

## **SLAC National Accelerator Laboratory**



Operated by Stanford University for the U.S. Department of Energy

#### DOE Order 470.4B – Safeguards and Security Program (1/17/2017)

**Site Compliance Plan** (2/11/2021)

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#### Introduction

This Site Compliance Plan (SCP):

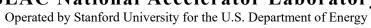
- a) corresponds with the version of the DOE Order on Safeguards and Security Program listed in the Prime Contract,
- b) outlines the specific CRD sections that apply to SLAC and the respective method of compliance clarifies that the Lab "In compliance". The applicable sections identified herein define SLAC's Baseline Level of Protection (BLP) as it correlates with the CRD and the SLAC Site Security Plan (SSP), states how the Laboratory complies with applicable requirements as tailored to the risks at the Laboratory,
- c) correlates and compares SLAC's Safeguards and Security Program and Site Security Plan with the CRD of this Order, and
- d) documents recurring deliverables\* and DOE-approved methods of compliance for applicable requirements.

#### Impact on the Contract:

Under the SCP, sections of the Order are incorporated into the Contract as-is, unless the SCP indicates that a section or portion thereof is inapplicable, or the section has been changed. Thus, for example, if "in compliance" is listed next to a section, that section is incorporated into the Contract as-is. However, where an SCP indicates that a section or portion thereof is inapplicable, the section or portion thereof is excluded from the Contract. In addition, where a section or portion thereof is applicable, but changes to the section have been agreed by the Parties, the section, as modified by the Parties, shall be incorporated into the Contract. The SCP also memorializes the Parties' agreement on how SLAC will comply with sections of the Order (whether or not modified).



## **SLAC National Accelerator Laboratory**





#### **DOE Order 470.4B – Safeguards and Security Program (1/17/2017)**

**Site Compliance Plan** (2/11/2021)

#### Attachment 1 - Contractor Requirements Document: DOE 470.4B, Safeguards and Security Program Planning

§	Requirement from	Compliance	Method	Deliverables*			
	Attachment 1 – CRD	Status	of C	Item	Frequency	Due	Recipient
			Compliance			Date(s)	(e.g., BASO)
1	REQUIREMENTS						
1	a. Safeguards and security programs must be developed and maintained that incorporate the requirements contained in this CRD and its associated attachments.	In compliance	SLAC has a Security program and will comply with all applicable requirements in the requirement of Attachment 1 of this order. SLAC has an approved Site Security Plan (SSP).	N/A	N/A	N/A	N/A
1	b. Programs associated with each topical area found in the attachments to this CRD must be implemented in accordance with the requirements stated for that topic.	N/A	SLAC does not have any Category I special nuclear material or targets subject to radiological or toxicological sabotage.	N/A	N/A	N/A	N/A
1	c. Contractors at facilities/sites that possess nuclear weapons and components, Category I special nuclear material or targets subject to radiological or toxicological sabotage must develop defensive plans that apply the DOE Tactical Doctrine as set forth in Attachment 4. Defensive plans must focus on the protection of sensitive assets while assuring the maximum survivability of protective force (PF) personnel.	N/A	SLAC does not have any Category I special nuclear material or targets subject to radiological or toxicological sabotage.	N/A	N/A	N/A	N/A
1	d. Incidents of security concern must be addressed in accordance with the requirements found in Attachment 5 and reported in accordance with applicable laws and regulations.	In progress 6/30/2021	SLAC does not do any classified work or material on site. We have established incident reporting protocols. All security/safety concern are reported to senior management. SLAC will cover the incidents of security concern in our contract with LLNL. In addition, SLAC will create an	N/A	N/A	N/A	N/A

<sup>\*</sup>Deliverables: Data delivered to DOE or other external agency (e.g., recurring reporting, external database entries)



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	Attachment 1 – CRD	Status	of	Item	Frequency	Due	Recipient
			Compliance			Date(s)	(e.g., BASO)
			internal protocol.				
1	e. Interfaces and necessary interactions between S&S programs and other disciplines such as safety, emergency management, classification, counterintelligence, facility operations, cyber system operations and security, and business and budget operations including property management must be identified and clearly defined; and must be maintained throughout the lifecycle of protective measures to ensure that S&S planning and operations work together effectively with these disciplines. Sensitive Compartmented Information is under the purview of the Office of Intelligence and Counterintelligence; necessary interfaces and interactions between that office and S&S programs must also be identified, defined, and maintained	In compliance	SLAC Security is integrated with the emergency and safety departments and interacts with all other disciplines at SLAC including safety, counterintelligence, facility operations, and cyber systems.	N/A	N/A	N/A	N/A
1	f. S&S programs must incorporate a risk-based approach to protect assets and activities against the consequences of attempted theft, diversion, terrorist attack, industrial sabotage, radiological sabotage, chemical sabotage, biological sabotage, espionage, unauthorized access, compromise, and other acts that may have an adverse impact on national	In compliance	SLAC security uses graded and risk approach to protect assets and activities and personal.	N/A	N/A	N/A	N/A

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**Site Compliance Plan** (2/11/2021)

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	Attachment 1 – CRD	Status	of	Item	Frequency	Due	Recipient
			Compliance			Date(s)	(e.g., BASO)
	security, the environment, or pose significant danger to the health and safety of Department of Energy (DOE) Federal and contractor employees or the public.						
	g. S&S programs must be tailored to address site-specific characteristics and requirements, current technology, ongoing programs, and operational needs to achieve acceptable protection levels that reduce risks in a cost-effective manner.		SLAC has an approved SSP that covers our security posture and site-specific requirements.	N/A	N/A	N/A	N/A

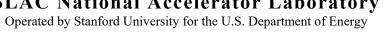
## Attachment 2 - Contractor Requirements Document: Safeguards and Security Program Planning

§	Requirements from	Compliance	Method		Deliverables*			
	Attachment 2 – CRD	Status	of	Item	Frequency	Due	Recipient	
			Compliance			Date(s)	(e.g., BASO)	
1	Section 1							
	Safeguards and Security Program							
	Planning							
1.5	REQUIREMENTS							
1.5	a. Perform planning activities that support the Department's Strategic Plan, the facility/site's mission, forecasts of significant changes to facility/site operations, and current and projected operational and fiscal constraints.	•	SLAC Security has an approved SSP and it covers all DOE orders currently in the SLAC contract. The SSP will be updated to cover all applicable requirements.	N/A	N/A	N/A	N/A	
1.5	b. Submit all contractor security plans for review and approval by DOE	In progress 8/1/2021	SLAC will submit an updated SSP to the DOE Site Office for approval.	N/A	N/A	N/A	N/A	

