As you may already know, the Government Accounting Office (GAO) is conducting a study on the “over classification of information” by Government agencies. The GAO has visited or will visit a number of Headquarters offices and field sites to gather information on our classification system. The study was prompted by Congressional concern that classification of information has proliferated since 9/11. There have also been numerous newspaper articles in recent months questioning the Government’s need to protect much of the information that has been classified and concerning Congress’ frustration with its inability to obtain classified documents from the executive branch.

Over classification hinders our ability to complete the work the public expects us to do. There are many problems associated with over classification that contribute to this. First, the cost to create and protect the immense quantity of classified documents the Government produces each year is tremendous. Second, the Government continues to have a serious problem in maintaining and granting over one million Americans the clearances they need to do their jobs. Third, because of the balkanized system of agencies controlling our classified information, personnel with need to know can’t get the information they require in a timely fashion or, like Congress, can’t get it at all. Finally, agency classification organizations bear the great cost of reviewing and declassifying documents under the requirements of Presidential Executive Order 12958.

The primary job of the DOE classification program has been to protect crucial nuclear weapon design and isotope enrichment technology information developed over the past 60 years. At one time, public interest groups believed the DOE was using classification to hide environmental problems at its sites. Fortunately, the DOE addressed this concern, and by the late 1990s, environmental remediation was ongoing at many former sites and active communication existed with local public groups about environmental issues. The result is that very few people today would argue that the DOE is practicing over classification.

Within the DOE we have a variety of policies and procedures to prevent over classification. First of all, we limit the number of individuals who can make original classification determinations. We also require the codification of their decisions through a centralized system to ensure that they are clearly understood and properly disseminated. Unlike many other agencies, the DOE only allows a limited number of properly trained and certified personnel to make classification decisions.

Marshall Combs, Director, Office of Security, opened the meeting emphasizing the importance of classification to the Nation’s security. He noted that in reviewing documents containing nuclear weapons history, reviewers become part of that history. Mr. Combs also stated that classification is a dynamic field, and we not only need to preserve the knowledge of retirees, but also require the codification of their decisions through a centralized system to ensure that they are clearly understood and properly disseminated.

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Special points of interest:

- What changes are in the next Manual? — See Page 2.
- What is HPSPD-12? — See Page 3.
- What classification/UCNI guides are being developed/revised — See Page 5.
- What do I do if I see classified information in the public domain? — See Page 6.
Andrew Weston-Dawkes, Director, Office of Classification and Information Control (OCIC), reported from Washington. Mr. Weston-Dawkes stated that drafts of the new Unclassified Controlled Nuclear Information (UCNI) regulation and DOE Manual 475.1-1A, Identifying Classified Information, have been prepared. He also indicated that the Oversight Review Program is being modified to place greater emphasis on performance. Knowledge management and guidance streamlining systems continue to be developed to preserve knowledge as highly qualified senior personnel retire.

Jim Wendt, Document Reviews Division (DRD); Edie Chalk, Technical Guidance Division (TGD); Vinh Le, Production and Analysis Division (PAD); and Nick Prospero, Outreach, Training, and Certification Program, reported on their activities in the last year. The DRD estimates that in the Executive Order Program nearly four million pages remain for review. The DRD also reported that it is teaming with the Oak Ridge Operations Office to review historical records of the former Kellex Corporation, which played a major role in the Manhattan Project, particularly in the area of gaseous diffusion for uranium enrichment. The PAD reported that HQ and local guides submitted to HQ have been or are being converted to Extensible Markup Language (XML), the new standard language for HQ guidance development. XML allows authors to place additional data in the file, including historical information that may be helpful to reviewers. The Outreach, Training, and Certification Program conducted 12 assistance visits to DOE and NNSA HQ and field organizations and visited 4 other agencies last year. Common problem areas uncovered during assistance visits included out-of-date guidance, incomplete information on Contract Security Classification Specification forms, other agencies not providing adequate guidance for work-for-others programs, and authority letters not being updated after reorganizations.

