



Memorandum from the Office of the Inspector General

December 6, 2023

Jason T. Regg

REQUEST FOR FINAL ACTION – AUDIT 2023-17415 – CONTINUITY OF OPERATIONS PLAN

Attached is the subject final report for your review and final action. Your written comments, which addressed your management decision and actions planned or taken, have been included in the report. Please notify us when final action is complete. In accordance with the Inspector General Act of 1978, as amended, the Office of the Inspector General is required to report to Congress semiannually regarding audits that remain unresolved after 6 months from the date of report issuance.

If you have any questions or wish to discuss our findings, please contact Robert L. Dixon, Senior Auditor, at (865) 633-7396 or Rick C. Underwood, Director, Financial and Operational Audits, at (423) 785-4824. We appreciate the courtesy and cooperation received from your staff during the audit.

David P. Wheeler
Assistant Inspector General
(Audits and Evaluations)

RLD:KDS

Attachment

cc (Attachment):

TVA Board of Directors
Thomas W. Barnett
Mary C. Corbitt
James R. Dalrymple
Samuel P. Delk
Buddy Eller
David B. Fountain
James Patrick Hall
Kelie H. Hammond

Gregory J. Henrich
Jeffrey J. Lyash
Jill M. Matthews
Aaron P. Melda
Donald A. Moul
Ronald R. Sanders II
Ben R. Wagner
Kay W. Whittenburg
OIG File No. 2023-17415



Office of the Inspector General

Audit Report

To the Vice President,
Security and Resiliency

CONTINUITY OF OPERATIONS PLAN

Audit Team
Robert L. Dixon
Maria V. Edwards

Audit 2023-17415
December 6, 2023

ABBREVIATIONS

BC	Business Continuity
COOP	Continuity of Operations
FCAT	Federal Continuity Assessment Tool
FCD	Federal Continuity Directive
FEMA	Federal Emergency Management Agency
MEF	Mission Essential Function
PPD-40	Presidential Policy Directive 40
RFC	River Forecast Center
ROC	Regional Operations Center
SOC	System Operations Center
SOP	Standard Operating Procedure
SPP	Standard Programs and Processes
S&R	Security and Resiliency
TOPS	Transmission Operations and Power Supply
TRANS-TSO	Transmission System Operations
TVA	Tennessee Valley Authority
VP	Vice President

TABLE OF CONTENTS

EXECUTIVE SUMMARY i

BACKGROUND..... 1

OBJECTIVE, SCOPE, AND METHODOLOGY 4

FINDINGS4

 ANNUAL CONTINUITY OF OPERATIONS TRAINING FOR TVA
 EMPLOYEES IS NOT CURRENTLY REQUIRED.....4

 CONTINUITY OF OPERATIONS PROGRAM ESSENTIAL RECORDS ARE
 NOT ADEQUATELY MAINTAINED..... 5

 RIVER FORECAST CENTER CONTINUITY OF OPERATIONS PLAN DOES
 NOT INCLUDE A DEFINED REVIEW CADENCE TO ENSURE TIMELY
 UPDATES.....5

 CONTINUITY OF OPERATIONS PROGRAM GUIDANCE DOES NOT
 ADDRESS TVA INFORMATION MANAGEMENT POLICY 5

RECOMMENDATIONS 6

APPENDICES

- A. OBJECTIVE, SCOPE, AND METHODOLOGY
- B. MEMORANDUM DATED NOVEMBER 29, 2023, FROM JASON REGG TO
 DAVID P. WHEELER



Audit 2023-17415 – CONTINUITY OF OPERATIONS PLAN

EXECUTIVE SUMMARY

Why the OIG Did This Audit

Continuity of operations (COOP) is an effort within the executive office of the President of the United States and individual federal executive departments and agencies to ensure that mission essential functions continue to be performed during disruption of normal operations. Mission essential functions are a limited set of agency-level functions that are directly related to accomplishing the mission of the organization and must be continued throughout, or resumed rapidly after, a disruption of normal activities. We included an audit of the Tennessee Valley Authority's (TVA) COOP plan on our annual audit plan due to the operational risks that could result from noncompliance with federal continuity guidance and/or inadequate COOP plan implementation.

