



DEPARTMENT OF ENERGY
National Nuclear Security Administration
Los Alamos Field Office
Los Alamos, New Mexico 87544



FEB 25 2013

MEMORANDUM FOR: BRUCE DIAMOND
GENERAL COUNSEL

FROM: JUAN L. GRIEGO
ACTING MANAGER, LOS ALAMOS FIELD OFFICE

SUBJECT: Request for Conference Exemption, Export Control Coordinators
Annual Training

Los Alamos Field Office (NA-00-LA) supports the enclosed request from Los Alamos National Security, LLC (LANS) for exemption to the reporting and approval requirements cited in Deputy Secretary Daniel B. Poneman's December 6, 2012, memorandum, subject: "Updated Guidance on Conference-Related Activities and Spending."

In view of the operational functions of the activities described in LANS' February 14, 2013, letter, in support of National Nuclear Security Administration's program objectives and the absence of key factors cited in Department of Energy (DOE) General Counsel (GC) Guidance issued July 5, 2012, NA-00-LA does not believe the Export Control Coordinators Annual Training constitutes a "conference" within the definition of 5 C.F.R. 410.404 or the above reference documents. NA-00-LA would appreciate General Counsel's review of the request and concurrence that the Export Control Coordinator's Annual Training is operational in nature and that the conference approval requirements, as contained in the referenced documents, do not apply.

If GC concurs with exemption, LANS will comply with Deputy Secretary Poneman's December 6, 2013, updated guidance and will be "expected to continue to apply strict scrutiny to DOE's participation to ensure the best use of Government funds and adherence with not only all applicable laws and policy, but the underlying spirit or principles, including ensuring that only personnel attend events that have a mission-essential need to do so, that expenses be kept to a minimum, and that participation in any associated social events be limited and restrained to the greatest degree practicable to avoid the appearance of impropriety."

Please direct questions in regard to this memorandum to Barbara F. Romero, NA-00-LA Conference Management POC, at Barbara.Romero@nnsa.doe.gov or (505) 665-1550.

Enclosure

Concur:

*Handwritten signature: H. A. B. / wr
BMD*

Do Not Concur:

Date:

Handwritten date: 2/25/13