Preface

The U.S. Department of Energy (DOE) Office of Security Assessments (EA-22), within the Office of Enterprise Assessments (EA) Office of Cyber and Security Assessments (EA-20), is responsible for conducting independent oversight appraisals of safeguards and security (S&S) programs at DOE sites and other organizations. These assessments focus on high consequence activities, such as high hazard nuclear operations, and the protection of high value security assets, such as Category I quantities of special nuclear material (SNM) and classified information assets, as mandated by DOE Orders 227.1A, Independent Oversight Program, and 226.1B, Implementation of Department of Energy Oversight Policy. To further support this mandate, a program was developed to perform limited-notice performance tests (LNPT) at DOE sites to collect data on key S&S program performance tasks under more realistic circumstances that reflect true readiness.

This guide is consistent with the EA-20 Appraisal Process Protocols, and is available on the EA webpage at http://energy.gov/iea/services/enterprise-assessments/security-and-cyber-evaluations/security-and-cyber-guidance.

EA-22 anticipates making periodic revisions to this guide in response to changes in DOE program direction and guidance, insights gained from assessment activities, and feedback from customers and stakeholders. As part of the revision process, users of this manual are invited to submit comments and recommendations to EA’s LNPT Program Manager, Thomas “Clay” Messer through email at Thomas.Messer@hq.doe.gov or telephonically at (301) 903-0327.
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## Acronyms

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<th>Acronym</th>
<th>Full Form</th>
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<tr>
<td>CAS</td>
<td>Central Alarm Station</td>
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<td>DOE</td>
<td>U.S. Department of Energy</td>
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<td>EA-20</td>
<td>Office of Cyber and Security Assessments</td>
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<td>Office of Security Assessments</td>
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<td>Office of Enterprise Assessments</td>
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<td>InfoSec</td>
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<td>LNPT</td>
<td>Limited-Notice Performance Test</td>
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<td>LSPT</td>
<td>Limited-Scope Performance Test</td>
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<td>MBA</td>
<td>Material Balance Area</td>
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<td>MC&amp;A</td>
<td>Material Control and Accountability</td>
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<td>METL</td>
<td>Mission Essential Task List</td>
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<td>NNSA</td>
<td>National Nuclear Security Administration</td>
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<td>NTC</td>
<td>National Training Center</td>
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<td>OFI</td>
<td>Opportunity for Improvement</td>
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<td>POC</td>
<td>Point of Contact</td>
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<td>PPE</td>
<td>Personal Protective Equipment</td>
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<td>PPM</td>
<td>Protection Program Management</td>
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<td>PSS</td>
<td>Physical Security Systems</td>
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<td>QRB</td>
<td>Quality Review Board</td>
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<tr>
<td>RD</td>
<td>Restricted Data</td>
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<tr>
<td>S&amp;S</td>
<td>Safeguards and Security</td>
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<td>SAP</td>
<td>Special Access Program</td>
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<td>SCI</td>
<td>Sensitive Compartmented Information</td>
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<td>SECON</td>
<td>Security Condition</td>
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<td>SNM</td>
<td>Special Nuclear Material</td>
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<td>SPO</td>
<td>Security Police Officer</td>
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<td>TA</td>
<td>Trusted Agent</td>
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Definitions

Appraisal – An appraisal is an Independent Oversight activity conducted by the Office of Enterprise Assessments to evaluate the effectiveness of line management performance and risk management, or the adequacy of DOE policies and requirements.

Best Practice – A best practice is a safety or security-related practice, technique, process, or program attribute observed during an appraisal that may merit consideration by other DOE and contractor organizations for implementation because it: (1) has been demonstrated to substantially improve safety or security performance of a DOE operation; (2) represents or contributes to superior performance (beyond compliance); (3) solves a problem or reduces the risk of a condition or practice that affects multiple DOE sites or programs; or (4) provides an innovative approach or method to improve effectiveness or efficiency.

Controller – An individual assigned to assist in conducting and controlling a performance test.

Deficiency – A deficiency is an inadequacy in the implementation of an applicable requirement or performance standard that is found during an appraisal. Deficiencies may serve as the basis for one or more findings.

Data Collection Form – A form developed for the appraisal team that is used to document the tasks, conditions, standards, and evaluation criteria for a performance test. This form is also used to record the results and observations of a test.

Evaluator – Individuals assigned the responsibility of formally assessing the readiness and performance effectiveness of S&S system elements during the conduct of a performance test as part of an independent oversight appraisal activity. Evaluators must be trained to perform their assigned duties.

Facility – A facility consists of one or more security interests under a single security management responsibility or authority and a single facility security officer within a defined boundary that encompasses all of the security assets at that location.

Findings – Findings are deficiencies that warrant a high level of attention on the part of management. If left uncorrected, findings could adversely affect the DOE mission, the environment, worker safety or health, the public or national security. Findings define the specific nature of the deficiency, whether it is localized or indicative of a systemic problem, and identify which organization is responsible for corrective actions.

Evaluator Limited-Notice Performance Test – A performance test that is coordinated and scheduled with one or more site trusted agents (TAs) but is conducted without prior announcement to other site personnel. Limited-notice tests are intended to elicit the most accurate information regarding an individual’s knowledge or the performance of S&S programs.

Limited-Notice Performance Test Program Manager – Individual (Federal) responsible for the implementation and maintenance of the limited-notice performance test program.

Limited-Notice Performance Test Team Lead – Individual (Federal or contractor) responsible for the execution of the limited-notice performance test program and for leading the planning, conduct, reporting, and closeout of performance testing activities at a specific site.
Limited-Scope Performance Test – A performance test designed to validate or evaluate specific skills, equipment, or procedures instead of testing an entire system or multiple subsystems. An LSPT may be interrupted to facilitate data collection, and the LSPT may be revised or restarted in order to achieve specific goals.

Opportunities for Improvement – Opportunities for improvement are suggestions offered in Independent Oversight appraisal reports that may assist cognizant managers in improving programs and operations. While they may identify potential solutions to findings and deficiencies identified in appraisal reports, they may also address other conditions observed during the appraisal process. Opportunities for improvement are provided only as recommendations for line management consideration; they do not require formal resolution by management through a corrective action process.

Performance Testing – 1. Activities conducted to evaluate all or selected portions of safety and security systems, networks, or programs as they exist at the time of the test. Performance testing includes, but is not limited to, force-on-force exercises, tabletop exercises, knowledge tests, limited-scope performance tests, limited-notice performance tests, penetration testing, vulnerability scanning, continuous automated scanning, and cyber security “red teaming.” Performance testing can be conducted as part of a scheduled appraisal activity (i.e., announced), or without prior knowledge of the entity being tested (i.e., unannounced). 2. A test requiring little or no use of language, the test materials being designed to elicit manual or behavioral responses rather than verbal ones.

Positive Attribute – An effective program activity, characteristic, or feature with an organization and shows promise during its early stages of becoming best practice with long-term sustainable impact, there is an objective basis for claiming effectiveness and has the potential for replication among other organizations.

Site – A site consists of one or more facilities operating under a centralized security management, including a designated security officer with consolidated authority and responsibility for the facilities.

Trusted Agent – Individuals who have appropriate operational authority or a compartmented role necessary to provide administrative and logistical support for coordination and conduct of independent oversight scheduled and limited-notice performance test activities. TAs are responsible for maintaining strict confidentiality of performance testing information in the interest of test validity. TAs must remain impartial in validating and developing performance test parameters and events necessary to evaluate identified objectives. The utmost diligence must be applied to limit the number of TAs to the minimum needed to administratively and logistically conduct the test.

Validation – The process by which EA ensures the factual accuracy of data collected during an appraisal activity and the effective communication to responsible managers and organizations of its impact.
Section 1: Introduction

Purpose

EA-22 provides feedback to internal and external stakeholders through independent evaluation of S&S policies and programs throughout the DOE. In order to perform this mission, EA-22 plans and conducts a variety of announced and unannounced appraisal activities and performance testing that incorporate a broad range of threats and scenarios in order to provide a complete and realistic evaluation of a site’s S&S system readiness to protect DOE assets. Although Category I quantities of SNM and highly sensitive classified information are emphasized, the limited-notice performance test (LNPT) program also includes performance testing of security system readiness for protection of Category II through IV SNM, classified matter, critical infrastructure, government property, and personnel. EA-22 develops and validates appraisal results in reports that may identify findings, deficiencies, best practices, positive attribute and/or opportunities for improvement (OFIs).

The LNPT Evaluator Appraisal Guide provides a set of detailed tools and references that the evaluator can use to plan, conduct, document, and close out limited-notice performance testing of S&S topics. These tools serve to promote consistency, ensure thoroughness, and enhance the quality of the appraisal process. A successful testing program relies heavily on the shared responsibility of EA personnel, Federal and contractor S&S managers, and TAs to maintain the propriety of performance testing planning information, and to ensure the site’s ability to conduct testing that is safe for all participants.

Given the inherent dangers and safety issues related to limited-notice testing, the information contained in this guide emphasizes safety considerations for choosing, planning, and conducting these types of tests. TAs and evaluators share responsibility for ensuring compliance with these controls. The information in this guide is based on the compilation and integration of widely recognized best practices, methods, and procedures, and is intended to be useful to both the novice and the experienced evaluator. For the experienced evaluator, detailed information is easily referenced and can serve as a reminder when conducting appraisal activities. For the novice evaluator, the information in this guide serves as a valuable training tool. Coupled with the assistance of an experienced evaluator, the novice is able to use the tools and reference material to collect data more efficiently and effectively.