Michael Spence, Classification Officer (CO) of the NNSA Service Center (SC), reported on NNSA initiatives. NNSA continues to refine its organizational structure. Major initiatives include developing procedures for joint NNSA/DOE guidance approval, establishing a 5-year contingency document review contract, distributing the electronic Classification Guidance System on the SC CLAN, developing the position of classification representative for field organizations without a CO, and ongoing appraisals of NNSA sites.

Daniel Blumenthal, from the Domestic Nuclear Detection Office (DNDO), Department of Homeland Security (DHS), was the guest speaker. The DNDO was created in April 2005 to “develop a global nuclear detection architecture and support the development of a domestic detection system to detect nuclear devices or fissile or radioactive material intended for illicit use.” The goal of the DNDO is to prevent a nuclear incident. This effort involves the DHS, the DOE, the Department of Defense, the Department of State, the Federal Bureau of Investigation, and state and local organizations without a CO, and ongoing appraisals of NNSA sites.

DOE Manual 475.1-1A Revision

DOE Manual 475.1-1A, Identifying Classified Information, is being revised. For the first time in several years, the manual will have an accompanying order, DOE Order 475.X. The order will define who the manual applies to, overall requirements and responsibilities, and define terms. The manual will provide details to implement the order. In addition to the order and manual, a guide will be developed which will describe suggested approaches to fulfilling manual requirements. An Oversight Review Process Guide is also being developed to explain the Oversight Review Program and assist organizations in performing their own oversight reviews and self-assessments.

The revised manual includes several new initiatives and a major revision of the Oversight Review Program. New initiatives include proposals to create a new category of intelligence-related information, establish field Classification Representative (CR) positions, and to define categories of guidance.

A new category of classified information is being proposed. Transclassified Foreign Nuclear Information (TFNI) would apply to intelligence-related foreign Government information that is similar to U.S. Restricted Data. This information is currently National Security Information, which means it could be automatically declassified. Transclassification of TFNI must be negotiated with the Director, Central Intelligence Agency.

Another proposal is to extend the position of CR, which is currently limited to Headquarters, to the field. Sites that do not have a Classification Officer (CO) would be required to have a CR designated by the head of the field element. The CR would have to be a derivative classifier (DC) and be aware of classified work at the field site.

Guidance categories are newly defined in the revised manual. In the past, “active,” “archived,” and “obsolete” guidance were commonly used but not defined. It is proposed to replace these terms with “active” and “cancelled” guidance. Cancelled guidance would be divided into “confirmation” guidance and “historical” guidance. Confirmation guidance would be used to confirm information is unclassified. Historical guidance would be used as a reference only.
Although SGI applies only to NRC-regulated facilities, DOE employees can expect to encounter it more frequently as more DOE facilities fall under NRC regulations, and we share more information concerning the packaging, transportation, and long-term storage of civilian radioactive waste. Consequently, DOE employees must understand the access and handling requirements of SGI, and in some instances, how to determine if a DOE-originated document contains SGI.

First, let's discuss what SGI is. The Atomic Energy Act defines SGI as information whose dissemination “could reasonably be expected to have a significant adverse effect on the health and safety of the public or the common defense and security by significantly increasing the likelihood of theft, diversion, or sabotage of materials or facilities subject to NRC jurisdiction.” These words may sound familiar since SGI is the older cousin of the DOE’s Unclassified Controlled Nuclear Information (UCNI). Examples of SGI include special nuclear material transportation; guns, gates, guards; pro-force reaction times and operational procedures; security system improvements and upgrades; and vulnerabilities and weaknesses not yet corrected. The NRC may also designate other information that falls within the definition as SGI.

Some SGI subject areas overlap with DOE classified subject areas; however, because NRC facilities are privately owned rather than Government facilities, some security issues related to them cannot be classified as National Security Information. In addition, NRC information is likely to be shared with noncleared individuals, such as state and local police and emergency responders. For these reasons, classification/designation for similar threat scenarios may be different for a DOE and an NRC facility. For example, a scenario that describes an attacker’s methodology and identifies vulnerabilities in the security system would be designated SGI by the NRC. However, the same information would be classified for a DOE facility. It is important to note that if information were considered to meet both the SGI and National Security Information levels, the classified markings would prevail.

