

<b>SAFEGUARDS AND SECURITY REQUIREMENTS</b>	Identifier: PRD-1002
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Safeguards and Security	Program Requirements Document	For Additional Info: <a href="http://EDMS">http://EDMS</a>	Effective Date: 06/22/20
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Manual: Subcontractors Requirements

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\*The current revision can be verified on EDMS.

## 1. PURPOSE

Safeguards and Security (S&S) requirements are established and maintained for subcontractors working at the Idaho National Laboratory (INL). These S&S requirements ensure that appropriate measures are in place to provide protection and accountability for personnel. S&S is also required to protect U.S. government and Fluor Idaho, LLC owned classified and sensitive information, nuclear materials, and computer systems from theft, diversion, sabotage, espionage, or other hostile acts.

## 2. APPLICABILITY

This document applies to all subcontractors and sub tier contractors working at the INL. Subcontractors may impose stricter requirements upon their employees, and the means of implementation may vary as determined by the subcontractor; however, compliance with the requirements of this document is mandatory.

Subcontractor S&S requirements may also be contained in the Special Conditions and associated technical documents of the subcontract.

## 3. REQUIREMENTS

### 3.1 General Security Requirements

- 3.1.1 The subcontractor shall be responsible for "flowing-down" to all lower-tier subcontractors, unions, and vendors all pertinent security requirements.
- 3.1.2 All personnel granted access to the INL shall comply with all DOE and contractor (see def.) security regulations and requirements.
- 3.1.3 The subcontractor shall report all abnormal or suspicious activities to the Fluor Idaho, LLC point-of-contact (see def.), or Warning Communication Center (526-1515) if the Fluor Idaho, LLC point-of-contact is not available.

### 3.2 Cyber Security Requirements

- 3.2.1 Subcontractors must adhere to all Fluor Idaho/DOE cyber security policies and procedures.

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- 3.2.2 Subcontractors are responsible for completing all required cyber security training/readings and adhering to the policies and procedures noted therein. Any subcontractor who will access the INL/ICP-Core network must complete the required cyber security training before utilizing computing equipment to directly or remotely connect to the INL/ICP-Core network. Failure to adhere to these policies could result in the loss or confiscation of computing equipment.
- 3.2.3 Personally owned equipment (e.g., home computers, PDAs, etc.) may not connect to the Fluor Idaho/INL/DOE network remotely, even if the user has received VPN approval (secure ID card access) through Computer Registration. Personally owned equipment will not be granted approval to connect to the network directly or remotely.
- 3.2.4 Only government-owned (Fluor Idaho/INL/DOE provided equipment is allowed to directly connect to any network in a government facility), unless special permission has been obtained through Fluor Cyber Security.
- 3.2.5 Subcontractor/corporate-provided computing equipment may connect to the networks remotely if the user has received VPN approval (secure ID card access) through Computer Registration, and the device meets all the cyber security requirements and is up-to-date on patches and virus protection. Depending on the types of data being accessed, there might be an additional requirement to have a derivative classifier review the data before it is cleared for release outside of the government controlled network.

**3.3 ICP-Core Access Control and Badging**

- 3.3.1 Each subcontractor employee requesting access to the INL shall:
- A. Be 18 years or older
  - B. Be a U.S. citizen
  - C. Receive an initial security briefing before receiving an INL security badge
  - D. Report to and obtain a badge from the contractor security office located at an access control point.
- 3.3.2 In order to have uncleared access to the INL, subcontractor employees shall have successfully completed a suitability for access check.
- 3.3.3 All subcontractor employees requiring access to the INL or its information systems for a period greater than six months will be Identity Proofed. Individuals requiring access to the INL for a period shorter than six months are considered short-term subcontractors or visitors and must

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have their access to INL facilities limited and controlled by local security procedures. All subcontractor employees requiring logical access must complete the Identity Proofing process.

To complete the Identity Proofing process, uncleared personnel must:

- Complete Standard Form 85, Questionnaire for Nonsensitive Positions
- Complete Form 306, Declaration for Federal Employment
- Complete DOE F 206.4, Information Sheet for Sponsorship of HSPD-12 Credential.
- Fill out a short security supplement form
- Have their fingerprints taken
- Provide two forms of approved identification in person to the registrar
- Have a new badge photo taken.

Personnel will be submitted for a background check to include the FBI fingerprint check. New personnel can be issued a temporary badge until the background investigation has been received. If no disqualifying issues are identified in the investigative results, the person will be issued a DOE standard credential/badge.