Organization

The introductory section (Section 1) describes the LNPT program and provides general information on appraisal tools and their use. Sections 2 through 5 provide detailed guidance for execution of the LNPT program, and the appendices provide templates and forms useful for planning, scheduling, and conducting LNPTs. The guide sections and appendices include:

- Section 2 – Planning
- Section 3 – Conduct
- Section 4 – Reporting
- Section 5 – Closeout
- Appendix A – Annual LNPT Program Plan Template
- Appendix B – Annual LNPT Program Schedule Template
- Appendix C – Example LNPT Data Collection Form
- Appendix D – Trusted Agent Form
General Considerations

Although the guidelines presented here cover a variety of activities, they do not and cannot address all protection program variations, systems, and procedures used at all DOE facilities. The tools may have to be modified or adapted to meet appraisal-specific needs. This guide will be enhanced and updated as appraisal methods improve and testing experience accumulates. The specific guidelines should not be viewed as operational imperatives; instead, they must be critically examined and interpreted on an appraisal-specific basis, taking into account site-specific factors.

The information in this guide does not repeat all of the detailed information in DOE directives or other EA-20 protocols and guides. Rather, this guide is intended to complement these documents by providing practical guidance for planning, collecting, analyzing, and reporting LNPT data. Evaluators are encouraged to refer to other protocol documents, topical area guides, as well as applicable DOE directives throughout all stages of the process.

Characterization of the LNPT Program

The objective of the LNPT program is to realistically assess the level of a site’s operational readiness and thereby determine, with reasonable certainty, whether the S&S protection elements are adequately meeting the appropriate standards established by DOE policy and providing appropriate protection to DOE security interests. Limited-notice testing, which is performed with as little notice of testing as practical considering all safety aspects of the tests, provides a more accurate evaluation of site S&S response capabilities and determines to what degree the S&S program is able to accomplish its mission. Emphasis is placed on the protection of Category I quantities of SNM and highly sensitive classified information; however, the LNPT program also tests the readiness of security programs and systems protecting Category II through IV SNM, classified matter, critical infrastructure, government property, and personnel.

The following focus areas are included within the scope of the LNPT program:

- Protection Program Management (PPM)
- Physical Security Systems (PSS)
- Protective Force
- Material Control and Accountability (MC&A)
- Information Security (InfoSec)
- Personnel Security

The basic mission of the Department’s S&S program is to protect DOE security interests from theft, sabotage, and other hostile acts that may adversely impact national security or the health and safety of the public, as well as life and property at DOE facilities. How the S&S program accomplishes this mission depends upon the specific security interests at a site/facility, as defined in locally promulgated directives, procedures, plans, and mission statements. LNPTs of these areas evaluate an organization’s ability to accomplish site/facility-specific requirements, as well as the applicable DOE policy requirements. One or more focus areas may be included in LNPT appraisal activities. The LNPT program is implemented by
qualified evaluators who have been assigned the responsibility of formally assessing the readiness and performance effectiveness of S&S system elements during the conduct of LNPTs.

**Compliance and Performance**

Many of the DOE policy requirements are stated in performance terms, detailing a mission, duty, or set of duties that must be performed; therefore, compliance requires effective performance. The LNPT program focuses on the performance of the programs and personnel in place, and provides evidence of a site/facility’s ability to perform its mission.

**Integration**

Integration involves the coordination and interface among the focus areas to achieve a more effective and organized appraisal effort. Thorough integration creates a synergism and enhances the quality and validity of the report, which strengthens EA’s overall capacity to provide significant, value-added contributions to the S&S community, as well as to DOE as a whole. In order to take into account the interdependency of the overall protection system’s elements, the integration process must continue throughout all phases of the appraisal process. This integration ensures that all pertinent data has been shared and adequately analyzed. Integration involves test planning, exchange of information among the evaluators, and an accompanying discussion of how information developed from testing influences judgments about the adequacy of the overall system’s performance.

**Using the Tools in Each LNPT Appraisal Phase**

All appraisals include four major phases: planning, conduct, reporting, and closeout. Subsequent sections of this document, as well as the flow chart on the following page, describe the activities and expectations associated with each appraisal phase.

- **Planning** – Planning is a continuous process that is initiated when the EA-22 Director releases the approved annual schedule. Highlights of planning include team composition and assignments, selection of tests and associated data collection forms, and site coordination. Planning activities culminate in the site/facility developing specific test plans and safety risk assessments.

- **Conduct** – The conduct phase normally includes two to three days of onsite performance testing and data collection activities, validation of the test results, and an out-briefing to appropriate site management. However, like planning, data collection activities occur throughout an appraisal.

- **Reporting** – The completion of performance testing and data collection activities mark the beginning of the reporting phase. The reporting phase includes: analysis of results; identification of findings, deficiencies, best practices, positive attribute, and/or OFIs; determination of conclusions; and preparation of a report.

- **Closeout** – Closeout actions include reviewing corrective actions as applicable, developing lessons learned, improving the appraisal process, and managing records.
Limited-Notice Performance Test Appraisal Guide

Section 2: Planning

General Information

LNPT planning includes confirming the types of performance tests to be conducted, coordinating with site TAs, and finalizing appropriate and realistic performance evaluation criteria based on DOE orders and site/facility operating procedures. The detailed information in this section helps to ensure internal quality and safety reviews of the performance tests are achieved and valid evaluation criteria are developed. Evaluators must be mindful of the classification implications of all LNPT products and are responsible for ensuring adequate protection of the information before and after obtaining the requisite classification review.

The planning process is designed to determine the who, what, when, where, why, and how of test execution. While planning may be relatively uncomplicated and quick for simpler tests, it is often the most time-consuming, detailed, and difficult part of the testing process. However, if a test has been thoroughly and skillfully planned, it will generally yield the required data and frequently, will do so even if unforeseen events occur. The actions described in this section are comprehensive in scope and will accommodate the planning of the most complex performance tests. For simpler performance tests, some actions will be quickly accomplished and others may not be applicable. The LNPT program does not include force-on-force testing or the use of engagement simulation systems.

Prior to the beginning of the calendar year, the LNPT program manager prepares an annual LNPT program plan that describes the process, scope, and team responsibilities (reference Appendix A, Annual LNPT Program Plan Template). Upon approval, the plan is distributed to DOE program offices and sites/facilities as notification of the possibility of limited-notice testing occurring during the year. The program manager also develops an annual LNPT program schedule that identifies the sites and focus areas to be tested during a 12-month period (reference Appendix B, Annual LNPT Program Schedule Template). As part of the schedule development, team leads and resources are also assigned. Typically, unless designated as the team lead, the LNPT program manager is available to support individual appraisals but is not considered a part of the team. The proposed schedule is forwarded to the EA-22 and EA-20 Directors for review and approval. Once approved, the schedule is considered sensitive information and not disseminated beyond the EA-20 organization and EA senior leaders. The plan and schedule are the foundation for planning decisions.

Approximately 60 days prior to the conduct of onsite testing, the team lead begins planning activities for the performance testing. Specific elements include:

- Confirming team composition and availability
- Selecting test objectives
- Coordinating conference calls with the LNPT team and the site/facility to begin coordinating the testing
Team Composition

The team consists of EA-22 Federal and contractor staff who observe and evaluate the performance tests. Table 2.1 describes the team resources needed for each of the phases, and, depending on the focus areas to be tested, there could be one to several evaluators in each applicable focus area.

<table>
<thead>
<tr>
<th>Team/Personnel</th>
<th>Phase 1 Planning</th>
<th>Phase 2 Conduct/Analysis of Results/Report Writing</th>
<th>Phase 3 Report Finalization/Closeout</th>
</tr>
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<tbody>
<tr>
<td>Team Lead</td>
<td>Dates</td>
<td>Dates Location</td>
<td>Dates Location</td>
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<tr>
<td>Evaluator (Focus Area 1)</td>
<td>Dates</td>
<td>Dates Location</td>
<td>Optional</td>
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<tr>
<td>Evaluator (Focus Area 2)</td>
<td>Dates</td>
<td>Dates Location</td>
<td>Optional</td>
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<tr>
<td>Evaluator/Writer</td>
<td>Dates</td>
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When confirming the team composition, the team lead ensures personnel do not have a conflict of interest with the organizations or subject areas that they are tasked to evaluate, possess the qualifications, experience, and training sufficient to review and test the areas assigned and that all personnel are available to support all phases and dates scheduled. When the team has been confirmed, the team lead notifies the team members, administrative staff, and Federal and contractor management, and requests participation in the LNPT of a particular site via email.

Test Selection

An important step in preparing for an LNPT is to establish the overall objective by specifically identifying the skill, capability, or protection element to be tested. Clearly defining the test’s objective ensures the most appropriate test is performed. Test objectives could be related to equipment (such as, does the alarm sensor send an alarm to the panel), or they could be personnel response actions (such as, does the protective force assess, communicate, and respond to the alarm condition according to procedures). A common objective for all LNPTs is an evaluation of the site’s ability to plan and conduct the tests. A specific data collection form is available to support this aspect of the testing.

The ultimate goal of planning is to anticipate and prepare for activities necessary to conduct the highest quality testing possible with the resources available. To the extent possible, impacts of the performance testing on site operations should be understood, minimized, and agreed upon by the LNPT team and the site/facility. To that end, it is useful to focus the planning process on the following key site/facility information:

- The characteristics of the site/facility, including its size, composition of the security organization, and mission
- General familiarity with how individuals are trained, managed, and equipped
The environment and site/facility operating conditions for the periods of testing to include the target areas

Selection of the LNPTs depends on a variety of factors that include but are not limited to, changes in site mission and operations, previous appraisal results, and trends identified in the DOE Enterprise. If the site is aware of and in the process of addressing specific deficiencies (i.e., previously identified findings that remain open), there may not be a need to test those particular areas knowing the site is addressing the discrepancy. However, if identified deficiencies required compensatory measures, testing to ensure those measures are effective would be valuable. Also, testing actions that were taken to address any past findings, especially those that may have been recently closed, would provide an effectiveness review valuable to the site and other stakeholders. If a site has recently upgraded the MC&A accountability system and previous appraisal reports identified findings/deficiencies with the process for resolving inventory discrepancies, the team should consider an LNPT that requires the site to produce an inventory listing of a particular material balance area (MBA) and conduct a serial number verification of the MBA. If the verification results in 100 percent accountability, a card inject could be introduced stating an anomaly was identified and must be resolved. This test would verify that the site’s new system was capable of producing a report and that the report was accurate, as well as testing the site’s progress on improving the process for resolving discrepancies should they occur. If a site’s mission has recently changed from protection of Category I SNM to protection of Category IV SNM and classified information, tests could be crafted to assess protocols for different protection levels. Additionally, security incidents have occurred at some sites due to the lack of proper access controls into and out of vaults and vault-type rooms. In this case, the team may consider tests that exercise the protective force response capability and knowledge of their authorities associated with Category IV and classified information. A second test could be designed to evaluate the entry/exit procedures for vaults and vault-type rooms and introduce a series of unauthorized attempts to access one or more areas. These tests could be conducted independently, and if adequate controls are in place to identify an attempt of unauthorized access, the tests could be conducted simultaneously to test the entire alarm process from generation to resolution. Again, if testing identifies deficiencies with access control in these areas and generation of the initial alarm is questionable, a test including protective force response may not be prudent.