Because SGI is unclassified, many DOE employees mistakenly equate it to Official Use Only or UCNI. However, many access and handling requirements for SGI are similar to the requirements for classified information. For example, SGI must be stored in an appropriate security container and must be electronically processed on a system that is self-contained within the licensee’s or contractor’s facility. Additionally, SGI documents must be double wrapped when transported outside a facility and the envelopes must be marked in a manner comparable to the requirements for classified information. Access requirements include not only a need to know, but also a determination of the trustworthiness of an individual. This is usually accomplished through a fingerprint check with the FBI. A security check is not necessary until access to a secure area is required.

Some DOE classification guides, such as CG-OCRWM-1, Joint DOE and NRC Sensitive Unclassified Information and Classification Guide for the Office of Civilian Radioactive Waste Management, contain topics that identify SGI information. DOE derivative classifiers (DCs) who are authorized to use these guides are also authorized to use these topics to determine if a document contains SGI and mark it appropriately. At present, there is no requirement for additional NRC training and certification; however, the DC must be locally trained on the proper SGI marking procedures and be knowledgeable in the subject area. DOE DCs are not authorized to decontrol documents that are marked SGI. This must be done by the NRC.

 Needless to say, we couldn’t cover everything you need to know about SGI in this article, but hoped to make you aware of some of the requirements. If you have any questions concerning SGI or need additional information, contact Nick Prospero at Nick.Prospero@hq.doe.gov or (301) 903-9967.

Homeland Security Presidential Directive-12 dated August 27, 2004, entitled “Policy for a Common Identification Standard for Federal Employees and Contractors” directed the promulgation of a Federal Standard for secure and reliable forms of identification for Federal employees and contractors. It further specified secure and reliable identification that (1) is issued based on sound criteria for verifying an individual employee’s identity; (2) is strongly resistant to identity fraud, tampering, counterfeiting, and terrorist exploitation; (3) can be rapidly authenticated electronically; and (4) is issued only by providers whose reliability has been established by an official accreditation process. National Institutes of Standards and Technology Federal Information Processing Standard (FIPS) 201 was issued February 25, 2005, as the standard.

The standard is applicable to identification issued by Federal departments and agencies to Federal employees and contractors (including contractor employees) for gaining physical access to Federally controlled facilities and logical access to Federally controlled information systems except for “national security systems” as defined by 44 U.S.C. 3542(b)(2).
Governments. The DNDO is staffed by members of the DHS and detailees from several other agencies. The effort involves complicated classification issues, and Mr. Blumenthal indicated further guidance is needed.

Lynn Gebrowsky, Director, Office of Safeguards and Security Policy (OSSP), discussed safeguards and security policy issues. OSSP is streamlining the 27 safeguards and security directives into a single DOE order and 7 topical manuals. Almost all concurrences and non-concurrences have been received. The new common identification badge for Federal and contractor employees was of particular interest. The identification cards will control “physical and logical access” to Government facilities and information, including computer access. Some embedded electronic data will be included on the card for proper identification. The common identification badge will begin to be phased in starting in October 2005.

Other speakers included: Paul Laplante, Director, Policy and Quality Management Division (PQMD), who gave a presentation on the revision to DOE Manual 475.1-1A; and Bern Stapleton, Program Manager for Safeguards Information (SGI), Nuclear Regulatory Commission (NRC), who gave a presentation on SGI. A joint presentation on the “No Comment” Policy was given by the NNSA SC and PQMD. These subjects are covered in depth in articles in this Communi Qué issue.


Some of these topics will be discussed in future issues of the Communi Qué. For a copy of the minutes, contact Cathy Maus at Cathy.Maus@hq.doe.gov or (301) 903-4863.

1. Which of the following statements concerning Safeguards Information (SGI) is correct?

   a. The protection requirements for SGI are identical as those for DOE OUO information.
   b. A DOE derivative classifier can determine that a document contains SGI if a DOE classification guide authorized for his/her use identifies information contained in the document as SGI.
   c. A DOE declassifier can decontrol an SGI document if the information is covered by a DOE classification guide authorized for his/her use.
   d. All of the above are correct.

2. If a topic in a classification guide shows that the information is SNSI [EV], the “Declassify On” line for a document dated August 1, 2005, that contains information covered by the topic should be annotated as:

   a. EV
   b. Event
   c. August 1, 2030
   d. None of the above.

