

**U.S. DEPARTMENT OF ENERGY  
NATIONAL NUCLEAR SECURITY ADMINISTRATION  
NEVADA SITE OFFICE**

**ORDER**

**NSO O 473.XB**

Approved: 09-17-07  
Review Date: 09-17-11  
Change 1: 11-27-07

---

**LOCK AND KEY CONTROL**

---



---

**INITIATED BY:**  
Office of the Assistant Manager  
for Safeguards and Security



## LOCK AND KEY CONTROL

NSO O 473.XB Chg 1  
11-27-07

1

1. OBJECTIVE. This Order provides National Nuclear Security Administration (NNSA) Nevada Site Office (NNSA/NSO) policies and procedures for the implementation of Lock and Key Control and Accountability as outlined in DOE M 470.4-2, Chapter X.
2. CANCELLATION. NSO O 473.XA, LOCK AND KEY CONTROL, dated 11-6-06.
3. APPLICABILITY.
  - a. The provision of this Order applies to all NNSA/NSO organizational elements.
  - b. The Contractor Requirements Document (CRD), Attachment 1, sets forth intended requirements to be applied to contractors, National Laboratories, other federal agencies, and other user organizations. Compliance with the CRD will be required to the extent set forth in a contract or management agreement.
4. REQUIREMENTS. These requirements apply to all NNSA/NSO contractors, National Laboratories, and other federal agencies whose security personnel or other designated representatives are involved with property protection or security interest areas lock and key administrative control and locksmith services.
5. RESPONSIBILITIES.
  - a. Office of the Assistant Manager for Safeguards and Security (OAMSS).
    - (1) Ensures the requirements outlined in this Order are in compliance.
    - (2) Ensures an NNSA/NSO Program Manager is appointed as a point of contact for the administration of Lock and Key Control.
  - b. NNSA/NSO Program Manager. Provides guidance for the Lock and Key Control program to the contractors, National Laboratories, and other user organizations. This person will ensure the contractors, National Laboratories, and other user agency points of contact are in compliance of all lock and key requirements. These requirements include, but are not limited to:
    - (1) Conducting periodic assessments of the program.
    - (2) Conducting periodic observations of the program.

Vertical line denotes change

## LOCK AND KEY CONTROL

NSO O 473.XB Chg 1  
11-27-07

2

---

- (3) Ensuring each contractor and National Laboratory appoints, in writing, an individual to perform oversight for the Lock and Key Control and Accountability program.
  - (4) Ensures the pinning and cutting of Level I, II, and III lock and keys are done in a limited area or have equivalent type measures.
6. PROGRAM REQUIREMENTS. An individual will be appointed, in writing, as the NNSA/NSO Program Manager, to perform oversight for the Lock and Key Control and Accountability Program. This appointee will ensure that the requirements of this Order are in compliance.
9. REFERENCES.
  - a. DOE O 470.4, PHYSICAL PROTECTION MANAGEMENT, dated 8-26-05.
  - b. DOE M 470.4-1, SAFEGUARDS AND SECURITY PROGRAM PLANNING AND MANAGEMENT, dated 8-26-05, and Changes thereto.
  - c. DOE M 470.4-2, PHYSICAL PROTECTION, dated 8-26-05, and Changes thereto.
  - d. DOE M 470.4-4, INFORMATION SECURITY, dated 8-26-05.
  - e. Title 10 Code of Federal Regulations, Part 824, *Procedural Rules for the Assessment of Civil Penalties for Classified Information Security Violations*.
10. DEFINITIONS.
  - a. Exclusion Area. A security area defined by physical barriers and subject to access control, where the mere presence in the area would result in access to classified matter. Only Q-cleared individuals will be afforded access to exclusion areas.
  - b. Facility Manager. An individual who has responsibility for ensuring facility repairs, construction, etc., are performed in a designated facility.
  - c. Key Control Officer. An individual who has been assigned the responsibility of administering the Lock and Key Control function as identified in this Order.

