

DEPARTMENT OF ENERGY
HEADQUARTERS OPERATIONS SECURITY PROGRAM
GUIDANCE FOR CONTRACTORS AND SUBCONTRACTORS

1. PURPOSE

- a. This document provides guidance for establishing an Operations Security (OPSEC) Program for Department of Energy (DOE) contracts and subcontracts associated with the DOE Headquarters. It contains statements of purpose, scope, and applicability. It discusses protection levels and the methodology to be used in determining these levels, describes and lists the specific program components which apply to each level, and includes specific guidance for developing an effective, appropriate OPSEC program at DOE Headquarters contractor and subcontractor facilities.
- b. This document is published to provide a means to appropriately structure an OPSEC program at DOE Headquarters contractor facilities, and subcontractor facilities, where deemed necessary or appropriate. Implementing an OPSEC program at these facilities will assist in the prevention of inadvertent release of information that could, if collected by foreign intelligence operations or other adversaries, provide information concerning Departmental sensitive or classified activities, projects, operations or technologies.
- c. This guide identifies a range of OPSEC structure components to be used by contractors and subcontractors of all sizes to develop an appropriate and effective OPSEC program. The guide is to be used by the Headquarters OPSEC Manager to determine OPSEC structures for Management and Operating (M&O) contractors, direct and prime support contractors to Headquarters, and by contractor OPSEC Managers for their DOE contracts.
- d. It is the intent of this OPSEC program guidance that OPSEC protections afforded at DOE Headquarters, M & O contractor, direct and prime support contractor levels be extended to contractors and subcontractors at lower levels. It is also the intent of this guidance that OPSEC protections installed at higher contracting levels not be compromised by activities occurring at lower contracting levels.

2. SCOPE

M & O contractors, direct and prime support contractors to Headquarters are required by the security clause incorporated in their contracts to comply with all DOE Safeguards and Security directives, including DOE Order 471.2, INFORMATION SECURITY PROGRAM, dated September 26, 1995, Chapter II, Operations Security Program.

3. APPLICABILITY

- a. Recognizing that contractors and subcontractors vary in size and resources, and contracts vary in length and scope, OPSEC programs implemented at contractor and subcontractor facilities should be designed to afford at least a minimum level of OPSEC protection and understanding for all contracts and subcontracts, with increasing levels of OPSEC protection and understanding applied for more sensitive contracts and subcontracts. Therefore, all contracts and subcontracts, under DOE Headquarters security cognizance, and dealing with or involving classified or sensitive unclassified information or material will be subject to review.
- b. Operations Security is an area of interest of Headquarters Security Survey Teams who conduct security surveys of facilities and organizations which have DOE security interests.
- c. Headquarters Program Offices (elements) responsible for a contract, and by extension a subcontract, should identify early in the procurement process whether the procurement requires the application of OPSEC protection. Current contracts should be reviewed by the responsible Headquarters Program Office (element) to determine whether or not the retroactive application of OPSEC protection is required.

4. REFERENCES

- a. National Security Decision Directive (NSDD) 298, dated January 22, 1988, National Operations Security Program.
- b. DOE Order 471.2, dated September 26, 1995, INFORMATION SECURITY PROGRAM, Chapter II, Operations Security Program.
- c. Department of Energy Operations Security Procedural Guide, dated September 1992.
- d. DOE Safeguards and Security Standards and Criteria, dated November 26, 1993, Chapter VI, Attachment E, Operations Security.
- e. DOE Order 470.1, dated September 28, 1995, SAFEGUARDS AND SECURITY PROGRAM, Chapter IX, Survey Program.
- f. DOE Guide 470.1-2, dated March 15, 1996, SAFEGUARDS AND SECURITY SURVEY AND SELF-ASSESSMENT GUIDE.
- g. Safeguards and Security Glossary of Terms, dated December 18, 1995.

5. DISCUSSION

- a. OPSEC is a nationally-mandated program as promulgated by National Security Decision Directive 298 (NSDD 298), signed on January 22, 1988. NSDD 298 has been implemented within DOE most recently by DOE Order 471.2. OPSEC is defined in the Safeguards and Security Glossary of Terms as:

"A process designed to disrupt or defeat the ability of foreign intelligence or other adversaries to exploit sensitive Departmental activities or information and to prevent the inadvertent disclosure of such information."

- b. OPSEC is not "just another security program." Quoting from NSDD 298:

"Security programs and procedures already exist to protect classified matter. However, information generally available to the public as well as certain detectable activities reveal the existence of, and sometimes details about, classified or sensitive undertakings. Such indicators may assist those seeking to neutralize or exploit U.S. Government actions in the area of national security."