3. The latest change to CG-SS-4 A is:

   a. Change 3, dated 08/26/03
   b. Change 2, dated 07/25/03
   c. Change 3, dated 05/05/05
   d. Change 4, dated 05/05/05

4. When a classification topic indicates that a document containing the information identified by the topic can be declassified upon the occurrence of a specific event, the event is described

   a. in a note to the topic.
   b. as note to the root topic.
   c. at the beginning of the chapter.
   d. any of the above.

5. Homeland Security Presidential Directive 12, which sets a policy for the identification standard for Federal and contractor employees, will begin phasing in

   a. October 2005
   b. January 2006
   c. September 2006
   d. One year from the date the Presidential directive was signed.

6. Which of the following is being revised?

   a. DOE Manual 475.1-1A, Identifying Classified Information
   b. CG-SS-4, Classification and UCNIP Guide for Safeguards and Security Information
   c. Classification Bulletin GEN-16, No Comment Policy for Classified Areas
   d. All of the above.

7. Which Guide update has been issued since the last Communi Qué?

   a. CG-NMP-2
   b. CG-ACP-1
   c. CG-NMI-1
   d. CG-HR-3

Answers (on page 7)
Classification Guides (CG)

CG-BPA-1. A new CG for the Bonneville Power Administration covering energy critical infrastructure information is being developed. The first working group (WG) meeting was held on December 19, 2004. The next WG meeting is scheduled for September.

CG-CM-1. A new CG concerning activities of the gaseous diffusion membrane technology transfer under the Commercial Membrane Corporate Research and Development Agreement was approved and issued.

CG-ES-1. A new CG for environmental sampling is being developed. Two WG meetings have been held. This CG will provide guidance for the rapidly improving environmental sampling capabilities used in support of National and international arms control and nonproliferation objectives. A final draft is in technical review.

CG-NEPW-1. The final draft CG for the robust nuclear earth penetrator weapon will be sent to the Department of Defense (DoD) and the National Nuclear Security Administration (NNSA) for approval. Once approved by the DoD, NNSA, and the Office of Classification and Information Control (OCIC), the guide will be published.

CG-HRW-1. The CG on historical radiological warfare information has been drafted and is awaiting declassification actions. The Technical Evaluation Panel reviewed and recommended the declassification of most of the radiological warfare information. An action memorandum has been sent to the DoD for coordination. The guide will delineate the small amount of radiological warfare information still requiring protection once the declassifications are approved.

CG-LCP-2. The revised CG on the Louisiana Energy Service Gas Centrifuge Program has been coordinated with the United Kingdom (UK) for final review and approval. It was sent to the Nuclear Regulatory Commission (NRC) for concurrence and approval.

CG-NMI-1. A new CG for nuclear material inventories is being developed.

CG-PET-1. A new CG to address proliferator enrichment technology is being developed.

CG-PSP-1. A new CG for the plasma separation process was developed. All technical issues have been resolved. The guide is in final coordination.

CG-RDD/IND-1. A new CG for radiological dispersal device/improvised nuclear device emergency response and consequence management is being jointly developed by the DOE, the Department of Homeland Security, and the NRC. Derived primarily from CG-RER-1, DOE Classification and Information Control (OCIC), the guide is in final coordination.

Guidance Status

CG-SS-1A. The Executive order update to the classified supplement to CG-SS-4 has completed, and some other changes have been made. The revised version of the guide has been approved and issued.

CG-SS-1. A WG has identified all topics in the CG for stockpile stewardship for deletion or transfer to other guides. CG-SSP-1 will be rescinded, and users will be provided a list of topics that will continue to be valid pending their migration to other guides.

CG-UK-2. A new WG, co-chaired by DOE and the UK, has met to begin work on a major revision to the CG for the exchange and safeguard of material between the United States and the UK. A WG meeting was held June 1-2, 2005. All technical issues have been resolved. Completion is expected in late 2005.