**Vertical line denotes change.**

## LOCK AND KEY CONTROL

NSO O 473.XB Chg 1  
11-27-07

3

- d. Key Custodian. An individual who has been assigned a key to a facility/room/transportainer, etc., by a Key Control Officer.
- e. Level I Key. Keys used in the protection of nuclear weapons and components; Special Nuclear Material (SNM) Category I and Category II quantities that roll up to a Category I quantity; high value government assets; Top Secret and/or Secret classified matter; and restricted key blanks used to protect vaults, vault-type rooms, material access areas, Sensitive Compartmented Information Facilities (SCIF), and exclusion areas.
- f. Level II Key. Security locks and keys used in the protection of building doors, entry control points, gates in public access fences, exclusion area doors, or other barriers or containers protecting Category II, Category III SNM, and explosives. This also includes classified matter including documents classified at the confidential level.
- g. Level III Key. Security locks and keys typically used to protect buildings, gates in fences, cargo containers, and storage areas for the protection of government property. Level III keys and locks must be used for the inside doors of buildings or office areas where DOE M 470.4-4, Chapter II, Section 2, applies. Level III keys will also be used inside facilities on room that contain sensitive or proprietary information, e.g., medical records, drugs, etc.
- h. Level IV Locks and Keys. Level IV locks and keys are used in offices where there is no open storage of classified matter. Desk keys, office keys, and vehicle keys are considered as administrative and do not require control or accountability.
- i. Limited Areas. An access-controlled area defined by physical barriers that is established for the protection of classified matter up to and including Top Secret and/or Category III quantities of SNM. Limited areas are standalone security areas.
- j. Organization Manager. An individual responsible for the day-to-day operations of a facility in which his/her organizational subordinates are the residing tenant. The Organization Manager will ensure the Lock and Key Control program is in compliance with Department of Energy and NNSA directives, policies, and local policies and procedures.

Vertical line denotes change

## LOCK AND KEY CONTROL

NSO O 473.XB  
9-17-07

4

---

- k. Property Protection Area. A security area established for the protection of government property. Uncleared individuals may have unescorted access to property protection areas.
  - l. Property Protection Key. A key that affords access to property protection areas through use of a Level III key.
  - m. Security Interest. Item or material that requires special protection including classified matter, SNM, security shipments, secure communications centers, SCIFs, automatic data processing centers or other systems that handle classified information.
  - n. Security Interest Area. Limited areas, exclusion areas, SCIFs, or other sensitive areas as approved by OAMSS.
  - o. Security Key. A key that affords access to a security interest area.
9. FORMS.
- a. NSO-268, Key Control Log.
  - b. NSO-269, Key Receipt.
  - d. NSO-270, Lost Key Risk Assessment.
  - c. NSO-271, Temporary Key Assignment Log.
9. CONTACT. Questions concerning this Order should be directed to OAMSS, (702) 295-0915.



Gerald L. Talbot, Jr.  
Manager

**CONTRACTOR REQUIREMENTS DOCUMENT (CRD)**

This CRD establishes the requirements for National Nuclear Security Administration (NNSA) Nevada Site Office (NNSA/NSO) contractors, National Laboratories, and other user agencies. Contractors must comply with the requirements in the NNSA/NSO Order listed under the Department of Energy (DOE) and NNSA Program Requirements to the extent set forth in their contracts. Following are those requirements that must be complied with:

1. Each contractor, National Laboratory, and user organization management must appoint, in writing, an individual to perform oversight for the Lock and Key Control and Accountability Program. Additional requirements are provided in DOE M 470.4-2.
2. The individual appointed as the oversight for the Lock and Key Control and Accountability Program must be given tasking authority to accomplish the requirements of the program as follows:
  - a. Ensures accurate completion of Locksmith Signature Authorization Cards annually for locksmith services by responsible organization. These cards will be reviewed for accuracy prior to submitting to the local Work Management Control.
  - b. The individual appointed as the oversight for the Lock and Key Control program will address all lock and key control issues with the NNSA/NSO Program Manager.
  - c. Coordinates the appointment of Key Control Officers (KCO) and provides training to ensure program requirements are met.
  - d. Ensures the Lock and Key Control program is in compliance with DOE and NNSA directives, policies, and procedures.
  - e. Implements a local procedure for the administration of Lock and Key Control.
3. KCOs will ensure:
  - a. Control/accountability through use of a database or equivalent.
  - b. Inventories are performed biannually for Level I keys, annually for Level II and III keys, or when keys transfer from one KCO to another. Inventories must