Acceptable forms of identification must consist of at least one photo identification issued by a federal, state or local office in accordance with the Federal REAL ID Act and an additional document from the list of approved forms of identification. The approved forms of identification, are the Standard Form 85 and Form 306 Declaration for Federal Employment, and may be obtained by contacting HR@icp.doe.gov.

**NOTE 1:** *Failure to return the required forms in a timely manner can result in access being denied.*

3.3.4 If the subcontractor successfully clears the employment suitability check conducted by Fluor Idaho LLC security, the subcontractor employee shall obtain an appropriate badge before beginning employment at the INL.

3.3.5 The results of the pre-employment/suitability personnel investigation conducted by Fluor Idaho LLC, shall be made available to Fluor Idaho LLC Security for eligibility verification and for issuance of an uncleared picture badge.

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- 3.3.6 Subcontractor drivers making deliveries shall be 18 years or older, and possess a valid driver's license and picture identification.
- 3.3.7 All subcontractors who are not U.S. citizens shall be identified and processed in accordance with DOE requirements.

**3.4 ICP-Core Access Control Points and Procedures**

**NOTE 1:** *Additional construction site security access requirements, if any, will be designated in the subcontract Special Conditions.*

**NOTE 2:** *In accordance with INL procedure LWP-11301, specific controls for governing personnel access are established at the INL. Officially designated INL access control points have been designated. There are five guard stations (access control points) that control access to the INL.*

- 3.4.1 When obtaining access to INL site facilities, subcontractor personnel shall use ONLY the following designated access control points:
- A. The primary entrance to the INL at East Portland between Highway 20/26 and Jefferson Boulevard
  - B. Lincoln Boulevard between Specific Manufacturing Capability (SMC) and Naval Reactor Facility (NRF), located immediately south of the junction with U.S. highway 33
  - C. Taylor Boulevard, located approximately 1.3 miles from the entrance to Materials and Fuels Complex (MFC) at U.S. Highway 20
  - D. North Van Buran located approximately .1 miles south of the junction with U.S. highway 20/26.
  - E. North Van Buren located approximately 1.3 miles north of the junction with U.S. highway 20/26. Take North Van Buren to Adams Blvd. to access RWMC and AMWTP guard gates.
- 3.4.2 When obtaining access to the INL Idaho Falls town facilities, subcontractor personnel shall obtain a badge from the Willow Creek Building (WCB) at 1955 Fremont Avenue prior to accessing any of the town facilities.
- 3.4.3 All vehicles used for construction purposes shall be clearly marked with the subcontractor's company name in one-inch-high letters (minimum) on each side of the vehicle.
- 3.4.4 All hand-carried articles should be tagged with the subcontractor employee's name, company, and phone number.

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- 3.4.5 Upon arrival at a contractor facility, subcontractor personnel shall submit all vehicles and hand-carried articles for warrantless search and inspection.
- 3.4.5.1 During vehicle searches, all occupants shall exit from the vehicle and open all receptacles such as:
- A. Glove box
  - B. Hood
  - C. Trunk
  - D. Toolboxes
  - E. Briefcases
  - F. Lunch boxes.
- 3.4.5.2 The occupants shall step away from the vehicle until the search and inspection is completed.
- 3.4.5.3 The occupants shall NOT proceed until completion of the search and inspection.
- 3.4.6 Subcontractors shall NOT control access to a Fluor Idaho facility.
- 3.4.7 If a subcontractor needs to open a door or allow another badged subcontractor access, they shall receive prior authorization from the Physical Security Officer.
- 3.4.8 Any subcontractor employee who does not have a valid INL security badge will be directed to an access control point or the contractor security office for issuance of a badge. If the individual is working for a valid subcontractor and has forgotten his/her badge, the individual will be directed to an access control point or the contractor security office and issued a temporary “forgotten” badge.

**3.5 Security Clearance**

**NOTE:** *The subcontract will identify whether subcontractor employees require a security clearance. Uncleared subcontractor employees may be allowed unescorted access to property protection areas (see def.), if they have an INL picture badge.*

- 3.5.1 Prior to working at any site location, all personnel shall receive a dosimeter, where required, and receive the necessary access training.