Our audit objective was to determine if TVA's COOP plan complies with applicable laws, regulations, and executive orders and has been adequately implemented. Our audit scope included the TVA COOP plans and applicable laws, regulations, and executive orders implemented as of December 31, 2022.

What the OIG Found

We determined TVA's COOP plan generally complies with applicable laws, regulations, and executive orders and has been adequately implemented. However, we identified three instances in which TVA's COOP plan is not currently in compliance with federal continuity directive guidance, including:

- Annual COOP training for TVA employees is not currently required.
- COOP program essential records are not adequately maintained.
- One organization's COOP plan does not include a defined review cadence to ensure timely updates.

Additionally, we determined COOP program guidance does not address TVA's information management policy.

What the OIG Recommends

We made four recommendations to TVA's Vice President, Security and Resiliency, including three to improve TVA's COOP program compliance and one to align COOP program guidance with TVA's information management policy.



Audit 2023-17415 – CONTINUITY OF OPERATIONS PLAN

EXECUTIVE SUMMARY

TVA Management's Comments

In response to our draft report, TVA management provided actions they plan to take to address each of our recommendations. See Appendix B for TVA management's complete response.

Auditor's Response

We agree with TVA management's planned actions.

BACKGROUND

Continuity of operations (COOP) is an effort within the executive office of the President of the United States and individual federal executive departments and agencies to ensure that mission essential functions (MEF) continue to be performed during disruption of normal operations. MEFs are a limited set of agency-level functions that are directly related to accomplishing the mission of the organization and must be continued throughout, or resumed rapidly after, a disruption of normal activities. We included an audit of TVA's COOP plan on our annual audit plan due to the operational risks that could result from noncompliance with federal continuity guidance and/or inadequate COOP plan implementation.

Applicable Policies and Regulations

In accordance with Presidential Policy Directive 40 (PPD-40),¹ *National Continuity Policy*, the Federal Emergency Management Agency (FEMA) developed federal continuity directives (FCD) to establish continuity program and planning requirements for executive departments and agencies. FEMA issued the following directives in 2017 relating to federal COOP activities:²

- **FCD-1: *Federal Executive Branch National Continuity Program and Requirements*** – This directive establishes the framework, requirements, and processes to support the development of continuity programs and specifies and defines elements of a continuity plan. The required continuity elements noted in FCD-1 include: delineation of essential functions; succession to office and delegations of authority; safekeeping of and access to essential records; continuity locations; continuity communications; human resources planning; devolution of essential functions; reconstitution; and program validation through testing, training, and exercises.
- **FCD-2: *Federal Executive Branch Mission Essential Functions and Candidate Primary Mission Essential Functions Identification and Submission Process*** – This directive provides guidance to assist in identification, assessment, and validation of MEFs. FCD-2 directs updates to and validation of essential functions, requiring (1) the conduct of a comprehensive business process analysis³ and business impact analysis⁴ and (2) the application of agency-wide risk analysis in support of organizational resilience and continuity programs.

¹ PPD-40 directed the Secretary of Homeland Security through the Administrator of FEMA to coordinate the implementation, execution, and assessment of continuity activities among executive departments and agencies.

² TVA Emergency Management personnel informed us that FEMA is currently working to revise the FCD guidance. However, a release date for updated directives has not been determined. TVA intends to review applicable policies and procedures to incorporate the revised FCD guidance once it is issued.

³ Business process analysis is a systematic method of examining, identifying, and mapping the functional processes, workflows, activities, personnel expertise, systems, data, interdependencies, alternate locations, and other resources needed to perform a MEF.

