



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



DOE Order 473.3A, Protection Program Operations (3/23/2016)

Site Compliance Plan (final rev. 07/06/2016)

Contents

Introduction:	1
Contractor Requirements Document (CRD) – Attachment 1	1
Contractor Requirements Document (CRD) – Attachment 2 – Contractor Protective Force.....	3
Contractor Requirements Document (CRD) – Attachment 3 – Physical Protection.....	4
Approvals	7

Introduction:

This Site Compliance Plan (SCP):

- a) corresponds with the version of the DOE Order on Protection Program Operations 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 Unclassified Foreign Visits and Assignments 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 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).

Contractor Requirements Document (CRD) – Attachment 1

Regardless of the performer of the work, the contractor is responsible for complying with the requirements of this Contractor Requirements Document (CRD) and flowing down CRD requirements to subcontractors at any tier to the extent necessary to ensure contractor compliance. Whenever a DOE Order, Notice or Manual is referenced within the CRD, the intent is to include reference to the CRD of that directive applicable to the contract.

This CRD is issued to identify requirements applicable to contractors. U.S. DOE contractors must adhere to PF program standards for protecting S&S interests including, but not limited to nuclear weapons, explosives, and components; SNM; vital equipment; classified matter; assets; facilities; and other areas of interest to the S&S Program such as DOE elements and their personnel. When a union is the bargaining representative of PF personnel, the contractor should be aware that it may be obligated to bargain about certain effects of implementation of this CRD, as required by the National Labor Relations Act.

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



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A violation of the provisions of this directive relating to the safeguarding or security of Restricted Data or other classified information may result in a civil penalty pursuant to subsection a. of section 234B of the *AEA of 1954* (42 U.S.C. 2282b). The assessment of civil penalties under 42 U.S.C. 2282b is set forth in 10 CFR Part 824, *Procedural Rules for the Assessment of Civil Penalties for Classified Information Security Violations*.

Contractors are responsible for complying with Attachments 2 and 3 to DOE 473.3A referenced in and made part of this CRD and providing program requirements and information applicable to contracts in which this CRD is inserted.

Notices: This Contractor Requirements Document is intended for the exclusive use of the elements of the Department of Energy (DOE), to include the National Nuclear Security Administration, their contractors, and government agencies/individuals authorized to use DOE facilities. DOE disclaims any and all liability for personal injury or property damage due to sue of this document in any context by any organization, group, or individual, other during official government activities.

Local DOE management is responsible for the proper execution of firearms-related programs for DOE entities. Implementation of this document's provisions constitutes only one segment of a comprehensive firearms safety, training, and qualification program designed to ensure that armed DOE protective force personnel are able to discharge their duties safely, effectively, and professionally. Because firearms-related activities are inherently dangerous, proper use of any equipment, procedures, or techniques etc., identified herein can only reduce, not entirely eliminate, all risk. A complete safety analysis that accounts for all conditions associated with intended applications is required prior to the contents of this document being put into practice.

Contractors are responsible for complying with Attachments 2 and 3 to DOE O 473.3A referenced in and made part of this CRD and providing the program requirements and information applicable to contracts in which this CRD is inserted.



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Contractor Requirements Document (CRD) – Attachment 2 – Contractor Protective Force

Requirements from CRD, Attachment 2	Full Compliance: Due Date or “In compliance”	Method of Compliance	Deliverables* (managed through SLACTrak)			
			Item	Frequency	Due Date(s)	Recipient (e.g., SSO)
1. <u>SUMMARY.</u> a. Sections A-M provide direction for administering the DOE contractor PF (CPF) and CPF firearms programs for the purposes of protecting S&S interests. b. Annex 1 provides the guidelines for legal authority, fresh pursuit, and rules of engagement. c. Annex 2 discusses performance testing used in the program. d. Annex 3 contains the provisions for implementing a canine program. e. Annex 4 provides instruction on security helicopter flight operations. f. Annex 5 provides guidance for demonstrator and protest plans. g. Annex 6 provides guidance for workplace violence and active shooter plans.		a. Sections A-M do not apply: SLAC does not have armed Protective Force. It does have an unarmed Contractor Protective force. b. Annex 1 does not apply: SLAC does not have an armed security force and relies on local law enforcement through MOU/MOAs. c. Annex 2 does not apply: SLAC does not have DOE Order 470.3B, <i>Graded Security Protection (GSP) Policy</i> in its contract, nor does SLAC have an armed protective force. d. Annex 3 does not apply: SLAC does not have DOE Order 470.4B, Admin Change 1, <i>Safeguards and Security Program</i> in its contract. SLAC does not accept, house, nor manage classified information, nor is it a Cat. 1, 2 or 3 facility. e. Annex 4 does not apply: SLAC does not operate helicopters. f. Annex 5 is guidance and has been reviewed. SLAC has a site-specific protocol for demonstrations and protests. g. Annex 6 is guidance and has been reviewed. SLAC has a site-specific protocol integrated with local law enforcement for workforce violence and active threats.				

