



Department of Energy

Washington, DC 20585

August 6, 2025

Dr. Kimberly S. Budil
Laboratory Director and President
Lawrence Livermore National Security, LLC
2300 First Street, Suite 204
Livermore, California 94550

SEL-2025-01

Dear Dr. Budil:

The Office of Enforcement has completed an evaluation into similar recurring incidents of security concern (IOSC) involving the introduction of unauthorized controlled articles into security areas, as reported into the Department of Energy's (DOE) Safeguards and Security Information Management System over the past three years. This evaluation identified concerns that warrant management attention by Lawrence Livermore National Security, LLC (LLNS).

The recurring incidents involved the introduction of items such as cell phones, smart televisions with Bluetooth, and laptops with Wi-Fi, microphones, and cameras into security areas. These incidents reveal potential noncompliances with LLNS's implementation of Title 10, Code of Federal Regulations, Part 824, *Procedural Rules for the Assessment of Civil Penalties for Classified Information Security Violations*. Specifically, LLNS did not adequately develop and implement procedures to detect and deter the introduction of unauthorized controlled articles into security areas. For example:

- The Office of Enforcement reviewed PRO-0042, *Assessments, Issues, and Corrective Action Management*, the institutional procedure LLNS uses to implement its assessment, issue, and corrective action management processes. This procedure, as written, lacks the specificity for assessments, issues, and corrective action management to effectively identify security issues. LLNS should ensure that this procedure is updated to provide clear and specific guidance on conducting assessments, identifying security issues, and managing corrective actions effectively.

Directorate Security Officers conduct causal analyses of incidents involving classified information in their respective organizations. The Office of Enforcement reviewed a sample of these analyses and found that while they were generally well-written and thorough in identifying causes, some lacked sufficient detail to fully understand the conclusions. Consequently, opportunities for program improvement were sometimes missed. For example, one incident

involving the introduction of controlled articles into security areas, offering significant lessons learned for prevention, was inaccurately deemed “isolated.” As a result, relevant lessons learned were not incorporated into broader preventative measures. To ensure such opportunities are not overlooked, LLNS should review and update its procedures associated with the management (or third-party) evaluation of completed causal analyses.

Additionally, during the review of LLNS IOSC case files, the Office of Enforcement noted that some of the corrective actions did not specifically identify measures to prevent recurrence. Corrective action statements often used terms such as “request” and “recommend” rather than specifying definitive, actionable steps. LLNS management should ensure corrective actions are specific, include clearly defined deliverables, and address identified causes.

- LLNS has implemented a program that divides its Limited Area (LA) spaces within buildings into five different types to minimize the introduction of unauthorized controlled articles into security areas while allowing employees to have access to their devices when appropriate. The LA space types are: (1) Managed LA, (2) Transit/Buffer Space, (3) Secure Space, (4) Enhanced Security Area, and (5) Insufficient Buffer Space. Each LA space type adheres to specific controlled article requirements and uses signage and building maps to ensure correct identification of areas where controlled articles, such as phones and laptops, are permitted. However, based on a review of the past two years of IOSC inquiry files, LLNS self-assessment reports, and interviews with LLNS personnel, the Office of Enforcement determined that LLNS signage and building maps often inaccurately identify areas where classified information is used, processed, and discussed. These inaccuracies in maps and signage have contributed to the increase in recurring IOSCs regarding the introduction of unauthorized controlled articles. LLNS should prioritize efforts to improve the accuracy of signage and maps to reduce these incidents.
- At the time of this evaluation, LLNS was conducting a comprehensive formal causal analysis to identify the causes of the recurring IOSCs involving the introduction of unauthorized controlled articles into security areas. Once this analysis is complete, LLNS plans to complete a corrective action plan to address the identified causes. LLNS should ensure that corrective actions are effective across the Laboratory and involve subject-matter experts in areas such as physical security, security awareness, technical security, and cyber security. Additionally, these corrective actions should be reviewed by both management and subject-matter experts to ensure these actions will effectively address the identified causes and reduce future IOSCs involving the introduction of controlled articles into security areas.


The Office of Enforcement acknowledges that LLNS has implemented corrective measures for the identified concerns, including: (1) adding security area location information into the LLNS Security Lab Map tool to increase awareness of security area

locations and restrictions; (2) providing security awareness information to personnel in buildings where unauthorized controlled article IOSCs have escalated, to better educate staff on security requirements; and (3) reviewing engineering controls (i.e., electronic detection technologies) for possible deployment across the Laboratory. These corrective measures, along with the Office of Enforcement's recommendations, should help address the underlying causes of these recurring incidents.

The Office of Enforcement has elected to issue this Enforcement Letter to convey concerns with similar recurring IOSCs involving the introduction of unauthorized controlled articles into security areas. Issuance of this Enforcement Letter reflects DOE's decision to not pursue further enforcement activity against LLNS at this time. In coordination with DOE's National Nuclear Security Administration, the Office of Enforcement will continue to monitor LLNS's efforts to improve security performance.

This letter imposes no requirements on LLNS, and no response is required. If you have any questions, please contact me at (301) 903-7707, or your staff may contact Ms. Carianne Zimmerman, Director, Office of Security Enforcement, at (301) 351-1186.

Sincerely,

A handwritten signature in black ink, appearing to read "Robin M. Keeler". The signature is fluid and cursive, with the first name "Robin" written in a larger, more prominent script than the last name "Keeler".

Robin M. Keeler
Acting Director
Office of Enforcement
Office of Enterprise Assessments

cc: Mike Sheldrick, Lawrence Livermore National Security, LLC
Florence Tindle, NA-LL