D and/or DUF<sub>6</sub> Contractors FSO or designee (e.g., line management) as applicable of the assessed custodial contractor. All ISSC assessment

and/or surveillance team members should attend the close-out meeting to personally present their conclusions. The close-out meeting is a summary presentation only. Findings and observations will be presented along with suggested corrective actions as identified. The D&D and DUF6 Contractors FSO or designee (e.g., line management) retain the right to revise or reject the findings of the assessment and/or surveillance team by documenting the evaluation and rationale in accordance with his/her issues management system procedure.

### **3.4 Reporting the Results**

As previously stated, the D&D and DUF<sub>6</sub> Contractors FSO or designee (e.g., line management) will provide the ISSC ODSA with a copy of a monthly report, which will provide the ISSC with the findings and corrective action(s) needed to effectively and efficiently provide oversight and report trends based on the findings. It is preferred these reports be provided on or before the 2nd day of each month. This allows the ISSC to flow the data into various monthly and quarterly reports scheduled for delivery to DOE.

The ISSC Security Organization will provide the D&D and DUF6 Contractors' FSOs with the tracking and trending data of the assessment and/or surveillance findings and observations. The manner of this collaborative exchange in documentation will facilitate a disciplined approach to the coordination in planning, scheduling, and performing the site-wide assessments and/or surveillances. The results of the assessment and/or surveillance of PORTS S&S program compliance with the DOE directives for the protection of site security assets and interests may be reviewed monthly at the DOE Security IPT as time allows, and remain subject to DOE independent assessment.

The D&D and DUF6 Contractors' FSOs must also submit their respective annual security program self-assessment and/or surveillance reports to the ISSC ODSA no later than August 30, of each calendar year for inclusion in the Annual Comprehensive Site Assessment Report to the Officially Designated Federal Security Authority.

### **3.5 Records Generated**

Issues identified during assessments and/or surveillances pertaining to the ISSC are evaluated for enforcement program applicability, in accordance with PMA-2614, *Nuclear, Worker Safety and Health, and Security Noncompliance Determination and Reporting*. Issues pertaining to D&D and DUF6 Contractors will be evaluated for enforcement program applicability in accordance with their applicable processes and procedures.

Issues identified during assessments and/or surveillances are evaluated for noncompliance with 10 Code of Federal Regulations (CFR) 820, *Procedural Rules for DOE Nuclear Activities*; 10 CFR 824, *Procedural Rules for the Assessment of Civil Penalties for Classified Information Security Violations*; and 10 CFR 851, *Worker Safety and Health Program*.

ISSC records generated or received must be submitted to ISSC Records Management and Document Control for record retention and disposition according to PMA-1300, *Record Life Cycle and Retrieval*. For detailed instruction on receipt and transfer of records to RMDC, see PMA-1306, *Records Transfer*. Prime contractors' employees and contractors must not conceal or destroy any information, including noncompliance or potential noncompliance records. (Reference: 18 U.S.C. 2071, *Unauthorized Removal and/or Destruction of Records*).

D&D and DUF<sub>6</sub> Contractors records are submitted to ISSC Records Management and Document Control staff through their applicable processes and procedures.

#### **4. REFERENCES**

The following references are used in this procedure:

10 CFR 820, *Procedural Rules for DOE Nuclear Activities*

10 CFR 824, *Procedural Rules for the Assessment of Civil Penalties for Classified Information Security Violations*

10 CFR 830, Subpart A, *Quality Assurance Requirements*

10 CFR 851, *Worker Safety and Health Program*

42 United States Code Chapter 23, Sections 2011 to 2296, *Atomic Energy Act of 1954*

DOE O 205.1B Chg. 2, *Department of Energy Cyber Security Program*

DOE O 232.2, *Occurrence Reporting and Processing of Operations Information*

DOE O 414.1D, *Quality Assurance*

DOE G 414.1-2B, Chg. 1, *Quality Assurance Program Guide*

DOE G 414.1-4, *Safety Software Guide for use with 10 CFR 830, Subpart A, Quality Assurance Requirements, and DOE O 414.1C, Quality Assurance.*

DOE O 470.4B, *Admin Chg. 1, Safeguards and Security Program*

DOE O 474.2, Chg. 3, *Nuclear Material Control and Accountability*

DOE O 473.3, *Protection Program Operations*

EM-QA-001, *Office of Environmental Management (EM) Quality Assurance Program (QAP)*

PMA-2711, *Suspension/Stop Work*

FBP-MC-PL-00002/R4, *Nuclear Materials Control and Accountability Plan*

PMA-4335, *Security Surveys, Self-Assessments, and Review Programs Process*

PMA-2602, *Oversight Activity – Management Conformity Assessment*

PMA-2607, *Incident Reporting and Issues Management Program*

PMA-2608, *Causal Analysis*

PMA-4330, *Reporting Security Incidents and Conducting Inquiries to Incidents of Security Concern*

PMA/PORTS-0340, *Safety and Security Management Systems (List 1) and Business Management Systems (List 2) Subject Matter Areas and Subject Matter Expert Assignments*

PMA/PORTS-55, *Integrated Safety Management System Plan*

PMA/PORTS-77, *Quality Assurance Program Plan*

PMA/PORTS/16-0752, *Contractor Assurance System*

PMA-4110, *Classification and Information Control*

PMA/PORTS-4109, *Unclassified Controlled Information Manual*

PMA-1300, *Record Life Cycle and Retrieval*

PMA/PORTS-15-0721, *Integrated Oversight Plan*

PMA-2614, *Nuclear, Worker Safety and Health, and Security Noncompliance Determination and Reporting*

PMA/PORTS-4111, *Classified Matter Protection and Control (CMPC) Program Manual or Plan*

PMAF-2604, *Oversight Activity – Management/Independent Conformity Assessment Report*

PMAF-4317, *Security Performance Oversight Activity Report*

PMA/PORTS/16-0754, *Site Security Plan for the Formerly Operating Portsmouth Gaseous Diffusion Plant, Piketon, Ohio*