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- 3.5.2 If the justification for a clearance has been approved by Personnel Security, subcontractor personnel shall complete and submit Standard Form (SF)-86, Questionnaire for National Security Positions, and fingerprints.
- 3.5.2.1 All security clearance documentation shall be submitted to the contractor within 14 calendar days of the date forms are issued or 14 calendar days of the date the subcontractor commences work, whichever is earlier.
- 3.5.2.2 If SF-86 or fingerprint cards are returned to the individual for further information, the resubmittal shall be completed and returned to the contractor within 10 calendar days.
- 3.5.2.3 When an access authorization (clearance) has been granted by the DOE, the subcontractor shall receive a comprehensive security briefing before receiving an “L” or “Q” security badge.
- 3.5.2.4 As long as a clearance is active, the subcontractor shall complete a security refresher briefing approximately every 12 months.
- 3.5.3 Each subcontractor employee who will act as an escort for other subcontractor personnel shall complete INL escort training which includes but not limited to the following:.
- 3.5.3.1 Required training and reading include:
- A. 000Z415, Initial Security Briefing
  - B. 00ICPESH, ESH&Q Awareness Training-ICP applicable Specific
  - C. 00000AN5 Annual Security Refresher Briefing (as)
- 3.5.3.2 Review PLN-1466, “INL General Physical Security Plan,” and, when applicable, the specific facility/area Physical Security Plan for the area the escorting will be taking place with subcontractor personnel.
- NOTE:** *The subcontract will identify under what circumstances, if any, escort requirements may be involved.*
- 3.5.4 Subcontractor personnel can escort Foreign Nationals if they are listed on the Foreign Visit Security Plan and have completed the Pre-Visit Briefing.
- 3.5.5 Foreign National assignees and visitors are not permitted to escort at the INL.

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**3.6 Control and Surrender of Badges**

- 3.6.1 The subcontractor shall ensure that requests for badge transfers are properly executed during the course of work on the subcontract and that all badges are surrendered upon completion of work on the subcontract.
- 3.6.2 Within 24 hours of permanently transferring a subcontractor employee to another subcontract with the same subcontractor, the subcontractor shall notify the contractor security section of the transfer and provide the new subcontract number and the duration of work under the new subcontract.
- 3.6.3 When a subcontractor employee completes the subcontract work, excluding transfers (see Step 3.6.2), the subcontractor shall comply with all exit requirements.
- 3.6.3.1 The employee shall surrender his/her badge.
- NOTE:** *The badge may be surrendered at the contractor's main security office on East Portland.*
- 3.6.3.2 An employee holding a security clearance shall sign a DOE Termination Statement the day of the employee's termination.
- 3.6.3.3 Upon exiting through one of the access control points, the employee shall surrender his/her exit pass.
- 3.6.4 Subcontractor employees not currently working at the INL or not assigned to a current subcontract shall immediately surrender their security badges to contractor security.
- 3.6.5 Upon notification of termination “**for cause,**” the employee shall be escorted by the subcontractor until the employee departs from the INL and surrenders their badge at a security post.
- 3.6.6 At the conclusion of the project and prior to requesting final payment, the subcontractor shall notify the subcontract administrator (SA) that all security badges have been either reassigned or returned.

**NOTE:** *If all security badges have been transferred or surrendered, Security will issue a release form to the SA. This release form will be attached to the final payment request. The payment will then be processed. If all badges are not accounted for, the subcontractor will be issued a list of outstanding badges from the SA. The subcontractor shall be held responsible for each unrecovered badge in accordance with the subcontractor's contract. When all issues are resolved, a release form will be issued to the subcontractor and attached to the final payment request.*

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**3.7 Illegal Drugs and Controlled Substances**

**NOTE:** *Through the Drug Free Work Place program, employees may be screened based on reasonable suspicion, accident, or incident. The contractor reserves the right to require a urine drug screen or a blood alcohol screen based on reasonable suspicion of illegal substance use; abuse of legal substances; or involvement in an accident or incident resulting in personal injury, death, or property damage.*

- 3.7.1 Any person under the subcontractor (including lower tier contractors and vendors) who becomes aware of or has knowledge of the illegal use or possession of drugs or *controlled substances* (see def.) by any individual shall immediately report that information to their supervisor, superintendent, or manager.
- 3.7.2 The subcontractor shall immediately report information of illegal use or possession of drugs or controlled substances to the Fluor Idaho *point-of-contract* (see def.).
- 3.7.3 The subcontractor's supervisor, superintendent, or manager shall immediately prevent access to classified matter by implicated individual(s) and or remove the individual(s) from any security area.
- 3.7.4 If the implicated individual(s) cannot immediately and clearly establish that the drug or controlled substance in question was legally obtained or used, the subcontractor's supervisor, superintendent, or manager shall escort the individual(s) to the contractor's security office.

**NOTE 1:** *Proof of legal purchase may consist of written evidence that the controlled substance was prescribed or administered by a licensed physician or was legally purchased over the counter.*

**3.8 Prohibited Activities**

- 3.8.1 Subcontractor employees shall NOT introduce activities to the INL that are classified as *prohibited activities* (see def.).