The factors used in test selection can be reviewed in greater detail in the appraisal process protocols document. Evaluators can also refer to the specific topical area assessment guides for common deficiencies and potential concerns noted on previous appraisals. In these sections of the guides, accompanying each potential concern or common deficiency is a short discussion providing additional detail. Reviewing the DOE requirements in each focus area, as well as review of the latest Department threat policy (e.g., Design Basis Threat), is also necessary when selecting the scope of the testing. This information is intended to help the evaluator further focus appraisal activities and to identify site-specific factors that may indicate whether a particular deficiency is likely to be present. Although focus is typically on the highest consequence activities, the evaluator must also consider the finite amount of time available to plan activities, collect data, and validate potential deficiencies. Therefore, consideration should be given to selecting tests that can reasonably be completed within the allotted time. In some cases, time constraints will require performing a smaller number of tests or multiple iterations of the same test, and, in other cases, the need may arise to perform less complex tests or a mixture of more or less complex tests.

Once the objective(s) are identified, the LNPT program manager sends e-mail notifications to the EA-1 Deputy Director, EA-20 and EA-22 Directors, and the designated team lead, detailing where the testing will be performed, when it will occur, what focus areas will be included, and requests direction regarding any additional objectives. Additionally, data collection form(s) are selected supporting the objectives that provide the evaluator with details on the specific task(s), condition(s), and standard(s). It is expected that
the site/facility will develop similar information in the test plan(s) for the entity being tested. The types of tests conducted can vary but generally include timed, knowledge, and/or skills. Although the protective force has specific requirements for physical testing and timed response in the form of LSPTs, alarm response and assessment performance tests, etc., other areas are also suitable for performance testing. When selecting specific tests, the team should consider the benefits of cross-area testing, such as protective force response to a system’s alarm or MC&A reliance on a system’s performance such as SNM detection. EA-22 maintains a library of approved data collection forms for performance testing (reference Appendix C, Example LNPT Data Collection Form). If an existing form requires modification or a new form must be created, the team lead coordinates this activity with the LNPT program manager. Examples of existing data collection forms and other testing possibilities include, but are not limited to:

Protection Program Management
- Conduct of performance tests
- Management response to a security incident
- Response to threat information or a change in the security condition (SECON) level

Physical Security Systems
- Conduct early warning detection system effectiveness testing
- Conduct Perimeter Intrusion Detection and Assessment System effectiveness testing
- Conduct exterior intrusion detection system effectiveness testing
- Conduct interior intrusion detection system effectiveness testing

Protective Force
- Alarm response
- Active shooter
- Firearm qualification
- Use of portal monitoring equipment
- Protestors
- Explosive detection
- Suspicious vehicles
- Workplace violence

Material Control and Accountability
- Material inventory of a specific location
- Remove, destroy, and apply a new tamper-indicating device
- Conduct of a daily administrative check
- Resolve inventory discrepancy
- Conduct a simulated stockpile emergency verification

Information Security
- Ability to mark a classified document
- Inventory of accountable documents
- Destruction of classified information

Personnel Security
- Verify the clearance and access control authorization of a given individual
- Produce a badge
During this process, the test data requirements from various focus areas are integrated, providing a more holistic view of the testing. For example, the data collection form for a SECON performance test should include PPM, protective force, and other applicable requirements in order to evaluate the effective implementation of the various SECON measures.

To facilitate the review of data collection forms and selection of appropriate tests, the following is provided, and describes each element of the data collection form:

- **Description** – The description states the objective of the test. For example, when an entry control point is being evaluated, the description would state, “The objective of this test is to evaluate security police officer (SPO) performance of entry inspections.”

- **Task** – The task states who will be tested and describes what is to take place during a test that initiates a response for evaluation. For example, for the entry control point test, the task would state, “SPOs shall conduct security area entry inspections.” Developing a task statement sometimes is aided by reviewing the applicable site/facility procedure(s) to determine what actions would be expected to take place. As a general rule, during limited-notice testing, the evaluator is not directly involved in the testing and is strictly evaluating both the response to the test as well as the site/facility’s ability to successfully conduct the test.

- **Condition** – The condition states who is to conduct the test, and will require an approved site test plan and/or procedures. Conditions may also include the environment, location, equipment present, time of day, or an action that causes the task to be performed. Developing an appropriate task and supporting conditions provides a realistic context for the performance test and describes conditions that may be encountered during testing.

- **Standard** – The standard consists of evaluation criteria derived from DOE Orders that are applicable to the task being evaluated. If a specific criterion is not evaluated during the testing it is noted as “not observed” and not considered part of the standard.

- **Evaluation Criteria** – Evaluation criteria are the specific required actions that must be completed for the site to successfully perform the task. Evaluation criteria are stated in the form of a question and include stating the applicable requirement from a national standard, DOE directive, or site procedure.

- **Related Criteria** – Related criteria can be found in National Training Center (NTC) curricula, other guides, and/or site procedures. Identifying related criteria allows the documentation of information regarding the robustness of the program, strengths, and best practices that were not necessary for the successful performance of the task, but could promote enhanced performance.

- **Supporting Questions** – Supporting questions assist the evaluator in determining if the evaluation criteria have been met and address potential follow-on questions depending on the test results.

- **Sequence of Activity** – The sequence of activity provides the evaluator with a chronological view of actions and events necessary for the successful conduct of the testing.

- **Evaluation** – The evaluation portion of the form provides an area for evaluators to explain what was observed and, where applicable, why the requirements were not met. Additionally, evaluators
may include other information such as strengths and best practices or positive attribute that support how the task was performed or how the test was conducted.

Site Coordination

The LNPT team lead initiates contact with the designated program office and facility/site, establishes initial TA/s, and schedules a conference call between the LNPT team lead and field/site Federal S&S manager and other pre-established TAs as applicable (See Appendix A). The LNPT team and site representatives are typically present on the call, but their presence is at the discretion of the team lead and field/site manager. During this call, the team lead describes the LNPT process, areas of focus, and requests that the site representative establish applicable Federal and/or contractor TAs to begin coordination of the performance tests. The call is followed by an e-mail between the team lead and the Federal manager to ensure accurate communication.

The use of TAs is key to successful testing, and prior to any discussion on test specifics, TA forms must be obtained from all site personnel involved (reference Appendix D, Trusted Agent Form). Additionally, the following points are discussed during this initial call and reinforced throughout the planning stage:

- The number of TAs must be kept to the minimum necessary to conduct a performance test, and all test documents must be marked with a bolded warning border that reads “Trusted Agent Use Only, Not to be Disseminated.”

- TAs are formally informed of their responsibilities to represent their site, to work closely with EA-22, and to sign the EA-22 TA form.

- Every effort should be made to keep the pool of TAs to the absolute minimum number of personnel required to conduct a safe and credible performance test. EA will evaluate the number of site TAs by using criteria contained in the “Conduct of Performance Tests” data collection form.

- The sharing of performance test information and materials is restricted to in-person exchanges, and where possible or practical, via encrypted e-mails. Every effort is to be maintained to prevent compromise of information (i.e. voice mails only left on phone lines dedicated to TA individuals and verifying that no one else is on the line and in the same room at the site where calls are fielded).

- The site TAs must verify tasks, conditions, and evaluation criteria are applicable to the site’s protection program.

- The site TAs are responsible for all site-specific safety requirements, test preparation, and test conduct. The role of EA evaluators is to observe and evaluate the performance of personnel and/or equipment being tested, as well as the site’s ability to test in a fair, realistic, and objective manner.

The LNPT team lead designates a team point of contact (POC) responsible for coordinating with the site/facility TAs. This coordination facilitates accurate communication and reduces the likelihood of mixed directions or tasks by the site/facility. Subsequently, the team POC and site/facility TAs initiate a call to begin coordinating activities to include requesting site access, discussing training requirements, communicating test objectives, tasks, conditions, and standards, and developing site-specific test plans and safety reviews. When designing performance tests, TA knowledge of the site protection program helps to ensure test conditions realistically reflect site/facility operations and ensures the test criteria, as conceived by the LNPT team, can be practically conducted. Clear, frequent, and effective communications is
absolutely essential to safe and successful completion of the testing; therefore, periodic conference calls
between the team and site TAs are necessary, and both the team and site TAs are responsible for maintaining
strict confidentiality of performance testing information. TAs must remain impartial in validating and
developing performance test parameters and events necessary to evaluate identified objectives.

Coordination with the site is through the designated team POC. If schedule changes or disagreements, etc.,
occur that cannot be resolved between the team and the site, the LNPT team refers the issue(s) to the LNPT
program manager and EA-22 Director for resolution.

The following tasks must be completed by the team prior to arriving on site. This list is not all inclusive
but provides a foundation for ensuring that the planning effort is successful.

- Each team member is responsible for specific tests and other specific tasks as necessary. The
  assignments optimize efficiency and ensure that all high-priority activities are accomplished. The
  responsible evaluator reviews the tests, ensures requirements are current and accurate, and prepares
  mentally to execute the test.

