

Office of Enforcement  
Office of Health, Safety and Security

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# U. S. DEPARTMENT OF ENERGY

## OFFICE OF ENFORCEMENT

2007 Annual Report



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## EXECUTIVE SUMMARY

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The Department of Energy (DOE or Department) Office of Enforcement, within the Office of Health, Safety and Security, is responsible for implementing the DOE enforcement program. This 2007 Annual Report describes the activities, accomplishments, and focus areas of the DOE Office of Enforcement from January 1 through December 31, 2007.

In 2007, the Office of Enforcement reviewed almost 300 nuclear safety and worker safety and health noncompliances reported into the Noncompliance Tracking System, and over 400 security incidents reported into the Safeguards and Security Information Management System. The Office of Enforcement also reviewed numerous issues and concerns from other sources, such as the Occurrence Reporting and Processing System, employee concerns, accident investigations, DOE Office of Independent Oversight reports, safeguards and security survey reports, and issues identified by DOE line management.

The Office of Enforcement issued notices of violation to six DOE contractors for violations of DOE nuclear safety and classified information security requirements in 2007. The assessed civil penalties for these six violation totaled \$3,581,250, and DOE granted \$398,750 of mitigation in determining the assessed civil penalties. In one case, the Secretary of Energy issued a compliance order directing a contractor to implement specific corrective actions for identified noncompliances. In three additional cases, DOE elected to use discretion by issuing enforcement letters for noncompliances, rather than notices of violation, to recognize contractors' proactive efforts in identifying and correcting noncompliances.

Implementing new enforcement programs in the areas of worker safety and health and classified information security was a major focus of the Office of Enforcement in 2007. The Office of Enforcement completed the first investigations and enforcement actions for classified information security noncompliances and the first investigation of worker safety and health noncompliances (enforcement action to be completed in early 2008). The two notices of violations issued as part of the first security enforcement action resulted in a total penalty amount of \$3.2 million, the largest in the Department's history. Additionally, the Secretarial Compliance Order issued as part of this same action was the second such order ever issued by DOE. Some of the Office of Enforcement's other major accomplishments in 2007 included initiating a process to conduct integrated program reviews, communicating with DOE contractors and field elements through various mechanisms, and enhancing the Office of Enforcement's internal processes, resources, and products.

In 2008, the Office of Enforcement intends to continue to implement its responsibilities for investigating noncompliances and, where necessary, taking enforcement actions. The Office of Enforcement management team intends to continue to emphasize openness and communication and will continue to solicit feedback from DOE site contractors and other stakeholders. Several specific priorities for calendar year 2008 include performing the first set of integrated program reviews, enhancing internal processes and technical capabilities, continuing to openly communicate with DOE and contractor organizations, promoting improvements in DOE site safety and security programs (e.g., by supporting the efforts of the Energy Facility Contractors Group) and increasing investigative emphasis on contractors' compliance with requirements for management assessment, feedback, and other improvement mechanisms as they apply to events and accidents.

## 1. INTRODUCTION

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The Department of Energy (DOE or Department) Office of Enforcement, within the Office of Health, Safety and Security, is responsible for implementing the DOE enforcement program. The Office of Enforcement's mission is to promote overall improvement in the Department's nuclear safety, worker safety and health, and security programs through the management and implementation of the required enforcement programs. It is the Office of Enforcement's operating philosophy that the use of incentives, and when necessary enforcement actions, will improve contractor performance and compliance and fulfill mission objectives. Consistent with the Office of Health, Safety and Security's mission and philosophy, the Office of Enforcement shares its insights gained through enforcement with other organizational elements within the Office of Health, Safety and Security; the Department; and the contractor community. Communication within the Office of Health, Safety and Security generates synergy among that Office's policy, field assistance, oversight, training, and enforcement functions to ensure that they are well-integrated and support effective contractor implementation of safety and security programs. Communication with the contractor community is intended to share lessons learned in order to improve protection of workers, the public, and the environment and, in the case of security enforcement, to enhance national security.

The Office of Enforcement strives for integration among the three subordinate organizations listed below, which represent three distinct enforcement programs. Although different regulations underlie each of these enforcement programs, the program objectives and underpinnings of the regulations are the same. Accordingly, the Office of Enforcement seeks to integrate these safety and security programs and is working to streamline the enforcement process to enhance timeliness. These efforts are discussed in this report.