**NOTE:** *All personnel and vehicles entering and leaving the INL are subject to property checks conducted by INL Security personnel.*

- 3.8.2 Subcontractor personnel shall not participate in any form of hunting or fishing activities within INL boundaries.



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- 3.8.3 Subcontractor personnel shall comply with all INL over-flight requirements.
- 3.8.3.1 All proposed flights over any portion of the INL by any type of aircraft shall be approved in advance by the DOE-ID Special Services Division (SSD) or Protective Force duty officer.
- 3.8.3.2 All proposed flights over any portion of the INL by any type of aircraft at altitudes currently prohibited by the Federal Aviation Administration shall be approved in advance by DOE-ID SSD.
- 3.8.3.3 Air flights closer than 1,000 feet to any INL facility shall be prohibited unless specifically authorized by the DOE-ID SSD.

**NOTE:** *The manager of any affected INL facility is notified by the DOE-ID SSD or duty officer, as applicable, before any approved overflights below 1,000 feet.*

**3.9 Prohibited and Controlled Articles**

- 3.9.1 Employees shall not intentionally bring *prohibited articles* (see def.) to the site with the intent of storing them at a designated INL entrance.

**NOTE:** *INL Security personnel will periodically make unannounced property checks. This will include random vehicle property control searches.*

- 3.9.2 Before introducing *controlled articles* (see def.) to the INL, subcontractor employees shall obtain approval from the contractor.
- 3.9.3 Subcontractors attempting to access the INL through any INL entrance may not leave their pets, non-badged personnel (i.e. family, friends, or children), weapons (i.e. including hunting rifles, hunting knives, boot knives, switch blades, or any knives longer than 8” when opened), alcohol, illegal drugs, and/or explosive devices on INL property.

**NOTE:** *Storage of prohibited articles at a designated INL entrance is prohibited. Weapons cannot be checked in at the Idaho Falls or RWMC facilities.*

**3.10 Transmitting Devices**

- 3.10.1 Before using any wireless *transmitting device* (see def.) at INL facilities, the Fluor Idaho, LLC point-of-contact shall be notified so that approval may be obtained from the Office of Spectrum Management, (208) 526-1145.

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- 3.10.2 The subcontractor shall supply copies of current FCC allocations to the Office of Spectrum Management.
- 3.10.3 All transmitting radio equipment shall be limited to 30 watts maximum power output.
- 3.10.4 A copy of a user permit and FCC license shall be in the possession of each user.
- 3.10.5 The subcontractor shall obtain a new approval for any change in FCC licensing.

**NOTE:** *Prior approval of two-way radio use at a different government site is not transferable to the INL. These permits must be updated annually.*

- 3.10.6 Wireless communications (such as cellular phones or radios) shall NOT be used in security areas unless prior approval has been received from contractor security.

**NOTE:** *Failure of the subcontractor to comply with INL requirements for use of transmitting devices will result in a notice from the contractor to remove any unapproved communication devices from the INL. Further failure may result in default termination of the subcontract and/or removal from the contractor proposers' list for a minimum period of one year.*

**3.11 Sensitive Unclassified Information**

**NOTE:** *The subcontract will identify whether or not the subcontract contains documents designated as sensitive unclassified information.*

- 3.11.1 The subcontractor shall comply with the sensitive unclassified information guidelines of Section 148 of the Atomic Energy Act of 1954, as amended and LWP-11202.
- 3.11.2 Sensitive unclassified information shall be protected against unauthorized disclosure. Drawings and documents that have been designated and stamped as sensitive unclassified information are subject to the provisions of Section 148 of the Atomic Energy Act of 1954, as amended, and LWP-11202. Any person who makes unauthorized disclosure of this information is subject to both criminal and civil penalties.
- 3.11.3 Each person who receives, acquires, or produces sensitive unclassified information shall take reasonable and prudent steps to ensure that it is protected from unauthorized disclosure.

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- 3.11.4 Only U.S. citizens who have an established need-to-know in the performance of official duties shall be allowed access to sensitive information.
- 3.11.5 Access by non-U.S. citizens shall only be permitted when it is in conjunction with established cooperative agreements, treaties, mutual defense acts, or DOE contracts.
- 3.11.6 To prevent unauthorized access, removal, or copying of sensitive unclassified information, such information shall remain under the control of the responsible person.
- 3.11.7 When sensitive unclassified information is outside of an access-controlled facility, the information shall be stored in a locked desk, file cabinet, office, or as required by LWP-11202.
- 3.11.8 Storage inside access controlled facilities should be out of sight, such as in a desk, file cabinet, or credenza.

