



NNSA Policy Letter: NAP-1

Date: May 21, 2002

TITLE: Establishment of a Policy Letter System for Managing Policy, Directives, and Business Practices Within the National Nuclear Security Administration

- I. OBJECTIVE: Define a formal system to develop and codify National Nuclear Security Administration (NNSA) policy, directives, and business management practices which are applicable to the Administration.

This system, to be called Policy Letters, codifies how the Administration will establish policy, and provide direction and guidance to all its elements. The Administration's Policy Letter system is a process which will: (1) establish new policy or directives that are unique to the Administration; (2) supplement or indicate how the Administration will implement a Departmental Directive including implementation of directives in a cost efficient manner; and/or (3) provide business and operating guidance. Administration Policy Letters will take two forms:

- Directives Policy Letters which are related to (1) and (2) above; and
- Business and Operating Policy Letters which relate to (3) above.

The Administration's Policy Letter system is issued under the authority of Section 3212(b)(2) of Public Law 106-65, the National Defense Authorization Act for Fiscal Year 2000.

- II. APPLICABILITY: The provisions of Policy Letters apply to all of the Administration's organizations and elements and to non-NNSA elements funding activities at sites where the Administration is the landlord.

- III. REQUIREMENTS:

The process for preparation and review of the Administration's Directives and Business and Operating Policy Letters is presented in the attachment.

Every Administration Directive or Business and Operating Policy Letter that specifies a procedure or process must include a flow chart of that process and identify the resource requirements (financial and manpower).

Once Administration Policy Letters have been reviewed and comments addressed by the owning element, the Policy Letter will be submitted to the Management Council for approval prior to obtaining the Administrator's (or other appropriate) signature.

- A. Directives Policy Letters are utilized, in addition to the Department's Directives System, to:
1. indicate how the Administration will implement a Department Directive;
 2. implement Departmental directives in a cost efficient manner;
 3. impart new policy and/or directives that are unique to the Administration; and/or
 4. provide short-term notices until more formal direction can be provided.

When an Administration Policy Letter supplements a Departmental directive, a notation will appear on the Departmental Directive (near the heading of the directive) that additional Administration requirements exist in an associated Policy Letter. The Department's Directives are applicable to the Administration unless or until an Administration Policy Letter is provided.

- B. Business and Operating Policy Letters will provide a process for issuing sound Business and Operating guidance that is essential to efficient operation. Examples of program elements owning administrative requirements and/or practices include, but are not limited to:
1. Associate Administrator for Facilities and Operations
 - a. Field Operations Support
 - a. Infrastructure and Facilities Management
 - b. Environment, Safety and Health Operations Support
 - c. Project Management and Engineering Support
 - d. Nuclear Safeguards and Security
 2. Associate Administrator for Management and Administration
 - a. Diversity programs
 - b. Planning, Programming, Budgeting and Evaluation
 - c. Procurement and Assistance Management
 - d. Human Resources
 - e. Information Technology, Information Systems, Information Management, and Chief Information Officer functions
 - f. Administrative Services and Internal and Management Controls
- C. Approved Policy Letters will be distributed to all Administration Headquarters and Field organizational elements.

- D. Both Directives and Business and Operating Administration Policy Letters will have the following sections:
1. Objective
 2. Applicability
 3. Requirements
 4. Responsibilities
 5. Contractor Requirements Document (Optional)
 6. References (Optional)
 7. Point of Contact for Administration Policy Letter
- E. Administration Policy Letters will be: (1) approved by the Management Council, (2) maintained by the Director, Policy and Internal Controls Management, (3) numbered sequentially (with a notation of the associated DOE Directive, if applicable), and (4) may be rescinded only by the person authorized to issue the Policy Letter.
- F. Administration Policy Letters which contain sensitive or classified information are subject to the review procedure in this policy. They will not be circulated by unsecure email, unsecure facsimile, or other unsecure means.