- The Office of Worker Safety and Health Enforcement, implements the Department's congressionally mandated worker safety and health enforcement program in accordance with Title 10, Code of Federal Regulations, Part 851, *Worker Safety and Health Program* (10 C.F.R. 851).
- The Office of Price-Anderson Enforcement implements the Department's congressionally mandated nuclear safety enforcement program in accordance with 10 C.F.R. 820, *Procedural Rules for DOE Nuclear Activities*.
- The Office of Security Enforcement implements the Department's congressionally mandated security enforcement program in accordance with 10 C.F.R. 824, *Procedural Rules for the Assessment of Civil Penalties for Classified Information Security Violations*.

As discussed in this report, during calendar year 2007 the Office of Enforcement focused on: (1) continuing its long established enforcement activities in the area of nuclear safety, and (2) implementing new enforcement programs in the areas of worker safety and health and classified information security. In implementing the new enforcement programs, the Office of Enforcement used the nuclear safety enforcement program as a model and adapted its successful practices to address the regulations for worker safety and health and security enforcement.

This 2007 Annual Report describes the activities, accomplishments, and focus areas of the Office of Enforcement from January 1 through December 31, 2007. The Office of Enforcement believes this report is important to the DOE community, other government agencies, and the public in providing information about the Department's enforcement program and ensuring that the Office of Enforcement has an open process. To further facilitate this open process, the Office of Enforcement has issued its [Enforcement Process Overview](#) to describe the enforcement programs for worker safety

and health, nuclear safety and security enforcement. It can be found at [http://hss.energy.gov/Enforce/EPO\\_1207.pdf](http://hss.energy.gov/Enforce/EPO_1207.pdf).

If you have questions or comments about this Annual Report or would like to provide feedback on the enforcement program, please contact:

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## 2. ENFORCEMENT CASES

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Procedural requirements, processes, and policies for the enforcement program are contained in:

- 10 C.F.R. 820 and its appendix A for nuclear safety enforcement
- 10 C.F.R. 851 subpart E and its appendix B for worker safety and health enforcement
- 10 C.F.R. 824 and its appendix A for security enforcement.

The DOE enforcement program addresses the following rules and requirements: 10 C.F.R. 830 (subpart A, *Quality Assurance* and Subpart B, *Safety Basis Requirements*); 10 C.F.R. 835, *Occupational Radiation Protection*; 10 C.F.R. 850, *Chronic Beryllium Disease Prevention Program*; 10 C.F.R. 851, *Worker Safety and Health Program* (Subpart B, *Program Requirements*, and Subpart C, *Specific Program Requirements*); 10 C.F.R. 1016, *Safeguarding of Restricted Data*; and 10 C.F.R. 1045, *Nuclear Classification and Declassification*. All applicable DOE security and cyber security orders and manual requirements established by contract or in DOE-approved program plans that implement the security rules (i.e., 10 C.F.R. 824, 1016, and 1045) are enforceable within the purview of the enforcement program. Other requirements, such as the *Information Requirements* provision of 10 C.F.R. 820.11, may also be enforced. Also, under 10 C.F.R. 708, *Contractor Employee Protection*, DOE may take enforcement action against contractors that have retaliated against employees for raising safety concerns.

This section discusses noncompliance reporting systems and the enforcement activities conducted in 2007. In 2007, enforcement actions were taken in the areas of security and nuclear safety. No enforcement actions have been taken in the area of worker safety to date; however, an enforcement action is under development at the time of publication of this report for worker safety noncompliances that were investigated in 2007. As discussed below, Office of Enforcement activities in 2007 included notices of violation, a compliance order, enforcement letters, and program reviews. In addition, a special report order was developed in 2007 and issued in January 2008.