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Contractor Requirements Document (CRD) – Attachment 3 – Physical Protection

Requirements from CRD, Attachment 3	Full Compliance: Due Date or “In compliance”	Method of Compliance	Deliverables* (managed through SLACTrak)			
			Item	Frequency	Due Date(s)	Recipient (e.g., SSO)
<p>This Attachment provides information and/or requirements associated with DOE O 473.3 as well as information and/or requirements applicable to contracts in which the associated CRD (Attachment 1 to DOE O 473.3) is inserted. This Attachment contains three sections composed of multiple chapters that provide direction for planning, implementing, and monitoring the application of Physical Protection measures. These Sections and their subsequent Chapters describe the mandatory procedures and management process applicable to Departmental operating environments.</p>	<p>Specific sections that apply to SLAC are outlined below.</p>					
Attachment 3, Section A – General Requirements						
Protection of Category III and IV Special Nuclear Material						
Chapter I (Protection Planning)	In Compliance	SLAC has a DOE-approved Site Security Plan (SSP) and has a security force providing security 24/7 to all government property/buildings/personnel and SLAC employees/contractors.	SLAC Site Security Plan	Biennially	4/30/16	SSO
Chapter II (Security Areas) 1-3	In Compliance	SLAC has designated security areas with applicable levels of control, including General Access Areas (GAA) and Property Protection Areas (PPA).	n/a	n/a	n/a	n/a
Chapter II (Security Areas) 4-8	Not Applicable – SLAC does not have classified matter or Category III or higher quantities of SNM.					
Chapter III (Posting Notices) 1 – General Requirements	In Compliance	SLAC has signage along perimeter fencing and at site entry points indicating that it is DOE property.	n/a	n/a	n/a	n/a

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Chapter III (Posting Notices) 2 - Trespassing	Not Applicable – SLAC does not have any higher level security areas that will require additional signage addressing deadly force.					
Chapter IV (Locks and Keys)	In Compliance	SLAC's Locks/Keys program ensures that: 1. SLAC does not have any Level I & II keys. 2. All SLAC keys are Administrative keys, with the exception of keys for some PPA areas designated as Level III keys. 3. SLAC has Site specific procedures for lock/keys, including an active inventory.	n/a	n/a	n/a	n/a
Chapter V (Maintenance)	Not Applicable – SLAC does not have classified or essential security systems.					
Chapter VI (Barriers)	Not Applicable – Although not required, SLAC's perimeter fence provides boundary lines for the site and has barriers for all PPA.					
Chapter VII (Communications, Electrical Power and Lighting)	Not Applicable – SLAC does not possess classified material and does not have Category III or higher SNM; Although not required, SLAC Security utilizes radios/cell phones and land lines based on best business practices and not based on DOE S&S requirements.					
Chapter VIII (Secure Storage)	Not Applicable – SLAC does not have any secure storage and it does not have any classified matters.					
Chapter IX (Intrusion Detection and Assessment Systems)	Not Applicable – SLAC does not have any classified matter or Category III SNM and therefore does not require Intrusion Detection Systems. SLAC uses an alarm system to monitor select doors/access points based on risk assessment and best business practices.					
Chapter X (Entry/Exit Screening)	Not Applicable – SLAC does not have any classified matter or Category III or higher SNM.					
Chapter XI (DOE Security Badge, Credential, and Shield Program)	In Compliance	SLAC does not issue HSPD 12 badges. SLAC utilizes the Office of Science Local Site Specific Only (LSSO) badges and maintains documented procedures for the Badging program. Some personnel, for business reasons in support of DOE, have been issued HSPD-12 badges which are managed by the SLAC Site Office or other sponsoring DOE entities (other than SLAC).	n/a	n/a	n/a	n/a
Attachment 3, Section B						
Protection of Category III and IV Special Nuclear Material						

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Chapter I (Protection of Category III and IV Special Nuclear Material)	In Compliance	SLAC does not currently possess or store, Cat III or IV SNM. All radiological materials are secured in the areas that are designated as PPA. SLAC Security provides access to the areas by special keys and Omni lock codes. Security also conducts 24/7 checks of the PPA areas every two hours.	n/a	n/a	n/a	n/a
Chapter II (Alarm Management and Control System)	In Compliance	SLAC does not have Category III SNM; However, administrative/safety control areas are equipped with alarms and cameras to ensure the proper level of protection is provided for high value Government property and data.	n/a	n/a	n/a	n/a
Chapter III (Intrusion Detection and Assessment Systems)	Not Applicable – SLAC does not have any classified matter.					
Chapter IV (Communications)	Not Applicable – SLAC does not have classified or secured communication lines, therefore does not require a detection system on radio frequency					
Chapter V (Protection During Transportation)	Not Applicable – SLAC does not transport nuclear materials requiring protections greater than Department of Transportation regulations.					
Attachment 3, Section C Protection Of Nuclear Weapons, Components, and Category I And II Special Nuclear Material	Not Applicable – SLAC does not have nuclear weapons components or Category I and II SNM.					

(end CRD)

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Approvals

Name:	Title:	Signature:	Date:
Brian Sherin	Director, ESH, SLAC	(on file)	
Tom Rizzi	ES&H & Facilities Lead, SSO	(on file)	

PLEASE RETURN SIGNED FORM TO: CONTRACT MANAGEMENT MS 75