Non-Possessing Security Plan

This plan summarizes the safeguards and security responsibilities of: (Company Name)

with its principal office and place of business at: (Street, City, State, and Zip Code)

doing business covered by this plan at the following location: (Street, City, State, and Zip Code)

The provisions of our contract with the Department of Energy (DOE) and/or with a DOE contractor do not authorize our company to receive, store, transmit, or originate classified information within our facility(ies). However, performance of work under this contract will require at least some of our personnel to hold DOE access authorizations for access to classified information and/or special nuclear material (SNM) at other approved DOE facilities. We understand that our company is responsible for ensuring that all personnel involved in this contract — including company managers, employees, and direct consultants, as well as any lower-tier subcontractors whose employees require DOE access authorizations — comply with all applicable DOE security requirements, including the following:

Security Training
[DOE M 470.4-1, Section J]

- Arranging for the Facility Security Officer (FSO) to complete training as necessary to implement all of the requirements in this plan, as well as other applicable provisions of the underlying DOE directives.
- Identifying any other company and subcontractor personnel who assist the FSO in implementing this plan — e.g., access authorizations — and arranging for training as necessary to ensure compliance with DOE requirements.

Access Authorizations
[DOE M 470.4-5 Chapter 1]

- Obtaining access authorizations as soon as possible for all Key Management Personnel (KMPs) identified in the Foreign Ownership, Control or Influence (FOCI) determination at the same level as the company's facility clearance.
- Obtaining other access authorizations only as required to perform work involving access to classified information and/or SNM, and only at the level required by each individual.
- Handling and submitting all access authorization requests and maintaining personal clearance-related documentation about individuals in accordance with the Privacy Act of 1974.
- Maintaining current information about all active access authorizations, including each cleared individual's name, DOE file number, date of clearance notification, and the classified contract(s) for which an access authorization is held.
- Ensuring that cleared individuals are aware of their responsibility to directly notify DOE of potentially relevant information — e.g., arrests, bankruptcies, garnishments, name changes, marriage/cohabitation, etc.
- Notifying DOE within two working days after the company becomes aware of a cleared individual's mental health treatment or any other condition that might cause a significant defect in judgment or reliability.
- Notifying DOE through established channels as soon as possible — but no later than two working days— when an individual no longer requires an access authorization (e.g., termination of employment or transfer to unclassified work).

Security Briefings
[DOE M 470.4-1 Section K]

- Ensuring that all company and subcontractor personnel — regardless of clearance status — receive initial security briefings prior to being allowed unescorted access to any DOE security area(s) under the company's control.
- Ensuring that all cleared company and subcontractor personnel receive comprehensive security briefings and execute SF-312, *Classified Information Nondisclosure Agreement*, before receiving access to classified information.
- Ensuring that all cleared company and subcontractor personnel receive annual security refresher briefings within the time frames prescribed by the DOE or prime contractor's Security Awareness Coordinator.
- Ensuring that cleared company and subcontractor personnel receive security termination briefings and complete DOE F 5631.29, *Security Termination Statement*, when their DOE access authorizations are terminated.
- Maintaining records of initial, comprehensive, refresher, and termination security briefings in a manner that the dates on which company and subcontractor personnel received these briefings.

Security Badges
[DOE M 470.4-2, Section A, Chapter XV]

- Ensuring that all company and subcontractor personnel who are granted access authorizations also receive standard DOE photo badges.
- Ensuring that any visitor, temporary, and/or other local site-specific (LSSO) badges used by the company comply with DOE requirements, including restrictions relating to foreign nationals.
- Ensuring that all individuals who receive a DOE security badge are aware of the requirement to report lost or stolen badges to the issuing Badge Office within 24 hours.
- Recovering DOE security badges as soon as company and subcontractor personnel terminate or otherwise no longer require badges, and immediately returning them to the issuing Badge Office.