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#### **DOE Order 470.4B – Safeguards and Security Program (1/17/2017)**

§	Requirements from	Compliance	Method		Deliverables*			
	Attachment 2 – CRD	Status	of Compliance	Item	Frequency	Due Data(s)	Recipient	
	cognizant security offices, establishing a Federally-approved authorization for site security operations as well as the Federal acceptance of any residual risk involved in operations under the requirements of the approved security plans.		Сопривисе			Date(s)	(e.g., BASO)	
1.5	c. Maintain accurate and current approved security plans that continue to accurately describe site/facility S&S procedures and requirements.	In progress 8/1/2021	Current security plans cover all S&S procedures and requirements and will be updated to include applicable requirements from DOE 470.4B.	N/A	N/A	N/A	N/A	
1.5	d. Conduct site operations in compliance with approved security plans.	In progress 8/1/2021	Current security plans cover all S&S procedures and requirements and will be updated to include applicable requirements from DOE 470.4B.	N/A	N/A	N/A	N/A	
1.5	e. Monitor progress on completion of implementation plans to ensure that approved actions are completed within the approved time frames.	In progress 6/1/2021	SLAC will ensure all implementation plans are completed and implemented.	N/A	N/A	N/A	N/A	
1.5	f. Develop and implement defense strategies and Security Incident Response Plans in accordance with the DOE Tactical Doctrine contained in Attachment 4 for facilities/sites that possess nuclear weapons and components, Category I SNM, or targets subject to radiological or toxicological sabotage.	N/A	Not applicable. SLAC does not have Category I SNM.	N/A	N/A	N/A	N/A	
1.5	g. Conduct assessments of protection effectiveness at a level of detail and at a level of rigor appropriate to the assets	In compliance	Security risk assessments are conducted to identify the appropriate protection level for assets. SLAC will conduct security risk	N/A	N/A	N/A	N/A	

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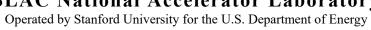
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	Attachment 2 – CRD	Status	of Compliance	Item	Frequency	Due Date(s)	Recipient (e.g., BASO)
	and security interests being protected and in accordance with national standards and DOE directives, and maintain documentation of such analyses in support of the security plan.		assessments using DOE's DBT software.			Date(s)	
1.5	h. Provide assurances for safeguarding against loss, theft, diversion, unauthorized access, misuse or sabotage of radioactive materials and radioactive sealed sources that could adversely affect national security and the health and safety of employees, the public, and the environment in accordance with all safety and security requirements applicable to the contract, including the CRD to DOE O 470.3B, Design Basis Threat (DBT) order, the CRD to DOE O 231.1B, Admin Chg 1, Environment, Safety and Health Reporting, and 10 CFR Part 835, Occupational Radiation Protection, Subpart M and Appendix E.	In progress 6/30/2021	SLAC has security measures and protocols to protect all property protection areas (PPAs).  SLAC will continue to implement all current security requirements and update any additional requirements from DOE Order 470.4B	N/A	N/A	N/A	N/A
1.5	i. Develop SECON response plans that can be immediately implemented when there is a change in either the Department's or a specific facility/site's SECON status.	In compliance	Not applicable. SLAC currently follows the National Terrorism Advisory System (NTAS) <a href="https://www.dhs.gov/national-terrorism-advisory-system">https://www.dhs.gov/national-terrorism-advisory-system</a>	N/A	N/A	N/A	N/A
1.I	Chapter I Security Plans 1. GENERAL All facilities and sites under DOE	In progress 7/30/2021	SLAC has an approved SSP and will update to include all applicable requirement from DOE Order 470.4B	N/A	N/A	N/A	N/A

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, ,	Attachment 2 – CRD	Status	of	Item	Frequency	Due	Recipient
			Compliance			Date(s)	(e.g., BASO)
	cognizance must have a security plan						
	which reflects the assets, security						
	interests, approved S&S program						
	implementation at that location, and						
	any residual risks associated with						
	operation under the security plan						
1.II	Chapter II	In compliance	Not applicable. SLAC currently follows the	N/A	N/A	N/A	N/A
	Security Conditions		National Terrorism Advisory System				
	1 GENERAL		(NTAS)				
	DOE security conditions (SECON)		https://www.dhs.gov/national-terrorism-advise				
	levels reflect a multitude of conditions						
	that may adversely impact						
	Departmental and/or facility and site						
	security. SECONs may include terrorist						
	activity, continuity conditions,						
	environmental (fire, chemical,						
	radiological, etc.) and/or severe weather						
	conditions. The day-to-day DOE						
	security readiness state is informed by						
	the DHS' NTAS. NTAS alerts are						
	established based on the analysis of a						
	continuous and timely flow of						
	integrated, all-source threat assessments						
	and reporting provided to Executive						
	Branch decision-makers. The SECON						
	levels will be managed by a Senior						
	SECON Decision Team, chaired by the						
	Deputy Secretary, with membership						
	comprised of the Under Secretaries, the						
	Associate Under Secretary for						
	Environment, Health, Safety and						



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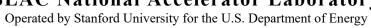
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	Attachment 2 – CRD	Status	of	Item	Frequency	Due	Recipient
			Compliance			Date(s)	(e.g., BASO)
	Security, and the Director, Office of						
	Intelligence and Counterintelligence.						
	This chapter details DOE requirements						
	for responding to changes in the						
	Departmental SECON levels and						
	NTAS alerts.						
1.III	Chapter III	In progress	SLAC will work with the DOE Site Office to	N/A	N/A	N/A	N/A
	Performance Assurance	6/1/2021	develop a Performance Assurance Plan				
	1 GENERAL		(PAP).				
	An acceptable level of performance						
	must be established and maintained to						
	ensure that all elements of a facility/site						
	protection program are workable and						
	function as designed and in accordance						
	with the overall protection goals						
	established by local facility/site						
	management. A performance assurance						
	program must be developed which						
	identifies the essential elements of the						
	protection program and establishes						
	monitoring and testing activities of						
	sufficient rigor to ensure that the						
	program elements are at all times						
	operational, functioning as intended,						
	and interacting in such a way as to						
	identify and preclude the occurrence of						
	adverse activity before security is						
	irreversibly compromised. The intent of						
	the performance assurance program is						
	not to duplicate monitoring and testing						
	activities conducted under ongoing						



