

**Chapter 7 Revision History:** Revisions by date (Newest to oldest):

**March 4, 2020:** Revised entire document

**January 8, 2019:** Revised entire document

**April 16, 2018:** Added the root cause analysis tool

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# Chapter 7 Department of Energy Headquarters Safeguards and Security Survey Program

## PURPOSE

The purpose of this chapter is to describe the responsibilities, requirements and methodology for the implementation of the Safeguards and Security (S&S) Survey Program at Department of Energy (DOE) Headquarters (HQ) in accordance with DOE Order 470.4B, Chg. 2, *Safeguards and Security Program, Appendix A, Section 2, Survey, Review, and Self-Assessment Programs*, requirements. The S&S Survey Program documents the required evaluation of DOE HQ S&S programs, identifies strengths and weaknesses, and provides for timely identification and correction of program deficiencies and noncompliant conditions for the purpose of preventing adverse events and improving the overall S&S posture of DOE HQ.

The S&S Survey Program provides assurance to the Secretary of Energy, Departmental Elements, and other government agencies (OGAs) that DOE S&S interests and activities are protected at the required levels. These programs also provide a basis for line management to make decisions regarding S&S program activities, including the allocation of resources, acceptance of risk, and mitigation of vulnerabilities.

## IMPLEMENTATION

Compliance with the requirements within this Chapter must be accomplished within 30 days of the issuance date.

## PROGRAM DESCRIPTION

### RESPONSIBILITIES

The DOE Office of Headquarters Security Operations (AU-40) Director, as the Officially Designated Federal Security Authority (ODFSA) and the Cognizant Security Authority for DOE HQ, is responsible for oversight of the S&S Survey Program.

The Office of Information Security (AU-42) is responsible for maintaining an S&S Survey Team and conducting all S&S surveys of Departmental Elements.

The S&S Survey Team is comprised of the following:

Survey Program Manager – The Survey Program Manager is responsible for leading and participating as a member of the S&S Survey Team. The Survey Program Manager provides oversight and management of each security survey, which includes the development of survey criteria, data collection, analysis, in-briefing, out-briefing, final reporting, recommendations, tracking findings, and trending analysis based on the survey results.

Survey Team Lead – The Survey Team Lead is responsible for the overall conduct of the survey, ensuring that the topical areas of the S&S program are reviewed and that any findings or deficiencies identified are fully supported by documentation and validated data.

Survey Team Members –The Survey Team Members have hands-on access to the information to be reviewed, interview appropriate personnel to determine knowledge levels and compliance, and help with performance testing.

## **SURVEY SCHEDULE**

AU-42 coordinates and develops an annual survey schedule of Departmental Elements based on planned DOE HQ operations. However, the survey schedule may be adjusted based on unplanned changes to DOE operations.

## **TYPES OF SURVEYS**

Surveys and special reviews are conducted by the S&S Survey Team to confirm that a Federal, or contractor facility meets all security requirements appropriate to the activities conducted at the respective facility.

The AU-42 S&S Survey Team performs the following types of surveys:

- S&S Initial Surveys (SSISs) are required as one of the conditions for granting a facility clearance (FCL). SSISs are conducted to determine whether facilities in question meet established standards for the protection of the security interests and activities covered by the FCL. SSISs will be completed not more than six months prior to the granting of an FCL. (DOE O 470.4B Chg.2 App. A, Sect. 2. 5.b & 6.a.)
- S&S Periodic Surveys (SSPSs) are conducted for facilities with an approved FCL to ensure the satisfactory protection and control of DOE security assets and interests. (DOE O 470.4B Chg.2 App. A, Sect. 2. 6.b.) The S&S Survey Team conducts SSPSs on an annual basis. (DOE F 470.8, Survey/Inspection Report Form).
- S&S Termination Surveys (SSTSs) are conducted to confirm that all S&S activities have been terminated, that access authorizations have been properly terminated or dispositioned, and/or that no DOE property or classified information/matter remains within the facility. (DOE O 470.4B Chg.2 App. A, Sect. 2. 5.b. & 6.c.)
- Although no longer referenced in the DOE O 470.4B, occasionally Special Surveys (SPECs), or special reviews, may be conducted as directed by the AU-40 Director or at the request of other AU line management.

## **TOPICAL AREAS**

The S&S Survey Team will conduct surveys of Departmental Elements and evaluate them against the following six topical areas identified on DOE Form 470.8. The S&S Survey Team will also use past surveys/inspections, incidents, infractions, and findings to identify areas of special emphasis for upcoming surveys. (DOE O 470.4B Chg.2 App. A, Sect. 2. 9.a.)