IV. RESPONSIBILITIES:

- A. Administrator, National Nuclear Security Administration
1. Sign all Administration Directives Policy Letters which establish policy
 2. Approve the rescinding of approved Administration Directives Policy Letters which established policy
- B. Principal Deputy Administrator, National Nuclear Security Administration
1. Sign all Administration Directives Policy Letters providing direction or guidance
 2. Approve the rescinding of approved Administration Directives Policy Letters which provides direction or guidance
- C. Management Council
1. Approve all Administration Directives Policy Letters
 2. Approve all Administration Business and Operating Policy Letters
 3. Recommend rescision of Administration Policy Letters
- D. Deputy Administrators for Defense Programs, Defense Nuclear Non-Proliferation, and Naval Reactors.
1. Prepare and recommend approval of Administration Directives Policy Letters for functions which they own
 2. Review and comment on Administration Directives and Business and Operating Policy Letters prepared by other Deputy Administrators, Associate Administrators, or Heads of NNSA Staff Offices.

- E. Associate Administrator for Facilities and Operations
 1. Manage the Administration's Directives Policy Letter System
 2. Manage the field element review of all Administration Policy Letters
 3. Prepare and recommend approval of Administration Directives and Business and Operating Policy Letters for functions owned by the Associate Administrator
 4. Sign approved Administration Business and Operating Policy Letters for functions owned by the Associate Administrator
 5. Review and comment on Administration Directives and Business and Operating Policy Letters prepared by Deputy Administrators, other Associate Administrators, or Heads of NNSA Staff Offices

- F. Associate Administrator for Management and Administration
 1. Manage the Administration's Business and Operating Policy Letter System
 2. Maintain the records management system for all Administration Policy Letters
 3. Prepare and recommend approval of Administration Directives and Business and Operating Policy Letters for functions owned by the Associate Administrator
 4. Review and comment on Administration Directives and Business and Operating Policy Letters prepared by Deputy Administrators, other Associate Administrators, or Heads of NNSA Staff Offices.
 5. Sign approved Administration Business and Operating Policy Letters for functions owned by the Associate Administrator

- G. Heads of NNSA Staff Offices
 1. Prepare and recommend approval of Administration Directives and Business and Operating Policy Letters for functions they own
 2. Review and comment on Administration Directives and Business and Operating Policy Letters prepared by Deputy Administrators, Associate Administrators, and Heads of other NNSA Staff Offices

- H. Field Element Managers
 1. Review and comment on all proposed Administration Policy Letters
 2. If the Administrator assigns Administration functions directly to one or more field elements, those field element managers may propose Administration Directives Policy Letters for those functions
 3. A Field Element Manager may establish a local system of Policy Letters to provide local guidance to Administration Directives and Business and Operating Policy Letters

All of the above responsibilities can be delegated within the respective organizations with the exception of those of the Administrator, Principal Deputy Administrator, and the Management Council.