New Guidance/Changes

(since last Communique)

CG-CM-1, 6/16/05
CG-NMP-2, Change 2, 6/16/05
CG-SCE-1, Change 2, 6/16/05
CG-SS-4, Change 4, 5/5/05
CG-SS-4A, Change 3, 5/5/05

Topical Classification Guides (TCG)

TCG-DS-2. A revision to the TCG for detonation systems is being developed. The revised guide will incorporate new technological developments and add use control information. The guide is in final coordination.

TCG-SSS. A second WG meeting is scheduled for October/November at Sandia National Laboratories/New Mexico.

Guidance (Continued on page 7)
Cancelled guidance would not be used to determine if information is classified.

Approving authorities would approve guidance cancellation. If the guidance were no longer needed by the issuing organization, the approving authority could decide to continue to maintain the guide or incorporate topics into other guidance. In such cases, it would no longer be necessary for the issuing organization to update the guidance.

There are several new training requirements proposed in the revised manual. Possible revisions include expanding the requirements for CO training and adding field CR training and subject-matter-specific classification awareness training. Enhanced training requirements for new hires, original classifiers, DCs, and derivative declassifiers have been proposed.

Oversight Review requirements that place more emphasis on performance are being proposed. Several old requirements would be removed and greater importance would be placed on self-assessments and oversight reviews of subordinate programs. Both would be required to cover all applicable areas of OCIC oversight reviews.

The revised manual includes many other proposed changes necessitated by the amendment to Executive Order 12958, creation of the NNSA, lessons learned from the Oversight Review Program, and questions received. Comments on the manual revision were due July 1st. When comments are incorporated, the draft manual and Contractor Requirements Document will be sent to REVCOM. If you have any questions concerning the manual, contact Linda Brightwell at LindaBrightwell@hq.doe.gov or (301) 903-5454.

There is an increasing amount of classified information available in the public domain. It appears on the Internet and in newspapers, articles, magazines, and books. When classified information is publicly compromised, comment by DOE employees can result in greater damage to the national security than would occur if no comment were made. Classification Bulletin GEN-16, “No Comment Policy for Classified Areas,” was written in 1986 to deal with these circumstances. However, GEN-16 was created before widespread use of the Internet. In the wake of the increased availability of sources that may contain classified information, the “No Comment” Policy is being reconsidered.

GEN-16 applies not only to classified information in the public domain, but to documents submitted to DOE in classified subject areas and spoken communications in classified subject areas. According to GEN-16, no comment is to be made on the accuracy, classification, or technical merit of classified information in the public domain or in documents submitted to DOE. Those instructions seem clear. However, there are several difficulties with the “No Comment” Policy.

Occasionally a person deserves special recognition for contributions to the classification community. This year, Nancy “Cathy” Maus was recognized for her role in establishing the classification training, certification, outreach and appraisal programs, and in developing classification policy. Throughout her years as a Federal employee and contractor, Cathy has dedicated herself to developing quality programs and mentoring persons within the programs. She continues to be an example to emulate.
What Is an EVENT?

When the automatic declassification of a document contains information identified in a classification guide topic specifies a certain event, it is conveyed by placing the term “EV” after the classification level for the topic (e.g., SNSI [EV] or SNSI [25X8; EV]). Many derivative classifiers (DCs) have been taking this literally by incorrectly placing “Event” or “EV” on the “Declassify On” line of the classifier stamp.

The correct procedure is to describe the event in sufficient detail for someone who isn’t a DC to be able to recognize when the declassification event occurs. Normally, the event information that is to be recorded on the stamp is identified in a note to the topic (e.g., NOTE: Declassify when the vulnerability is corrected.), but it may be listed elsewhere. For example, declassification events may appear only once as a note to the root topic, at the beginning of a chapter, or at the beginning of a section (e.g., The declassification event for the designated subtopics below occurs when the vulnerability is corrected.). The instructions will always be there, you just have to look.

Andrew P. Weston-Dawkes
Director, Office of Classification and Information Control

Guidance (Continued from page 5)

TCG-VH-2. A revision to the TCG for vulnerabilities and hardening is in final coordination.
TCG-WI-2. A first draft of a revision to the TCG for weapon initiators is being developed.
TCG-WM-2. A revision to the TCG for weapon materials has been developed. Comments on the draft guide from DOE and NNSA stakeholders have been received and are being incorporated. No comments have been received from DoD.