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	quality assurance and safeguards and security operations, but to include them in a comprehensive approach to assuring system effectiveness.  Implementation activities and schedules for performance assurance plans must be included in the facility or site security plan.		Compnance			Date(s)	(c.g., DASO)
2	Section 2 Survey, Review and Self-Assessment Program						
2.5	5. REQUIREMENTS Contractors are responsible for ensuring that the following activities related to program reviews and self-assessments are conducted at facilities and sites under their cognizance, and for ensuring that assistance and data are provided as directed to Federal security personnel during survey activities. Procedures applicable to these activities must be documented in facility or site security plans.	In compliance	Surveys have been conducted at SLAC by DOE. The last survey was March 2018. SLAC will continue to participate in DOE surveys and will conduct a self-assessment.	N/A	N/A	N/A	N/A
2.5	a. Review security programs on a continuing basis.	In compliance	SLAC will continue to implement.	N/A	N/A	N/A	N/A
2.5	b. Conduct formal self-assessments at intervals consistent with DOE direction and risk management principles.	In progress 8/30/2021	SLAC will create internal protocols to conduct self-assessments.	N/A	N/A	N/A	N/A
2.5	c. Prepare and submit to the DOE cognizant security office formal reports of self- assessments and related	In progress 9/30/2021	SLAC will provide reports to DOE.	N/A	N/A	N/A	N/A

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	Attachment 2 – CRD	Status	of	Item	Frequency	Due	Recipient
			Compliance			Date(s)	(e.g., BASO)
	findings and corrective actions.						
2.5	d. Evaluate all S&S topics relating to Program Management Operations, Physical Protection, Protective Force, Information Security, Personnel Security, and Materials Control and Accountability that are applicable at the facility or site through the self- assessments.	In compliance	Surveys have been conducted at SLAC by DOE. The last survey was March 2018. SLAC will continue to participate in DOE surveys and will conduct self-assessments.	N/A	N/A	N/A	N/A
2.5	e. Provide management support for all self-assessment activities both in execution and in remedy	In compliance	SLAC ESH director has participated in survey and will in self-assessment.	N/A	N/A	N/A	N/A
2.5	f. Implement corrective actions for issues identified in self-assessments and surveys in a timely and effective manner, and validate the effectiveness of corrective actions to prevent recurrence of the issues.	In progress 7/30/2021	SLAC will use current tools utilized at SLAC to document and correct all corrective actions and findings.	N/A	N/A	N/A	N/A
2.5	g. Cooperate with survey activities conducted by the DOE cognizant security office or other Federal authorities.	In compliance	DOE has conducted survey and assessment at SLAC.	N/A	N/A	N/A	N/A



## **SLAC National Accelerator Laboratory**





#### **DOE Order 470.4B – Safeguards and Security Program (1/17/2017)**

**Site Compliance Plan** (2/11/2021)

#### Attachment 3 - Contractor Requirements Document: Safeguards and Security Program Management Operations

§	Requirements from	Compliance	Method		Delivera	bles*	
	Attachment 3 – CRD	Status	of	Item	Frequency	Due	Recipient
			Compliance			Date(s)	(e.g., BASO)
	Section 1						
	Facility Clearance and Registration						
	of Safeguard and Security Activities						
1	5. REQUIREMENTS	In progress	SLAC will create protocols/policies and will	N/A	N/A	N/A	N/A
	Contractors are responsible for ensuring	9/30/2021	comply with requirements a-n in this section.				
	that the following activities are		SLAC will not have any classified work or				
	accomplished for the facility clearance		material on-site. All procedures applicable to				
	program at facilities and sites under		the FCL program will be documented in our				
	their cognizance. Procedures applicable		SSP.				
	to the FCL program must be						
	documented in facility or site security						
	plans.						
1.5	a. Establish and maintain facility	In compliance	SLAC has created a Personnel Security	N/A	N/A	N/A	N/A
	clearance activities in accordance with		Program and it will be implemented.				
	the requirements contained in this						
	directive and in national policies.						
1.5	b. In all FCL activities, provide	In progress	SLAC will provide and seek approval from	N/A	N/A	N/A	N/A
	complete information to enable the	9/30/2021	the DOE Site Office.				
	DOE cognizant security office and/or						
	other DOE Federal authorities to						
	ascertain the attendant risk and whether						
	classified information and other						
	security assets are adequately protected,						
	including but not limited to accurate						
	and complete submissions of DOE F						
	470.1, Contract Security Classification						
	Specification (CSCS) and DOE F						
	470.2, Facility Data and Approval						

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	Record (FDAR), for entry into the Safeguards and Security Information Management System (SSIMS).						
1.5	c. Ensure that any change that might affect the validity of the FCL is reported to the DOE cognizant security office.	In progress 9/30/2021	SLAC will comply and will report all changes to DOE Site Office.	N/A	N/A	N/A	N/A
1.5	d. When a subcontract is established for work involving security clearances, classified information or matter, or nuclear and other hazardous material presenting a potential radiological, chemical or biological sabotage threat, submit a request for a subcontractor FCL and the associated DOE F 470.2, Facility Data and Approval Record (FDAR), to the DOE cognizant security office.	In compliance	SLAC will follow all protocols.	N/A	N/A	N/A	N/A
1.5	e. Ensure that DOE F 470.2, FDAR, and other information pertaining to subcontracts is accurately and currently maintained.	In compliance	SLAC will comply and ensure all the information is accurate. This was updated in September 2020.	N/A	N/A	N/A	N/A
1.5	f. Immediately and accurately comply with all reporting requirements related to the FCL.	In compliance	SLAC will comply per our Personnel Security Program.	N/A	N/A	N/A	N/A
1.5	g. Ensure that when a limited facility clearance has been granted, strict access restrictions are imposed to limit access to the scope of the contract; provide written documentation to the DOE cognizant security office stating the	In compliance	SLAC will comply per our Personnel Security Program.	N/A	N/A	N/A	N/A