- The team POC verifies that the site has received all necessary information for the team to access
  the site (includes site access as well as any areas/buildings necessary for testing purposes).

- All team members complete site-specific training.

- The team POC verifies that signed TA forms have been received from all participants.

- Site TAs are briefed on specific test objectives and evaluation criteria, and the team coordinates
  with TAs on the approach for conducting the LNPTs.

- The team POC drafts a schedule of testing activities and coordinates with the site TAs to finalize
  and to ensure testing topics, times, and locations are accurately reflected. To better accommodate
  the identification of trends, multiple iterations of tests may be conducted wherever possible, based
  on the objectives and evaluation criteria (reference Appendix F, Site-Specific Performance Testing
  Schedule Template).

- The team receives final test plans from the site TAs and reviews them prior to testing to ensure
  stated objectives can be met and safety risk assessments are complete.

- The team performs a final validation of performance test objectives, testing approach/methodology,
  and performance evaluation criteria with the designated site TAs, and observes, where possible,
  any final logistical and safety activities performed by the site in preparation for the LNPTs.

In addition to test plans, the LNPT team may request the facility/site provide some supporting
documentation. This data call could include items such as the performance assurance program plan, training
records, procedures, training lesson plans, existing performance test data, etc. By obtaining this information
during the planning stage, the LNPT team will have access to the necessary resources/data in the event
testing yields less than positive results, facilitating a more effective review during the conduct and report
writing phases (reference “Unexpected Results” paragraph in Section 3, Conduct, for additional information
and options).
Test Plans

As stated, the most important part of effective performance testing is planning, and the greatest emphasis in planning involves creating robust test plans. The site TAs prepare the test plan(s) required to conduct the LNPTs and then forward the test plans to the LNPT team for review. During this review, the team ensures that execution of the plan as written will result in meeting the performance objectives, and that control measures have been identified to ensure the testing will be conducted safely. Although there is no required format, best practice and NTC course curriculum suggest, at a minimum, that test plans include the following elements:

- Purpose and scope of the testing
- Objective(s)
- Tasks, conditions, and standards
- Sequence of activity
- Resources required (includes people, equipment, and time)
- Safety assessment.

Performance tests are used to evaluate various skills, procedures, equipment, strategies and tactics, and to identify trends. To ensure testing leads to useful and valid information, the conditions under which performance tests are conducted must be as realistic as possible, and any necessary constraints and artificialities must be designed to have a neutral effect on player performance. The performance test plan must emphasize specific criteria based on requirements, with additional data collected from the testing, to provide valuable information to correct deficiencies and/or improve the protection system strategy. The insights gained from performance tests are factored into overall conclusions about the protection system strategy or its elements. Artificialities associated with testing should be minimized, and simulations are generally a poor substitute for actual performance and should be used only when unavoidable. If the LNPT team lead or TAs determine the artificialities and/or restrictions associated with a planned test are so severe as to jeopardize the realization of valid results, alternate methods or other forms of testing should be considered.

In some instances, the nature of the test may require that the persons being tested (or those supporting the tests) are notified immediately preceding the conduct of the test. Generally, site personnel and evaluators and/or equipment are placed in situations where test responses can be observed while potential safety and routine site operational concerns are addressed. However, if notification is essential to safely conducting the test, only pertinent site personnel should be forewarned of the test. Methods to mitigate the notification of personnel prior to testing include:

- Conducting an array of tests in a random order at different locations with varied personnel.
- Conducting a test without pre-designating who or what is tested. Examples include coordinating the inventory of a site's SNM without announcing which MBA or containers will be inspected or not pre-identifying which containers will be inspected for tamper-indicating devices.
Safety

LNPTs require that personnel being tested are unaware that testing is being conducted for as long as possible. These types of tests require special care and detailed planning to ensure they are coordinated and conducted safely. The site/facility is responsible for generating safety risk assessments, and the LNPT team members review the safety risk assessment prior to commencing testing. During this review, the LNPT team determines if appropriate controls were identified to mitigate any potential safety hazards or risks associated with each of the test actions indicated by the task description. For example, in the case of sensor testing, controls might include ensuring the site requires the person climbing the fence to don specific personal protective equipment (PPE), or avoiding certain areas with razor wire, etc. In the case of testing protective force response, controls might include ensuring that the site has a sufficient number of controllers who can clearly communicate to responding forces that an exercise is being conducted rather than a real-world event. If testing could result in personnel being placed in unusually high risk or if the safety assessments do not appear to be thorough or address the areas of concern, the team must coordinate with the site to address the concerns. If the team does not receive acceptable safety risk assessments prior to conducting the tests, the team lead must notify the site Federal security manager and the LNPT Program Manager that testing is postponed until the issues can be addressed. If the team is unsure of the thoroughness of the assessments, the EA-22 safety officer can be contacted for advice and assistance. The EA-22 safety officer may serve as an LNPT evaluator in order to assess the adequacy of risk assessments and controls. Additionally, the team POC should ascertain before an appraisal whether PPE will be required for site/facility access and during testing, what equipment will be provided by the site, and what team members are expected to bring with them (safety shoes, glasses, cold weather gear, etc.).
Section 3: Conduct

General Information

The conduct phase involves the collection and validation of data obtained during LNPT activities. Although the majority of data collection activity is performed on site during the actual testing, some activities associated with evaluating the site’s planning and conduct of the testing will be accomplished via document reviews and interviews. While on site, team members are expected to comply with security-related postings and placards that indicate the boundaries of security areas, as well as rules regarding prohibited articles. Team members are also expected to comply with all InfoSec and cyber security policies regarding the use of classified and unclassified computers, and the control and handling of documents containing classified or controlled unclassified information. When in doubt about any regulation or policy, team members should consult the team lead and site TA for clarification. If problems are encountered, or if local requirements alter essential test activities, evaluators should inform the team lead as soon as possible.

As part of planning and as a refresher during the conduct of testing, evaluators should reference the topical area assessment guides for specific information on performance testing considerations and common deficiencies/potential concerns. The following is a listing of some of the available resources:

- Appraisal Process Protocols
- PPM Assessment Guide
- PSS Systems Assessment Guide
- Protective Force Assessment Guide
- Personnel Security Assessment Guide
- Classification and Information Control Assessment Guide
- Classified Matter Protection and Control Assessment Guide
- MC&A Assessment Guide

Conduct and Execution of Activities

Limited-notice performance testing should be conducted in a realistic environment that safely assesses how DOE protection programs/elements will perform in the event of an actual security emergency. The information gathered from LNPTs is intended to be reasonably comprehensive, although it is recognized that not every conceivable variation will be addressed. This section describes the activities associated with data collection and testing.

The primary goal of limited-notice performance testing is to determine with reasonable certainty, whether the S&S protection elements adequately meet the appropriate standards established by DOE policy and provide appropriate protection to DOE security interests. Testing is generally conducted over a two to three day period and consists of a series of LSPTs, alarm response and assessment performance tests, knowledge tests, skills tests, qualifications, etc. The evaluators evaluate the conduct of test activities, evaluating site performance in accordance with predetermined criteria and communicating on-the-spot validation of observed test results with the site TAs. “Win/Lose” conclusions are not drawn from performance tests; rather, testing is used to evaluate various skills, procedures, equipment, strategies, and tactics. Prior to departing the site, the team lead will verbally brief the Federal S&S manager and/or designee on the preliminary results, and also provide a one page LNPT results summary.
Performance testing requires a high level of coordination and planning prior to arrival on site to ensure the most efficient use of time and resources. This planning and coordination process should continue after the evaluators arrive at the site and up to the moment the test is administered. Throughout the process, evaluators should be alert for indications of the level and adequacy of management support for various elements of the S&S program. Indicators include the availability of adequate resources (including facilities and equipment) and appropriate qualifications of performance testing personnel. If testing includes conducting interviews, evaluators should follow the information and questions provided on the data collection form. This does not prevent an evaluator from asking additional questions or pursuing additional lines of questioning; however, care should be taken to ensure that the focus remains on the requirements and site policies and procedures. Interviews should be conducted in a conversational and non-threatening manner. Much of the interview is essentially an oral knowledge test, and the person being interviewed will consider every question to be a test. The interviewer should not be bound by the text of prepared questions, and questions may have to be phrased and rephrased, as necessary, to elicit the desired information. The goal of the interview is to determine the individual’s true perception or understanding of the subject matter, and at times, it will take more effort to elicit that information from some people than from others. This delay may not be an indication of the employees’ lack of knowledge or skills, rather their understandable nervousness and lack of experience in clearly articulating to assessors what they do.

While on site, the ability to observe operations is also a good way to see how personnel perform their routine duties. Observations may be either deliberate or ad hoc. For example, specific portal testing may be observed for 30 minutes during routine operations to see whether proper procedures are followed, or the entry control process may be observed every time the evaluator passes through or by an entry control point. The time and location of deliberate observations should be carefully planned to provide representative and sufficient data, and should be limited to instances where the activity to be observed will definitely occur. It is a waste of time for an evaluator to stand around hoping that something will happen. Evaluators should be alert at all times while on site and actively pursue, as appropriate, anything they observe that is pertinent to performance. Evaluators should also be familiar with local procedures to be able to determine if they are being followed.

Although planning is the most difficult and time consuming part of many performance tests, test conduct is no less important, because if the test plan is not properly executed, useful data will not be gathered and the planning effort and all other resources spent on the test will have been wasted to some degree. Test conduct involves the accurate execution of the performance test plan, and if the plan is detailed and thorough, the test should run smoothly (from a control standpoint) and there should be built-in capabilities to deal with most unexpected events.

Several factors are important to conduct valid, useful performance testing and must be considered during the conduct phase, including:

Security – During any performance testing, the security of the site must be considered. If personnel or equipment are taken off post or out of service for testing, compensatory measures are frequently needed to ensure that the minimum security needs of the facility are met. Any test, even a simple one, may require compensatory measures if the test has the potential to divert the attentions of personnel from their normal responsibilities. The need for compensatory measures should be determined by the site, and to support limited-notice testing, compensatory measures may have to be more subtle to avoid compromising the test.
Realism – In order to elicit an accurate response, tests must be conducted under conditions that are as realistic as possible. A continuous effort must be made to ensure tests and test conditions are as real as possible, and to attempt to ensure that artificialities have a neutral impact on the outcome.