⁴ Business impact analysis provides a method of identifying the potential negative impacts of failing to perform an essential function. It assists in the prioritization of essential functions and supporting resources, considering the consequences of their loss or degradation and their criticality to the organization's mission.

TVA Standard Programs and Processes (SPP) 35.400, *TVA COOP Program*, provides planning and program guidance for implementing the TVA COOP program to ensure TVA remains capable of conducting its MEFs under all threats and conditions. The provisions of TVA-SPP-35.400 are applicable to TVA organizations and personnel that perform MEFs, including the functions, operations, and resources necessary to ensure the continuity of TVA's MEFs when normal operations are disrupted or threatened with disruption.⁵

Mission Essential Functions

In accordance with FCD-2 guidance, TVA identified the following two MEFs:

- **River Management** – TVA's River Management organization has responsibility for this MEF, which includes (1) maintaining the operational performance of the Tennessee River and associated waterways and (2) regulating the stream flow primarily for the purposes of promoting navigation and controlling floods, providing a reliable water supply with sufficient water quality, and providing and operating facilities for the generation of electric energy. TVA's River Management organization maintains primary guidance supporting the COOP program in its Standard Operating Procedure (SOP) 35.400, *River Forecast Center (RFC) COOP Plan*. During an evacuation, RFC management should activate their COOP plan and relocate to the alternate site or an operational capable remote location.
- **Bulk Electric System** – TVA's Transmission Operations and Power Supply (TOPS) organization has responsibility for this MEF, which includes ensuring the functionality of the bulk electric system by performing balancing authority, reliability coordinator, and transmission operator responsibilities. These functions are performed at the TVA System Operations Center (SOC) and Regional Operations Center (ROC) facilities. TOPS maintains primary guidance supporting the COOP program in Transmission System Operations (TRANS-TSO) 30.504, *SOC Degradation & Evacuation*, and TRANS-TSO-30.505, *ROC Degradation & Evacuation*. During an emergency evacuation and transfer of function for either the SOC or ROC, each facility is designated to serve as the backup operations center for the other.

Responsible Organizations

TVA's Security and Resiliency (S&R) organization, which includes TVA Emergency Management, maintains responsibility for agency-level COOP activity and is accountable for ensuring that TVA has an effective and sufficient COOP capability.⁶ As noted above, River Management and TOPS have responsibility for performing each of TVA's identified MEFs.

⁵ All essential functions performed by TVA that do not fall under the COOP program are identified as business essential functions and are managed by the TVA business continuity (BC) program. This program is (1) not subject to PPD-40 or FEMA continuity guidance and (2) implemented through TVA-SPP-35.420, *TVA BC Program*.

⁶ The agency-level COOP program previously fell under TVA's River and Resources Stewardship organization. Following a 2023 reorganization, S&R has overall responsibility for the program.

TVA's Enterprise Records group within the Office of General Counsel organization includes an essential records program that leads TVA in the identification and protection of records that are critical to deployment of emergency operations, performance of MEFs, and reconstitution of normal operations during an emergency or other event of business disruption. COOP essential records include records that (1) specify how MEFs will be performed and (2) are needed to protect the legal and financial rights of the government and its citizens during performance of the MEFs, during an emergency, disaster, or disruption. FCD-1 includes specific requirements and TVA-SPP-35.400 provides guidance relating to identification and maintenance of COOP essential records.

Reporting and Oversight

TVA Emergency Management personnel are responsible for providing periodic reporting to FEMA regarding COOP program status and progress. This includes submissions through FEMA's Federal Continuity Assessment Tool (FCAT), which is used by federal organizations to assess a continuity plan and program against the requirements for a viable continuity capability and program as outlined in FCD-1 and FCD-2.⁷ The FCAT is used for (1) quarterly capability reporting requirements and (2) determining whether gaps exist in the organization's continuity plan and program. As part of this reporting process, TVA utilizes the FCAT to identify areas for improvement relating to the COOP program and implement corrective actions. Recent areas identified by TVA Emergency Management personnel include opportunities to improve the following processes:

- Incorporation of corrective actions from exercises and events at both the agency and organization levels.
- Automation of the process for maintaining rosters of personnel capable of performing continuity operations.
- Incorporation of risk assessment at the agency level to ensure business process analysis and business impact analysis are supportive of MEFs.
- Oversight and enforcement of periodic testing requirements for satellite phones and federal telecommunications priority credentials.