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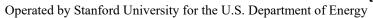
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	restrictions to be imposed and how they will be enforced.						
1.5	h. Report all changes in the organization's key management personnel (KMP) as they occur and process access authorizations for new KMP immediately.	In compliance	SLAC will comply per our Personnel Security Program.	N/A	N/A	N/A	N/A
1.5	i. Ensure that exclusion actions for KMP who will not be cleared are made a matter of record by the organization's executive body, and provide a copy of the resolution to the DOE cognizant security office.	In compliance	SLAC will comply per our Personnel Security Program.	N/A	N/A	N/A	N/A
1.5	j. Establish internal procedures to ensure that cleared employees are aware of their responsibilities for reporting pertinent information to the FSO, appropriate DOE authorities (including counterintelligence), the Federal Bureau of Investigation, or other Federal authorities as required by DOE directives, the terms of the classified contract, and U.S. law.	In compliance	SLAC will comply and create procedures/protocols to ensure all cleared employees are aware of their responsibilities.	N/A	N/A	N/A	N/A
1.5	k. Cooperate with DOE and other Federal authorities during official inspections, investigations concerning the protection of classified information and DOE security interests, and during personnel security investigations of present or former employees and others.	In compliance	SLAC will participate in DOE inspections.	N/A	N/A	N/A	N/A

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			Compliance				(e.g., BASO)
1.5	l. Upon receiving notification from	In compliance	SLAC will comply and follow DOE	N/A	N/A	N/A	N/A
	DOE that an FCL is suspended, take		directions and has created a Personnel				
	immediate action to implement		Security Program.				
	instructions contained in the						
	notification package for securing						
	classified matter and/or special nuclear material at an approved cleared facility						
	pending restoration of the FCL.						
1.I	Chapter I	In progress	SLAC will be a Non-Possessing facility and	N/A	N/A	N/A	N/A
1.1	Facility Clearance Program	4/30/2021	cleared individuals will adhere to the Site	1,111	1 1	1,111	1,111
			Security Plan. SLAC worked with the DOE				
			Site Office and the Security DEAR clauses				
			were added to the SLAC contract.				
1.I	2. ELIGIBILITY REQUIREMENTS						
	A contractor or prospective contractor						
	must meet the following eligibility						
	requirements prior to being processed						
1.1.2	for an FCL:	I.,	The Consideration of the Alexander	N/A	N/A	N/A	N/A
1.I.2	a. be selected to perform tasks under a contract containing the DEAR security	In progress 6/30/2021	The Security clause was added to the SLAC contract.	N/A	N/A	N/A	N/A
	clauses found at 48 CFR Part 952;	0/30/2021	contract.				
112	b. be organized under the laws of one	In progress	SLAC will comply per our Personnel	N/A	N/A	N/A	N/A
11112	of the 50 States, the District of	6/30/2021	Security Program.	1,112	1 1	1,111	1,111
	Columbia, or Puerto Rico and must be		, ,				
	located in the United States or a U.S.						
	territorial area or possession;						
1.I.2	c. have a reputation for integrity and	In progress	SLAC will comply per our Personnel	N/A	N/A	N/A	N/A
	lawful conduct in its business dealings;	6/30/2021	Security Program.				
1.I.2	d. not have been barred from	In progress	SLAC will comply per our Personnel	N/A	N/A	N/A	N/A
	participating in U.S. Government	6/30/2021	Security Program.				
	contracts (this includes key						

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			Compliance			Date(s)	(e.g., BASO)
	management personnel on the contract);					/-	
1.1.2	e. not be under foreign ownership, control, or influence (FOCI) to a degree that the granting or continuation of the FCL would be inconsistent with the	In compliance	SLAC will comply and create protocols/procedures. SLAC FOCI was approved.	N/A	N/A	N/A	N/A
	national interest.						
1.II	Chapter II Importance Ratings 1. FACILITY IMPORTANCE RATINGS Importance ratings are used to establish a risk-based system for identifying the level of protection applicable to security assets and activities of facilities. Each facility granted an FCL must be assigned an importance rating. Contractors may recommend a facility rating based upon activities conducted; a final determination of the rating for each facility will be made by the DOE cognizant security office. Each facility's assigned importance rating must be recorded on DOE F 470.2,	In progress 4/30/2021	SLAC will comply with this requirement and will implement in our protocols/polices. SLAC will be a Non-Possessing facility and will not have any classified work or material on-site.	N/A	N/A	N/A	N/A
	Facility Data and Approval Record						
	(FDAR).						
1.III	Chapter III	In progress	SLAC will comply and create a Foreign	N/A	N/A	N/A	N/A
	Facility Clearance Approval	4/30/2021	Ownership, Control, or Influence (FOCI)				
	Requirements		program and appropriate security clauses				
	1. ISSUANCE OF FCLs		will be added to the contract. SLAC will				
	All eligibility requirements listed below		work with the DOE Site Office to ensure				
	must be satisfied prior to the issuance		proper steps are completed.				

<sup>\*</sup>Deliverables: Data delivered to DOE or other external agency (e.g., recurring reporting, external database entries)



# **SLAC National Accelerator Laboratory**





#### **DOE Order 470.4B – Safeguards and Security Program (1/17/2017)**

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	Attachment 3 – CRD	Status	of	Item	Frequency	Due	Recipient	
			Compliance			Date(s)	(e.g., BASO)	
	of an FCL. The DOE Acquisition							
	Regulation (DEAR) prohibits the award							
	of a classified contract until an FCL has							
	been granted and issued. When an							
	existing unclassified contract is							
	modified to require classified work, the							
	contract modification cannot take effect							
	until an FCL is issued and the							
	appropriate DEAR security clause is							
	inserted in the contract.							
1.IV	Chapter IV	N/A	SLAC will not require an interim limited	N/A	N/A	N/A	N/A	
	Interim and Limited FCLS		FCLS.					
	1. INTERIM FCL							
	Interim FCLs are granted on a							
	temporary basis, pending completion of							
	full investigative and approval							
	requirements, including but not limited							
	to the completion of background							
	investigations for final access							
	authorizations for those individuals							
	required to be cleared in connection							
	with the FCL, such as key management							
	personnel (KMP).							
	2. LIMITED FCL							
	The United States has entered into							
	agreements with certain foreign							
	governments which establish							
	arrangements whereby a foreign-owned							
	U.S. company may be considered							
	eligible for an FCL without any							
	additional FOCI negation or mitigation							