Foreign Travel
[DOE O 551.1B]

- Ensuring that all company and subcontractor personnel who engage in official foreign travel comply with all pre-trip notification and briefing requirements established by the sponsoring DOE or contractor organization.
- Ensuring that all company and subcontractor personnel who engage in official foreign travel submit post-travel trip reports within 30 days after returning to their duty stations.

Non-Possessing Security Plan

Facility Clearance [DOE M 470.4-1 Section I]	• Protecting all Government property in the company's possession and submitting a property control security plan to DOE for approval if the company becomes responsible for more than $5 million in Government property. • Ensuring that any solicitations for lower-tier contracts or other agreements with other companies that require their personnel to obtain access authorizations contain the notice at DEAR 952.204.72, *Facility Clearance*. • Submitting a DOE F 470.1, *Contract Security Classification Specification* (CSCS), through appropriate channels and obtaining DOE approval before awarding a lower-tier agreement that requires access authorizations to another company. • Ensuring that any lower-tier agreements awarded to other companies that will require access authorizations contain the clauses at DEAR 952.204-2, *Security*, and DEAR 952.204-70, *Classification/Declassification.* • Submitting a CSCS form to DOE through appropriate channels if significant changes occur in a previously registered agreement — e.g., the extension of the contract end date or the termination of work requiring access authorizations.
FOCI [DOE M 470.4-1 Section H]	• Notifying DOE immediately of any actual or anticipated changes in FOCI that might affect the company's current FOCI status — e.g., a change from "*No*" to "*Yes*" in an item on SF-328, *Certificate Pertaining to Foreign Interests*. • Providing annual certifications to DOE if no significant changes have occurred in the company's ownership; its officers, directors, and executive personnel; or the information in the company's last full FOCI certification.
Classification Guidance [DOE M 475.1-1A, Att. 2]	• Ensuring that any company personnel certified as Authorized Derivative Classifiers (ADCs) for work at other facilities receive all required training, including Classified Matter Protection and Control (CMPC) requirements. • Ensuring that any company personnel whose work involves generating matter at other facilities that might be classified receive CMPC training and are aware of the procedures for obtaining ADC reviews.
Incidents of Security Concern [DOE M 470.4-1 Section N]	• Ensuring that all company personnel who are authorized access to classified information and/or SNM at other facilities are aware of the requirements and procedures for immediately reporting security infractions or incidents. • Establishing an incident management program that provides for appropriate disciplinary measures if DOE determines that company personnel have committed security infractions or incidents.
Survey Reviews [DOE M 470.4-1 Section G]	• Reviewing the company's compliance with DOE requirements in implementing the applicable security programs covered by plan at least once between the formal five-year reviews conducted by DOE. • Documenting the results of these self-assessments; preparing corrective action plans for any deficiencies; and tracking corrective actions until fully implemented.
Other Undertakings [Specify]	•

Our company will develop internal procedures as needed to implement all applicable DOE security requirements and inform company and subcontractor personnel of their individual responsibilities for implementing these requirements. In addition, company and subcontractor personnel will comply with applicable security procedures at the sites where work involving classified information and/or SNM is performed.

Our company understands that, at least every five years, designated DOE representatives must inspect our facilities compliance with all applicable DOE safeguards and security requirements. Upon request, company personnel will provide DOE with documentation for these reviews. If DOE notifies our company in writing that its security procedures and/or practices do not comply with DOE security requirements, we will submit an appropriate corrective action plan to DOE within 30 working days and provide at least quarterly progress reports until DOE determines that all deficiencies are corrected.

CERTIFICATIONS

As the designated Facility Security Officer, I accept lead responsibility for ensuring company compliance with all applicable DOE security requirements, including those highlighted in this plan.

_____ Typed Name _____ Signature

_____ Telephone Number _____ Date

The undersigned management representative certifies that the Facility Security Officer has been given the authority, resources, and other management support needed to ensure company compliance with all applicable DOE security requirements. If a new Facility Officer is appointed, the company also agrees to immediately notify DOE and to execute a new Non-Possessing Plan.

_____ Typed Name _____ Signature

_____ Official Title _____ Date