V. POINT OF CONTACT FOR ADMINISTRATION POLICY LETTER: Director, Field Operations Support, (202) 586-8123.

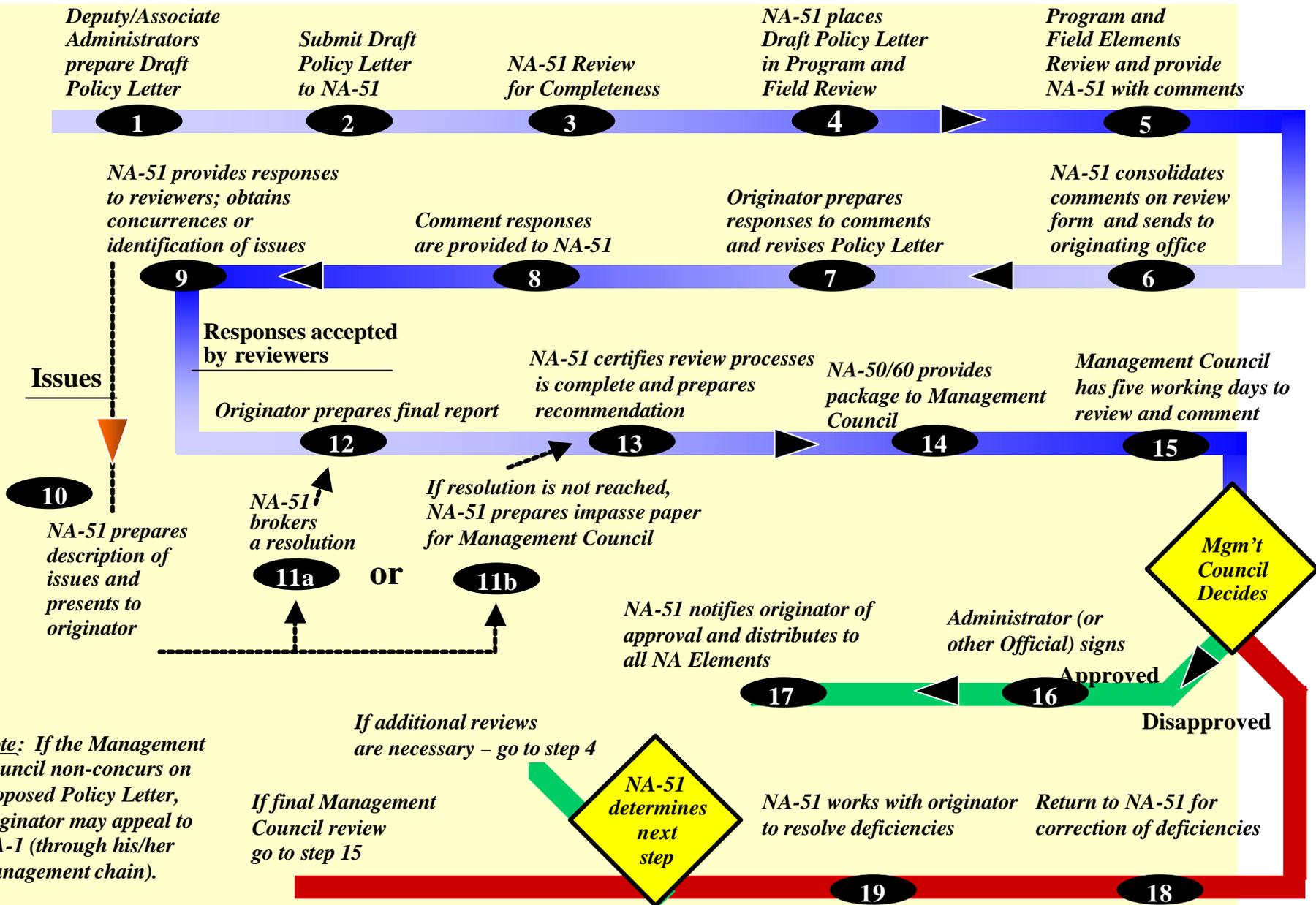
BY ORDER OF THE ADMINISTRATOR:



John Gordon
Administrator

Attachment:
Flow Chart with Detailed Guidance/Instruction

NNSA Policy Letter Review Process



Attachment to “NNSA Policy Letter Review Process” Flowchart

Detailed Guidance/Instructions for National Nuclear Security Administration (NNSA) Policy Letter Process

Step 1: Deputy/Associate Administrators Prepare Draft NNSA Policy Letter

NNSA Office of Primary Interest (OPI)--owner of the requirement--identifies a need to provide unique guidance and direction for all NNSA elements and drafts Policy Letter. The draft Policy Letter should be submitted by the cognizant Deputy or Associate Administrator to the Office of Field Operations Support if draft policy will:

- Establish new policy or directives that are unique to NNSA or
- Supplement or indicate how NNSA will implement a Departmental Directive including implementation of directives in a cost efficient manner. These Policy Letters will be reviewed using the procedures identified in this guidance.

If the draft policy will provide business and operating guidance, the draft policy should be submitted to the Policy and Internal Controls Management Office for review, formatting, and staffing. The review of business and operating guidance will follow the steps marked with a [B].

Step 2: Submit Draft NNSA Policy Letter to Field Operations Support (NA-51)

To initiate a review, the document should be sent electronically (email) to the “NNSA Policy Letters” mailbox. The transmission should include the following:

- A cover memo requesting Headquarters and Field review of an NNSA Policy Letter that:
 - briefly outlines the background of the action; identifies what problem this action solves (address statutory or other drivers, the benefits the action will bring to NNSA, and the consequences of disapproval); identifies costs associated with the action (addresses potential costs of the specific action as well as the costs of the overall program); and discusses how the Department compares with other Federal agencies in this area.
 - lists the organizations and individuals that have been involved in its development and clearance.
- The draft NNSA Policy Letter should be in final form, including appropriate attachments, appendices, etc. Every Directive NNSA Policy Letter or Business and Operating NNSA Policy Letter that specifies a procedure or process must include a flow chart of that process and identify the resource requirements (financial and manpower).
- The request for review must include the approval of your Deputy/Associate Administrator.

