



STANFORD UNIVERSITY
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).

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



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

§	Requirement from Attachment 1 – CRD	Compliance Status	Method of Compliance	Deliverables*			
				Item	Frequency	Due Date(s)	Recipient (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

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			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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	security, the environment, or pose significant danger to the health and safety of Department of Energy (DOE) Federal and contractor employees or the public.						
1	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.	In compliance	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 Attachment 2 – CRD	Compliance Status	Method of Compliance	Deliverables*			
				Item	Frequency	Due Date(s)	Recipient (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.	In compliance	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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	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.						
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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	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.				
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) https://www.dhs.gov/national-terrorism-advisory-system	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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	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 Security Conditions 1 GENERAL DOE security conditions (SECON) 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	In compliance	Not applicable. SLAC currently follows the National Terrorism Advisory System (NTAS) https://www.dhs.gov/national-terrorism-advis	N/A	N/A	N/A	N/A

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	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	<p>Chapter III Performance Assurance 1 GENERAL</p> <p>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</p>	In progress 6/1/2021	SLAC will work with the DOE Site Office to develop a Performance Assurance Plan (PAP).	N/A	N/A	N/A	N/A

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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.						
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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	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

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

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

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

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	management personnel on the contract);						
1.I.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 national interest.	In compliance	SLAC will comply and create protocols/procedures. SLAC FOCI was approved.	N/A	N/A	N/A	N/A
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, Facility Data and Approval Record (FDAR).	In progress 4/30/2021	SLAC will comply with this requirement and will implement in our protocols/policies. 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
1.III	Chapter III Facility Clearance Approval Requirements 1. ISSUANCE OF FCLs All eligibility requirements listed below must be satisfied prior to the issuance	In progress 4/30/2021	SLAC will comply and create a Foreign Ownership, Control, or Influence (FOCI) program and appropriate security clauses will be added to the contract. SLAC will work with the DOE Site Office to ensure proper steps are completed.	N/A	N/A	N/A	N/A

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	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 Interim and Limited 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	N/A	SLAC will not require an interim limited FCLS.	N/A	N/A	N/A	N/A

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	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	<p>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.</p>	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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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 directives applicable to those programs.	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
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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	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.						
2.5	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
2.I.1	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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	<p>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 FOCL.</p> <p>(1) foreign intelligence threat, including record of economic and government espionage against U.S. targets;</p> <p>(2) risk of unauthorized technology transfer;</p> <p>(3) type and sensitivity of classified information or matter, or special nuclear material (SNM) to be accessed;</p> <p>(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;</p> <p>(5) record of compliance with pertinent U.S. laws, regulations, and contracts;</p> <p>(6) nature of bilateral and multilateral security and information exchange agreements that may be relevant;</p>						

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	(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 with an existing FCL that impacts a 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 performance.	In compliance	SLAC will evaluate and follow DOE FOCI requirements.	N/A	N/A	N/A	N/A
2.I.1	d. Any doubt as to whether unacceptable FOCI can be effectively mitigated to the point that affording the applicant access to classified information or matter is clearly consistent with national security will be resolved in favor of the national security.2.	In compliance	SLAC will evaluate and follow DOE FOCI requirements.	N/A	N/A	N/A	N/A
2.II	Chapter II FOCI Mitigation 1. GENERAL If DOE determines that a company is under FOCI, DOE will determine the extent to which and the manner in which the FOCI may result in unauthorized access to classified	In progress 6/30/2021	SLAC will comply with all the FOCI mitigation covered in this section and will create protocols and polices. SLAC SSP will be updated.	N/A	N/A	N/A	N/A

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	<p>information or SNM and the types of actions that will be necessary to mitigate the associated risks to a level deemed acceptable to DOE.</p> <p>2. FOCI MITIGATION INSTRUMENTS</p> <p>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.</p>						
3	Section 3 Safeguards and Security Awareness						
3	5. REQUIREMENTS Contractors are responsible for ensuring that the following activities are	In compliance	Overall Security awareness and compliance information is covered in general orientation training. In addition SLAC conducts an	N/A	N/A	N/A	N/A

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	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 / Counter-intelligence and other relevant topics. SLAC will continue to implement this requirement.				
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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	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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	<p>program at facilities and sites under their cognizance. Procedures applicable to classified visits must be documented in facility or site security plans.</p> <p>a. Ensure that the number of classified visits is held to a minimum.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>e. Ensure that, for visits by foreign nationals, appropriate procedural limitations are developed and followed for the visit to preclude access to</p>						

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				Item	Frequency	Due Date(s)	Recipient (e.g., BASO)
	<p>information not related to the visit and the scope of the international treaty or agreement governing the visit.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>i. Establish procedures to ensure that all classified information or matter,</p>						

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				Item	Frequency	Due Date(s)	Recipient (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 Contractors are responsible for ensuring that security training activities are accomplished at facilities and sites under their cognizance. Procedures applicable to S&S training must be documented in facility or site security plans.	In compliance	SLAC does not have an armed protective force. SLAC Security is not armed and are trained only to observe and report. Some of the officers are certified Emergency Medical Technicians (EMTs). 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	a. The S&S training program for each facility must encompass all program elements which are performed by employees working at that location. The content of training (initial, refresher, and on-the-job) must be consistent with the knowledge and skills required to perform assigned S&S tasks and/or responsibilities as	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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	determined by valid and complete job analyses.						
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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	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

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	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	<p>9. REQUIREMENTS</p> <p>Contractors are responsible for ensuring 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.</p> <p>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:</p> <p>(1) verification of the recipient’s capability to protect and control the information consistent with Department S&S and classification and control policies;</p> <p>(2) a determination that the intended</p>	N/A	SLAC does not possess any classified work or material.	N/A	N/A	N/A	N/A

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

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Attachment 5 – Incidents of Security Concern

§	Requirements from Attachment 5 – Incidents of Security Concern	Compliance Status	Method of Compliance	Deliverables*			
				Item	Frequency	Due Date(s)	Recipient (e.g., BASO)
	Section 1 Incident Identification and Reporting Requirements	In progress 6/1/2021	SLAC will comply per our Personnel Security Program	N/A	N/A	N/A	N/A
1	<p>1. OBJECTIVE To ensure the occurrence of a security incident prompts the appropriate graded response, to include an assessment of the potential impacts, appropriate notification, extent of condition, and corrective actions. The long-term management of incidents serves as an effective Program Planning and Management (PPM) tool for enhancing site-specific implementation of security policies.</p> <p>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:</p> <p>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;</p> <p>b. Meeting regulatory reporting</p>	N/A	SLAC does not do any classified work or material on site. We have a establish incident reporting protocols and will continue to use the same system. All security/safety concern are reported to senior management and DOE Site Office. SLAC will cover the incidents of security concern in their contract with LLNL. In addition, SLAC will create an internal protocol.	N/A	N/A	N/A	N/A

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



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

Site Compliance Plan (2/11/2021)

§	Requirements from Attachment 5 – Incidents of Security Concern	Compliance Status	Method of Compliance	Deliverables*			
				Item	Frequency	Due Date(s)	Recipient (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)

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



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Approvals

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

Please return signed document to Contract Management.

Revision History

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