



# HS-42/43 Update ECWG Fall Workshop

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October 26, 2011



## HS-42 Update Activity Since Spring 2011



- **PNOVs: LANS Extremity Exposure, SRNS Puncture Wound, NSTec Fire Seal, SPRU Contamination Event**
- **Consent Orders: WRPS Program Deficiencies, URS QA Deficiencies**
- **Enforcement Letters: CWI QA Deficiencies, EnergySolutions Contamination Event, SEC Contamination Events**
- **ANL Regulatory Assistance Review**



## HS-43 Update Activity Since Spring 2011



- **RAR (SST) and RAR Follow-ups**
- **Demise of IMI Tables - - > “Significance Level A/B”**
- **10 C.F.R. 824 Rewrite**
- **Enforceable Directives on Website**



## **HS-43 RAR Results – Improvements Seen**



- ✓ **Senior Management Attention to the Overall Security Program**
- ✓ **Reduction of Classified Holdings - Smaller Security Footprint**
- ✓ **Improved Partnership Between Enforcement Coordinators and Security Organizations**
- ✓ **Increased Use of Centralized Issues Management Systems**



## HS-43 RAR Results - Challenges



- ✓ **Effectiveness of Self-Assessment Programs**
- ✓ **Restrictive Criteria for Conducting Formal Causal Analysis**
- ✓ **Willingness to Self-Report Programmatic, Recurring, and Willful/Intentional Occurrences - Transparency**



# **Proposed EFCOG S&S Working Group Activity – Self-Assessment**



- ✓ **Develop a Guidance Document that Provides a Consistent Approach to Classified Information Security Assessments**
  - **Scope, Methodology, Objectives, Compliance vs. Performance Elements, Documentation, Effectiveness Verification**
  
- ✓ **Develop a Guidance Document that Provides Criteria and Methodology for Conducting a Causal Analysis**
  - **Key Process Elements to be Effective, Objectives, Useful Tools, Documentation**



# Questions ??