The FCAT tool is also used in the conduct of FEMA assessments using data from the quarterly submissions. FEMA performs biennial continuity assessments of federal executive branch departments and agencies, with the most recent review of TVA performed in 2019. During this review, FEMA assigned TVA's continuity program a comprehensive capability score⁸ of 10 (on a scale of 0 to 10, with

⁷ The FCAT is comprised of three sections: Program Management, Organization Continuity Capability, and Maintaining Continuity Capability. Each section includes continuity activities and supporting elements critical to each section. These supporting elements are further divided according to the five solution areas of: planning, organization, equipment, training, and exercise. The FCAT uses a 10-point scoring system. According to FEMA, this progressive scoring system is an integral part of the evaluation and allows an organization to demonstrate progress from one assessment to the next.

⁸ The comprehensive capability score represents the total score for the assessment. According to FEMA, the comprehensive capability score is derived from scores assessed in the individual sections and elements listed in footnote 7 to ensure the most accurate measurement of data collected using the FCAT's 10-point scoring system.

10 being the highest rating). This included scores of 10 for each individual program section and element.

OBJECTIVE, SCOPE, AND METHODOLOGY

Our audit objective was to determine if TVA's COOP plan complies with applicable laws, regulations, and executive orders and has been adequately implemented. Our audit scope included the TVA COOP plans and applicable laws, regulations, and executive orders implemented as of December 31, 2022. A complete discussion of our audit objective, scope, and methodology is included in the Appendix.

FINDINGS

We determined TVA's COOP plan generally complies with applicable laws, regulations, and executive orders and has been adequately implemented. However, we identified three instances in which TVA's COOP plan is not currently in compliance with FCD guidance, including:

- Annual COOP training for TVA employees is not currently required.
- COOP program essential records are not adequately maintained.
- One organization's COOP plan does not include a defined review cadence to ensure timely updates.

Additionally, we determined COOP program guidance does not address TVA's information management policy.

ANNUAL COOP TRAINING FOR TVA EMPLOYEES IS NOT CURRENTLY REQUIRED

FCD-1 requires an organization's training program to include and document annual continuity awareness briefings for the entire workforce, including new personnel as they onboard. TVA Emergency Management personnel informed us there is not currently an agency-level requirement in place for all TVA employees to receive continuity training.

TVA has developed an online training course titled "TVA COOP Awareness Training" that outlines (1) roles and responsibilities and (2) the elements of TVA's comprehensive COOP program. However, this course is not currently required for all TVA employees. Requiring TVA employees to complete this course or other similar training options would increase COOP awareness and support fulfillment of the related FCD-1 requirement.

COOP PROGRAM ESSENTIAL RECORDS ARE NOT ADEQUATELY MAINTAINED

FCD-1 requires organizations to prepare an essential records packet that includes a compilation of key information, instructions, and supporting documentation needed to access essential records in an emergency situation. We requested copies of TVA's COOP MEF essential records inventory documentation for 2022. In response to our request, TVA Enterprise Records personnel informed us that compliance with TVA's annual essential records update process has been inconsistent. Specifically, issues noted included (1) gaps in the identification of essential records and (2) a lack of clear understanding by individual TVA organizations of the differences between records that relate to TVA's COOP and BC programs and their critical importance to aid in reconstitution of normal operations during disaster recovery.