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			Compliance			Date(s)	(e.g., BASO)	
	instrument. To ensure that release of information or access to SNM is in accordance with the U.S. National Disclosure Policy, a limited FCL must be restricted to one security activity involving classified information or SNM.							
1.V	Chapter V Personnel Security Clearances and Exclusion Procedures Required in Connection with Contractor FCLS 1. SECURITY CLEARANCES REQUIRED IN CONNECTION WITH THE FC Certain officials [typically the owners, officers, directors, partners, regents, trustees, and/or executive personnel (KMP)] with the ability to affect the organization's policies or practices in security activities conducted under the contract must be cleared to the level of the FCL or formally excluded from access as appropriate. For multiple facility organizations, each subordinate cleared facility's KMP must also be cleared or excluded. Changes in an organization's KMP must be reported as they occur and access authorizations must be processed for new KMP immediately.	In progress 5/30/2021	SLAC will only have a limited number of individuals that will require security clearance. The individuals requiring security clearance will be approved by COO office before the process for clearance is initiated.	N/A	N/A	N/A	N/A	



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			Compliance			Date(s)	(e.g., BASO)
1.VI	Chapter VI Reporting Requirements 1. GENERAL Contractors are required to report certain events that have an impact on the status of the facility clearance. The reporting requirements stated here pertain specifically to the FCL; additional requirements related to FOCI issues, personnel security concerns, and other security matters are also reportable and can be found in the	In progress 6/30/2021	SLAC will comply with all the requirements in sections 2 and 3 of Reporting Requirements. SLAC will report any events that have an impact on the status of the facility clearance to the DOE Site Office.	N/A	N/A	N/A	N/A
	directives applicable to those programs.						
1.VII	Chapter VII Suspensions 1. REASONS When the following conditions occur, the DOE cognizant security office must suspend the FCL. a. When a company with a FCL is determined to be under FOCI that has not been mitigated, the FCL must be suspended. Contract performance on activities involving proscribed information must not continue until all applicable FOCI requirements are met. b. When findings or other deficiencies in a survey, self-assessment, inquiry, inspection or evaluation indicate suspension of a FCL is necessary, the DOE cognizant security office will	In progress 5/30/2021	SLAC will comply with and resolve any issues regarding suspension of FCL. SLAC will create internal protocols and update its SSP.	N/A	N/A	N/A	N/A

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# **SLAC National Accelerator Laboratory**





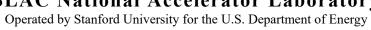
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	Attachment 3 – CRD	Status	of Compliance	Item	Frequency	Due Date(s)	Recipient (e.g., BASO)
	determine whether the FCL must be suspended pending validated corrective actions.						
1.VIII	Chapter VIII Facility Clearance Termination and Closet Out 1. CONTRACT CLOSEOUT/FACILITY CLEARANCE TERMINATION a. General. When a contract ends and/or a facility clearance is no longer necessary, the FCL will be terminated. All security clearances connected to the facility clearance must be terminated and all DOE property, classified information, and/or nuclear and other hazardous material presenting a potential radiological, chemical or biological sabotage threat must be appropriately reallocated, disposed of, destroyed, or returned to an appropriate DOE or cleared DOE contractor organization.	In progress 6/30/2021	SLAC will work with the DOE Site Office to ensure all protocols are followed if FLC is no longer required or needed at SLAC. SLAC Security will create internal protocols and update the SSP.	N/A	N/A	N/A	N/A
2	Section 2 Foreign Ownership, Control, or Influence Program	In progress 6/30/2021	SLAC will comply with all the requirements in this section of FOCI program. SLAC will create protocols/policies and update the SSP to cover the entire program.	N/A	N/A	N/A	N/A
2	5. REQUIREMENTS Contractors are responsible for ensuring that the following activities are accomplished for the FOCI program.	In progress 6/30/2021	SLAC will comply with all the requirements in this section of FOCI program. SLAC will create protocols/policies and update the SSP to cover the entire program.	N/A	N/A	N/A	N/A

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	Procedures applicable to the FOCI program must be documented in facility or site security plans.						
	a. Establish and maintain activities related to FOCI in accordance with the requirements contained in this directive and in national policies.	In progress 6/30/2021	SLAC will comply per our Personnel Security Program.	N/A	N/A	N/A	N/A
2.5	b. In all FOCI activities, provide complete information to enable the DOE cognizant security office and/or other DOE Federal authorities to ascertain the attendant risk and whether classified information and other security assets are adequately protected, including but not limited to accurate and complete submissions of Standard Form (SF) 328, Certificate Pertaining to Foreign Interest, and information provided during annual certification and review activities.	In progress 6/30/2021	SLAC will comply per our Personnel Security Program.	N/A	N/A	N/A	N/A
2.I	Chapter I General FOCI Program Information 1. GENERAL.	In progress 4/30/2021	SLAC will create protocols and policies once FOCI program is created.	N/A	N/A	N/A	N/A
	a. An FCL will not be granted until all relevant aspects of FOCI have been resolved and, if necessary, appropriately mitigated.	In compliance	SLAC will follow and complete all protocols until all relevant aspects of FOCI have been resolved and, if necessary, appropriately mitigated.	N/A	N/A	N/A	N/A
2.I.1	b. The determination of whether a U.S. company is under FOCI will be made on a case-by-case basis. In instances where the company is unable to identify	In compliance	SLAC will evaluate and follow DOE requirements.	N/A	N/A	N/A	N/A

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	a foreign owner (e.g., the participating						
	investors in a foreign investment or						
	hedge fund cannot be identified), DOE						
	may determine that the company is not						
	eligible for an FCL. The following are						
	examples of factors which DOE will						
	consider to determine whether a						
	company is under FOCI, is eligible for						
	an FCL in spite of FOCI issues, and the						
	protective measures required to						
	mitigate FOCI.						
	(1) foreign intelligence threat, including						
	record of economic and government						
	espionage against U.S. targets;						
	(2) risk of unauthorized technology						
	transfer;						
	(3) type and sensitivity of classified						
	information or matter, or special						
	nuclear material (SNM) to be accessed;						
	(4) nature, source, and extent of FOCI,						
	including whether foreign interests hold						
	a majority or substantial minority						
	position in the company, taking into						
	consideration all immediate,						
	intermediate, and ultimate parent						
	companies;						
	(5) record of compliance with pertinent						
	U.S. laws, regulations, and contracts;						
	(6) nature of bilateral and multilateral						
	security and information exchange						
	agreements that may be relevant;						