Safety – The safety of personnel and facilities is of the utmost importance. No test is vital enough to justify serious bodily injury or significant facility damage. There is, however, always an element of risk in testing S&S functions, just as there is an element of risk in everyday activities. The challenge in performance testing is to find ways to conduct realistic and meaningful tests in as safe a manner as possible, without exposing participants to undue hazards. The development of a thorough safety risk assessment prior to testing is key to minimizing hazards.

Test the Right Thing – It is important that the objective of the performance test is relevant to the assigned mission of the personnel being tested. The objective of each performance test must be clearly understood, and each test must be conducted with that objective in mind.

Collect the Necessary Data – The purpose of a test is to collect required data. If a test does not yield the needed data, it is not an effective use of the time, effort, and resources that went into the test. The data collection form and the site’s performance test plan are key to ensuring valid results.

Control Measures – Conducting an orderly and safe test requires the enforcement of various control measures. Some measures can be restrictive, so it is important to strike a balance between the need for realism and the need to control the test. Without being overly burdensome, sufficient control measures should be implemented to ensure that the test can be executed properly and realistically, and that it can be conducted safely. Typical control measures include boundaries, off-limits areas, controller actions, test initiation and termination, and logistics.

Final Coordination and Conduct – Final coordination of all aspects of test preparation should be completed before the test begins, including ensuring that all necessary participants are present, facility preparations are complete, and all logistical requirements have been met. Evaluators should observe and document the site’s/facility’s ability to monitor test events to ensure that: 1) all pre-planned scenario events and injects are executed as planned; 2) controllers are provided necessary supervision and advice; 3) timely decisions are made to resolve any problems that may arise; 4) planned scenario events are adjusted as necessary; 5) the test is conducted in a safe manner; and 6) the test is terminated when the appropriate conditions are met.

Validation – Validation is a method used by EA evaluators to confirm observation of the results of testing activities with site representatives. When each test is terminated and/or at the time a fact is identified during any of the testing activities, formal discussions are conducted between evaluators, site representatives, and/or topic subject matter experts detailing what was observed. This process promotes transparency, objectivity, and openness to resolve differing points of view. For example, during an entry/exit test at an access control portal, a large vehicle is seen entering a Protected Area through the emergency access gate without a detailed search. The evaluator must validate that all personnel present observed this event and that no other pertinent information could explain the activity, such as a search at a previous location, unseen escort vehicle, etc. It is critical that any and all important facts being used by the assessment team to form a conclusion related to a protection program are fully known by site POCs and their superiors. Failure to share important details can cause the appraisal team to not be provided all relevant information surrounding an identified fact, and may lead to miscommunications between the appraisal team and the assessed site.
Unexpected Results

If the testing does not achieve the objective, if performance does not meet the evaluation criteria as documented on the data collection form, or if the evaluator(s) was not in a position to witness all aspects of the testing, additional data collection and/or testing may be necessary. If time does not permit additional testing, data review could be considered. Data review may include evaluation of the training provided to the test participants to ensure it is appropriate and reflective of the expected performance and to determine whether it has been received by all personnel performing the task(s). Review of site procedures and previous performance testing conducted on the specific elements is useful in determining if less-than-adequate performance is simply a single data point or indicative of a systemic deficiency. The following section includes options for collecting this data.
Section 4: Reporting

General Information

The report preparation and formal validation phase of an appraisal generally takes place after data collection is complete (although, at times, these activities may identify additional data needs). Data must be organized, assimilated, and analyzed in order to form conclusions and report the results. This section discusses the various tasks to be accomplished during report preparation, including data analysis, and identification of deficiencies, best practices, positive attributes and/or OFIs. The main goals of this phase are to thoroughly analyze all available data, draw valid conclusions from that analysis, and prepare a report that accurately reflects the status of the program(s) being examined, and provides managers with the information necessary to develop corrective actions and affect positive change. Upon completion of testing, prior to departing the site, the LNPT team lead provides a verbal briefing and LNPT results summary to the site Federal security manager and/or designee of the preliminary results, and emphasizes that the results are preliminary and based on information currently available. Additionally, the team lead sends an e-mail through the LNPT program manager to the EA-1 Deputy Director and EA-20 and EA-22 Directors summarizing the outcome of the effort.

During the reporting phase, evaluators must be mindful of the following items in order to ensure a valid and useful report is developed.

- Refer to the appropriate policy references to determine whether the facility is complying with applicable requirements.
- Refer to the applicable site plans and procedures to determine whether the site is complying with site requirements.
- Analyze the data and interpret the results in order to identify deficiencies and the impacts of deficiencies, which will help determine the significance of findings.
- Document positive attributes identified during the various phases of testing, as well as best practices that could be useful to the DOE Enterprise.
- Prepare a report documenting the results of the testing, including introduction and background, LNPT descriptions and results of the testing, and conclusions (reference Appendix G Report Template).

Analysis

Analysis involves a critical review of all data collection results, particularly any identified program deficiencies, strengths, and weaknesses, and leads to logical, supportable conclusions regarding how well the program functions, whether the program element has been effectively implemented, and if the program or element satisfies the intent of DOE policy.

If no deficiencies are identified, analysis involves reviewing the positive attributes and best practices. However, if deficiencies in performance are identified, the analysis must consider observations individually and collectively, and then must balance them against the identified strengths or mitigating factors to
determine the overall impact on the program's/element's effectiveness. Factors considered during analysis include:

- Is the observed deficiency an isolated event or systemic?
- Did the site know of the deficiency, and, if so, what actions were or are being taken?
- What is the importance or significance of the deficiency?
- Do mitigating factors exist, such as the effectiveness of other programs or program elements that may compensate for the deficiency?
- What actual or potential effect does the deficiency have on mission performance or accomplishment?
- Does the deficiency result in an actual or potential vulnerability to DOE interests?

Some deficiencies may result in formal findings that indicate significant deficiencies, safety, or security concerns that warrant formal corrective action plans. Minor and non-systemic deficiencies must be appropriately identified so that they can be corrected, but these deficiencies do not require the same level of focus necessary for findings. The following chart is used to determine the significance of a deficiency and how it should be presented in the accompanying report.

Examples of the process used for determining the significance of identified deficiencies are listed below using one of the scenarios provided in the planning section involving protective force response to a vault-type room.
**Limited-Notice Performance Test Appraisal Guide Reporting**

**Positive Attribute** – Site X has configured the Central Alarm Station (CAS) database to include designated response times for each alarm location. The CAS system records the length of time from alarm annunciation to alarm resolution, and compares the time to the required response time. Responses to alarms that exceed time requirements are displayed in weekly CAS manager reports. These events are reviewed by the protective force and vulnerability assessment group to identify root cause, and to modify alarm response procedures if required. This effective program activity is well established with long-term sustainable impact, and has the potential for replication among other security organizations.

**Deficiency** – A SPO responding to an alarm at a vault-type room arrives several minutes after the site-required response time. The response time is not considered a single point failure, nor is it a compliance-based weakness. This test result would be considered a performance-based weakness, and, if the deficiency is a one-time occurrence or if other site data gives indication it is not systemic in nature and does not represent a risk to classified matter, it may be described as a deficiency in the report. If additional data indicates that the deficiency has occurred at other times and/or in other testing, this test result may be systemic and would be considered a finding rather than a deficiency. Deficiencies are presented in a manner that identifies the concern and provides a reasonable amount of information to support the site’s ability to address and improve its programs. Deficiencies do not mandate corrective action plans.

**Finding** – An un-cleared security officer is required to respond to an alarm at a vault-type room containing classified matter. The security officer upon arrival at the facility finds the door unlocked, resulting in unmitigated access to the classified contents of the vault. Since this test result involves the potential for any un-cleared security officer to respond to the alarm, it would also be considered systemic compliance and performance weakness and a finding may be warranted. Findings are presented in a manner that identifies both the specific problem and the appropriate DOE (or other) reference. Findings are worded to express the specific nature of the deficiency, clearly indicate whether the deficiency is localized or indicative of a systemic problem, and clearly identify which organization (specific contractor, field office, program office, etc.) is responsible for developing corrective actions. Typically, assignment of a finding includes a discussion of the impact of the condition described, including any mitigating factors and compensatory measures.

**Major Vulnerability** – An un-cleared security officer responds to an alarm on a vault-type room and, as a part of site procedures, retrieves the combination to the door in case it is needed to complete assessment and resolution of the alarm. This action provides indication that an un-cleared security officer could have or may have had access to classified matter and would be considered a single point failure. Additionally, since vault-type rooms have the possibility of open storage of classified restricted data, the discrepancy would also be considered a major vulnerability. In the event a significant vulnerability is identified, the LNPT team lead will initiate required notifications per DOE Order 227.1A, *DOE Independent Oversight Program* and EA management. Conditions that may warrant this notification represent imminent dangers or situations that present unacceptable immediate risks to workers, public health, or the environment, or a major vulnerability (e.g., unacceptable risk of SNM theft or diversion, radiological or industrial sabotage, espionage, or significant compromise of classified information).

EA evaluators have a broad range of knowledge in their individual areas of expertise, and have the advantage of observing methods of program implementation across the entire DOE Enterprise. When findings, deficiencies, or other weaknesses in program implementation are identified during testing, it is useful for team members to provide insight on approaches that could be adopted by line management to improve program performance. These recommended approaches are presented as specific OFIs in the report. If finding(s) were issued, responsible DOE/National Nuclear Security Administration managers are required to ensure that corrective actions are developed and implemented. The corrective actions must be
managed and tracked to completion using site- or program-specific issues management processes and systems. DOE Order 226.1B, *Implementation of Department of Energy Oversight Policy*, provides the requirements for DOE line management and contractors to manage findings and corrective actions. In some cases, the Director of EA-20 may request that corrective action plans be submitted to the office for review and comment. The appraisal program may verify and validate the effectiveness of corrective actions, and confirm the closure of findings as part of non-LNPT appraisal activities conducted at the sites throughout the year.