- c. OPSEC is a systems analysis process employing elements of traditional security, intelligence, counterintelligence, and deception. The risk management process is an integral part of the OPSEC analysis. It consists of asset valuation and judgment about the consequence of loss; identification and characterization of the threats to specific assets; identification and characterization of the vulnerability of specific assets; identification of countermeasures, costs and tradeoffs; and risk assessment. The goal of OPSEC is to keep DOE critical and sensitive information from our adversaries by discovering unguarded (unclassified) pathways that may lead to critical and sensitive (classified or unclassified) information, also known as vulnerabilities, and implementing cost-effective countermeasures that will eliminate or minimize the vulnerabilities.

(1) An example of a pathway might be unclassified or sensitive unclassified information discarded in normal trash receptacles. The collection of this information and its ultimate collation could lead to the exploitation of such information by a determined adversary who has access to normal trash receptacles, and is given the opportunity to retrieve material for later analysis. The collected information, during subsequent analysis, could provide the adversary with indicators leading to a classified or sensitive unclassified activity, operation, or technology.

(2) An example of a cost-effective countermeasure, for this specific instance, would be the use of a shredder to shred the material before it is placed in the normal trash. An alternative, if the purchase or use of a shredder is considered impractical, would be to tear the material into several small pieces before it is placed in trash receptacles.

6. PROGRAM GUIDANCE

This section provides guidance for determining at what protection level a contractor's or subcontractor's OPSEC program must provide.

- a. Program Level Structures. OPSEC programs should be established at one of three levels. Level I requires the minimum level of OPSEC protection and guidance as identified in DOE Order 471.2. Level II requires a higher level of OPSEC protection and guidance than Level I for larger and/or more sensitive contracts and subcontracts. Level III requires a complete OPSEC program as implemented at DOE Headquarters.
- b. Evaluation Requirements. An evaluation is required to determine the appropriate OPSEC program level assignment. The evaluation should be performed by the DOE Headquarters Program Office (element) responsible for the contract or subcontract and the Headquarters OPSEC Manager. Direct and prime support contractor OPSEC and/or Security Managers, in consonance with the DOE Headquarters Program Office, should evaluate subcontracts to determine the appropriate subcontract OPSEC program level.
- c. Facility/Contract Categories. Categories that should be applied in determining whether a contractor or subcontractor must establish and maintain an OPSEC program for a Headquarters contract or subcontract are:
 - (1) Facility Importance Ratings (A, B, C and PP) are developed and assigned by DOE Headquarters for every facility having a security interest under DOE Headquarters cognizance. Facilities having a D or E importance rating do not require an OPSEC program. The ratings are described in DOE Guide 470.1-2. This information can be obtained from the Headquarters OPSEC Manager.
 - (2) Highest Classification held identifies whether Top Secret, Secret, or Confidential information (whether Restricted Data, Formerly Restricted Data, or National Security Information) or material is involved in the contract or subcontract. This category also includes information considered to be sensitive unclassified or proprietary.
 - (3) Security Interest/Sensitivity describes whether there is a high, medium or low foreign intelligence or other adversary interest or sensitivity about the activities or outputs of the contract or subcontract. This determination is made in coordination with intelligence liaisons, classification officers, and the associated program office representatives.
 - (4) Number of Cleared Employees working on the contract or subcontract.

- (5) Time Period and Dollar Amount of the contract or subcontract.
- (6) Currently Active describes whether or not the contract or subcontract is in the procurement cycle, being performed, or terminated/close to being terminated.
- d. Assignment of Requisite Protection Levels. General guidance listed below is provided to assist in the evaluation process for assigning contractors and/or subcontractors to a particular program level, either Level I, Level II, or Level III. A brief description of OPSEC activities associated with each level is included.

It is the intent of this guidance that the highest level of OPSEC protection and understanding be applied to the contract and/or subcontract that is consistent with each contract's/subcontract's sensitivity and resources. Special Access Programs (SAPs) require Level II at minimum. (NOTE: It is expected that some flexibility will be used when assigning a contract and/or subcontract to a specific level.)

| OPSEC Level Guidance | Level I | Level II | Level III |
|--|----------------|------------------|--------------------|
| Facility Importance Rating (DOE) | C or PP | B or C | A, B or C |
| Highest Classification Required | Secret | Secret or SAP | Top Secret or SAP |
| SNM Category/Attractiveness | None | III or None | I, II, III or None |
| Security Interest/Sensitivity | Low | Medium | High |
| Number of Cleared Employees (contract) | < 10 | 10-50 | > 50 |
| Dollar Amount (contract) | < \$500K | \$ 500K to \$ 5M | > \$ 5M |
| Active Contract | Yes | Yes | Yes |
| Other Agency Security Cognizance | No | No | No |