[B] Step 3: NA-51 Reviews for Completeness

Upon receipt, NA-51 will ensure that all the items delineated in Step 2 (above) are included with the request and assign a tracking number to the NNSA Policy Letter (the numbers will be sequential with an annotation of associated DOE Directive). If any relevant information is missing, NA-51 will return to the originator until the package is complete.

[B] Step 4: NA-51 Places Draft NNSA Policy Letter in Program and Field Review

NA-51 will electronically circulate the NNSA Policy Letter, accompanied by any necessary explanatory information, to designated Points of Contact (POC) for each organizational element within NNSA Headquarters and Field for review. A due date for the response will be determined by NA-51, in consultation with the OPI, prior to distribution.

[B] Step 5: Program and Field Elements Review and Provide NA-51 with Comments

Comments will be accepted electronically (email to the “NNSA Policy Letters” mailbox) from the designated Headquarters and Field POCs to NA-51. NA-51 will provide an information copy of the comments electronically to the originator as they are received.

Step 6: NA-51 Consolidates Comments on a Review Form and Sends to Originating Office

Within 24 hours of the conclusion of the comment period, NA-51 will consolidate the review comments and officially forward (electronically) along with a cover tracking sheet (sample attached) to the originating office for response. (If no comments are received during the review, proceed to Step 13.)

Step 7: Originator Prepares Responses to Comments and Revises NNSA Policy Letter

Originator should prepare responses to comments and make associated changes to the NNSA Policy Letter. Every effort should be made to close out the comment resolution phase within two weeks. If additional time is required, NA-51 should be notified and a new due date established. The final package should be electronically transmitted to NA-51 that includes:

- Comment resolution matrix (should include all comments received and the proposed resolution for each comment)
- Final revised NNSA Policy Letter
- Redline/strikeout of the revised NNSA Policy Letter showing changes made as a result of the NA-51 review process.
- Certification from the Deputy/Associate Administrator (on the tracking sheet) that the revised NNSA Policy Letter is approved.

Step 8: Comment Responses are Provided to NA-51

NA-51 will ensure that all the items delineated in Step 7 (above) are included in the response. If any relevant information is missing, and/or comments were not addressed, NA-51 will return the package to the originator until it is complete.

Step 9: NA-51 Provides Responses to Reviewers; Obtains Concurrence or Identification of Issues

NA-51 will electronically transmit the package to the designated POCs for each commentor. This transmission will include comment resolution matrix, final revised NNSA Policy Letter and redline/strikeout of the revised NNSA Policy Letter showing changes made as a result of the NA-51 review process.

Step 10: Responses Accepted by Reviewers **PROCEED TO STEP 12; IF RESPONSES ARE**

NOT ACCEPTED, GO TO STEP 11

The designated POC for each commentor will ensure that the resolutions are reviewed and accepted by the commentor and that the resolution is acceptable to the organization's management. Acceptance will be sent (electronically) to the "NNSA Policy Letters" mailbox along with the signed tracking sheet.

Step 11: (a) NA-51 Brokers a Resolution **OR** (b) If resolution is not reached, NA-51 prepares impasse paper for Management Council

NA-51 will work with the document originator and POC for the commentor to broker a resolution. If resolution is not possible, NA-51 (in consultation with the originator and POC/ commentor) will prepare an impasse paper for the NNSA Management Council. The impasse paper will be signed by the appropriate management (Deputy Administrator, Associate Administrator, or Head of Field Element) prior to elevation to the Management Council.

Step 12: Originator or the Policy and Internal Controls Management Office Prepares Final Package

NA-51 will confirm to the originator the acceptance of the resolution of all comments. Originator will prepare final package and electronically transmit to NA-51 that includes:

- Comment resolution matrix (revised to include the name of person accepting resolution).
- [B] Final revised NNSA Policy Letter.
- Redline/strikeout of the revised NNSA Policy Letter showing changes made as a result of the NA-51 review process.
- [B] Certification from the Deputy/Associate Administrator that the revised NNSA Policy Letter is approved by the originating organization.

Step 13: NA-51 Certifies Review Process is Complete and Prepares Recommendation

NA-51 certifies review process and prepares final package for approval of the Management Council. Final package will include:

- Summary memo to the Management Council identifying commentors, summary of comments received and their resolution, and NA-51 recommendation for approval.
- Comment resolution matrix.
- Redline/strikeout of the NNSA Policy Letter identifying changes made during review.
- Final NNSA Policy Letter.
- Tracking sheet showing approvals.