TVA Enterprise Records provided example listings of COOP MEF essential records from prior years to support our understanding of the process. However, as a result of the inconsistencies described above, they do not consider these listings for previous periods through 2022 to be complete. Enterprise Records personnel stated that the process for identifying COOP and BC essential records has been revised for 2023, including additional training for individual TVA organizations, enhanced tracking procedures, and engagement at the executive level to drive compliance. Implementation of this revised process is ongoing during 2023.

RFC COOP PLAN DOES NOT INCLUDE A DEFINED REVIEW CADENCE TO ENSURE TIMELY UPDATES

FCD-1 requires continuity programs to include a review of the continuity plan annually and update as required. In addition, TVA-SPP-35.400 requires the annual maintenance of COOP plans and procedures. TVA-SPP-35.400, TRANS-TSO-30.504, and TRANS-TSO-30.505 contain annual review requirements and were revised appropriately. However, River Management SOP-35.400 does not include a defined review cadence and was not revised from January 29, 2021, (revision 2) to March 31, 2023 (revision 3). A defined annual review frequency would help fulfill the FCD-1 and TVA-SPP-35.400 requirements and reduce the risk that River Management SOP-35.400 becomes out-of-date, inaccurate, or otherwise noncompliant.

COOP PROGRAM GUIDANCE DOES NOT ADDRESS TVA INFORMATION MANAGEMENT POLICY

TVA-SPP-12.002, *TVA Information Management Policy*, requires TVA to implement security controls to protect the confidentiality, integrity, and availability of TVA's information commensurate with the criticality and sensitivity of the information. TVA-SPP-12.002 also states that COOP planning information is

(1) an example of TVA restricted information⁹ and (2) designated for official use only. Neither TVA-SPP-35.400 nor the individual MEF COOP plans contain guidance relating to implementation of the requirements included in TVA-SPP-12.002. Providing guidance relating to information management policy implementation would help ensure COOP program documentation is consistent and in compliance with the provisions of TVA-SPP-12.002.

RECOMMENDATIONS

We recommend the Vice President (VP), S&R:

1. Implement annual COOP training for the TVA workforce in accordance with FCD-1 requirements.

TVA Management's Comments – In response to our draft report, TVA management agreed with our interpretation of FCD-1 training requirements and stated continuity planning requirements will be revised to establish an expectation for all TVA organizations to administer annual awareness briefings for their workers. Emergency Management will define minimum required topics and ensure oversight to track and report training completion. See Appendix B for TVA management's complete response.

Auditor's Response – We agree with TVA management's planned actions.

2. Work with the Executive VP, Office of General Counsel, to complete implementation of processes necessary to ensure timely, complete, and accurate identification and maintenance of COOP essential records for TVA's MEFs in accordance with FCD-1 requirements.

TVA Management's Comments – In response to our draft report, TVA management agreed with our finding and stated they will ensure that planned enhancements are deployed. See Appendix B for TVA management's complete response.

Auditor's Response – We agree with TVA management's planned actions.

3. Work with the VP, River and Resources Stewardship, to update River Management SOP-35.400 to include a requirement for a minimum annual review frequency.

TVA Management's Comments – In response to our draft report, TVA management agreed with our finding and stated the RFC COOP plan will be revised to annotate and add an annual cadency review requirement. See Appendix B for TVA management's complete response.

⁹ TVA restricted information is defined as any information that could reasonably be expected to have a serious adverse effect on organizational operations (mission, functions, image, or reputation), organizational assets, or individuals, when disclosed or modified without authorization.

Auditor's Response – We agree with TVA management's planned actions.

4. Update TVA-SPP-35.400 and individual MEF COOP plans as determined necessary to include guidance addressing the requirements for COOP planning information noted in TVA-SPP-12.002.

TVA Management's Comments – In response to our draft report, TVA management agreed Continuity Program documents should be handled in a manner that ensures the confidentiality, integrity, and availability of the information they contained. Emergency Management will revise TVA's emergency planning requirements to establish the expectation that all emergency management documents, including those related to continuity, are reviewed and marked in accordance with TVA-SPP-12.002. See Appendix B for TVA management's complete response.

