

# Inside SSA

Office of Security and Safety  
Performance Assurance

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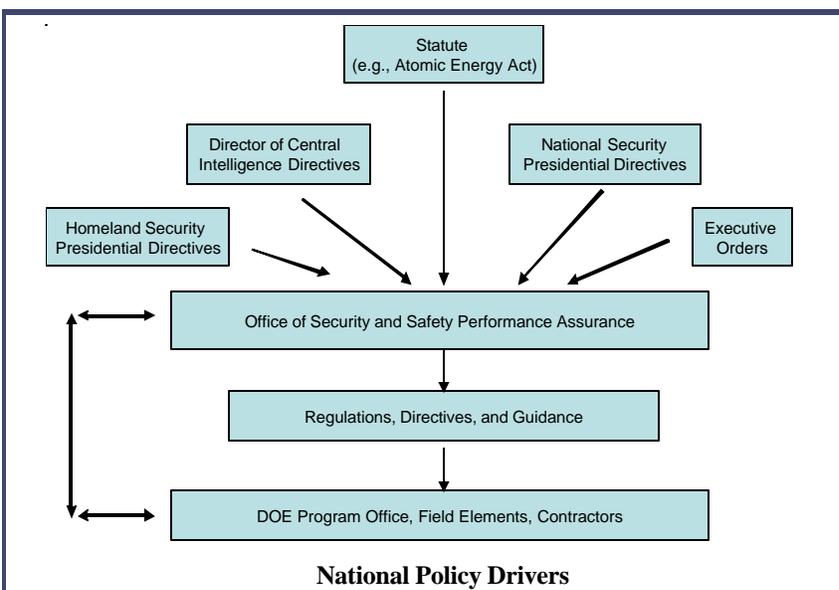
## DOE Safeguards and Security Policy: How it is Created and Maintained

The Office of Security and Safety Performance Assurance (SSA) is responsible for developing and promulgating clear and consistent safeguards and security policies governing the protection of national security and other critical assets entrusted to the Department of Energy (DOE). To meet this responsibility, these policies must be based on a sound understanding of both the threat and DOE's capabilities to respond to it. Additionally, to be effective, these policies must be implemented by informed customers who have a vested interest in ensuring the consistent application of policy and are involved in the continuous improvement of those policies. In this issue of *Inside SSA*, we examine how safeguards and security policy is developed in DOE, with special emphasis on coordination among the Department's many elements as policy is promulgated, implemented, and continuously improved.

### Policy Sources

As shown in the figure below, the drivers for new policy and changes to current policy can come from many sources, both internal and external to the Department. Among the external sources are new laws enacted by Congress, Executive Orders, and Homeland and National Security Presidential Directives. In the case of national-level policy, there is normally some level of coordination with DOE and other Federal departments and agencies before the national policy is promulgated. For Presidential policies, the usual coordination mechanism is an interagency working group with members from the Executive Branch elements that will be affected by the policy.

The forum for interagency coordination is the Policy Coordination Committees (PCC), established by



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National Security Presidential Directive-1 under the National Security Advisor, to cover a wide range of topical areas. Of primary interest for DOE safeguards and security policy is the Records Access and Information Security Policy Coordinating Committee, which consists of six standing working groups that address specific topical areas such as personnel security, classification management, physical security, information systems security, and the National Industrial Security Program Policy Advisory Committee. Ad hoc working groups are also formed as the need arises. Typically, DOE has voting representation when a Departmental interest is involved, and DOE working group members often use the same mechanisms to represent the Department's interests in developing Government-wide policy that DOE uses for internal policy development (discussed below). The important point is that even when the policy driver is from a source outside DOE, the Department can present its interests and concerns during policy development.

When legislation drives the development of policy, preliminary coordination focuses more narrowly on interactions between high-level DOE representatives and Congressional staff. Again, DOE representatives strive to address the concerns of all Departmental elements that may be affected by proposed legislation.

Internal policy drivers can take many forms. New or amended policy may result from analysis of policy implementation in the field by the Office of Independent Oversight and Performance Assurance. The need for new or amended policy may also become apparent if a serious security issue rises to the level of Secretarial interest—for example, the policy

**Quality Panels**

Quality Panels, consisting of subject matter experts from throughout the Department, have been formed to cover a wide spectrum of safeguards and security topical areas, including:

- ◆ Program Planning and Management
- ◆ Protection Program Operations
- ◆ Personnel Security
- ◆ Information Security
- ◆ Material Control and Accountability
- ◆ Protective Force
- ◆ Training

**What is RevCom?**

The Review and Comment (RevCom) System is the DOE coordination system for developing administrative directives. The system makes it easy for DOE Federal and contractor organizations to comment on draft directives. It is maintained as an open system where the content available through [revcom.doe.gov](http://revcom.doe.gov) represents a variety of opinions and judgments to be considered by DOE management in setting official DOE policy. Officially approved DOE policy is posted on <http://www.directives.doe.gov/>.

