



STANFORD UNIVERSITY
SLAC National Accelerator Laboratory
 Operated by Stanford University for the U.S. Department of Energy



DOE Order 227.1A - Independent Oversight Program (12/21/2015)
Site Compliance Plan (final rev., 07/07/2016)

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Introduction

This Site Compliance Plan (SCP):

- a) corresponds with the version of the DOE Order on Independent Oversight Program listed in the Prime Contract,
- b) states how the Laboratory complies with applicable requirements as tailored to the risks at the Laboratory, and
- c) documents DOE-approved methods of compliance for applicable requirements and that there are no recurring deliverables*.

Impact on the Contract:

Under the SCP, sections of the CRD 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 CRD 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 CRD (whether or not modified).

Attachment 1 - Contractor Requirements Document (CRD)

CRD §	Requirements from CRD, Attachment 1	Compliance Status	Method of Compliance	Deliverables* (managed through SLACTrak)			
				Item	Frequency	Due Date(s)	Recipient (e.g., SSO)
1.	The contractor must support the conduct of Independent Oversight appraisal activities conducted by the Office of Enterprise Assessments (EA) at sites and facilities for which they are responsible. This support includes, but is not limited to, providing the following: a. Timely identification of points of contact to provide information and support during appraisals; b. Documentation and information concerning safety and security programs ⁴ for which they are responsible; c. Access to contractor-managed facilities, networks, and personnel; and d. Work space and administrative support for appraisal teams.	In compliance	SLAC is in compliance with the CRD through the implementation of the SLAC “Audit Management, Resolution, and Follow-Up Program” document and through implementation of the SLAC Contractor Assurance System.	n/a	n/a	n/a	n/a

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



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CRD §	Requirements from CRD, Attachment 1	Compliance Status	Method of Compliance	Deliverables* (managed through SLACTrak)			
				Item	Frequency	Due Date(s)	Recipient (e.g., SSO)
2.	When notified by EA of imminent danger or condition or major vulnerability that presents an unacceptable immediate risk to workers, the public, the environment, or national security, the responsible contractor organization must take the following actions in coordination with DOE line management: a. Promptly identify immediate compensatory actions to mitigate the condition, b. Within 4 working days, notify the cognizant DOE line manager of actions taken and compensatory measures planned, and c. Develop and implement actions (including determining costs and identifying funds) to eliminate the vulnerability or reduce the level of risk to an acceptable level as soon as possible.	In compliance	See section 1.	n/a	n/a	n/a	n/a
3.	When requested, the contractor must review and provide comments on the factual accuracy of draft appraisal reports through the responsible DOE field element.	In compliance	See section 1.	n/a	n/a	n/a	n/a
4.	Draft appraisal reports provided to contractors for review must only be shared with personnel with their organization, parent corporations, and subcontractors for the purpose of factual accuracy evaluation and initial corrective action development and implementation.	In compliance	See section 1.	n/a	n/a	n/a	n/a
5.	The contractor must prepare, implement, and tracked to completion corrective actions to address findings identified in EA appraisal reports. Finding and other deficiencies identified in appraisal reports are managed in accordance with establish issues systems (DOE O. 226.1) and quality assurance programs (DOE 414.1 and 10 CFR Part 830).	In compliance	See section 1.	n/a	n/a	n/a	n/a
6.	The contractor must provide information on corrective actions to DOE when requested to support EA appraisal activities.	In compliance	See section 1.	n/a	n/a	n/a	n/a

⁴Throughout this document, safety and security programs means (1) programs for the protection of the public, the environment, and worker health and safety; and (2) programs for the protection of security assets to include special nuclear materials and classified and sensitive unclassified information in all forms. This includes cyber security and emergency management programs.

(end CRD)

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Definitions

Appraisal: An appraisal is an Independent Oversight activity conducted by the Office of Enterprise Assessments to evaluate the effectiveness of line management performance and risk management or the adequacy of DOE policies and requirements.

Best Practice: A best practice is a safety or security-related practice, technique, process, or program attribute observed during an appraisal that may merit consideration by other DOE and contractor organizations for implementation because it: (1) has been demonstrated to substantially improve safety or security performance of a DOE operation; (2) represents or contributes to superior performance (beyond compliance); (3) solves a problem or reduces the risk of a condition or practice that affects multiple DOE sites or programs; or (4) provides an innovative approach or method to improve effectiveness or efficiency.