Occasionally during testing, findings or deficiencies are observed that stem from policy weaknesses (e.g., lack of policy, lack of clarity in policy, ambiguous or contradictory policies, inappropriate policy, or inappropriate implementation guidance). When such policy weaknesses are identified, they are communicated to the Headquarters element responsible for the policy in question, either via the formal report or in a separate written policy paper that identifies the subject, provides necessary background information, states the problem, discusses its implications, and, if appropriate, recommends a course of action.

**Report**

A report using the template in Appendix G, is developed outlining the LNPT results, including findings, deficiencies, best practices, positive attributes, and/or OFIs. Evaluators must take care to ensure that a derivative classifier reviews field notes, draft reports, and final reports and ensure that documents containing Official Use Only, Controlled Unclassified Information, Unclassified Controlled Nuclear Information, or classified information are properly safeguarded. Evaluators must also be aware that classified information might be derived by combining unclassified information together into one document.

As part of the validation, a factual accuracy review of the draft report is conducted by the field office/designee after EA-22 management review. The site/facility being appraised has an opportunity and responsibility to provide feedback to the LNPT team lead when concerns over factual accuracy exist. The site/facility should provide additional data and identify site personnel who can help team members identify corrections for any factual accuracy misunderstanding. Once factual accuracy comments are resolved, the team lead will submit the draft report to the LNPT program manager for incorporation into the EA tracking system for review, approval, and distribution.

Distribution of the final report will depend upon the nature and scope of the testing activity but, at a minimum, a copy will be transmitted to the Federal program office and field element managers. Copies may be distributed to others in the line management organization or who have a vested interest in the appraisal results.
Section 5: Closeout

General Information

The closeout process includes developing lessons learned and ensuring that official records from the testing are appropriately maintained. Depending on the results and severity of identified deficiencies, a briefing to appropriate managers on the process, results, and conclusions of the activity may be conducted.

Lessons Learned

At the conclusion of each LNPT activity, the team will develop lessons learned. The team lead will also solicit comments from site Federal and contractor security managers to gain their perspectives and insights on how to improve the LNPT process. These lessons learned will be used to revise test objectives, tasks, conditions, and evaluation criteria. The team should also use this time to determine whether changes are necessary to existing data collection forms or whether additional tests need to be developed. If so, changes are proposed to the LNPT program manager for review and incorporation.

Records

The appraisal program follows the DOE Administrative Records Schedules found at http://energy.gov/cio/administrative-records-schedules that are maintained by DOE’s Office of the Chief Information Officer. Records associated with each LNPT activity are archived for a period of ten years from the date of the final report of the activity. Additional information may be retained as necessary to fully document an LNPT activity, and, at a minimum, the archives contain the following types of information, in either electronic or hard copy form:

- Annual LNPT Program Plan
- Correspondence pertinent to the testing, as determined by the LNPT program manager
- Final report
- TA forms

Additionally, a site has been established on the DOE Headquarters computer network to track, maintain, and control documents associated with the LNPT program. Access is controlled through three levels: moderator, participant, and viewer. Moderators have site administrative controls and can upload, change, and delete; only the LNPT program manager and representatives and select administrative personnel serve as moderators. Personnel with participant-level access have the ability to read and write to documents on the system; only LNPT report writers have participant-level access. Viewer level only allows the reading of documents; viewers include management and individuals who may participate as evaluators in the LNPT program.
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Appendix A: Annual LNPT Program Plan Template

OFFICE OF SECURITY ASSESSMENTS (EA-22)
LIMITED-NOTICE PERFORMANCE TEST (LNPT) PROGRAM PLAN
CALENDAR YEAR XXXX

[DATE]

Office of Security Assessments
Office of Cyber and Security Assessments
Office of Enterprise Assessments
U.S. Department of Energy
OFFICE OF SECURITY ASSESSMENTS (EA-22)

LIMITED-NOTICE PERFORMANCE TEST (LNPT) PROGRAM PLAN

CALENDAR YEAR XXXX

Approved by: _______________________________ Date: ________________

[NAME]
Director
Office of Security Assessments
Office of Cyber and Security Assessments

Approved by: _______________________________ Date: ________________

[NAME]
Director
Office of Cyber and Security Assessments
Office of Enterprise Assessments
I. INTRODUCTION

The Office of Security Assessments (EA-22), within the U.S. Department of Energy (DOE) Office of Enterprise Assessments’ (EA), Office of Cyber and Security Assessments, has established a limited-notice performance test (LNPT) program and plans to conduct LNPTs of site/facility protection programs in calendar year XXXX. EA-22 evaluates performance effectiveness in the context of applicable DOE policies and directives and locally-approved operating procedures, and in accordance with DOE Order 226.1B, Implementation of Department of Energy Oversight Policy, and DOE Order 227.1A, Independent Oversight Program. The EA-22 Limited-Notice Performance Test Evaluators Guide provides detailed information and tools to assist evaluators in evaluating the results of performance testing of DOE safeguards and security (S&S) programs.

The objective of LNPT appraisal activities is to provide DOE and National Nuclear Security Administration (NNSA) managers with an evaluation of the adequacy and effectiveness of security programs/elements related to the protection of special nuclear material (SNM) and other assets. EA-22 will collaborate with trusted agents (TAs) from DOE program, site, operations, and/or field offices to conduct LNPT appraisal activities, separate from other scheduled appraisal activities such as multi-topic and follow-up reviews. The successful conduct of LNPT appraisal activities will require the full cooperation and assistance of DOE Headquarters, site, operations, and/or field offices. LNPT results will be provided in reports to the applicable office(s) for use in both developing corrective actions and identifying lessons learned and best practices, furthering improvements to S&S programs throughout the Enterprise. The LNPT report will describe the results of field performance, identify deficiencies and best practices, positive attributes, and/or provide opportunities for improvement (OFIs) for maintaining or enhancing security effectiveness, thereby supporting management’s continuing pursuit of excellence. This plan describes the scope, schedule, and process for conducting these tests.

II. APPRAISAL SCOPE

LNPTs may be conducted to evaluate protection systems used to secure:

- Category I-IV SNM
- Classified information
- Critical infrastructure
- Government property
- Personnel

A broad range of threats, as defined in DOE Order threat policy, will be included to provide a realistic evaluation of site S&S response capabilities. Testing will be conducted in two or more of the following focus areas:
• Protection Program Management
• Physical Security Systems
• Protective Force
• Material Control and Accountability
• Information Security
• Personnel Security.

III. SCHEDULE

EA-22 evaluators and designated site TAs plan and prepare for the conduct of testing. The onsite activities typically consist of a series of LNPTs, conducted over a period of two to three days, and include an initial brief on planned activities as well as an out brief on the preliminary results for the Federal security manager. A report is generated and, once finalized and approved, is distributed to the field and applicable program offices and stakeholders. Senior DOE and NNSA Headquarters managers are also briefed on the overall results.

IV. TEAM RESPONSIBILITIES AND ASSIGNMENTS

[NAME] is the LNPT program manager and will implement and maintain the program throughout 20XX. Team leads will be assigned for each specific review and, as such, will be the points of contact (POC) managing the planning, conduct, and report writing activities. The LNPT program manager and the assigned team lead will ensure that activities are conducted in accordance with this plan, established protocols, and procedures. Upon notification of testing, each site/facility is required to designate an initial POC and submit a TA form for that individual.

V. LNPT APPRAISAL PROCESS

The ultimate goal of planning is to anticipate and provide for every action necessary to conduct the highest quality appraisal possible with the resources available. As part of the planning process, the team lead will notify the program office and field Federal security manager or designee of the intent to conduct testing during a specific timeframe. To accomplish the objectives of the LNPT program, the manager must appoint one or more TAs upon notification of an LNPT appraisal and complete TA forms. TAs assist EA-22 in planning and conducting the performance tests by expediting detailed planning, coordination, and allocation of local resources. Additionally, the TAs are responsible for ensuring that LNPTs meet all site-specific requirements for safety, test preparation, and test conduct. TAs are made aware of all LNPT details and are expected to maintain this information in confidence. EA-22 provides the focus areas and specifics of the testing, then observes and evaluates the performance of the personnel, procedure, and/or equipment being tested, as well as the site’s/facility’s ability to test in a fair and objective manner.

The following list describes the process applied by EA-22 for coordinating with site TAs to facilitate conduct of LNPTs.
Planning

- An annual plan is developed that introduces the LNPT program by defining the appraisal scope, schedule, team responsibilities and assignments, and process. The plan is disseminated to the applicable DOE Headquarters, program, and field offices.

- During the planning for a specific site, the LNPT team lead contacts the applicable Federal security manager or designee to discuss the types of tests being considered, and requests an adequate number of Federal and/or contractor TAs be made available to begin coordination of the LNPTs.

- The LNPT team selects the performance test objectives and related evaluation criteria for the site/facility.

- The LNPT team coordinates with the site’s/facility’s TAs on specific test objectives and evaluation criteria, and begins coordinating with site/facility TAs to develop an approach for conducting the LNPTs.

- EA-22 transmits the LNPT Test Description Document to the primary site TA for use in developing performance test plans and safety risk assessments.

- The site's TAs develop performance test plans and associated safety risk assessments, and also provide the data call identified in the LNPT Test Description Document.

- The LNPT team reviews and concurs on the site’s/facility’s completed performance test plans and safety risk assessments.

Conduct

- The LNPT team reviews performance test objectives, testing approach/methodology, and performance evaluation criteria with the designated TAs, and observes (as necessary) any final logistical and safety activities performed by the site in preparation for the LNPT.

- The LNPT team observes the conduct of all LNPT activities, evaluates site/facility performance in accordance with predetermined criteria, and communicates on-the-spot validation of observed test results with the site TA.

