Survey and Self-Assessment Program

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3/10/14

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1. INTRODUCTION

1.1 Objectives

1.1.1 Provide assurance to the Departmental Elements that Safeguards and Security (S&S) interests and activities are protected at the required levels.

1.1.2. Provide Department of Energy (DOE) Federal and contractor line management with the information necessary to make informed decisions regarding the allocation of resources, acceptance of risk, and mitigation of S&S vulnerabilities.

1.2 Purpose

1.2.1 To ensure that S&S systems and processes at the Lexington facility are operating in compliance with Departmental and national-level policies, requirements, and standards for the protection of security assets and interests.

1.2.2 To provide the means for timely identification and correction of deficiencies and noncompliant conditions to prevent adverse events, and validate the effectiveness of corrective actions implemented to address identified deficiencies.

1.2.3 To confirm that the Lexington facility meets all security requirements appropriate to the activities at their facility.

1.2.4 To inform line management of the effectiveness of the facility security program. To identify any issues or concerns with the security program so that these can be addressed and corrected.

1.2.5 To allow both contractor and Federal managers to manage risk in an informed and rational manner.

1.2.6 To ensure that any point the facility is in compliance with all security requirements appropriate at the activities, information, and conditions at the location.

1.2.7 To provide an integrated evaluation of all applicable topical/subtopical area to determine the overall status of the facility’s S&S program, and ensure the objectives are met.
2.0 APPLICABILITY

2.1 This procedure applies to all PPPO employees and contractors involved in any capacity with the Safeguards and Security Self-assessments and Survey Program for the Lexington facility.

2.2 This procedure is intended to assist personnel responsible for planning and conducting self-assessments to evaluate and document DOE facility performance and compliance with safeguards and security requirements and standards.

3.0 SCOPE

3.1 The scope of the program may vary depending on the analysis and evaluation of the status of the S&S program employed at the Lexington facility. The facility importance rating assigned to the S&S interests is one of the primary factors in determining the comprehensiveness of a self-assessment or a survey.

3.2 Other factors that can influence the self-assessment scope are results of last survey, last self-assessment, reports of S&S-related incidents during the survey period, or knowledge of potential problem areas acquired during past surveys and self-assessments.

3.3. Surveys and self-assessments are planned, scheduled, and conducted in an integrated manner. If topical and subtopical area evaluations are performed separately, PPPO must document and integrate the results of each into a single Comprehensive Self-Assessment Report that includes a composite facility rating.

3.4 The survey and/or self-assessment scope should include:

3.4.1 Compliance. Compliance reflects the status of the S&S program as measured against implementation of applicable Federal statutes, regulations, policies, approved site security plan (SSP), and other approved security plans and procedures.

3.4.2 Performance. Performance indicates the degree to which the elements of the (S&S) program meet protection objectives based on the operational observed performance.

3.4.3 Comprehensiveness. Comprehensiveness identifies the breadth of protection afforded all activities and interests within a facility. This is accomplished by an evaluation of the adequacy and effectiveness of programs and a thorough examination of the implementation of policies, practices, and procedures to ensure compliance and performance. All applicable topical areas identified on DOE Form (F) 470.8, “Survey/Inspection Report” Form must be evaluated.

4.0 REFERENCES

DOE O 470.4B, Chg 1, Appendix A, Section 2
5.1 Acronyms

CAP      Corrective Action Plan
CSCS     Contract Security Classification Specification
DOE      U.S. Department of Energy
F        Form
FCL      Facility Clearance
FDAR     Facility Data Approval Record
FSO      Facility Security Officer
O        Order
ODFSA    Officially Designated Federal Security Authority
PPPO     Portsmouth/Paducah Project Office
S&S      Safeguards and Security
SNM      Special Nuclear Material
SSIMS    Safeguards and Security Information Management System

5.2 Definitions

5.2.1 Assessor- a subject matter expert who is assigned to perform a self-assessment of the facilities compliance in a specific topical or subtopical area of safeguards and security.

5.2.2 Safeguards and Security Survey – An integrated performance and compliance based evaluation of all applicable topics to determine the overall status of the S&S program at a facility or site and ensure that safeguards and security systems and processes at the location are operating in compliance with Departmental and national-level policies, requirements, and standards. Surveys are conducted or supervised by Federal security personnel.

5.2.3 Initial Survey – A comprehensive review of the security status at a facility which is a candidate for a facility clearance (FCL), conducted to determine whether the facility in question meets established standards for the protection of the security interests and activities to be covered by the FCL.