**How does RevCom work?**

- ◆ The DOE Directives Management Team (ME-43) posts new draft DOE directives and sets the due dates in the RevCom system. RevCom automatically sends an alert to all DPCs.
- ◆ Using RevCom, the DPCs assign subject matter experts (SMEs) to comment on the draft directive, and set comment due dates for the SMEs.
- ◆ The Headquarters lead program secretarial office (LPSO) DPCs consolidate comments from all their reporting offices and ensure that the consolidated comments mirror the views of their LPSO/Secretarial Officer. The consolidated/endorsed comments are then submitted to the directive writer via RevCom.
- ◆ The directive writer views the comments placed on RevCom, and responds to and resolves any major issues. The directive writer then submits proposed comment resolutions to the commenting organizations via RevCom.
- ◆ DPCs accept or reject the proposed resolutions on-line in RevCom.
- ◆ Once all comments are resolved, the Directives Management Team forwards the RevCom coordinated draft directive to the Secretary or Deputy Secretary for approval, then issuance.

on classified removable electronic media. In addition, changes in existing policy, such as the recent changes to the Postulated Threat and the DOE Design Basis Threat, may drive further policy modifications. Finally, the field may propose policy improvements to the SSA Office of Safeguards and Security Policy for action.

**Policy Development Within DOE**

The Office of Safeguards and Security Policy (SO-10.1) is responsible within SSA for collecting all safeguards and security drivers, both internal and external, and using them to formulate DOE safeguards and security policy. Formal DOE policy may be issued as a regulation, through the Federal Register for inclusion in the Code of Federal Regulations, or as a Departmental directive.

SO-10.1 represents DOE in the PCC working groups for externally driven policy, reviews draft legislation and other agency policy, and closely follows national policy developments. SO-10.1 personnel also maintain vital communications across the DOE complex to help distribute proposed national-level policy and collect complex-wide feedback. One of the most effective communications links has been the DOE Safeguards and Security Quality Panels.

**Quality Panels**

In the early 1990s, the Office of Security established Safeguards and Security Quality Panels to bring experts together to resolve

issues relating to policy and implementation. The Quality Panels have been effective in identifying the need for new or amended policies and communicating with policy developers. By calling on subject matter experts throughout the Department, including the National Training Center and policy and oversight functions, the Quality Panel process helps assure that draft policies receive wide review within the Department.

To promote full participation and interaction, SSA is looking at ways to broaden representation on the Quality Panels. SSA is now aggressively pursuing the possibility of extending the Quality Panels through web-based forums that will provide ongoing, real-time mechanisms for posting and exchanging ideas. This approach frees the Quality Panels from some constraints of time, resources, and numbers of participants and is expected to further improve this highly effective process.

**Formal Policy Development**

The formal process for coordinating draft policy throughout the Department is the DOE Review and Comment System, known as RevCom (see box above). Using RevCom allows DOE the widest possible participation in formal policy development in an organized and documented manner. The term “policy,” in the context of RevCom, refers to Policies, Notices, Orders, Manuals, and Guides found in the numbered directives structure. RevCom is not used for the development of DOE

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regulations, which are issued through the Federal Register process for public review and comment and ultimately in the Code of Federal Regulations.

### Continuing Policy Improvement

The creation of SSA brought the Office of Security and its attendant policy development function under the same umbrella organization as the Office of Independent Oversight and Performance Assurance, strengthening the links between policy development and policy implementation assessment. Close communication between these offices enhances continuous policy improvement. As a supplement to assessment processes, such as inspections, surveys, self-assessments, Inspector General audits, and reviews from such outside organizations as the General Accounting Office and the Information Security Oversight Office, the enhanced communication between the oversight and policy arms of SSA improves the policy development process.

In the review and analysis of Departmental safeguards and security policy, all these processes culminate in the Annual Assessment of Policy. Again, with the closer relationship between the oversight and policy development elements of SSA, this annual report will incorporate lessons learned that will be addressed rapidly and effectively through policy improvements.