### Noncompliance Reporting

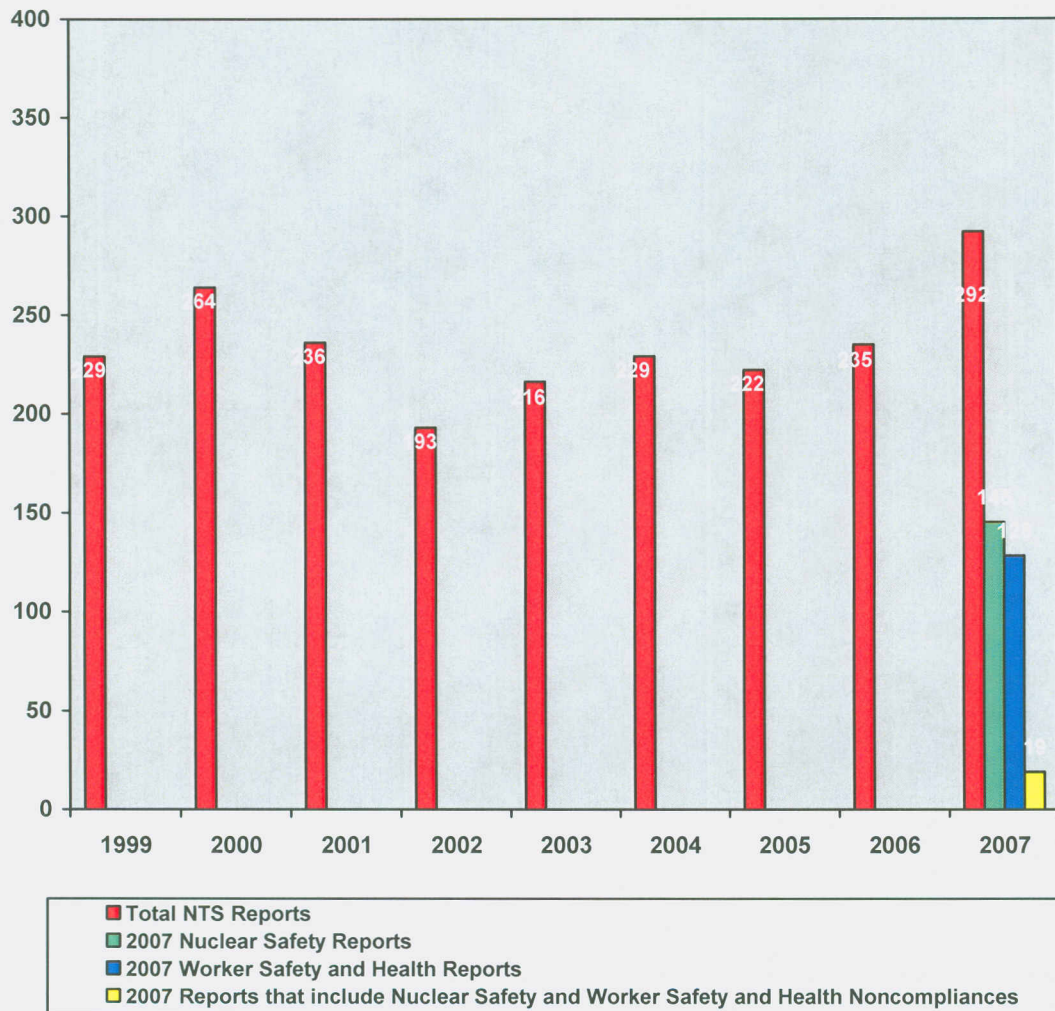
The Office of Enforcement established the Noncompliance Tracking System (NTS) for voluntary reporting of nuclear safety and worker safety noncompliances. Security noncompliances are reported into the Safeguards and Security Information Management System (SSIMS)<sup>1</sup>. DOE enforcement policies allow discretion in pursuing most noncompliance conditions; therefore, the Office of Enforcement may choose not to initiate an enforcement action if contractors appropriately self-identify the condition, report it into NTS or SSIMS, and promptly correct it. For more significant cases, the policies also allow for mitigation of civil penalties when contractors promptly self-identify and report noncompliances, and implement prompt and comprehensive corrective actions. Although progress has been made, noncompliance reporting for worker safety and security at DOE sites needs further refinement and continued maturation. Worker safety noncompliance reporting is a 2008 focus area and is discussed further in section 3 under the subheading “Worker Safety and Health.”