5.2.4 Periodic Survey – A survey conducted for all cleared facilities in accordance with established schedules and covering all applicable topics to meet the objectives of the S&S survey.

5.2.5 Termination Survey – A survey of a cleared facility conducted to verify the termination of Departmental activities and the appropriate disposition of S&S interests at that facility. The termination survey confirms that all S&S activities have been terminated or awarded to another contractor, that access authorizations have been properly terminated or dispositioned, and that no DOE property, classified information or matter, and nuclear and other hazardous material presenting a potential radiological or toxicological sabotage threat remains.
5.2.6 **Self-Assessment** – An internal integrated evaluation of all applicable S&S topical areas at a contractor facility or site, conducted by contractor security personnel at intervals consistent with risk management principles, to determine the overall status of the S&S program at that location and verify that S&S objectives are met. The DOE cognizant security office may direct a specific self-assessment interval and may direct that self-assessment reports be provided to DOE.

5.2.7 **Finding** – A factual statement of identified issues and deficiencies (failure to meet a documented legal, regulatory, performance, compliance, or other applicable requirement) in the safeguards and security program at a facility, resulting from an inspection, survey, self-assessment, or any other S&S review activity.

5.2.8 **Observation** - documents relatively minor discrepancies or other issues requiring less formal attention by the facility. An Observation may also document a good business practice or other particularly positive aspect of a security program.

6.0. REQUIREMENTS AND RESPONSIBILITIES

6.1 Requirements

PPPO will ensure that the following activities related to program reviews and self-assessments are conducted at the Lexington facility, and will ensure that assistance and data are provided as directed to Federal security personnel during self-assessment and survey activities.

6.1.1 Review security programs on a continuing basis.

6.1.2 Conduct formal self-assessments at intervals consistent with DOE direction and risk management principles.

6.1.3 Prepare and submit to the DOE cognizant security office formal reports of self-assessments and related findings and corrective actions, as applicable.

6.1.4 Evaluate all S&S topics related to Program Management Operations, Physical Protection, Information Security, Personnel Security, and Unclassified Foreign Visits and Assignments that are applicable at the facility or site through the self-assessments. Provide management support for all self-assessment activities both in execution and in remedy.

6.1.5 Implement corrective actions for issues identified in self-assessments and surveys in a timely and effective manner, and validate the effectiveness of corrective actions to prevent recurrence of the issues.

6.1.6 Cooperate with survey activities conducted by the DOE cognizant security office or other Federal authorities.
6.2 Responsibilities

6.2.1 Facility Security Officer or Designee

Ensure that the requirements for the survey and self-assessment program are met.

6.2.1.1 Establish an annual self-assessment schedule for the fiscal year to ensure that all S&S topics that are applicable at the Lexington facility are assessed/evaluated to ensure compliance.

6.2.1.2 Track the self-assessments schedule to ensure completion.

Note:
The self-assessment schedule will be tracked at the PPPO Security Staff Meetings and entered into Live-Link upon completion.

6.2.1.3 Ensure that self-assessments are conducted for all applicable topical areas during the fiscal year.

6.2.1.4 Conduct formal self-assessments at intervals consistent with risk management principles and/or as directed by the DOE ODFSA, and reports are provided to that office, as applicable.

6.2.1.5 Ensure corrective action plans (CAPS) are developed in a timely and effective manner for self-assessment and survey findings.

6.2.1.6 Submit the CAP to the Deputy Manager for approval.

Note
The CAP will include the names of individuals directly responsible for resolving the finding, actions required for resolution of all findings, and a final date for resolution. Overall responsibility for assuring the plan is executed will remain with the PPPO FSO and/or designee.

6.2.1.7 Ensure that all findings regardless of source are entered in the PPPO Findings Tracking System (Live Link).

6.2.1.8 Ensure the submittal of quarterly status reports for all survey findings and self-assessment findings until completed, validated, and closed in SSIMS.
6.2.1.9 Establish a follow-up process to ensure timely progress on the resolutions of findings.

6.2.1.10 Provide a close out statement to the ODFSA for signature upon completion of each CAP action to reflect closure in SSIMS.

6.2.1.11 Validate the effectiveness of the corrective actions to prevent recurrence of an issue identified within the most recent survey and/or self-assessment.