- Prior to departing the site, the team lead will verbally brief the Federal S&S manager and/or designee on the preliminary results, and also provide a one page LNPT results summary. In the event a significant vulnerability is identified, the LNPT team lead will initiate required notifications per DOE Order 227.1A, and EA management.

Reporting

- The LNPT team develops a report outlining the LNPT results as well as any identified deficiencies, best practices, positive attributes, or OFIs. Findings, if identified, will require formal corrective action plans.
Upon approval, the final report is distributed to the applicable DOE Headquarters, program and field offices and stakeholders.

EA appreciates the assistance provided by the Federal and contractor personnel in executing the LNPT program. If you have questions or concerns relating to EA-22’s LNPT initiative, please contact me at (XXX) XXX-XXXX or the LNPT program manager at (XXX) XXX-XXXX.

Distribution:

All DOE and NNSA Sites
## Appendix B: Annual LNPT Program Schedule Template

### LIMITED-NOTICE PERFORMANCE TESTING
20xx Schedule

<table>
<thead>
<tr>
<th>Site A</th>
<th>Focus Areas</th>
<th>Planning</th>
<th>Conduct</th>
<th>Report Due</th>
</tr>
</thead>
<tbody>
<tr>
<td>Name, Lead</td>
<td>Protective Force PSS</td>
<td>Jan-Feb</td>
<td>Feb 3-5</td>
<td>Mar 5</td>
</tr>
<tr>
<td>Name, Evaluator</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Name, Evaluator</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Name, Writer</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Site B</th>
<th>Focus Areas</th>
<th>Planning</th>
<th>Conduct</th>
<th>Report Due</th>
</tr>
</thead>
<tbody>
<tr>
<td>Name, Lead</td>
<td>Protective Force MC&amp;A</td>
<td>Feb-Mar</td>
<td>Mar 11-13</td>
<td>May 3</td>
</tr>
<tr>
<td>Name, Evaluator</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Name, Evaluator</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Name, Writer</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Site C</th>
<th>Focus Areas</th>
<th>Planning</th>
<th>Conduct</th>
<th>Report Due</th>
</tr>
</thead>
<tbody>
<tr>
<td>Name, Evaluator</td>
<td>Protective Force PSS InfoSec</td>
<td>Jun-Jul</td>
<td>Jul 8-10</td>
<td>Jul 30</td>
</tr>
<tr>
<td>Name, Evaluator</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Name, Evaluator</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Name, Writer</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
Appendix C: Example LNPT Data Collection Form

Example

Trusted Agent Information Do Not Disseminate

Respond to Protestors

Limited-Notice Performance Test

Data Collection Form

**Description:** The objective of this test is to evaluate the response of security police officers (SPOs) to protestors.

**Task:** SPOs shall respond to personnel protesting on government property.

**Condition:** Site performance testing personnel shall conduct a protestor limited-notice performance test, per site performance testing plans and procedures.

**Standard:** The standard consists of evaluation criteria derived from Department of Energy (DOE) Orders that are applicable to a response to protestors. If a specific criterion is not evaluated during the testing it will be noted as “not observed” and not considered part of the standard.

**Evaluation Criteria:**

<table>
<thead>
<tr>
<th>EVALUATION CRITERIA</th>
<th>Meets requirement</th>
<th>Does not meet requirement</th>
<th>Notes</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. Did protective force personnel demonstrate familiarity with response to civil disturbances? DOE O 473.3, Attachment 2, Section E, 1.c., and 10CFR1046 Appendix B, B(4)(b)</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>2. Did protective force personnel demonstrate familiarity with response to protestors? DOE O 473.3, Attachment 2, Section E, 1.c., and 10CFR1046 Appendix B, B(4)(b)</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>3. Did protective force personnel demonstrate familiarity with search techniques for individuals? DOE O 473.3, Attachment 2, Section E, 1.c., and 10CFR1046 Appendix B, B(4)(b)</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
4. Did protective force personnel demonstrate familiarity with methods of arrest and detention? DOE O 473.3, Attachment 2, Section E, 1.c., and 10CFR1046 Appendix B, B(4)(b)

5. Did protective force personnel demonstrate the knowledge of and ability to apply DOE policy on the use of force and limited arrest authority? 10CFR1047.2 and 10CFR1046 Appendix B, b.4.c.(6).

**RELATED CRITERIA** - Can be found in National Training Center (NTC) curriculum, guides/directives, and/or site procedures. Allows the documentation of information regarding requirements that may not be within the specific scope of the testing and/or the robustness of the program, strengths and best practices that were not necessary for the successful performance of the task. NTC TRF-100D “Introduction to Protective Force,” Lesson 23 “Use of Force.”

<table>
<thead>
<tr>
<th>Yes/No</th>
<th>Notes</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
</tr>
</tbody>
</table>

1. Did the first unit in the vicinity identify unknowns and report back to the Central Alarm Station/others?

2. Did subsequent units in the vicinity observe and report?

3. How long did it take for the protestors to be identified and reported?

4. Did responders maintain continuous and active observation?

5. Did the Central Alarm Station/Secondary Alarm Station pass on situational information to responding patrols?

6. Did responding patrols communicate their actions appropriately?

7. Was the protective force supervisor dispatched to the incident location and did he/she assume command and control?

8. Did the protective force verbalize instructions and question demonstrators?

9. Were the protestors segregated, secured (handcuffed), and searched?
10. Were protestors belongings (equipment) seized and searched?  

11. Was Local Law Enforcement Agency contacted (simulated)?  

12. Were protestors questioned about other protestor’s participation?  

13. Was a search initiated for other protestors or suspicious activities?  

14. Were the actions taken at the scene appropriate and effective?  

15. Are the SPOs aware of the Use of Force model and the definitions of a Reasonable Officer’s Perception?  

16. Are the requirements each SPO shall possess on deadly force and limited arrest authority identified in the job analysis?  
10CFR1046 Appendix B, B, 4.c. (6).  

**SUPPORTING QUESTIONS**  - Assist the evaluator in determining if the evaluation criteria has been met and addresses potential follow-on questions depending on the test results.  

1. None.  

**Sequence of Activity:**  
Prior to test conduct, EA and site personnel will review the data collection form and site testing materials/plans/procedures to ensure the test parameters are understood.  

SPOs shall respond to the protestors. EA will observe the response and record results. EA will validate results with site personnel and complete the data collection form.  

**Evaluation (explanation of what was observed/reviewed and, where applicable, why the requirements were not met/identify trends):**
Appendix D: Trusted Agent Form

OFFICE OF SECURITY ASSESSMENTS
MEMORANDUM OF UNDERSTANDING AND AGREEMENT
REGARDING TRUSTED AGENT DUTIES AND RESPONSIBILITIES

This memorandum summarizes the purpose, duties, responsibilities, and relationships associated with the use of Trusted Agents (TAs) in connection with performance testing by the Office of Security Assessments (EA-22), within the U.S. Department of Energy (DOE) Office of Enterprise Assessments (EA).

1.0 Background:

1.1 Performance Tests.

When conducting performance tests in conjunction with EA appraisals, EA-22 typically employs one or more TA – appointed by the inspected facility/organization/operations office – who assist in planning and conducting the performance tests. EA-22 places a great deal of reliance on TAs – who possess an intimate knowledge of site configuration, organizations, and procedures to ensure that the necessary detailed planning, coordination, and local resource allocation are achieved on an expedited basis.

1.2 Duty of Confidentiality.

Because the TA represents both their facility/organization and is knowledgeable of sensitive performance test information (e.g., scenario details), it is critically important that the TA have the necessary authority to make appropriate decisions and that they and their managers understand the confidentiality requirements of the position.

For the purposes of the TA’s responsibilities, confidential information includes information that is both oral and written. Further, confidential information includes information that is indirectly received by the TA (for example, information that is inadvertently heard by the TA).

2.0 Responsibilities:

2.1 Representation of Inspected Facility/Organization.

TAs represent their facilities/organization in agreeing to various details of performance test planning and conduct. Such details may include but are not limited to the identification and the selection of appropriate “insiders” or insider information, the selection of realistic scenarios and scenario events, and the development of appropriate control measures and simulations. The TA must have the authority to agree to such test details on behalf of the facility/organization. Sensitive scenario details or other planning details that could compromise scenario information shall not be referred for approval to higher managers or any other individuals who are not TAs.
2.2 Collaboration with EA-22.

TAs work closely with the EA-22 planning team and site personnel to ensure that performance tests are rigorous, realistic, and safe. In this regard, TAs must willingly provide all information necessary to devise and conduct realistic, meaningful, and safe performance tests. Further, TAs take the lead in working with other site personnel to ensure that the necessary planning, coordination, and logistical requirements are accomplished; these duties shall be executed without divulging or compromising sensitive information that might affect the validity of test results.

3.0 Non-Disclosure Agreement:

As an undersigned party to this agreement, the TA understands that any and all information regarding knowledge/performance testing is confidential because of the national security significance. As a result of the unique nature of this sensitive information, there is no adequate remedy at law for any breach of the TA’s foregoing responsibilities under this agreement. The TA further understands that DOE will suffer irreparable harm in the event of any breach of confidentiality, directly or indirectly. In addition to seeking appropriate equitable relief, DOE will pursue the full range of sanctions available including termination or loss of unescorted access, as well as referral to the DOE Office of the Inspector General or the Department of Justice for potential criminal prosecution.

The obligation of nondisclosure shall continue after the conclusion of the TA’s responsibilities under this agreement until the information is no longer confidential (for example, where the information becomes publicly known through no fault of the TA or where circumstances require EA-22 to publicly release the information).

By signing below, the Trusted Agent formally acknowledges full and complete understanding of an agreement to the foregoing terms.