- e. OPSEC Activities Associated With Protection Levels. The minimum activities required under each of the three levels are listed below. The "X" under each Level column identifies those activities that need to be accomplished for the specific level. The activities listed were developed from the DOE OPSEC Safeguards and Security Standards and Criteria and can be used to establish an appropriate OPSEC program level for all DOE Headquarters contracts and/or subcontracts.

| OPSEC Activities Associated With Protection Levels. | LEVEL | | |
|---|--------------|-----------|------------|
| | I | II | III |
| 1. Determination of the need for an OPSEC program has been determined by the Headquarters Program Office (element) responsible for the procurement. | X | X | X |

| OPSEC Activities Associated With Protection Levels. | LEVEL | | |
|---|-------|----|-----|
| | I | II | III |
| 2. DOE Order 471.2 and other DOE OPSEC guidance is on hand or readily available. | X | X | X |
| 3. Contractor/subcontractor has an OPSEC Plan that meets guidelines set forth in DOE 471.2. | | | X |
| 4. Contractor/subcontractor has a DOE-approved Security Plan that includes OPSEC program purpose and activities. | | X | X |
| 5. Procedures are in place for the OPSEC Plan to be reviewed and approved by contractor management on a periodic basis. | X | X | X |
| 6. OPSEC Plan has identified goals and milestones, with a fixed timetable. | X | X | X |
| 7. An OPSEC Manager is appointed/designated. | | X | X |
| 8. An OPSEC Point-of-Contact (POC) is appointed/designated. | X | | |
| 9. The OPSEC Manager ensures that OPSEC threat briefings, education and training are provided, and that OPSEC Assessments are conducted. | | | X |
| 10. The OPSEC Manager/POC ensures that OPSEC threat briefings, education and training are provided. | X | X | X |
| 11. The OPSEC Manager/POC has the authority commensurate with the responsibility for developing and implementing local OPSEC programs. | X | X | X |
| 12. The OPSEC Manager/POC, as the designated representative of management organizations, establishes/maintains contact with personnel administering the contract or subcontract. | X | X | X |
| 13. There is a formally designated OPSEC Working Group that meets on a regular basis. | | | X |
| 14. Minutes or records of OPSEC Working Group meetings are maintained for historical and continuity purposes | | | X |
| 15. The OPSEC Working Group develops and prioritizes OPSEC Program objectives. | | | X |
| 16. The local OPSEC threat statement, to include sub-contractor activity as appropriate, is developed, where necessary. (NOTE: Threat Statement is generic at Level I; more specific at Levels II and III.) | X | X | X |
| 17. An appropriate Critical Program Information & Indicators (CPI&I) is developed for the contract or subcontract | X | X | X |
| 18. CPI&I lists are developed, prioritized, and disseminated to appropriate upper management and key personnel. | X | X | X |
| 19. CPI&I lists are modified to accommodate changes in technology and/or projects, new programs, and variances in the threat. | | X | X |
| 20. The OPSEC Working Group annually reviews the Threat Statement, CPI&I lists, and updates as appropriate | | | X |
| 21. A site-specific OPSEC Assessment schedule is developed. | | | X |
| 22. If conducted (required for Level III), OPSEC Assessments are performed in accordance with DOE 471.2, the DOE OPSEC Procedural Guide, and: | X | X | X |
| - A record of the identified vulnerabilities is maintained as part of the OPSEC Program files; | X | X | X |

| OPSEC Activities Associated With Protection Levels. | LEVEL | | |
|--|-------|----|-----|
| | I | II | III |
| - Identified vulnerabilities are analyzed and prioritized; | X | X | X |
| - Countermeasures for identified vulnerabilities have been developed for implementation; | X | X | X |
| - Identified vulnerabilities and recommended counter-measures are conveyed to program personnel, sub-contractor personnel (if appropriate), and implemented as determined by contractor management | X | X | X |

7. PROGRAM REVIEW AND APPROVAL

- a. Contractors required to establish an OPSEC program should provide program documentation to DOE as part of their Facility Security Plan for review and approval. A separate OPSEC Plan is required only for contracts meeting Level III criteria and Special Access Programs.
- b. Subcontractors required to establish an OPSEC program as part of a larger contract should respond to the prime contractor regarding whether separate OPSEC program documentation will be required, or whether the prime contractor will provide OPSEC guidance directly to each subcontractor.

8. OPERATIONS SECURITY POINT OF CONTACT

The OPSEC Representative and/or the Headquarters Security Officer of the Headquarters Element your contract supports, or the DOE Headquarters OPSEC Manager (301-903-4031) may be contacted for any additional information regarding the guidance contained in this document.