The Office of Enforcement reviewed the 292 nuclear safety and worker safety and health reports that were submitted into NTS in 2007, as shown in Figure 3-1. Because 10 C.F.R. 851 became enforceable in 2007, the data in figure 3-1 for 2007 includes a breakdown of the reports by nuclear

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<sup>1</sup> SSIMS now incorporates the Incident Tracking and Analysis Capability (ITAC), which formerly maintained these reports.

safety, worker safety and health, or both (i.e., some reports identified issues in both nuclear safety and worker safety and health). Figure 3-1 shows that there were more total NTS reports in 2007 than in prior years. This increase is attributable to the number (128) of worker safety and health reports in 2007, as 10 C.F.R. 851 became enforceable. The number of nuclear safety-related NTS reports decreased by approximately 30 percent in comparison to the previous eight-year average. The Office of Enforcement is evaluating this data to identify the reasons for the recent decrease in nuclear safety-related reports.



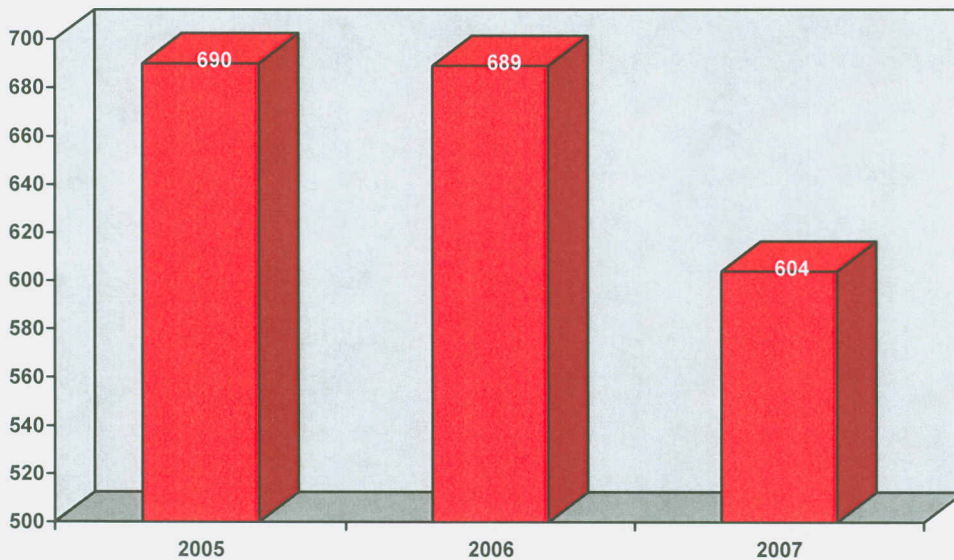
**Figure 3-1: Number of NTS Reports**

Altogether, approximately half of the reports were submitted into NTS only after an event or upon identification by DOE or some other external organization, rather than being identified through contractor assessment programs; 40 percent of the nuclear safety reports (the same percentage as in 2006) and 60 percent of the worker safety and health reports were driven by events or DOE/external organizations. The NTS reports that were submitted after an event and associated causal analysis indicate a continuing need to strengthen assessments to better identify and correct non-compliant conditions before those conditions contribute to an accident or undesired event.

In 2007, a total of 604 incidents of security concern were reported through SSIMS. Of the 604

incidents, 356 involved noncompliances with DOE directives regarding the protection of Restricted Data and other classified information. Such information protection noncompliances typically are identified as the result of event that could place classified matter at risk of compromise. For example, such events could entail providing classified information to unauthorized personnel (e.g., including classified information in an unclassified email). Figure 3-2 represents the total number of security incidents reported for calendar years 2005, 2006, and 2007. This figure shows that slightly fewer security incidents were reported in 2007 than in to prior years. This decrease can be at least partly attributed to a locally approved deviation associated with cell phone incident reports at Sandia National Laboratories.

The Office of Enforcement judges that the number of incidents involving classified matter could be reduced even further. To this end, greater emphasis is needed on security incident trending and fixing weaknesses identified during self-assessments. One approach that would give self-assessment results greater emphasis and visibility is to selectively track significant self-assessment findings and the associated corrective actions in SSIMS. An additional benefit to this approach would be that contractors could take credit, from an enforcement program perspective, for self-reporting areas of potential noncompliance associated with classified information. This reporting is in addition to reporting security events in accordance with Section N of DOE Manual 470.4-1, *Safeguards and Security Program Planning and Management*.