**Vertical line denotes change.**

## LOCK AND KEY CONTROL

include all issued keys or key in storage. Inventories will be conducted by physically comparing the key series and key number to the information on the key logs/database. Level IV keys have no inventory value.

- c. Receipts are in place for all keys issued. Key Receipts, Form NSO-269, are used to ensure that the individual accepts his responsibility as a key custodian. This form will be signed by the key custodian and maintained by the Key Control Officer for the purpose of tracking and audit trail.
- d. Lost Key Risk Assessments, Form NSO-270, are conducted when a lock, key, padlock, or core cannot be accounted for. Proper notification must be made on the database or key control log. A Key Control Log, Form NSO-268, is used for tracking keys in lieu of a formal database.
- e. A Lost Key Risk Assessment form must be completed and forwarded to the organization oversight for submission as an Incident of Security Concern in accordance with DOE M 470.4-1.
- f. Temporary Key Assignment Log, Form NSO-271, is used when the issuance of keys is on a temporary basis, not to exceed four working days.
- g. Property protection hardware, e.g., keys and degraded hardware to the responsible oversight.
- h. Destruction of keys and documentation of such destruction.
- i. Notify the oversight, in writing, when a KCO changes.
- j. Keys are issued to mission essential personnel.
- k. Issuance is kept to a minimum.
- l. Keys are retrieved from persons when no longer needed.
- m. Accountability of all padlocks and cores.
- n. Ensures all keys have been categorized as Level I, II, or III.
- o. All duplicated keys must be entered into accountability and receipted by the KCO prior to issuance.

## LOCK AND KEY CONTROL

NSO O 473.XB  
9-17-07

Attachment 1  
Page 3

---

- p. Ensures Level I and Level II keys are not removed from the facility nor taken home.
- q. Ensures Level I and Level II keys are maintained in a General Services Administration (GSA)-approved repository.
- r. Secures spare padlocks and backup padlocks that have not yet been placed in use but are intended for use to secure classified matter in a GSA-approved repository.
- s. Ensures key custodians are briefed by the KCO as to their responsibilities for the control and accountability of keys issued to them and that keys are returned when no longer needed.

#### 4. LOCKSMITH SERVICES.

- a. Locksmith services for property protection areas and security interest areas will be accomplished in accordance with local implementing procedures and organizational procedures.
- b. Keys that have been retrieved from personnel due to relocation, termination, or because the requirement for a key no longer exists, will be returned to the KCO and documented. If the KCO determines that keys are no longer required, they will be returned to the locksmith for destruction and the data base and/or key control log will be documented.
- c. The locksmith will be responsible for key fabrication, duplicating, repair, and maintaining documentation of keys issued to the KCOs and maintaining adequate receipt information.

#### 5. PROTECTION OF KEYS. To ensure the overall Lock and Key Control Program is in compliance with applicable DOE and NNSA directives, the following must be adhered to:

- a. Grand master security keys must be kept to an operational minimum and under strict control.
- b. Level I and II keys must have a unique identifying number and must be secured in a tamper-resistant serialized key ring. It is the option of each organization to use tamper-resistant serialized key rings for Level III keys.