The six topical areas include:

- Program Management Operations
- Physical Security

- Information Security; including Classified Matter Protection and Control (CMPC) and Operational Security (OPSEC)
- Personnel Security
- Unclassified Foreign Visits and Assignments
- Protective Force

## **SURVEY METHODOLOGY**

### **COORDINATION AND PREPARATION**

The S&S Survey Team Lead will contact the Departmental Element point of contact (POC) to coordinate the survey dates and activities. The Departmental Element POC is responsible for coordinating survey activities within the element to ensure that the S&S Survey Team are provided access to necessary information and personnel. The Departmental Element POC is also responsible for establishing meeting spaces for the S&S Team to utilize for their in-briefing, and other security activities.

The S&S Survey Team will develop Lines of Inquiries (LOIs), or requirements, based off of the memorandum from then Deputy Secretary Dan Brouillette, *Headquarters Facilities Master Security Plan and Headquarters Security Officer Program*, dated November 9, 2018, (S-2 Memo), relevant chapters of the HQFMSP, and DOE S&S Orders for each topical area they will review. The S&S Survey Team will use the LOIs as a benchmark when surveying Departmental Elements.

### **NOTIFICATION AND DATA CALL**

The S&S Survey Team will formally notify the Departmental Element of the upcoming survey. This notification will identify what is to be surveyed, dates of the survey, the process of the survey, as well as the information that will be requested (data call). Prior to the commencement of an S&S Survey, the Survey Team will request the assessed Departmental Element provide records and documents for review of their S&S program(s). This request will be sent prior to the planned survey via official correspondence. Submitted data should arrive to the S&S Survey Team by the date specified in the correspondence. Reviewing requested documentation prior to the S&S Survey Team's arrival will help reduce the overall operational impact and required completion time for the survey.

### **SCHEDULE AND TIMELINE OF EVENTS DEVELOPMENT**

During the data call and review, the S&S Survey Team will develop a survey schedule based on the LOIs and will coordinate the schedule with the Departmental Element POC. This coordination ensures an efficient use of time and reduces production impact to the surveyed element.

## IN-BRIEFING

Prior to initiating survey activities, the S&S Survey Team will conduct an in-briefing for the surveyed Departmental Element. The Departmental Element POC may invite any member of their element for the in-briefing. The purpose of the in-briefing is to discuss the intent of the survey, review the planned activities (i.e., scope, LOIs, personnel interviews, etc.) and initiate the survey activities.

## SURVEY CONDUCT

The S&S Survey Team verifies, by evaluation of objective evidence, whether applicable S&S program topical areas are being implemented by the Departmental Element in compliance with DOE requirements.

During the course of performing surveys, the S&S Survey Team will:

- Review the LOIs and interview the POCs on their roles and responsibilities;
- Immediately report any conflicts or difficulties with individual(s) being surveyed to the Survey Program Manager or designee;
- Report any conditions requiring prompt corrective action to the Departmental Element's POC, Survey Team Lead, and the Survey Program Manager or designee;
- Identify and document findings including repetitive or programmatic issues of noncompliance;
- Record/document assessment results in a manner that facilitates expeditious completion of the survey report;
- Investigate an observed deficiency; and,
- Assign topical area/sub-topical area ratings in accordance with DOE F 470.8 (see attachment 7-1) based upon survey results.

NOTE: If the S&S Survey Team makes a determination that a security interest is at risk, they will cease operations, make all necessary notifications, and take necessary steps to safeguard and secure the security interest.

## RECOMMENDATIONS AND FINDINGS

As part of the survey report, the S&S Survey Team may come across processes or performance matters that the surveyed Departmental Element needs to address.

Recommendations: An opinion-based statement submitted by the S&S Survey Team to identify ways in which the safeguard and security topical area might be improved. The recommendation can be linked to a requirement but does not identify a failure to meet the requirement.

Finding: A finding is a factual statement of a failure to meet a documented legal, regulatory, performance, compliance, or other applicable requirement in the S&S program. If left uncorrected, a finding has the potential to result in near-term significant adverse consequences to the health, safety, or security of personnel or property, or the achievement of the mission. When findings are issued, they are assigned to the specific Departmental

Element where the deficiency was identified. The S&S Survey Team will write all findings in a manner that will allow them to be corrected.

### **OUT-BRIEFING**

The S&S Survey Team will conduct an out-briefing with the Departmental Element's POC and their management to discuss the results of the survey, including any identified findings. Any logistical arrangements will be coordinated through the Departmental Element POC to conduct the out-briefing.