TRUSTED AGENT: ________________________       ________________________________
                      Print Name                      Signature/Date

SITE OFFICIAL: __________________________         ________________________________
                        Print Name                    Signature/Date

EA-22 OFFICIAL: _________________________       ________________________________
                        Print Name                    Signature/Date

Type of information: _________________________
Level of information: _________________________
Appendix E: Test Description Document Template

Trusted Agent Information Do Not Disseminate

This document describes the performance tests identified for the [DATE] [SITE] Limited-Notice Performance Test (LNPT) appraisal. A data call is identified for each test. Unclassified data call shall be delivered via Entrusted email, to the Office of Security Assessments (EA-22) Coordinator by [DATE]. Classified data call, if any, shall be available on-site during the LNPT appraisal.

1. Response to a Protestor

Description: The objective of this test is to evaluate the response of security police officers (SPOs) to a protestor.

   a. Task: SPOs shall respond to a protestor.

   b. Condition: [CONTRACTOR] performance testing trusted agents (TAs) shall conduct a protestor LNPT, per [CONTRACTOR] performance testing plans and procedures.

   c. Standard: Evaluation criteria (order requirements) are contained in the Office of Enterprise Assessments (EA) data collection form. EA will evaluate:

      (1) Applicable protective force documentation.
      (2) Execution of response plans / procedures.
      (3) Effectiveness of SPOs response to a protestor.

   d. Data call:

      (1) Protective Force documents associated with protestors.
      (2) Performance test plan.

2. [Repeat for each test.]

Please give me a call if you have any comments and/or questions.

[NAME]  EA-22 LNPT Coordinator, Contractor
XXX-XXX-XXXX
Office of Enterprise Assessments
U.S. Department of Energy
## Appendix F: Site-Specific Performance Testing Schedule Template

<table>
<thead>
<tr>
<th>Day, Date</th>
<th>Activity</th>
<th>Time</th>
<th>EA</th>
<th>Site POC</th>
<th>Location</th>
<th>Comments</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Depart for SITE</td>
<td>0730 hrs</td>
<td>EA</td>
<td>SITE POC</td>
<td>Location</td>
<td>Designated vehicles from hotel.</td>
</tr>
<tr>
<td></td>
<td>SITE arrival, move to workspace, meet trusted agents.</td>
<td>0800 - 0900 hrs</td>
<td>EA Team</td>
<td>SITE Federal TA Phone #</td>
<td>Location</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Attend Test 1 Pre-briefing &quot;Respond to Protestor.&quot;</td>
<td>0900 - 1000 hrs</td>
<td>EA Team</td>
<td>SITE Contractor Test Lead Phone #</td>
<td>Site Location</td>
<td>Receive briefing, EA team location assignments.</td>
</tr>
<tr>
<td></td>
<td>Test 1, &quot;Respond to Protestor.&quot;</td>
<td>1000 - 1100 hrs</td>
<td>EA- Test Lead</td>
<td>SITE Contractor Test Lead Phone #</td>
<td></td>
<td>EA data collection form, &quot;Respond to protester.&quot;</td>
</tr>
<tr>
<td></td>
<td>Attend Test 1 Hotwash &quot;Respond to Protestor.&quot;</td>
<td>1100- 1200 hrs</td>
<td>EA Team</td>
<td>SITE Contractor Test Lead Phone #</td>
<td>Site Location</td>
<td>Factual accuracy.</td>
</tr>
<tr>
<td></td>
<td>Attend Test 2, Pre-briefing &quot;Conduct Package Search.&quot;</td>
<td>1300 - 1330 hrs</td>
<td>EA Team</td>
<td>SITE Contractor Test Lead Phone #</td>
<td>Site Location</td>
<td>Receive briefing, EA team location assignments.</td>
</tr>
<tr>
<td></td>
<td>Test 2, &quot;Conduct Package Search.&quot;</td>
<td>1330 - 1400 hrs</td>
<td>EA- Test Lead</td>
<td>SITE Contractor Test Lead Phone #</td>
<td></td>
<td>EA data collection form, &quot;Conduct Entry Inspections.&quot;</td>
</tr>
<tr>
<td></td>
<td>Attend Test 2, Hotwash &quot;Conduct Package Search.&quot;</td>
<td>1500- 1600 hrs</td>
<td>EA Team</td>
<td>SITE Contractor Test Lead Phone #</td>
<td>Site Location</td>
<td>Factual accuracy.</td>
</tr>
<tr>
<td></td>
<td>End of day meeting.</td>
<td>1600 - 1630 hrs</td>
<td>EA Federal Lead EA Team</td>
<td>SITE Federal TA Phone # SITE TAs</td>
<td>Site Location</td>
<td>Factual accuracy.</td>
</tr>
</tbody>
</table>
Note: Specific dates and times are dependent upon the scope and type of limited-notice performance tests to be conducted.
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Appendix G: Report Template

[Insert header/footer – Typically Unclassified Controlled Nuclear Information or Official Use Only]

MEMORANDUM FOR [NAME]

[TITLE]

[ORGANIZATION]

FROM: [NAME]

[TITLE]

[ORGANIZATION]

SUBJECT: Results of Limited-Notice Performance Tests at the [SITE] conducted on [DATES]

Introduction and Background

The U.S. Department of Energy (DOE) independent Office of Enterprise Assessments (EA) uses limited-notice performance tests (LNPTs) to provide realistic evaluations of safeguards and security (S&S) response capabilities at DOE sites. The LNPT process focuses on selected S&S components, in contrast to multi-topic assessments, which provide a more complete assessment of the overall S&S system. The LNPT program is managed in accordance with Departmental directives and EA protocols, addresses a broad range of threats at selected sites, and evaluates key aspects of S&S performance and programmatic health. A goal of this program is to gather data with minimal advance notice to personnel and facilities being tested, in order to provide a realistic appraisal under actual operating conditions. The LNPTs are conducted on site, typically over a period of two to three days, and consist of several activities designed to safely test specific elements of the organization’s S&S program.
This memorandum summarizes the results of [#] LNPTs that EA conducted at the [SITE] on [DATE]. Federal staff members from the [SITE FEDERAL OFFICE] and designees from [SITE CONTRACTOR], which provides physical security and protective force support to the SITE, served as “trusted agents” (TAs). Site TAs supported the conduct of the LNPTs by establishing test venues and coordinating appropriate safety, administrative, and logistical requirements in support of the test objectives.

The results of these LNPTs may include best practices, positive attributes, findings, deficiencies, and opportunities for improvement based on the EA team’s observations. Positive attributes represent notable observations favorable to the activity being observed. A finding represents a deficiency that warrants a high level of management attention that, if left uncorrected, could adversely affect the DOE mission, worker safety and health, the public, or national security. Corrective action plans must be developed for findings and managed in accordance with DOE requirements (i.e., DOE Order 226.1B, Implementation of Department of Energy Oversight Policy; DOE Order 227.1A, Independent Oversight Program; DOE Order 414.1D, Quality Assurance; and DOE Order 470.4B, Safeguards and Security Program). A deficiency is an inadequacy (e.g., failure to implement a requirement or meet a performance standard) identified during an appraisal. Deficiencies may serve as the basis for one or more findings. Opportunities for improvement are suggestions offered by EA assessors on approaches that line managers may consider to improve program performance, but are not directed actions.

EA developed data collection worksheets for each LNPT, describing the task, conditions, and standards for the test and identifying evaluation criteria derived from DOE directives and related criteria from applicable DOE standards, guides, lesson plans, and other sources. The objectives of the (#) LNPTs were to evaluate: (List objectives).

While conducting LNPTs at [SITE], EA identified several positive attributes, deficiencies, and opportunities for improvement for management’s awareness and consideration.

**LNPT Activities and Results**

**Test 1 – [Title]**

**Description:** The purpose of this test was to [INSERT brief description of test]

**Conduct/Results:**

**Positive Attributes:**

**Findings:**

**Deficiencies:**

**Opportunities for Improvement:**

Repeat for each test conducted.
Conclusions – (Example only – Conclusions should be based on the specific testing results.)

The [#] LNPTs conducted at [SITE] were designed to assess elements of the organization’s protection strategy in a manner that replicated potential “real world” threats by eliciting responses from personnel who were given little or no advance notice of the activities. Overall, responses met the evaluation criteria and reflected an appropriate level of training and adherence to organization security policies. Two findings and one deficiency were identified, requiring further management attention to ensure that appropriate actions are taken to strengthen the overall program. Additionally, three opportunities for improvement were identified for management’s consideration.

EA wishes to acknowledge the assistance provided by the [SITE OFFICE] Federal staff, as well as [SITE CONTRACTOR] personnel who were instrumental in conducting these tests in an objective, confidential manner. If you have questions or concerns related to the EA LNPT initiative or the LNPT results, please contact me at (XXX) XXX-XXXX or the LNPT Program Manager, [NAME] at (XXX) XXX-XXXX.

cc:
Appendix H: LNPT Briefing Template

[Insert header/footer – Typically Unclassified Controlled Nuclear Information or Official Use Only]

Office of Enterprise Assessments
Conduct of Limited Notice Performance Tests at the [SITE]

[DATE]

Summary

EA-22 evaluated [#] LNPTs conducted at the [SITE] in [SITE LOCATION] on [DATE].

[INSERT TEST RESULTS]

[EXAMPLE SUMMARY] Overall, this appraisal identified two findings and one deficiency requiring management attention, as well as three OFIs for management’s consideration.

Scope and Conduct

The U.S. Department of Energy (DOE) Office of Enterprise Assessments (EA) uses limited-notice performance tests (LNPTs) to provide realistic evaluations of safeguards and security (S&S) response capabilities in contrast to multi-topic assessments, which are more complete assessments of the S&S system. The LNPT program is managed in accordance with Departmental directives and EA protocols, addresses a broad range of threats at select sites, and evaluates key aspects of safeguards and security performance and programmatic health. A goal of the program is to safely collect data under conditions that are as close to normal day-to-day operations as possible (with minimal advance notice to tested personnel), while minimizing the impact on mission operations. For each LNPT, forms were developed that describe the task, conditions, and standards, as well as the DOE directives-based evaluation criteria. The details and results of each test were documented in a report specifying best practices, positive attributes, findings, deficiencies, and opportunities for improvement (OFI).
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