[B] Step 14: NA-50/NA-60 Provides Final Package to the Management Council

After NA-51 Director concurrence, NA-51 will deliver the final package to the Associate Deputy Administrator for Facilities and Operations or the Associate Deputy Administrator for Management and Administration (as appropriate) for presentation to the NNSA Management Council.

[B] Step 15: Management Council Reviews and Approves (IF MANAGEMENT COUNCIL DISAPPROVES, PROCEED TO STEP 18)

The Management Council provides each member with five working days to review the package, approves and forwards to the designated signator for signature.

Step 16: Administrator (or other NNSA Official) Signs

Administrator (or other designated NNSA Official) signs NNSA Policy Letter and returns to NA-51 for further processing.

[B] Step 17: NA-51 notifies originator of approval and distributes to all NNSA Elements

Upon approval, NNSA Policy Letters will be distributed to all NNSA Headquarters and Field organizational elements. Original copies will be sent to the Director, Policy and Internal Controls Management for entry into the NNSA policy retention system. NA-51 will forward (electronically) to ME-80 for inclusion in the DOE Directives System.

Step 18: Return to NA-51 for Correction of Deficiencies

If document is unacceptable to the Management Council, package with comments will be returned to NA-51 for comment resolution.

Step 19: NA-51 Works with Originator to Resolve Deficiencies

If additional reviews are requested, go to Step 4; if comments need resolution, repeat steps 7, 8, 13, 14, 15. If the Management Council requests additional action above those identified above, NA-51 determines next steps/path forward to resolve deficiencies/issues and returns revised NNSA Policy Letter package to the Management Council.

If the deficiencies cannot be resolved to the satisfaction of the Management Council, and the Management Council non-concurs on the Policy Letter, NA-51 will provide the non-concurrence to the document originator. The originator may then decide to appeal the Management Council's decision to the Administrator. The Management Council's non-concurrence must be part of the forwarding package and should be submitted through the originator's management chain and tracked in IDRMS.

Attachment:
Tracking Sheet

**Tracking Sheet
for National Nuclear Security Administration (NNSA)
Policy Letter Process**

NNSA Policy Letter Number: NAP-1

NNSA Policy Letter Title: Establishment of a Policy Letter System for Managing Policy, Directives, and Business Practices Within the National Nuclear Security Administration

Originator: Eric Schweitzer, NA-51, 6-8123

Originating Date: 1/30/02

Date of Final Approval:

Step	Action	Signature	Date
2	Deputy/Associate Administrators Submit Draft NNSA Policy Letter to Field Operations Support (NA-51)	Deputy/Associate Administrator	
4	NA-51 Places Draft NNSA Policy Letter in Program and Field Review	NA-51 Office Director	
5	Program and Field Elements Review and Provide NA-51 with Comments (comments attached)	NA-51 Office Director	
6	NA-51 Consolidates Comments on a Review Form and Sends to Originating Office	NA-51 Office Director	
8	Comment Responses are Provided to NA-51	Deputy/Associate Administrator	
10	Responses Accepted by Reviewers IF RESPONSES ARE NOT ACCEPTED, GO TO STEP 11 (acceptance attached)	NA-51 Office Director	
11	(a) NA-51 Brokers a Resolution OR (b) If resolution is not reached, NA-51 prepares impasse paper for Management Council	Deputy/Associate Administrator and Reviewer's Manager	
13	NA-51 Certifies Review Process is Complete and Prepares Recommendation	NA-51 Office Director	
15	Management Council Reviews and Approves (IF MANAGEMENT COUNCIL DISAPPROVES, PROCEED TO STEP 18)	Principal Deputy Administrator	

17a	NA-51 notifies originator of approval	NA-51 Office Director	
17b	NA-51 distributes to all NNSA Headquarters and Field organizational elements		
17c	Original to the Director, Policy and Internal Controls Management for entry into the NNSA records management system		
17d	NA-51 forwards to ME-80 for inclusion in the DOE Directives System		
18	Management Council Returns to NA-51 for Correction of Deficiencies		
19a	NA-51 Works with Originator to Resolve Deficiencies	NA-51 Office Director	
19b	Revised NNSA Policy Letter package returned to the Management Council		