

Procedure: Property Management – High-Risk Personal Property

Personal Property Manual Section	3209
Revision	1
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Regulatory Assurance System	Property and Infrastructure
Owner	Property and Infrastructure Requirement Assurance System Owner
Review Cycle	Every 3 years

1 Purpose

This procedure describes the process to acquire, manage and control, through disposal, government-owned High-Risk Personal Property (HRPP) in a cost-effective, risk-based, efficient, and environmentally sound manner consistent with national security and nonproliferation policies.

2 Procedure

2.1 Marking

- 2.1.1 All HRPP is designated and identified as High Risk/Sensitive as outlined in *Procedure: Property Management – Identification and Marking of Personal Property*.
- 2.1.2 Certain HRPP, when received, if by its nature cannot be individually marked (e.g., stores items, metal stock, etc.) is exempt from marking requirements.
 - 2.1.2.1 For HRPP assets that cannot be marked, documentation of the asset shall be included in the computerized asset management system (i.e., Sunflower).
 - 2.1.2.2 Examples of documentation to identify HRPP assets in the computerized asset management system (i.e., Sunflower) can include serialization, physical characteristics, pictures of the asset, etc.
- 2.1.3 Property custodians receive guidance from Property Staff which outlines custodians' responsibilities surrounding HRPP along with safeguard procedures.
 - 2.1.3.1 When feasible, whenever high-risk personal property is not in use, it is stored in a locked repository.
 - 2.1.3.2 If the property is consumed, consumption information and employee acknowledgement are stored within the computerized asset management system (i.e., Sunflower).
- 2.1.4 To the extent practicable and economical, HRPP identification markings are removed by the custodian or ISD LPC prior to disposal.

2.2 Inventory

- 2.2.1 Inventories which document all existing HRPP are conducted annually by the Property Staff with the responsible custodian as outlined in *Procedure: Property*

*Management - Inventories.***2.3 Pre-Disposal Processing**

- 2.3.1 HRPP is disposed of using methods to ensure that it does not adversely affect the national security or nuclear nonproliferation objectives of the United States.
- 2.3.2 Custodians are responsible for initiating disposal of HRPP assigned to them. Appropriate documentation, such as manufacturer drawings or user manuals, if available, is provided by the custodian prior to sending HRPP to the Property Office for excess, disposal, contract termination, loan, or other off-site transfer.
- 2.3.3 All export control reviews of nuclear-related, dual-use, or other proliferation-sensitive equipment, materials or information, involve Property Staff and Export Control Legal Team.
- 2.3.4 Export control determinations/clearances clearly delineate conditions, restrictions, or other requirements to be placed in agreements for the transfer of dual-use, or other proliferation-sensitive personal property. Consultation with Property Staff or the vendor may be required.
- 2.3.5 Proliferation-sensitive personal property, when possible and to the extent practicable, is stripped of all characteristics which cause it to be proliferation-sensitive after the asset is listed on the GSA PPMS system and made available to other DOE contractors and Federal Agencies.
- 2.3.6 The disposition (including demilitarization of items on the Munitions List) of trigger list property are subject to applicable provisions of 41 CFR 109-1.5303 and DOE Guidelines on Export Control and Nuclear Nonproliferation. Demilitarization requirements regarding combat material and military personal property follow guidance contained in DoD 4160.21-M-1 and 41 CFR 109-42.1102-8.
- 2.3.7 If, and when, ITAR and trigger list assets require disposition, the Property Staff will obtain DOE-approved destruction plans and follow guidance on proper destruction.

2.4 Scrap Sales

- 2.4.1 When assets are stripped of all the characteristics which caused it to be proliferation sensitive, Property Staff can dispose of the asset appropriately.
- 2.4.2 When assets are not stripped of these characteristics, then the Property Staff will make necessary arrangements with a vendor to witness the destruction of the asset.
- 2.4.3 When received, the Property Staff will destroy/shred the asset documentation, (i.e., destroying manuals and schematics of the High-Risk assets).

2.5 Other Disposal Actions

- 2.5.1 All disposal actions include a high-risk review, export control review, radiological and hazardous review. End Use Certificates and Restricted Party Screening may be required depending on the receiving party.
- 2.5.2 All disposal action documentation is reviewed by the Logistics and Property Control Manager or delegate prior to disposal.

3 Responsibilities

- 3.1 **Property and Infrastructure Requirement Assurance System Owner** approves this policy, identifying necessary resources, and overseeing consistent laboratory compliance.
- 3.2 **Logistics and Property Control Department Head** is responsible for implementing and managing changes to this policy by assigning appropriate resources.
- 3.3 **Logistics and Property Control Department (Property Staff)** are responsible for following guidance for the lifecycle of high-risk personal property from acquisition to disposal.

4 Definitions

- 4.1 **Custodian.** The individual who is responsible for the protection, control, and proper use of property under his or her stewardship.
- 4.2 **Government property.** All property owned or leased by the Government. Government property includes both Government-furnished property and contractor-acquired property. Government property includes material, equipment, special tooling, special test equipment, and real property. Government property does not include intellectual property and software.
- 4.3 **High Risk Personal Property (HRPP)** refers to assets that, because of their potential impact to public health and safety, the environment, national security interests, or proliferation concerns, must be controlled, and disposed of in a manner other than routine. The categories of high-risk property are automatic data processing equipment, especially designed or prepared property, export-controlled information, export controlled property, hazardous property, nuclear weapon components or weapon-like components, proliferation sensitive property, radioactive property, special nuclear material and unclassified controlled nuclear information.
- 4.4 **Personal Property.** Includes all equipment, material, and supplies not classified as real property (Refer to 41 CFR Chapter 102-71).
- 4.5 Acronyms
 - CFR** Code of Federal Regulations
 - DOE** Department of Energy
 - FNAL** Fermi National Accelerator Laboratory
 - FRA** Fermi Research Alliance, LLC
 - LPC** Logistics & Property Control Department
 - SOC** Security Operations Center

5 Resources / Supporting Documentation

N/A

6 Revision History

Version Number	Date	Author	Change Summary
0	03/04/19	Jack Kelly LPC Department Head	First Issuance
1	09/01/2024	Kevin Coppert LPC Department Head	Updates as result of FY22 audit findings.

7 Approvals

Title	Name	Electronic Signature
Property and Infrastructure Requirement Assurance System Owner	Mark T. Jeffers	