6.2.1.12 Establish and implement a trending analysis for deficiencies resulting from surveys or self-assessments to determine if systemic and systematic causal factors are present on multiple findings. If so, the associated corrective action plans must address these causal factors.

6.2.1.13 Ensure an Annual Comprehensive Self-Assessment Report is developed utilizing a compilation of the information attained from self-assessments performed on all of the applicable topical and subtopical areas.

6.2.1.14 Ensure the Annual Comprehensive Self-Assessment Report reflects a trending analysis.

6.2.2 Employees

All DOE employees and DOE contractors are to provide full cooperation with survey and self-assessment activities whether they are conducted by the DOE ODFSA or the Security Organization.

6.2.3 Assessor

6.2.3.1 Conduct with sufficient scope, depth, and frequency to ensure that at any point the facility is in compliance with all security requirements appropriate to the activities, information, and conditions at the location.

6.2.3.2 Submit a draft of the self-assessment scope and requirements to the FSO or designee for concurrence prior to starting the activity.

6.2.3.3 Utilize data collection such as document reviews, performance tests, observations, interviews, and discussions to ensure that each self-assessment subtopic is evaluated against the applicable DOE directives, the Site Security Plan, other applicable security plans and procedures.

6.2.3.4 Validate compliance/closure for identified finding(s) closed since the most recent periodic survey and/or self-assessment.

6.2.3.5 Verify the status of any remaining open finding(s) (regardless of source).
6.2.3.6 Identify any compliance or performance deficiencies that may require issuing new findings or observations.

6.2.3.7 Submit the self-assessment report to the FSO or designee for concurrence and signature upon completion.

Note:
Whenever possible, at least one performance test should be performed for each subtopical area. For areas that are not applicable, be prepared to give a justification as to why a performance test was not utilized.

7.0 GENERAL INFORMATION

7.1 SURVEYS

7.1.1 Frequency

7.1.1.1 The DOE ODFSA will determine the frequency of surveys, which may be increased or decreased consistent with risk management principles.

7.1.1.2 Surveys will be conducted not more often than once every 12 months unless special circumstances exist.

7.1.2 Types

7.1.2.1 Initial Surveys – A favorable survey is required as one of the conditions for granting a facility security clearance. This initial survey must be completed not more than 6 months prior to the granting of the FCL if the facility will possess classified information or matter or SNM, or will have a facility importance rating of “PP”.

7.1.2.1 Periodic Surveys – Periodic surveys must be conducted for all cleared facilities to ensure that S&S measures employed by the facility are adequate for the protection of security assets and interests. The National Industrial Security Program specifies that surveys of contractor facilities will be conducted not more often than once every 12 months unless special circumstances exist. 32 CFR Part 2001.60 establishes a requirement for an annual survey specifically for the assessment of activities related to classified information. At the discretion of the DOE ODFSA, other topics may be combined with this requirement to meet the periodic survey requirement. At the discretion of the DOE ODFSA, other topics may be combined with this requirement to meet the periodic survey requirement. For facilities which do not have classified interests or SNM, the frequency of the periodic survey may be established consistent with risk management principles and documented in the applicable security plan with a description.
of the reasons for the schedule (e.g., good performance on past surveys and self-assessments, regular satisfactory performance assurance testing, non-possessing facilities, etc.)

7.1.2.2 **Termination Surveys** – When a contract for which an FCL has been granted is terminated or otherwise ended (e.g., suspended), a termination survey must be conducted to verify the termination of security activities and the appropriate disposition of S&S interests. Examples of survey activities include: the appropriate disposition, destruction, or return of classified information or matter, SNM, hazardous material, or property; the signing of a certificate of possession if classified is to be retained by the contractor for the allowable period; security badge retrieval; verification of debriefings or verification of the transfer of access authorizations to other DOE interests. Surveys must be conducted onsite at facilities possessing Top Secret classified information or matter, Restricted Data, Sensitive Compartmented Information or special access program information or matter, or SNM. For all other facilities, termination surveys may be conducted either onsite or through any other means established by the ODFSA.

7.2 **SELF-ASSESSMENTS**

7.2.1 **Schedule**

7.2.1.1 An annual schedule for performing self-assessments of all applicable topical areas is established for the fiscal year. These self-assessment commitments are tracked and placed in *Live Link* upon completion.

7.2.1.2 Conduct formal self-assessments at intervals consistent with risk management principles and/or as directed by the DOE ODFSA, and reports are provided to that office, as applicable.