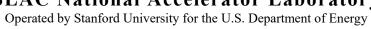
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			Compliance			Date(s)	(e.g., BASO)
	(7) whether the government of the						
	foreign interest has industrial security						
	and export control regimes in place that						
	are comparable to those of the United States						
	(8) ownership or control, in whole or in						
	part, by a foreign government						
2.I.1	c. If there is a change in a company	In compliance	SLAC will evaluate and follow DOE FOCI	N/A	N/A	N/A	N/A
	with an existing FCL that impacts a	vop.:	requirements.	1,,12	1 0.11	1,111	1,111
	favorable FOCI determination, the FCL						
	will be suspended or terminated unless						
	security measures are taken to remove						
	the possibility of unauthorized access						
	or adverse impacts to contract						
2.I.1	performance. d. Any doubt as to whether	T.,1:	SLAC will evaluate and follow DOE FOCI	N/A	N/A	N/A	N/A
2.1.1	unacceptable FOCI can be effectively	In compliance	requirements.	IN/A	IN/A	N/A	IN/A
	mitigated to the point that affording the		requirements.				
	applicant access to classified						
	information or matter is clearly						
	consistent with national security will be						
	resolved in favor of the national						
	security.2.						
2.II	Chapter II	In progress	SLAC will comply with all the FOCI	N/A	N/A	N/A	N/A
	FOCI Mitigation 1. GENERAL	6/30/2021	mitigation covered in this section and will				
	If DOE determines that a company is		create protocols and polices. SLAC SSP will be updated.				
	under FOCI, DOE will determine the		be updated.				
	extent to which and the manner in						
	which the FOCI may result in						
	unauthorized access to classified						

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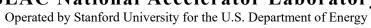
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			Compliance			Date(s)	(e.g., BASO)
	information or SNM and the types of						
	actions that will be necessary to						
	mitigate the associated risks to a level						
	deemed acceptable to DOE.						
	2. FOCI MITIGATION						
	INSTRUMENTS						
	The affected organization or its legal						
	representatives may propose a plan to						
	negate or reduce unacceptable FOCI;						
	however, DOE has the right and						
	obligation to impose any security						
	method, safeguard, or restriction it						
	believes necessary to ensure that						
	unauthorized access to classified						
	information or matter, or SNM, is						
	precluded. An organization that will not						
	implement the security measures						
	determined necessary by DOE to						
	mitigate its foreign involvement to an						
	acceptable level is ineligible for a FOCI						
	determination and an FCL. Under all						
	methods of FOCI mitigation,						
	management positions requiring						
	security clearances in conjunction with						
	the FCL must be filled by U.S. citizens						
	residing in the United States.						
3	Section 3						
	Safeguards and Security Awareness						
3	5. REQUIREMENTS	In compliance	Overall Security awareness and compliance	N/A	N/A	N/A	N/A
	Contractors are responsible for ensuring		information is covered in general orientation				
	that the following activities are		training. In addition SLAC conducts an				

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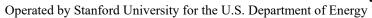
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	Attachment 3 – CRD	Status	of Compliance	Item	Frequency	Due Date(s)	Recipient (e.g., BASO)
	accomplished for the security awareness program. Procedures applicable to the security awareness program must be documented in facility or site security plans.		annual Security/Safety fair which covers different subjects in Security / Safety / UFNAP / Cybersecurity / Counterintelligence and other relevant topics. SLAC will continue to implement this requirement.			(0)	
3.5	a. Ensure that security briefings are conducted in accordance with the requirements of this section for all covered individuals.	In progress 9/15/2021	SLAC created and will provide security briefing to all individuals that have a security clearance.	N/A	N/A	N/A	N/A
3.5	b. Ensure that, if briefings are conducted through electronic means, a method exists to ascertain and verify that the individual completes all required content prior to receiving credit for the briefing.	In progress 9/15/2021	SLAC will comply per our Personnel Security Program.	N/A	N/A	N/A	N/A
3.5	c. Ensure that all individuals granted DOE security clearances (access authorizations) execute a Standard Form (SF) 312, Classified Information Nondisclosure Agreement, prior to being granted access to classified information or matter, or SNM.	In progress 9/15/2021	SLAC will comply per our Personnel Security Program.	N/A	N/A	N/A	N/A
3.5	d. Ensure that non-DOE personnel granted unescorted access to a facility or site security area receive appropriate awareness information (e.g., information on prohibited and controlled articles).	In progress 5/15/2021	SLAC will comply per our Personnel Security Program.	N/A	N/A	N/A	N/A
3.5	e. Develop and issue supplemental awareness materials, tailored to local facility/site conditions and issues and	In progress 5/15/2021	SLAC will create security briefing and awareness materials for individuals who will have clearance. Non-cleared individuals will	N/A	N/A	N/A	N/A

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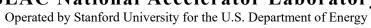
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	Attachment 3 – CRD	Status	of Compliance	Item	Frequency	Due Date(s)	Recipient (e.g., BASO)
	appropriate for both cleared and non- cleared employees and visitors, to make them aware of their security responsibilities.		continue to receive their security briefing in ESH training and the annual SLAC Safety and Security Fair.				
3.5	f. Ensure that executed SF 312 forms and other records related to the security awareness program are maintained in accordance with ISOO and DOE records requirements.	In Compliance	SLAC will comply per our Personnel Security Program.	N/A	N/A	N/A	N/A
3.5	g. Ensure that individuals are appropriately authorized to witness and accept the SF 312 on behalf of the United States and that such designations of authority are documented in the current facility/site security plan.	In Compliance	SLAC will comply per our Personnel Security Program.	N/A	N/A	N/A	N/A
3.5	h. Determine administrative actions to be taken when individuals fail to complete the requirement for annual refresher briefings.	In Compliance	SLAC will comply per our Personnel Security Program.	N/A	N/A	N/A	N/A
3.5	i. Ensure that information of counterintelligence concern is reported to the supporting counterintelligence office.	In Compliance	SLAC will comply.	N/A	N/A	N/A	N/A
4	Section 4 Control of Classified Visits	N/A	Not applicable at SLAC. SLAC does not conduct classified work on-site or possess classified material.	N/A	N/A	N/A	N/A
4	5. REQUIREMENTS Contractors are responsible for ensuring that the following activities are accomplished for the classified visits	N/A	SLAC does host classified visits	N/A	N/A	N/A	N/A

