

Chapter 7 Revision History

Revisions by date (Newest to oldest)

October 31, 2023: Revised entire document

June 1, 2022: Revised entire document

March 4, 2020: Revised entire document

January 8, 2019: Revised entire document

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 immediately.

PROGRAM DESCRIPTION

RESPONSIBILITIES

The DOE Office of Headquarters Security Operations (EHSS-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 (EHSS-42) is responsible for maintaining an HQ Survey Team and conducting all S&S surveys of Departmental Elements.

The HQ 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 HQ 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

EHSS-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 HQ Survey Team to confirm that a Federal facility meets all security requirements appropriate to the activities conducted at the respective facility.

The EHSS-42 HQ 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 HQ 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, Special Surveys (SPECs), or special reviews, are conducted as directed by the EHSS-40 Director or at the request of other EHSS line management.

SELF-ASSESSMENTS

HQ departmental elements are permitted to conduct internal security self-assessments for their own individual purposes. Reports will describe what activities were assessed, what was observed, and what was identified as not in compliance with all applicable DOE policy and requirements.

Security-related findings may be issued as a result of a self-assessment. If a finding is issued, the Headquarter Security Officer (HSO)/Point of Contact (POC) must be notified and must coordinate with the HQ Survey Team for the development of a Corrective Action Plan (CAP) to resolve the finding. The completed CAP must be validated by the HQ Survey Team to ensure that the actions taken have fully resolved the finding. All security-related findings must be entered into SSIMS by the HQ Survey Team and tracked until they are closed.

Concerns, observations, and recommendations that result from self-assessments are not entered into SSIMS. They are tracked and closed by the individual HQ element using their own procedures.

The self-assessment report must be signed by the HQ departmental element federal management. All self-assessment reports are to be provided to the HQ Survey Team by the HQ departmental element HSO/POC Alternate HSO, or HSO Representative.

TOPICAL/SUB-TOPICAL AREAS

The HQ Survey Team will conduct surveys of Departmental Elements and evaluate them against the topical and sub-topical areas identified on DOE Form 470.8, *Survey/Inspection Report Form*. The HQ 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 HQ 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 HQ Survey Team are provided access to necessary information and personnel. The Departmental Element POC is also responsible for establishing meeting spaces for the HQ Survey Team to utilize for their in-briefing, and other security activities.

The HQ Survey Team will develop Lines of Inquiries (LOIs), or requirements, based off of the relevant chapters of the Headquarters Facilities Master Security Plan (HQFMSP), and DOE S&S Orders for each topical area they will review. The HQ Survey Team will use the LOIs as a benchmark when surveying Departmental Elements.

NOTIFICATION AND DATA CALL

The HQ 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 HQ 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 HQ Survey Team by the date specified in the correspondence. Reviewing requested documentation prior to the HQ 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 HQ Survey Team will develop a survey schedule based on the LOIs and will coordinate the schedule with the Departmental Element POC. The schedule will be annotated within the in-briefing presentation. This coordination ensures an efficient use of time and reduces production impact to the surveyed element.

IN-BRIEFING

Prior to initiating survey activities, the HQ Survey Team will conduct an in-briefing for the surveyed Departmental Element. The Departmental Element POC may invite any member(s) within the departmental 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 HQ Survey Team verifies, by evaluation of objective evidence, whether the Departmental Element is in compliance with the applicable requirements outlined in DOE S&S Orders and relevant chapters of the HQFMSP.

During survey activities, the HQ Survey Team will:

- Review the LOIs and interview the POCs on their roles and responsibilities;
- Interview additional departmental element personnel, as needed;
- 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 Program Manager, and EHSS-42 Director, or designee;
- Identify and document findings including repetitive or programmatic issues of non-compliance;
- 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, *Survey/Inspection Report Form* based upon survey results.

NOTE: If the HQ Survey Team determines 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 HQ 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 HQ Survey Team to identify ways in which the S&S 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 HQ Survey Team will write all findings in a manner that will allow them to be corrected.

OUT-BRIEFING

The HQ 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.

If any findings were developed during survey activities, the HQ Survey Team will meet with the Departmental Element POC immediately following the out-briefing to provide guidance/instruction on how to complete Corrective Action Plans (CAPs) to resolve the findings.

REPORT DEVELOPMENT

Reports will describe what the HQ Survey Team assessed, what was observed, what was identified as not in compliance with all applicable DOE policy, as well as any noteworthy practices.

The draft report will be sent from the HQ Survey Team to the Departmental Element POC to conduct a factual accuracy review of the draft report. The surveyed Departmental Element will be given 5 business days 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 HQ Survey Program Manager and the surveyed Departmental Element POC.

FINAL REPORT

The HQ Survey Team will publish the final report after the factual accuracy review. The final survey report will be sent from the EHSS-40 Director, or designee, to the Departmental Element Director (Dash 1), with a cc 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*, attached to it, which will be used to enter any identified findings into the 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 HQ 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 HQ 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 HQ 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 must be developed by the Departmental Element POC no later than 30 days from the date that the final survey report was published and must include a determination of the causal analysis of findings and milestones, if additional steps are required to address findings.

If any findings are issued, the HQ Survey Team will provide the Departmental Element POC with the appropriate paperwork for completing CAPs and milestone(s) and offer guidance/instruction on completing these forms immediately following the out-brief. Within the 30-day timeframe, the CAP is required to be approved and signed by the Departmental Element's federal management and are forwarded to the HQ Survey Program Manager for entry into SSIMS. The HQ Survey Team will then monitor all findings and the status of the CAP(s) until all items have been completed.

Once the surveyed Departmental Element has completed a CAP, to include all applicable milestones, the surveyed Departmental Element POC will contact the HQ Survey Team to conduct a validation of the actions taken and ensure the security issue has been resolved. The HQ Survey Team will close the finding in SSIMS and will provide the Departmental Element POC the approved validation paperwork for their records.

SURVEY NOTES AND DOCUMENTATION

The HQ 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 HQ Survey Team with any questions regarding this Chapter at (301) 903-0213 or HQSURVEYTEAM@hq.doe.gov.

References

[DOE Order 470.4B, Change 2, Safeguards and Security Program, Appendix A, Section 2, Survey, Review, and Self-Assessment Programs](#)

[Headquarters Facilities Master Security Plan](#)

[DOE F 470.8, Survey/Inspection Report Form](#)

[Corrective Action Plan Milestone Sheet](#)

[Corrective Action Plan Sheet – Part I and Part II](#)

[Instructions for Completing a Corrective Action Plan Cover Sheet – Part II](#)

[Corrective Action Plan Validation Report Form](#)

[Instructions for Completing a Corrective Action Plan Milestone Sheet](#)

[Corrective Action Elements Part III \(Continued\) – Action Plan Cover Sheet](#)

[Causal Analysis Table](#)