Cognizant Manager: The DOE field or Headquarters manager who is directly responsible for program management and direction, and the development and implementation of corrective actions. Cognizant managers may be line managers or managers of support organizations.

Deficiency: A deficiency is an inadequacy in the implementation of an applicable requirement or performance standard that is found during an appraisal. Deficiencies may serve as the basis for one or more findings.

Directives: Directives are defined in DOE O 251.1, *Departmental Directives Program*.

Findings: Findings are deficiencies that warrant a high level of attention on the part of management. If left uncorrected, findings could adversely affect the DOE mission, the environment, worker safety or health, the public or national security. Findings define the specific nature of the deficiency, whether it is localized or indicative of a systemic problem, and identify which organization is responsible for corrective actions.

Imminent Danger: Conditions or practices in the workplace where a danger exists which could reasonably be expected to cause death or serious physical harm either immediately or before the abatement of such danger, through normal procedures, would otherwise be required.

Independent Oversight: Independent oversight refers exclusively to oversight by DOE Headquarters organizations that do not have line management responsibility for the activity. Oversight by supporting organizations that are direct reports to line management is not considered DOE independent oversight. Within DOE, the sole responsibility for independent oversight of safety and security programs resides with the Office of Enterprise Assessments, reporting directly to the Office of the Secretary of Energy.

Line Management: Line management refers the unbroken chain of responsibility that extends from the Secretary of Energy to the Deputy Secretary, to the Secretarial Officers who set program policy and plans and develop assigned programs, to the program and Field Element Managers, and to the contractors and subcontractors who are responsible for execution of these programs. It is distinct from DOE support organizations, such as the Office of Environment, Health, Safety and Security, Office of Management, and Office of the Chief Information Officer, which also have responsibilities and functions important to security and safety.

Major Vulnerability: A vulnerability which, if detected and exploited, could reasonably be expected to result in a successful attack causing serious damage to the national security.

Opportunities for Improvement: Opportunities for improvement are suggestions offered in Independent Oversight appraisal reports that may assist cognizant managers in improving programs and operations. While they may identify potential solutions to findings and deficiencies identified in appraisal reports, they may also address other conditions observed during the appraisal process. Opportunities for improvement are provided only as recommendations for line management consideration; they do not require formal resolution by management through a corrective action process.

Performance Testing: Activities conducted to evaluate all or selected portions of safety and security systems, networks, or programs as they exist at the time of the test. Performance testing includes, but is not limited to, force-on-force exercises, tabletop exercises, knowledge tests, limited-scope performance tests, limited-notice performance tests, penetration testing, vulnerability scanning, continuous automated scanning, and cyber security "red teaming." Performance testing can be conducted as part of a scheduled appraisal activity (i.e., announced), or without prior knowledge of the entity being tested (i.e., unannounced).

Policy: The term "DOE policy" or "policy" when used in lower case in this Order is meant to be all inclusive of documents describing the philosophies, fundamental values, administration, requirements, and expectations for operation of the Department. It includes but is not limited to DOE Policies and other types of directives issued under DOE O 251.1.



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Program Secretarial Officers: Heads of DOE Departmental Elements listed on the Office of Management website at https://www.directives.doe.gov/references/doe_departmental_elements.

Recommendations: Recommendations are suggestions for senior line management’s consideration for improving program or management effectiveness. Recommendations transcend the specifics associated with findings, deficiencies, or opportunities for improvement and are derived from the aggregate consideration of the results of the appraisal.

Safety and security programs: Includes (1) programs for the protection of the public, the environment, and worker health and safety; and (2) programs for the protection of security assets to include special nuclear materials and classified and sensitive unclassified information in all forms. Within the scope of this directive, safety and security programs include cyber security and emergency management programs.

Approvals

Name	Title:	Signature:	Date:
Marc E. Clay	Director, Contractor Assurance and Contract Management, SLAC	(on file)	
Dave Osugi	Environmental/QA Program Manager	(on file)	

Please return signed document to: Contract Management, MS 75