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, o	Attachment 3 – CRD	Status	of	Item	Frequency	Due	Recipient
			Compliance			Date(s)	(e.g., BASO)
	program at facilities and sites under						
	their cognizance. Procedures applicable						
	to classified visits must be documented						
	in facility or site security plans.						
	a. Ensure that the number of classified						
	visits is held to a minimum.						
	b. Ensure that each classified visit is						
	necessary, that the purpose of the visit						
	cannot be achieved without providing						
	access to or a disclosure of classified						
	information, and that any disclosure of						
	classified information or matter during						
	visits occurs only for a lawful and						
	authorized U.S. Government purpose.						
	c. Ensure that local procedures are						
	established for processing and handling						
	classified visits to facilities under their						
	cognizance by cleared U.S. citizens and						
	for processing requests for classified						
	visits by cleared individuals from their						
	facilities to other locations.						
	d. Ensure that procedures are						
	established for processing and handling						
	visits by foreign nationals to facilities						
	under their cognizance in accordance						
	with governing international						
	agreements or treaties.						
	e. Ensure that, for visits by foreign						
	nationals, appropriate procedural						
	limitations are developed and followed						
	for the visit to preclude access to						



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			Compliance				(e.g., BASO)
	information not related to the visit and						
	the scope of the international treaty or						
	agreement governing the visit.						
	f. Establish procedures to ensure that						
	classified visit requests are sent and						
	received through the DOE cognizant						
	security office and the appropriate						
	security offices of other Federal						
	government agencies.						
	g. Establish procedures to ensure that,						
	for classified visits involving access to						
	RD or SNM by cleared U.S. citizens						
	who are not otherwise authorized for						
	such access, the prospective visitor has						
	been approved for such access by the						
	facility/site's authorized ODFSA for						
	this purpose, has received an						
	appropriate briefing concerning the						
	protection of RD and/or SNM prior to						
	being given access, and has signed an						
	acknowledgement that the briefing has						
	been received.						
	h. Establish procedures to ensure that						
	access granted under paragraph g.						
	above is tracked and maintained as part						
	of the site classified visits file and is not						
	entered into any clearance tracking						
	database or extended for any purpose						
	outside the approved classified visit.						
	i. Establish procedures to ensure that all						
	classified information or matter,						



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			Compliance			Date(s)	(e.g., BASO)
	including the visitor's personal notes, to						
	be removed by individuals granted						
	access under paragraph g. above is sent						
	through the DOE cognizant security						
	office to the established classified						
	mailing address listed in SSIMS for the						
	facility which the individual represents.						
	Hand-carrying of classified information						
	from DOE premises by individuals						
	granted RD access in connection with a						
	classified visit is strictly prohibited.						
5	Section 5						
	Safeguards and Security Training						
	Program						
5	5. REQUIREMENTS	In compliance	SLAC does not have an armed protective	N/A	N/A	N/A	N/A
	Contractors are responsible for ensuring		force. SLAC Security is not armed and are				
	that security training activities are		trained only to observe and report. Some of				
	accomplished at facilities and sites		the officers are certified Emergency Medical				
	under their cognizance. Procedures		Technicians (EMTs).				
	applicable to S&S training must be		SLAC will continue to follow all California				
	documented in facility or site security		required training in addition to all required				
	plans.	27/4	training for SLAC.	3.7/4	27/4	37/4	27/4
5.5	a. The S&S training program for each	N/A	SLAC does not have any classified work or	N/A	N/A	N/A	N/A
	facility must encompass all program		material or an armed protective force. SLAC				
	elements which are performed by		will continue to follow all California				
	employees working at that location.		required training in addition to all required				
	The content of training (initial,		training for SLAC.				
	refresher, and on-the-job) must be						
	consistent with the knowledge and						
	skills required to perform assigned S&S						
	tasks and/or responsibilities as						

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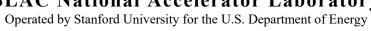
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	determined by valid and complete job analyses.		Сотришес			Date(s)	(c.g., D/150)
5.5	b. Individual training needs must be evaluated against a job or functional analysis of the position to ensure that appropriate job-related training is identified. Training requirements must be determined by analyzing needs, the job or function, and/or desired performance. Analyses must be conducted to ensure that training courses identify and address the requirements of the job competencies.	N/A	See 5.5.a.	N/A	N/A	N/A	N/A
5.5	c. Training courses must be produced using a systematic approach that includes at least analysis, design, development, implementation, and evaluation phases.	N/A	See 5.5.a.	N/A	N/A	N/A	N/A
5.5	d. Training that meets analysis requirements can be provided by external resources such as commercial vendors or other government training agencies. Training products procured from these resources must be evaluated at the site level for consistency with DOE policy and needs.	N/A	SLAC does not have any classified work or material or an armed protective force. SLAC will continue to follow all California required training in addition to all required training for SLAC.	N/A	N/A	N/A	N/A
5.5	e. Evaluation of training must be performed to ensure that instructional objectives are met and to determine overall effectiveness. Knowledge and/or performance- based testing must	N/A	SLAC does not have any classified work or material or an armed protective force. SLAC will continue to follow all California required training in addition to all required training for SLAC.	N/A	N/A	N/A	N/A

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# **SLAC National Accelerator Laboratory**





#### **DOE Order 470.4B – Safeguards and Security Program (1/17/2017)**

§	Requirements from	Compliance	Method	Deliverables*			
	Attachment 3 – CRD	Status	of Compliance	Item	Frequency	Due Date(s)	Recipient (e.g., BASO)
	be used to measure the knowledge and/or skills acquired from training programs.						
5.5	f. Accurate and complete employee training records that contain dates of course attendance, course title, and scores/grades achieved (where applicable) must be maintained in accordance with DOE Administrative Records Schedule 1, Personnel Records.	N/A	SLAC does not have any classified work or material or an armed protective force. SLAC will continue to follow all California required training in addition to all required training for SLAC.	N/A	N/A	N/A	N/A
5.5	g. Training plans that project training derived from a valid needs analysis for the forthcoming year must be developed annually	N/A	See 5.5.f.	N/A	N/A	N/A	N/A
5.5	h. In accordance with the NISPOM, facility/site security officers must complete training appropriate to their position and the security operations conducted at their assigned facilities. This training should be completed within 1 year of appointment to the position of FSO.	N/A	See 5.5.f.	N/A	N/A	N/A	N/A
6	Section 6 Restriction on the Transfer of Security-Funded Technologies	N/A	SLAC does not possess any classified work or material.	N/A	N/A	N/A	N/A
6	6. OBJECTIVE Protect and control classified and unclassified controlled Office of Environment, Health, Safety and Security (AU) funded technology, other	N/A	SLAC does not possess any classified work or material.	N/A	N/A	N/A	N/A