UCNI Topical Guidelines (TG)
TG-NNP-2. A revision of the nuclear nonproliferation TG is being developed.

If you have any questions, contact Edith Chalk, Director, Technical Guidance Division, at edith.chalk@hq.doe.gov or (301) 903-1185.
**UPCOMING EVENTS**

August 22-25  OCIC Oversight Review, Livermore  
SO, LLNL, and Sandia National Laboratories/CA.

August 30  NNSA Initial DC Training, PXSO

August 31  NNSA Weapon Video Training, PXSO

August 31  NNSA DC Recertification Training, PXSO

September 13  NNSA Initial DC Training, FORS

September 13-15  Classification Officer/Representatives Course, GTN

September 14  NNSA Weapon Video Training, GTN

September 14  NNSA DC Recertification Training, GTN

September 19-22  Information Security Oversight Office Inspection of DOE Information Security Program

September 26  OCIC Oversight Review, NA-20

September 27  NNSA Initial DC Training, NNSA SC

September 27  Classifiers Course, GTN

September 28  NNSA Weapon Video Training, NNSA SC

September 28  NNSA DC Recertification Training, NNSA SC

October 18-19  Derivative Declassifiers Course, GTN

October 18-21  OCIC Oversight Review, Y-12 Site Office, Y-12 NSC, and OSTI

October 24-27  Historical Records Restricted Data Reviewers Course, FORS

October 31- November 4  Overview of Nuclear Weapons Classification Course, NNSA SC

November 8  NNSA Initial DC Training, KCSD

November 9  NNSA Weapon Video Training, KCSD

November 9  NNSA DC Recertification Training, KCSD

**CONGRATULATIONS!**

**to**

**DON WRIGHT**

**OF BECHTEL-NEVADA**

**for receiving the**

**2005 AWARD OF EXCELLENCE**

Each year, at the Classification Officer’s banquet, the Office of Classification and Information Control recognizes a person from the classification community for outstanding service. The Award of Excellence is presented to an individual who made significant contributions to the classification program. This year Don Wright was selected to receive this award. Don’s distinguished career spanned more than 20 years, including nine years as the CO for Bechtel Nevada. During his tenure as CO, Don consolidated classification efforts of three Nevada sites into a single classification program. Throughout his career, Don assisted in the development of many classification guides, and played a vital role in the development of guidance for the Device Assembly Facility, the Joint Actinide Shock Physics Experimental Research Facility, and the Unconventional Nuclear Warfare Defense Program. Don’s efforts encompassed the areas of nuclear weapon testing, nuclear weapon diagnostics, stockpile stewardship, and nuclear emergency response. His dedication and initiative earned him the respect of his peers and the Award of Excellence for 2005.

**HSPD-12 (Continued from page 3)**

In response to HSPD-12 and Office of Management and Budget guidance, a Department of Energy Interdepartmental Working Group, along with the HSPD-12 Project Management Office chaired by the Office of the Chief Information Officer, has developed the new Departmental identification credential that will meet the criteria of FIPS 201. In conjunction with the new credential, working groups are also developing the associated system modifications required for identity verification, credential issuance, physical access, and logical access required to be fully compliant with FIPS 201. In addition, a Privacy Impact Assessment is also underway. When fully implemented, the Departmental plan to comply with HSPD-12 will significantly improve the Department’s physical and logical security posture and provide machine readable and electronic verification of transactions.

Full implementation of the Departmental plan to comply with FIPS 201 will impact a multitude of current employee and contractor policies. The Interdepartmental Working Group is currently assessing the required changes. Required changes will be in place prior to initial implementation. The initial implementation of the DOE plan for compliance with HSPD-12 and FIPS 201 will start on October 27, 2005, beginning with updated identity verification processes prior to badge issuance at all DOE sites. Sites are now being considered for the initial implementation of the new DOE credential and the installation of the corresponding modifications to the physical access systems and IT systems commencing later in FY 2006.

Additional articles will be published in subsequent issues to promulgate the implementation strategy, the selection of the initial implementation locations, and the progress being made to full compliance across all DOE locations. Questions may be directed to the Project Manager, Fred Catoe, at 202-586-3768.