



## Department of Energy

Washington, DC 20585

October 3, 2024

Dr. Thomas Mason  
Laboratory Director  
Triad National Security, LLC  
Los Alamos National Laboratory  
Bikini Atoll Road SM 30  
Los Alamos, New Mexico 87545

SEL-2024-01

Dear Dr. Mason:

The Office of Enforcement has completed an evaluation into similar recurring Incidents of Security Concern (IOSC) involving the introduction of unauthorized controlled articles into security areas, as reported by Triad National Security, LLC (Triad) into the Department of Energy's (DOE) Safeguards and Security Information Management System between October 2023 and February 2024. Based on this evaluation, the Office of Enforcement identified concerns that warrant management attention by Triad.

The recurring incidents involved the introduction of items such as cell phones, coffee makers with Bluetooth, and earbuds with microphones, into security areas, revealing concerns with Triad's implementation of Title 10, Code of Federal Regulations, Part 824, *Procedural Rules for the Assessment of Civil Penalties for Classified Information Security Violations*. Specifically, Triad did not adequately develop and implement procedures to detect and deter the introduction of unauthorized controlled articles into security areas. For example:

- The Office of Enforcement reviewed P217, *Controlled Portable Electronic Devices*, the Triad governing document for controlled articles, and interviewed Triad employees responsible for implementing P217. P217 is in revision to include clarity on the process of introducing controlled articles into security areas. The current document has inexplicit and incomplete instructions on the processes for introducing controlled articles into security areas (e.g., review and approval of disablement procedures for microphone, camera, and wireless capabilities). As a result, employees are not always implementing these processes properly. Triad should develop and implement clear procedures that define Triad requirements and employee responsibilities when introducing any controlled articles (e.g., privately owned, Triad-owned, and vendor-owned) into security areas.
- The Los Alamos Field Office requested that Triad conduct a causal analysis to identify the root cause of recurring IOSCs involving the introduction of

unauthorized controlled articles into security areas. Triad completed the causal analysis in May 2023 using a simplified apparent causal analysis method, which determined that the root cause for the IOSCs was human error. Triad should consider conducting a more rigorous causal analysis using a structured causal analysis method (e.g., change analysis, barrier analysis, or tree analysis) to give senior management a higher degree of certainty that the root causes are properly identified and that effective corrective actions are developed to universally address those causes. Triad should also consider having a qualified Causal Analyst lead the causal analysis.

- The Office of Enforcement interviewed Triad Inquiry Officials (IO) during the onsite portion of this evaluation, revealing that Deployed Security Professionals (DSP) conduct cursory reviews of cell phones involved in IOSCs and do not include subject matter experts. When an IOSC involves the introduction of a cell phone into a security area, the assigned DSP asks the cell phone owner if any classified processing or discussions occurred in the security area where the cell phone was present. If the owner replies “no,” the DSP requests permission to check the phone for evidence of an active call or photographs taken during the period the phone was in the security area. If the check produces negative results, no further action is taken. If the owner of the phone indicates that the phone was in proximity of classified processing or discussions, the DSP will check the phone for an active call or photographs taken during the period the phone was in the security area. If the check produces negative results, no further action is taken. If the check reveals the phone contains classified information, there is no current process to confiscate the affected electronic device. Consequently, Triad should establish a process that directs the actions necessary to ensure affected electronic devices are appropriately sanitized. Triad should also consider questioning others who are familiar with the security area (e.g., the cell phone owner’s immediate supervisor, or the Classified Matter Protection and Control Manager) regarding the frequency of classified work and discussions around the area of the IOSC. Triad should also include subject matter experts in the inquiry process to evaluate cell phones involved in IOSCs to help determine whether classified matter was potentially compromised.

The Office of Enforcement acknowledges that Triad has implemented corrective measures for the identified concerns, including: (1) increasing training for Triad employees regarding the introduction of unauthorized controlled articles into security areas; (2) posting additional signage across the Laboratory to remind employees not to introduce unauthorized controlled articles into security areas; and (3) reviewing engineering controls (i.e., electronic detection technologies) for deployment across the Laboratory. In addition to the recommendations above, these corrective measures should reduce the likelihood of similar incidents in the future.

The Office of Enforcement has elected to issue this Enforcement Letter to convey concerns with similar recurring IOSCs involving the introduction of unauthorized controlled articles into security areas. Issuance of this Enforcement Letter reflects DOE’s decision to not pursue further enforcement activity against Triad at this time. In

coordination with the DOE's National Nuclear Security Administration, the Office of Enforcement will continue to monitor Triad's efforts to improve security performance.

This letter imposes no requirements on Triad, and no response is required. If you have any questions, please contact me at (301) 903-7707, or your staff may contact Ms. Carrienne Zimmerman, Director, Office of Security Enforcement, at (301) 351-1186.

Sincerely,

A handwritten signature in black ink, appearing to read 'Anthony C. Pierpoint', with a stylized flourish at the end.

Anthony C. Pierpoint  
Director  
Office of Enforcement  
Office of Enterprise Assessments

cc: Tamara Greenwood, Triad National Security, LLC  
Theodore Wyka, NA-LA