**3.12 External Transmission or Reproduction of Documents and Information**

- 3.12.1 Documents that are identified as possibly containing sensitive unclassified information shall only be transmitted outside an authorized place of use or storage by the INL mail service, U.S. mail, or an individual with authorized access.
- 3.12.2 Documents shall be packaged to preclude disclosure of the presence of sensitive unclassified information.
- 3.12.3 Packages to be mailed shall be marked with both a recipient address and return address.
- 3.12.4 Sensitive unclassified information shall only be discussed or transmitted over unprotected telephone or telecommunication circuits, or processed or produced on an automatic data processing system if it complies with the guidelines of LWP-11202 for the protection of sensitive unclassified information.
- 3.12.5 Sensitive unclassified information shall be reproduced only when necessary to carry out official duties.
- 3.12.6 Reproduced sensitive unclassified information shall be properly marked.
- 3.12.7 Requests for release of sensitive unclassified information to sources without a need-to-know shall be referred to the contractor security office.

**NOTE:** *Subcontractor failure to comply with the following disposal requirements will result in the contractor withholding final payment until such time as the subcontractor complies.*

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3.12.8 When sensitive unclassified information is no longer needed or the subcontract work is completed and accepted, the subcontractor shall properly dispose of the information.

3.12.8.1 For offsite disposal, the subcontractor shall verify in writing to the SA that all subcontractor documents and other materials that contained sensitive unclassified information have been disposed of by methods that ensure complete destruction or otherwise preclude retrieval.

3.12.8.2 For onsite disposal, the subcontractor shall submit all subcontractor documents and other materials containing sensitive unclassified information to the SA for disposal.

**4. REFERENCES****4.1 Source Documents**

48 CFR 970.2201(b)(1)(ii), Basic Labor Policies

Section 148 of the Atomic Energy Act of 1954, as amended

DOE O 473.4B, Admin Chg. 1 Safeguards and Security Program

DOE O 473.3 Protection Program Operations

**4.2 Related Documents**

PRD-5001, “Training and Indoctrination”

Optional Form 306, “Declaration of Federal Employment”

Standard Form 85, “Questionnaire for Non-Sensitive Positions”

FRM-1860, “Security Supplement”

DOE Termination Statement

LWP-11202, “Controlled Unclassified Information Program”

**5. APPENDICES**

None

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**6. DEFINITIONS**

Fluor Idaho, LLC Point-of-Contract (POC) – Individual identified in the subcontract documents as the duly authorized representative for overseeing subcontractor work activities.

Contractor – Battelle Energy Alliance, LLC (BEA) and/or Fluor Idaho, LLC (ICP-Core). The term “Contractor” may be used interchangeably to mean BEA or ICP-Core security requirements.

Controlled Articles – Includes, but is not limited to, government – or company-owned cameras, video/audio recording devices, transmitting devices, or other government property transported on or off the INL or between DOE facilities.

Controlled Substances – Includes, but is not limited to, the following five basic categories:

- A. Central Nervous System (CNS) – Stimulants. Consist of three basic categories: Amphetamines, Methamphetamine, and Cocaine.
- B. Central Nervous System (CNS) – Depressants. Consist of three basic categories: Barbiturates, Methaqualone, and Tranquilizers.
- C. Narcotics/Opiates. Are also CNS depressants with the added characteristic of being a powerful analgesic or painkiller. Examples include Codeine, Demerol, Dialaudid, Methadone, Morphine, Opium, Percodan, and Heroin.
- D. Hallucinogens. Consist of four major types: LSD, Psilocybin, Mescaline (Peyote), and PCP.
- E. Cannabis. Consist of Marijuana, Hashish, and Hashish Oil.

Prohibited Activities – Includes, but is not limited to, gambling, hunting, fishing and trapping; non-emergency aircraft landings, or flights below current FAA minimums; and the destruction, excavation, or appropriation of any historic or prehistoric ruin, artifact, or object of antiquity from the INL.

Prohibited Articles – Includes, but is not limited to, firearms, ammunition, alcoholic beverages, illicit narcotics, explosives, wiretapping or eavesdropping devices, or any dangerous or potentially dangerous instruments or materials likely to cause substantial injury to persons, property, or animals.

Property Protection Area – A type of security area having boundaries identified with barriers and access controls for the protection of DOE property.

Transmitting Devices – Items such as CB radios and government – and corporate (business)-owned cellular phones and radios.