7.2.2 Perform self-assessment of all applicable topical/subtopical areas.

7.2.3 **Exemption**

7.2.3.1 Federal facilities are not required to conduct self-assessments in addition to surveys under DOE O 470.4B, Appendix A, Section 2, (7); therefore, when PPPO is scheduled for a Periodic Survey a determination will be made on a case by case basis whether a Comprehensive Self-Assessment Report will be submitted to the ODFSA.
7.2.4 Ratings

7.2.4.1 Self-Assessment Ratings must be based upon the effectiveness and adequacy of the security programs in the subject facility. The ratings listed below must be used for all formal self-assessment reports. When a topic does not apply at a given facility, or if a topic is not rated, the self-assessment report must contain this information. All ratings must be supported and documented with the rating justification and rationale. The ratings are as follows:

- **Satisfactory** – The element being evaluated meets protection objectives or provides reasonable assurance that protection objectives are being met.

- **Marginal** – The element being evaluated partially meets protection objectives or provides questionable assurance that protection objectives are being met.

- **Unsatisfactory** – The element being evaluated does not meet protection objectives or does not provide adequate assurance that protection objectives are being met.

7.3 Findings

7.3.1 All open S&S findings from the most recent self-assessment and survey are to be reviewed during the self-assessment to validate the status of the corrective actions and to evaluate the impact on the current operation of the facilities S&S program.

7.3.2 Findings from all self-assessments will be documented in the annual comprehensive self-assessment report and submitted to the ODFSA as applicable.

7.4 Report Content

7.4.1 Individual Self-Assessment Reports

- **Must be prepared on a Safeguards and Security Self-Assessment Report form (See Exhibit A)**

- **Ensure that pertinent documentation accompanies the report to support the conclusions.**

7.4.2 The Annual Comprehensive Self-Assessment Report

Must be provided to the FSO and/or designee and contain the following items:

- **Survey/Inspection Report Form DOE F 470.8**
7.4.2.2 Table of Contents

7.4.2.3 Executive Summary and Introduction Containing:

1. The scope, methodology, period of coverage

2. A brief overview of the facility, function, scope of operations, and contractual information (e.g., contract number, award and expiration dates, contract type, identification of security clauses, identification of the security and overall scores assigned to the most recent contract appraisal);

3. 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.

4. The overall composite facility rating with supporting rationale; and

5. A reference to a list of findings identified during the self-assessment.

7.4.2.4 Narrative for all rated topical and sub-topical areas that include:

1. A description of the site's implementation of the program element;

2. The scope of the evaluation;

3. A description of activities conducted; including any performance tests used in the evaluation;

4. The identification of all findings, including new and previously identified open findings, regardless of source and their current corrective action status; and

5. An analysis that provides a justification and rationale of the factors responsible for the rating.

5) 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);
- A listing of all new findings resulting from the self-assessment;
• A listing of all previous findings that are open, to include the current status of corrective actions;

• A self-assessment schedule listing for all applicable topical areas.

6) Distribution

• The self-assessment report must be sent to the appropriate ODFSA.

• Self-assessment reports must be distributed to the FSO and/or designee, applicable senior managers, personnel responsible for corrective actions, and other personnel, as deemed appropriate.

**Exemption:**

Federal facilities are not required to conduct self-assessments in addition to surveys under DOE 0 470.4B, Appendix A, Section 2, (7); therefore, when PPPO is scheduled for a Periodic Survey a determination will be made on a case by case basis whether a Comprehensive Self-Assessment Report will be submitted to the ODFSA.

6. TRACKING AND TRENDING

6.1 Requirement

Trending analyses of deficiencies must be conducted to determine if systemic and systematic causal factors underlie multiple self-assessment findings and, if so, the associated corrective action plans must address these causal factors.

6.2 Methodology

1) PPPO Findings Tracking System (Live Link) will be used to track self-assessment and survey deficiencies and corrective actions until closed.

2) Trending evaluations will be considered in the resolution of findings in the subtopical area of program management to determine if systemic and systematic causal factors exist with the S&S program.

3) Any negative trends identified from the results of the evaluations will be analyzed to ensure that the corrective action plans address the root cause and the need to ensure continuous improvement of the S&S program.
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### Scope of Assessment:

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Assessor(s):

Project/Functional Manager (Signature)

Date of Self-Assessment:

Date of Review:

F = Finding  O = Observation  S/A = Satisfactory/Acceptable  P = Proficiency  N/A = Not Applicable  NE = Not Evaluated