### **REPORT DEVELOPMENT**

Reports will describe what the S&S Survey Team assessed, what was observed, and what was identified as not in compliance with all applicable DOE policy.

The draft report will be sent from the Director, AU-42 or designee to the Departmental Element POC to conduct a factual accuracy review of the draft report. The surveyed Departmental Element will be given a specified timeframe by the S&S Survey Team to respond with comments. If responses/comments are not received within the specified timeframe, the report will be finalized as is. Disagreements during the factual accuracy review should be mutually resolved between the S&S Survey Program Manager and the surveyed Departmental Element POC.

### **FINAL REPORT**

The S&S Survey Team will publish the final report after the factual accuracy review. The final survey report will be sent from the AU-42 Director or designee to the Departmental Element POC.

### **ENTERING SURVEY DATA INTO SSIMS**

All final survey reports must have the completed and approved DOE F 470.8, *Survey/Inspection Form*, and findings entered into Safeguards & Security Information Management System (SSIMS). All surveys must provide ratings for topical and sub-topical areas reviewed and designate an overall composite rating. The definitions of the ratings, as defined in DOE O 470.4B are:

- Satisfactory - Indicates the Departmental Element evaluated by the S&S Survey Team meets protection objectives or provides reasonable assurance that protection objectives were being met at the time of the survey.
- Marginal - Indicates the Departmental Element evaluated by the S&S Survey Team partially meets protection objectives or provides questionable assurance that protection objectives were being met at the time of the survey.
- Unsatisfactory - Indicates the Departmental Element evaluated by the S&S Survey Team does not meet protection objectives or does not provide adequate assurance that protection objectives were being met at the time of the survey.

### **CORRECTIVE ACTION PLAN**

A corrective action plan (CAP) must be developed and implemented in a timely and effective

manner for all findings identified in S&S surveys. CAPs are required to be developed within 30 days of issuance of the final survey report and must include a determination of the causal analysis of findings and milestone sheets if steps are required to address findings. The CAP is required to be approved and signed by the Departmental Element's management. Final CAPs are forwarded to the S&S Survey Program Manager for entry into SSIMS. The S&S Survey Team will then monitor all findings and the status of the CAP until all items have been completed.

Once the surveyed Departmental Element has completed a CAP item or milestone, the surveyed Departmental Element POC will contact the S&S Survey Team to conduct a validation of the actions taken and ensure the security issue has been resolved. The S&S Survey Team will document CAP closures in SSIMS.

### **SURVEY NOTES AND DOCUMENTATION**

The S&S Survey Team will scan all survey notes and retain all records in accordance with DOE requirements. (DOE O 470.4B Chg.2 App. A, Sect. 2. 10.) All documentation from surveys will be retained as historical documentation.

## **Point of Contact**

Contact the S&S Survey Team with any questions regarding this Chapter at (301) 903-0213.

## **References**

DOE Order 470.4B, Change 2, *Safeguards and Security Program, Appendix A, Section 2, Survey, Review, and Self-Assessment Programs*

*Headquarters Facility Master Security Plan*

S-2 Memorandum, dated November 9, 2018, subject: *Headquarters Facilities Master Security Plan and Headquarters Security Officer Program*

## **Forms/Samples/Graphics**

DOE F 470.8, *Survey/Inspection Report Form* (Attachment 7-1)

Corrective Action Plan Sheet (Attachment 7-2)

Instructions for Completing a Corrective Action Plan Sheet (Attachment 7-3)

Corrective Action Plan Milestone Sheet (Attachment 7-4)

Instructions for Completing a Corrective Action Plan Milestone Sheet (Attachment 7-5)

Corrective Action Validation Report (Attachment 7-6)

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**ATTACHMENT 7-2**

<b>PART I</b> <b>CORRECTIVE ACTION PLAN SHEET</b>		
<b>Finding Number:</b>	<b>Facility Code:</b>	
<b>Responsible HQ Element Surveyed:</b>		
<b>Topical Area:</b>	<b>Sub-topical Area:</b>	
<b>Reference(s) (i.e., Orders, Requirements, etc.):</b>		
<b>Description of Deficiency:</b>		
<b>PART II</b>		
<b>Causal Analysis Process Used:</b>		
<b>Causal Code(s):</b>		
<b>Corrective Action Description:</b>		
<b>Estimated Completion Date:</b>		
<b>Surveyed POC:</b>		
<b>Print Name</b>	<b>Signature</b>	<b>Date</b>
<b>Federal Management Approval is Required:</b>		
<b>Print Name</b>	<b>Signature</b>	<b>Date</b>
<b>PART III (If Applicable)</b>		
<b>Revised Completion Date:</b>		
<b>Reason for Revised Completion Date:</b>		
<b>If Revising Completion Date, Federal Management Approval is Required:</b>		
<b>Print Name</b>	<b>Signature</b>	<b>Date</b>

