



EFCOG Safeguards and Security  
Working Group Meeting  
October 14, 2009

Office of Security Enforcement  
Update

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## Overview



- ✓ **Activities for the Past Year**
- ✓ **Ongoing Activities**
- ✓ **Upcoming Activities**
- ✓ **Program Reviews**
- ✓ **Enforcement Investigations**
- ✓ **Preventing Enforcement Actions**
- ✓ **Closing Comments**
- ✓ **Questions**



## Activities for the Past Year



- ✓ **Completed Secretary's Compliance Order - LANL 12/08**
- ✓ **Conducted Enforcement Investigation at ETTP 2/09**
- ✓ **Issued 2008 Office of Enforcement Annual Report 2/09**
- ✓ **Conducted Program Review at Pantex 3/09**
- ✓ **Implemented Security Significance Database 3/09**
- ✓ **Participated Annual Enforcement Coordinators Overview Training 4/08**
- ✓ **Conducted Program Review at BNL 7/09**
- ✓ **Issued Enforcement Letter to Y-12 7/09**
- ✓ **Hosted ETTP Enforcement Conference 8/09**
- ✓ **Conducted Enforcement Investigation at SNL 8/09**
- ✓ **Conducted Program Review at Y-12 10/09**



## Ongoing Activities



- ✓ **Development of ETTP Enforcement Action**
- ✓ **Development of SNL Investigation Report**
- ✓ **Development of Y-12 Program Review Report**
- ✓ **Monthly Trending Meetings**



## Upcoming Activities



- ✓ **Conduct Enforcement Investigation at INL 10/09**
- ✓ **Develop Program Review Schedule for CY 2010**
- ✓ **Complete Analysis of CY 2009 Security Incident Data**



## Program Reviews



- ✓ **PNNL 6/08 – Report Issued**
- ✓ **SRS 9/08 – Report Issued**
- ✓ **SNL 11/08 – Report Issued**
- ✓ **Pantex 3/09 – Report Issued**
- ✓ **BNL 8/09 – Report Pending HSS Concurrence**
- ✓ **Y-12 10/09 – Report Development Ongoing**



## Program Review Themes



- ✓ **Enforcement Coordinators Role and Responsibilities  
Not Formally Defined**
- ✓ **Internal Assessments Not Effective in Identifying  
Noncompliant Conditions**
- ✓ **Inconsistent Categorization of Security Incidents**
- ✓ **Ineffective Corrective Actions to Prevent Recurrence**
- ✓ **Weak Security Incident Trending Analysis**



## Enforcement Investigations



- ✓ **LANL – Theft of Classified Matter 1/07**
- ✓ **ETTP – Theft of Classified Matter 2/09**
- ✓ **SNL – Adverse Security Incident Trend 8/09**
- ✓ **INL – Significant Security Incident 10/09**

**Note: Select enforcement actions for serious or egregious security incidents**



# Preventing Enforcement Actions



- ✓ **Be Knowledgeable Security Incident Trends**
  - System vs. Human
  - Isolated Issue or Systemic Problem
  - Specific Classified Topic
  - Specific Location or Organization
  - New Scope of Work, Facility or Assigned Employees
- ✓ **Comprehensive Internal Assessments**
  - Assessment Driven vs. Event Driven
  - Include Compliance and Performance Elements
- ✓ **Causal Analysis/Root Causal Analysis/Corrective Actions**
  - Effective in Preventing Recurrence
  - Involvement by Trained Staff
- ✓ **Performance Precursors**
  - Proactive vs. Reactive



## Closing Comments



- ✓ **Contractor Organizations in Best Position to Identify and Promptly Correct Noncompliances**
- ✓ **Substantial Incentive for Early Identification, Reporting and Prompt Corrective Actions**
- ✓ **Proper and Continuing Level of Security Vigilance**
- ✓ **Integrate Enforcement Coordinators into Security Organizations**
- ✓ **Input to CY 2010 Program Review Schedule**



**Questions/Comments???**



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