This new synergy between policy implementation assessment and policy development is leading to other improvements in policy. The safeguards and security policy streamlining initiative, discussed below, has provided additional impetus for several of these assessment tools. In the future, SSA expects to develop an electronic version of the streamlined policy documents that will provide informational links to policy drivers, maintain detailed records of policy changes, and form the basis for performance indicators and evaluative criteria that can be used to assess the success of safeguards and security policy and its implementation.

### Streamlining DOE Safeguards and Security Directives

Safeguards and security policy streamlining is an SSA initiative to combine the 27 current safeguards and security directives, along

with numerous guidance memoranda, into a concise set of documents: an umbrella Order outlining the responsibilities and authorities, 6 topical manuals, and a reference manual. Streamlining—condensing the number of policy documents—will make it easier for users to locate relevant guidance. It will also assure that any change in one aspect of safeguards and security policy is correctly and consistently coordinated with any other policies that may be affected by that change.

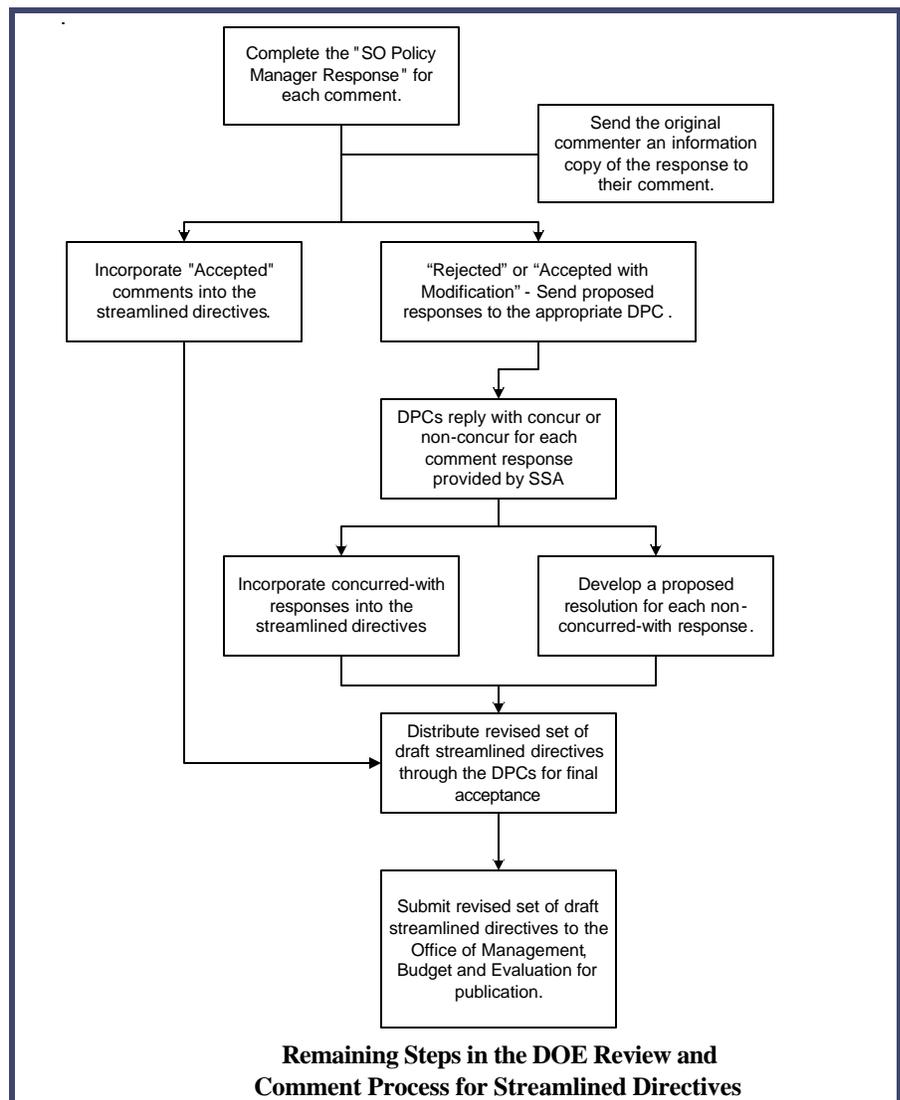
### The Review Process

Due to the size and complexity of the streamlining effort, the DOE RevCom system could not be used for the formal review and comment process. A chief concern is that the aggregated safeguards and security policies, some entailing detailed procedures, are designated Official Use Only (OUO). Because RevCom cannot process OUO material, an alternative

method for distribution, review, and comment resolution was devised.