## LOCK AND KEY CONTROL

6. TRAINING.
  - a. All Lock and Key Control Officers and anyone having responsibility for Lock and Key Control and Accountability will be trained by the individual assigned oversight responsibility for the organization.
  - b. Training will be conducted annually or as new KCOs are appointed.
  - c. Training will also be provided on the method used for control and accountability, e.g., a database or equivalent.
7. FACILITY MANAGERS (FM). FMs will have minimal responsibilities for lock and key control. FMs will only ensure locks are properly maintained as part of the facility execution plan and will not have any authority for assignment of key control officers or issuance of keys.
8. ORGANIZATION MANAGERS. An individual responsible for the day-to-day operations of the facility in which his/her organizational subordinates are the residing tenant. The Organization Manager will ensure the Lock and Key Control program is in compliance with DOE and NNSA directives, policies, and local policies and procedures.
  - a. Organization Managers will coordinate all lock and key control matters with the resident Lock and Key Control Officer and the contractor Lock and Key Control appointed oversight.
  - b. Organization Managers will approve all key work requests and will ensure the Lock and Key Control Officer is aware of all requests regarding Lock and Key Control.
  - c. Organization Managers will ensure Key Control Officers return all keys to closed facilities to the Real Estate Services Office. Keys will be taken out of accountability by the KCO prior to their return.
  - d. Lock and Key Control issues and concerns will be addressed with the appointed oversight for each contractor, National Laboratory, and user organization.





LOCK AND KEY CONTROL

NSO O 473.XB  
9-17-07

Attachment 3  
Page 1 (and 2)

NSO-269  
05/2005

<b>KEY RECEIPT FOR THE NATIONAL NUCLEAR SECURITY ADMINISTRATION NEVADA SITE OFFICE (NNSA/NSO) EMPLOYEES</b>		
<i>I hereby acknowledge receipt of and responsibility for the key described below. I understand that this key is the property of NNSA/NSO and must be returned to the Key Control Officer or a Security Forces Representative when possession is no longer necessary in the performance of my duties, upon transfer, or termination of employment. I also understand that I am not authorized to loan out this key or to prepare, or have prepared, duplicate keys. I must notify the Key Control Officer immediately if the key is lost or misplaced.</i>		
<b>Key Make &amp; Number:</b>		<b>Area:</b>
<b>Building/Room Number:</b>		<b>Other:</b>
<b>Other:</b>		<b>Other:</b>
<b>Comments:</b>		
_____	_____	_____
<b>Key Custodian's Name</b>	<b>Signature</b>	<b>Date</b>



# LOCK AND KEY CONTROL

NSO O 473.XB  
9-17-07

Attachment 4  
Page 1 (and 2)

NSO-270  
06/2005

## LOST KEY RISK ASSESSMENT

Building No.:	Key Control Officer:	
Key issued to:	Key opens:	Key Level:
Who lost key:	When/where lost:	
What happened:		
Reported to:	Reported by:	
What action was taken to locate the key:		
Assessment findings with specific emphasis on theft/vandalism:		
Action taken/planned as a result:		
Recommend re-keying facility:	Yes <input type="checkbox"/>	No <input type="checkbox"/>
If no, justification:		
Corrective action to prevent future occurrence:		
Assessment conducted by:		

\_\_\_\_\_  
Key Control Officer

\_\_\_\_\_  
Date

\_\_\_\_\_  
Facility Manager

\_\_\_\_\_  
Date

Distribution: Local Security Representative  
Lock and Key Control Oversight  
Facility Manager (if required)







**U.S. DEPARTMENT OF ENERGY  
NATIONAL NUCLEAR SECURITY ADMINISTRATION  
NEVADA SITE OFFICE**

**PAGE CHANGE**

**NSO O 473.XB Chg 1**

**Change 1: 11-27-07**

---

## **LOCK AND KEY CONTROL**

---

1. PURPOSE. To transmit a revised page to NSO O 473.XB, LOCK AND KEY CONTROL, dated 9-17-07.
2. EXPLANATION OF CHANGE. To correct when inventories are performed on keys and editorial change regarding Program Manager (this affects acronym establishment).
3. LOCATION OF CHANGES.

<u>Page</u>	<u>Paragraph</u>
1	5a(2) & 5b
2	6
3	j
1-1	Introduction, 2b & 3b

After filing the attached page, this transmittal may be discarded.

   
Gerald L. Talbot, Jr.  
Manager

---

**INITIATED BY:**  
**Office of the Assistant Manager  
for Safeguards and Security**