Unclassified Until Filled In, Then Handle Appropriately

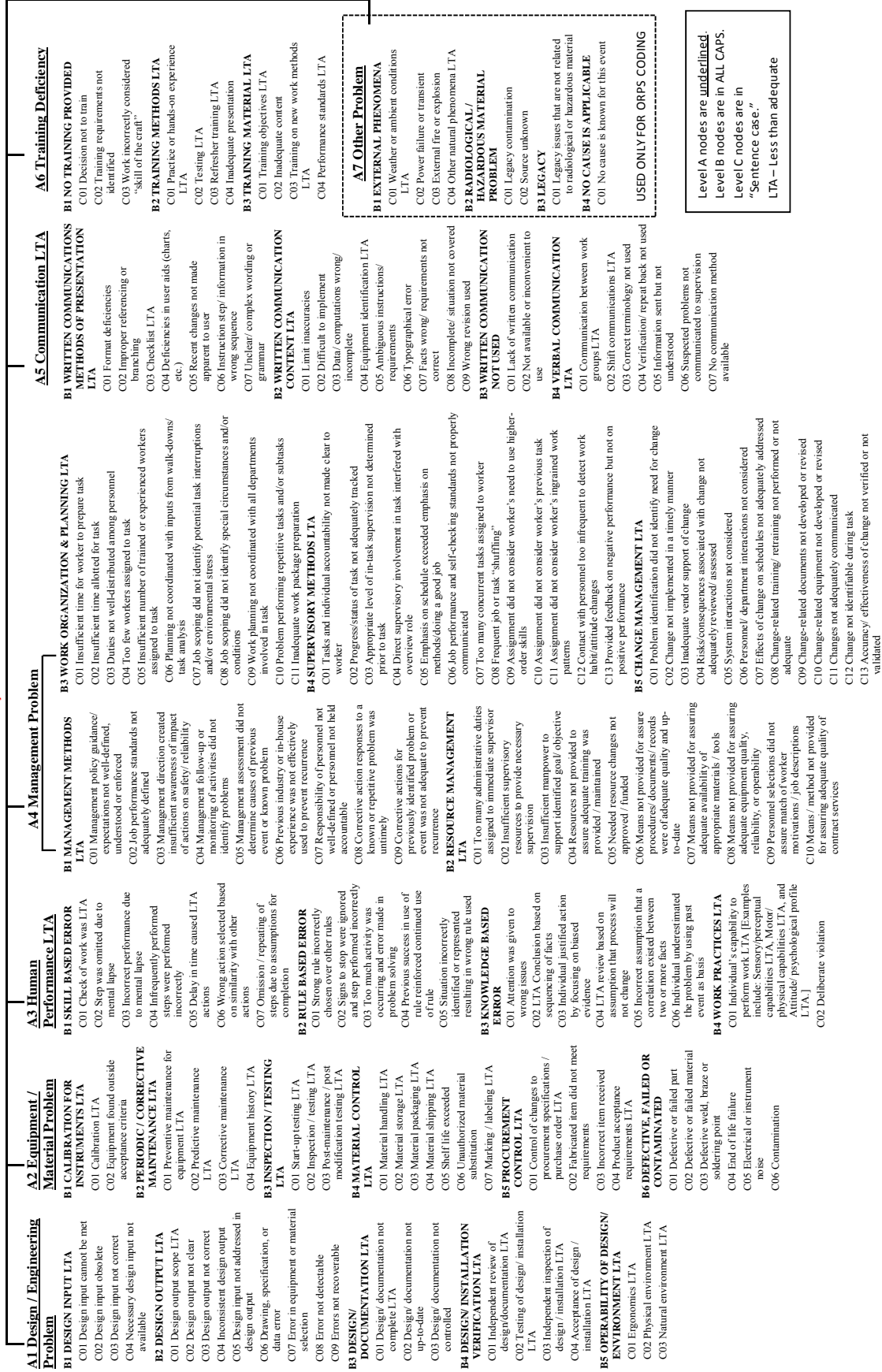
## ATTACHMENT 7-3

### Instructions for Completing a Corrective Action Plan Sheet

Surveyed POC is responsible for completing the Corrective Action Plan and implementing the Causal Analysis.