In May 2004, the draft streamlined documents were distributed on compact disks and in hard copy to the same Directives Points of Contact (DPCs) used in the RevCom process. The DPCs, in turn, distributed the materials within their organizations, with the same distribution pattern as RevCom, helping assure the widest possible distribution and the most inclusive review of the material.

The final comments are now in the hands of the policy developers in SO-10.1, who are coordinating and managing the comment resolution process in accordance with RevCom requirements. In total, 1911 major comments and 1008 suggested comments were sent in from across the DOE complex through the DPCs. The ongoing review process is summarized in the flow chart below.



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## Upcoming Activities

### Design Basis Threat (DBT) Site Assistance Visits:

- Y-12
- Savannah River Site
- Nevada Test Site
- Oak Ridge National Laboratory
- Office of Secure Transportation
- Los Alamos National Laboratory

### ES&H Inspections:

- Pantex
- Sandia National Laboratories/New Mexico
- Argonne National Laboratory - East (ANL-E)

### Emergency Management, Safeguards and Security, and Cyber Security Inspection:

- Sandia National Laboratories/New Mexico

### Cyber Security Inspections:

- Western Area Power Administration
- Southeastern Power Administration



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SSA created a database to document and track each comment and all subsequent actions related to that comment. These functions are especially useful because a single comment in one manual may have repercussions for the umbrella order and some or all of the other manuals. All comments have been entered into the database, and an initial assessment has been completed. Most of the comments appear not to require further research or coordination between multiple offices. SSA staff are now completing the “resolution” section of the database page for each comment, as shown below. For the more complex issues, SSA has initiated action to facilitate their resolution.

Comment ID	1933	Commenter	Science, Rebecca	Org Code	DOE M 470 S-4	Report by Citation	View Commenter Citation
Manual	DOE M 470.S-4	Comment Date	Science, Rebecca				
Citation	Attachments						
Comment	Stated references are incorrect.						
Commenter Proposed Response	Line 2 should reference paragraph 1 and line 3 should reference paragraph 2.						
Current Status	Response Completed						12/15/2004
Assigned To	William Security	Accepted					
SO Policy Manager Response	Agree with the comment and proposed response. Corrections will be made accordingly.						
DPC Concurrence	Concur.						
Resolution	Not applicable - Concurrence achieved.						
Notes	Similar to Comment #1313.						
Status	Status Date	Status					
	12/01/2004	Comment Received					
	12/01/2004	Comment Reviewed- Research Required					
	12/01/2004	Response Completed					

**S-4 Comments by Citation**

Science, Rebecca

Find Comment By Comment ID

E-mail for Discussion

Current Comment

Complex  
 Direct  
 Editorial  
 Undefined

**Return**

## Finalizing the New Directives

The next step is to send the proposed comment resolutions to the DPC for the office where the comment originated, in order to ensure full coordination. Communications will be accomplished electronically, with the person originating the comment being sent an information copy.

If you submitted a comment on the streamlined directives that was forwarded by your DPC, and if the decision was to “accept with modification” or “reject” it, you will be hearing from SO-10.1. Web-based facilitation tools, telephone conferences, and face-to-face meetings may be used in resolving comments. SO-10.1 may also contact you for more information or clarification. At a minimum, you will receive an electronic copy of the comment response sent to your DPC. If you submitted a comment but receive no further communication on the matter, please contact your DPC to determine its status.

After resolving all comments, SO-10.1 will distribute the revised directives, again through the DPCs for further distribution as they deem necessary. Everyone can then review and comment on all changes, and determine how individual changes affect the entire document set. After concurrence on the revised draft directives, they will be forwarded to the Office of Management, Budget and Evaluation for publication. With the assistance of all those who submitted comments, the DPCs, and policy developers, SSA intends to issue the final streamlined directives by the third quarter of fiscal year 2005.

When the new streamlined directives are released, users can look forward to many benefits—most notably, ease of use. With all safeguards and security policy organized by topical area, finding just the policy or procedure you’re looking for will be much simpler. The consolidation of the directives will also facilitate updating; the links established in the comment resolution process will allow easier coordination of changes throughout the order and all seven manuals. ■

## Solicitation of Comments, Questions, and Suggestions

SSA welcomes your thoughts about our newsletter. Please send or phone comments, questions, or suggestions to:

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This newsletter can be found on the SSA web site at <http://www.ssa.doe.gov>