Auditor's Response – We agree with TVA management's planned actions.

OBJECTIVE, SCOPE, AND METHODOLOGY

Our audit objective was to determine if the Tennessee Valley Authority's (TVA) continuity of operations (COOP) plan complies with applicable laws, regulations, and executive orders and has been adequately implemented. Our audit scope included the TVA COOP plans and applicable laws, regulations, and executive orders implemented as of December 31, 2022. To achieve our objective, we:

- Reviewed relevant external guidance issued by the Federal Emergency Management Agency (FEMA) to obtain an understanding of key federal COOP requirements, including:
 - Federal Continuity Directive 1, *Federal Executive Branch National Continuity Program and Requirements*.
 - Federal Continuity Directive 2, *Federal Executive Branch Mission Essential Functions and Candidate Primary Mission Essential Functions Identification and Submission Process*.
- Reviewed TVA COOP policies and procedures at both the agency level and organization level to identify key requirements relating to the administration of TVA's COOP program and performance of mission essential functions (MEF), including:
 - TVA Standard Programs and Processes (SPP) 35.400, *TVA's Continuity of Operations Program*.
 - TVA-SPP-35.420, *TVA Business Continuity Program*.
 - Transmission System Operations (TRANS-TSO) Standard Operating Procedure (SOP) 30.504, *System Operations Center Degradation and Evacuation*.
 - TRANS-TSO-SOP-30.505, *Regional Operations Center Degradation and Evacuation*.
 - River Management SOP-35.400, *River Forecast Center Continuity of Operations Plan*.
 - Other relevant SPPs and program guidance, including TVA-SPP-12.002, *TVA Information Management Policy*.
- Reviewed business process analyses, enterprise risk information, succession planning documentation, system notification and alert guidance, emergency preparedness guidance, information management and essential records guidance, and other related supporting information.
- Interviewed TVA personnel from Security and Resiliency, River and Resources Stewardship, Transmission Operations and Power Supply, and Office of General Counsel to gain an overall understanding of TVA's COOP program, including administrative roles and responsibilities.
- Obtained an understanding of internal controls associated with TVA's COOP program. We identified management review and approval of the agency-level COOP program SPP and individual MEF COOP plans as the key internal control significant to the audit objective. Our primary method for testing the

operating effectiveness of this control was reviewing the SPP and COOP plans for evidence of review by appropriate levels of management within the specified timeframes.

- Visited primary and alternate sites for each MEF to gain an understanding of the functions performed, procedures for relocation, and processes for continuing organizational activities when normal operations are disrupted.
- Reviewed the ratings and responses TVA provided to FEMA on the December 2022 Federal Continuity Assessment Tool submission, including review of supporting documentation.
- Reviewed Federal Continuity Assessment Tool ratings and responses submitted by TVA for previous reporting periods during 2021 and 2022.
- Reviewed individual MEF COOP plans for inclusion of elements required in TVA-SPP-35.400.
- Reviewed TVA COOP plan implementation, including evidence of the following for program management and COOP plans: (1) management review and approval, (2) periodic revision, (3) communication, (4) training and testing, and (5) external review and reporting.

We conducted this performance audit in accordance with generally accepted government auditing standards. Those standards require we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objective. We believe the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objective.

November 29, 2023

David P. Wheeler
TVA Office of Inspector General

RESPONSE - DRAFT AUDIT 2023-17415 - CONTINUITY OF OPERATIONS PLAN

Security & Resiliency appreciates the TVA Office of Inspector General's (OIG) review of the agency's Continuity of Operations Plan (COOP). Continuity planning is a reflection of TVA's unwavering commitment to performing our critical mission of public service under all conditions. We wish to acknowledge the courtesy and inquisitive spirit of the OIG auditors responsible for this report, Robert Dixon and Maria Edwards. We value the recommendations provided as opportunities to strengthen our operations and continue to improve TVA's Comprehensive Emergency Management Program (CEMP).