<sup>\*</sup>Deliverables: Data delivered to DOE or other external agency (e.g., recurring reporting, external database entries)



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_	Attachment 3 – CRD	Status	of	Item	Frequency	Due	Recipient	
			Compliance			Date(s)	(e.g., BASO)	
	Technology Development Program							
	(TDP)-related information, and							
	protection practices and expertise that							
	may be provided to recipients who are							
	not Department of Energy (DOE)							
	Federal or contractor employees.							
6	9. REQUIREMENTS	N/A	SLAC does not possess any classified work	N/A	N/A	N/A	N/A	
	Contractors are responsible for ensuring		or material.					
	that activities related to the transfer of							
	security-funded technologies are							
	accomplished at facilities and sites							
	under their cognizance. Procedures							
	applicable to the transfer of security-							
	funded technologies must be							
	documented in facility or site security							
	plans.							
	a. General. The dissemination in any							
	form of AU-funded classified and/or							
	unclassified controlled technology,							
	other TDP S&S-related information, or							
	protection practices/expertise to							
	individuals or organizations outside the							
	Department and its operational facilities							
	is prohibited until the following has							
	taken place:							
	(1) verification of the recipient's							
	capability to protect and control the							
	information consistent with Department							
	S&S and classification and control							
	policies;							
	(2) a determination that the intended							



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#### **DOE Order 470.4B – Safeguards and Security Program (1/17/2017)**

**Site Compliance Plan** (2/11/2021)

§	Requirements from	Compliance	Method	Deliverables*			
	Attachment 3 – CRD	Status	of	Item	Frequency	Due	Recipient
			Compliance			Date(s)	(e.g., BASO)
	recipient has a strict need-to-know; a						
	security clearance or access						
	authorization at the appropriate level						
	for any classified information; and that						
	the Department's ability to protect its						
	facilities and assets will not be						
	weakened or degraded by the transfer in						
	question; and						
	(3) approval of the transfer is obtained						
	in accordance with the requirements for						
	a risk assessment and the review and						
	approval process set forth below, and						
	with applicable Export Control laws						
	and regulations.						

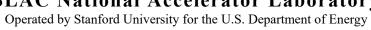
#### **Attachment 4 – Department of Energy Tactical Doctrine**

 Requirements from	Compliance	Method		Delivera	bles*	
Attachment 4 – Department of	Status	of	Item	Frequency	Due	Recipient
Energy Tactical Doctrine		Compliance			Date(s)	(e.g., BASO)
Attachment 4	N/A	SLAC does not have an armed protective	N/A	N/A	N/A	N/A
Department of Energy Tactical		force. SLAC has a contractor with Allied				
Doctrine		Universal and the officers are observe-and-				
		report only and are certified EMTs.				

\*Deliverables: Data delivered to DOE or other external agency (e.g., recurring reporting, external database entries)



## **SLAC National Accelerator Laboratory**





#### **DOE Order 470.4B – Safeguards and Security Program (1/17/2017)**

**Site Compliance Plan** (2/11/2021)

#### **Attachment 5 – Incidents of Security Concern**

§	Requirements from	Compliance	Method		Deliverables*				
	<b>Attachment 5 – Incidents of Security</b>	Status	of	Item	Frequency	Due	Recipient		
	Concern		Compliance			Date(s)	(e.g., BASO)		
	Section 1	In progress	SLAC will comply per our Personnel	N/A	N/A	N/A	N/A		
	Incident Identification and	6/1/2021	Security Program						
	Reporting Requirements								
1	1. OBJECTIVE	N/A	SLAC does not do any classified work or	N/A	N/A	N/A	N/A		
	To ensure the occurrence of a security		material on site. We have a establish incident						
	incident prompts the appropriate		reporting protocols and will continue to use						
	graded response, to include an		the same system. All security/safety concern						
	assessment of the potential impacts,		are reported to senior management and DOE						
	appropriate notification, extent of		Site Office. SLAC will cover the incidents of						
	condition, and corrective actions. The		security concern in their contract with						
	long-term management of incidents		LLNL. In addition, SLAC will create an						
	serves as an effective Program		internal protocol.						
	Planning and Management (PPM) tool								
	for enhancing site-specific								
	implementation of security policies.								
	2. PURPOSE								
	To set forth requirements for the U.S.								
	Department of Energy (DOE) Incidents								
	of Security Concern (IOSCs) process,								
	including timely identification,								
	notification, inquiry, reporting, and								
	closure of IOSCs. The IOSC program								
	serves multiple purposes to include:								
	a. Ensuring that security incidents are								
	communicated to DOE/National								
	Nuclear Security Administration								
	(NNSA) line management, U.S.								
	Congress, other agencies or foreign								
	governments, as appropriate;								
	b. Meeting regulatory reporting								

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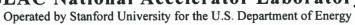
**Site Compliance Plan** (2/11/2021)

§	Requirements from	Compliance	Method	Deliverables*			
	Attachment 5 – Incidents of Security	Status	of	Item	Frequency	Due	Recipient
	Concern		Compliance			Date(s)	(e.g., BASO)
	requirements;						
	c. Enhancing the ability to track and						
	trend the health of the security program						
	at the site and overall Department;						
	d. Ensuring that incidents are assessed						
	relative to the impact to national						
	security and the collateral impact with						
	other programs and security interests;						
	e. Enabling mechanisms to support						
	performance assurance, self-						
	assessment, oversight, and other key						
	security functions;						
	f. Enhancing the ability to influence						
	policy development and site security						
	implementation; and						
	g. Ensuring that the S&S programmatic						
	successes are identified and						
	communicated internally and						
	externally.						

(end CRD)



## **SLAC** National Accelerator Laboratory





#### **DOE Order 470.4B – Safeguards and Security Program (1/17/2017)**

Site Compliance Plan (2/11/2021)

#### **Approvals**

Name	Title	Signature	Date
Brian Sherin	Deputy Director for Operations, SLAC	Both	2/12 /2021
Thomas V. Rizzi	Division Director of Operations, BASO	Thomas V. Riggi	2/16/2021
Paul Golan	Head of Field Element, BASO	Magni	2/ /6/2021

Please return signed document to Contract Management.

## **Revision History**

Revision	Revision Date	Summary of Change(s)
R0	2/11/2021	Original release.