<b>Part I</b>		
Place finding information from Survey Report into Part I.		
<b>PART II</b>		
<b>Causal Analysis Process Used:</b> Identify the technique used to identify the Causal Code. The preferred DOE Headquarters tool is using the causal analysis tree to help in identifying the root cause outlined below.		
<b>Causal Code(s):</b> More than one code is acceptable but not common, except if one of the codes is human error, which is generally supported by a second code.		
<b>Corrective Action Description:</b> High-level description of corrective action to include clear concise information. If multiple steps are required, a separate Milestone Sheet should be completed.		
<b>Estimated Completion Date:</b> Enter the date the action is expected to be completed.		
<b>Surveyed POC:</b> Insert name of the Element POC.		
<b>Federal Management Approval is Required:</b> By signing, the surveyed Federal Management concurs and approves the CAP.		
<b>Print Name</b>	<b>Signature</b>	<b>Date</b>
<b>Part III (If Applicable)</b>		
<b>Revised Completion Date:</b> Update completion date, initial form submission will not have information in this block, however additional submissions may include adjustments required by a delay in corrective action efforts.		
<b>Reason for Revised Completion Date:</b> A brief narrative on why the date must be revised, not for the purposes of approval by the surveying organization, but for informational purposes.		
<b>If Revising Completion Date, Federal Management Approval is Required:</b>		
<b>Print Name</b>	<b>Signature</b>	<b>Date</b>

# CAUSAL ANALYSIS TREE



**ATTACHMENT 7-4**

<b>CORRECTIVE ACTION PLAN MILESTONE SHEET</b>		
<b>Finding Number:</b>	<b>Date:</b>	
<b>Milestone Number:</b>		
<b>Milestone Description:</b>		
<b>Milestone Due Date:</b>	<b>Date Milestone Completed:</b>	
<b>Surveyed POC:</b>		
<b>Print</b>	<b>Signature</b>	<b>Date</b>
<b>Federal Management:</b>		
<b>Print</b>	<b>Signature</b>	<b>Date</b>
<b>Milestone Number:</b>		
<b>Milestone Description:</b>		
<b>Milestone Due Date:</b>	<b>Date Milestone Completed:</b>	
<b>Surveyed POC:</b>		
<b>Print</b>	<b>Signature</b>	<b>Date</b>
<b>Federal Management:</b>		
<b>Print</b>	<b>Signature</b>	<b>Date</b>

Unclassified Until Filled In, Then Handle Appropriately

## ATTACHMENT 7-5

### Instructions for Completing a Corrective Action Plan Milestone Sheet

SECTION	INSTRUCTIONS
Finding Number	Enter the finding number.
Date	Enter the date the form is completed.
Milestone Number	Enter milestone number (consecutive starting with 1). If more than two milestones are identified, an additional milestone sheet(s) will be required.
Milestone Description	<ul style="list-style-type: none"> <li>• Write milestone with clear deliverables that solve the problem. Ensure that the milestone address and correct the deficiency.</li> <li>• Limit individual milestone instructions to brief, concise statements describing logical segments of the specified milestone.</li> <li>• Write a realistic and achievable milestone that can be verified.</li> <li>• Do not overextend a milestone beyond your control. Ensure that resources are available.</li> <li>• If completion of the milestone is required by persons outside of the responsible manager's authority, the responsible manager coordinates the milestone with the supporting program Element.</li> </ul>
Milestone Due Date	Enter the due date for each milestone.
Date Milestone Completed	Enter the actual date each milestone was completed.
Surveyed POC Signature	Surveyed POCs sign for concurrence of each assigned milestone.
Federal Management Signature	Federal Management sign for concurrence of each assigned milestone.



ATTACHMENT 7-6

**THIS FORM IS TO BE COMPLETED BY THE HQ SURVEY TEAM**

CORRECTIVE ACTION PLAN VALIDATION REPORT		
<b>Finding Number:</b>		
<b>Finding Short Description:</b>		
<b>Validation Requested By:</b>	<b>Phone #:</b>	<b>Date:</b>
<b>Conducted By:</b>	<b>Phone #:</b>	<b>Date:</b>
<b>CAP Validated?</b>	<b>Yes:</b>	<b>No:</b>
<b>Comments:</b>		
<b>SSIMS Closure:</b>	<b>Date:</b>	
<b>Evaluator(s) Print and Sign:</b>		<b>Date:</b>
<b>Survey Program Manager Approval:</b>		<b>Date:</b>
<b>AU-42 Director Print and Sign:</b>		<b>Date:</b>

UNCLASSIFIED UNTIL FILLED IN, THEN HANDLE APPROPRIATELY