TVA management has reviewed the report and offers the following response:

Recommendations

1. Implement annual COOP training for the TVA workforce in accordance with FCD-1 requirements.

Response:

Emergency Management agrees with the OIG's interpretation of FCD-1 training requirements. Emergency Management will revise TVA continuity planning requirements, found in TVA-SPP-35.200, Emergency Preparedness Programs, to establish the expectation for all TVA organizations to administer annual awareness briefings, an accepted form of training, for their workers in the TVA Learning Management System. Emergency Management will define minimum required topics for both continuity and non-continuity positions and ensure oversight to track and report training completion. Essential records training requirements should be set and enforced separately by Enterprise Records in accordance with their governance accountabilities.

2. Work with the Executive VP, Office of General Counsel, to complete implementation of processes necessary to ensure timely, complete, and accurate identification and maintenance of COOP essential records for TVA MEFs in accordance with FCD-1 requirements.

Response:

Enterprise Records agrees with the OIG's findings related to TVA's state of compliance with the Essential Records regulatory requirements across COOP and [Business Continuity Program] BCP programs.

David P. Wheeler
Page 2
November 29, 2023

The program will ensure that planned enhancements to the annual cycle are deployed which include senior leader engagement at cycle start, push of periodic metric reporting, and escalation of non-compliance to executive leadership.

3. Work with the VP, River and Resources Stewardship, to update River Management SOP-35.400 [RvM-SOP-35.400 - River Forecast Center Continuity of Operations (COOP) Plan] to include a requirement for a minimum annual review frequency.

Response:

River Management agrees with the finding regarding the RFC COOP plan. The RFC COOP plan will be revised to annotate and add an annual cadency review requirement and the RFC COOP plan will be changed from an "SOP" template to an "SPP" template. This will provide a review cadence on the cover sheet and language in the body of the document will be updated in Section 3.1.2 Sr. Manager, River Forecasting Center, Execution (B) with the following statement: "Ensures that this document is reviewed and/or revised, if necessary, on an annual basis", which reflects the expectation set forth by TVA level COOP requirements. In addition, River Management has caught up the essential records inventory submission that has been overdue and we are now current in the inventory cycle.

4. Update TVA-SPP-35.400 and individual MEF [Mission Essential Function] COOP plans as determined necessary to include guidance addressing the requirements for COOP planning information noted in TVA-SPP-12.002.

Response:

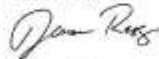
Emergency Management agrees that Continuity Program documents should be handled in a manner that ensures the confidentiality, integrity, and availability of the information they contain. Emergency Management will revise TVA's emergency planning requirements, found in TVA-SPP-35.200, Emergency Preparedness Programs, to establish the expectation that all emergency management documents, including those related to continuity, are reviewed, and marked in accordance with TVA-SPP-12.002, TVA Information Management Policy.

Along with Transmission Operations & Power Supply Compliance, the Transmission emergency preparedness coordinator reviewed this document and Transmission concurs with the OIG recommendations that are proposed for the VP, Security & Resiliency.

David P. Wheeler
Page 3
November 29, 2023

If you have any questions or need additional information, please contact me at 423-394-3862 or
by email at jregg@tva.gov.

Sincerely,



Jason Regg
Vice President, Security & Resiliency
Tennessee Valley Authority

JTR: MSS: CBM

cc:

Thomas W. Barnett
Rebecca L. Coffey
Mary C. Corbitt
James R. Dalrymple
Samuel P. Delk
David B. Fountain
James Patrick Hall
Kelie H. Hammond
Gregory J. Henrich
Aaron P. Melda
Donald A. Moul
Ronald R. Sanders II
Kay W. Whittenburg
OIG File No. 2023-17415