**Figure 3-2: Number of Security Incidents Reported**

### Notices of Violation

When violations of enforceable rules and requirements are identified, DOE has the authority to issue notices of violation and assess civil penalties. Six enforcement actions were issued in 2007 that included 12 severity level I, 16 severity level II, and 3 severity level III violations, with civil penalties totaling \$3,581,250. The assessed civil penalties also included \$398,750 of mitigation that DOE deemed to be warranted because of the contractor’s proactive identification of the condition, their causal analysis, and the resulting corrective actions. Table 3-1 summarizes the six enforcement actions. One enforcement case had an assessed civil penalty of over \$500,000 and is discussed below.



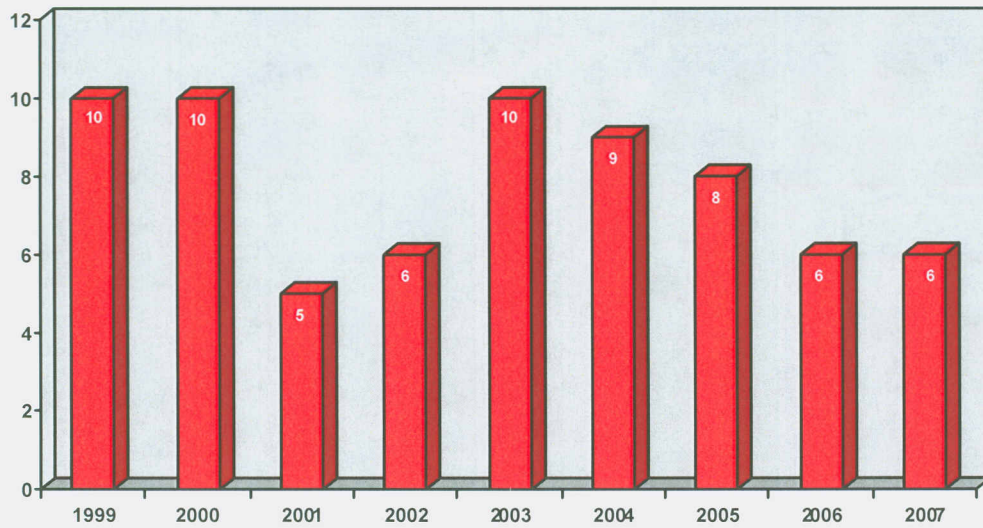
The University of California was cited for deficiencies in security controls for protection of classified information at the Los Alamos National Laboratory, which it managed until May 31, 2006. The investigation determined that the University of California was responsible for some of the deficient security controls that contributed to unauthorized downloading, reproduction, and removal of classified matter, which was discovered in October 2006. The enforcement action included five severity level I violations with an assessed civil penalty of \$3,000,000 that was later reduced to \$2,800,000 in a settlement. The assessed civil penalty considered various factors, including the number and severity of the violations, the duration of the violations, the maximum permissible penalties based on fee limits, the contractor’s performance history at Los Alamos National Laboratory, and the gravity of the security risks.

**Table 3-1: Summary of Enforcement Actions**

EA No.	Contractor – Site	Date Issued	Number and Severity Level	Final Civil Penalty	Civil Penalty Mitigation
2007-01	Los Alamos National Security – Los Alamos National Laboratory	07/13/07	7-I	\$300,000	NA*
2007-02	University of California – Los Alamos National Laboratory	09/28/07	5-I	\$2,800,000	NA*
2007-03	CH2M-Washington Group Idaho, LLC – Idaho National Laboratory Accelerated Retrieval Project	06/14/07	2-II	\$55,000	\$55,000
2007-04	BWXT Y-12, LLC – Y-12 National Security Complex	09/18/07	4-II	\$137,500	\$82,500
2007-05	Bechtel National Inc. – Hanford Site	10/04/07	6-II, 2-III	\$165,000	\$165,000
2007-06	Battelle Energy Alliance – Idaho National Laboratory	12/03/07	4-II, 1-III	\$123,750	\$96,250
Totals			12-I, 16-II, 3-III	\$3,581,250	\$398,750

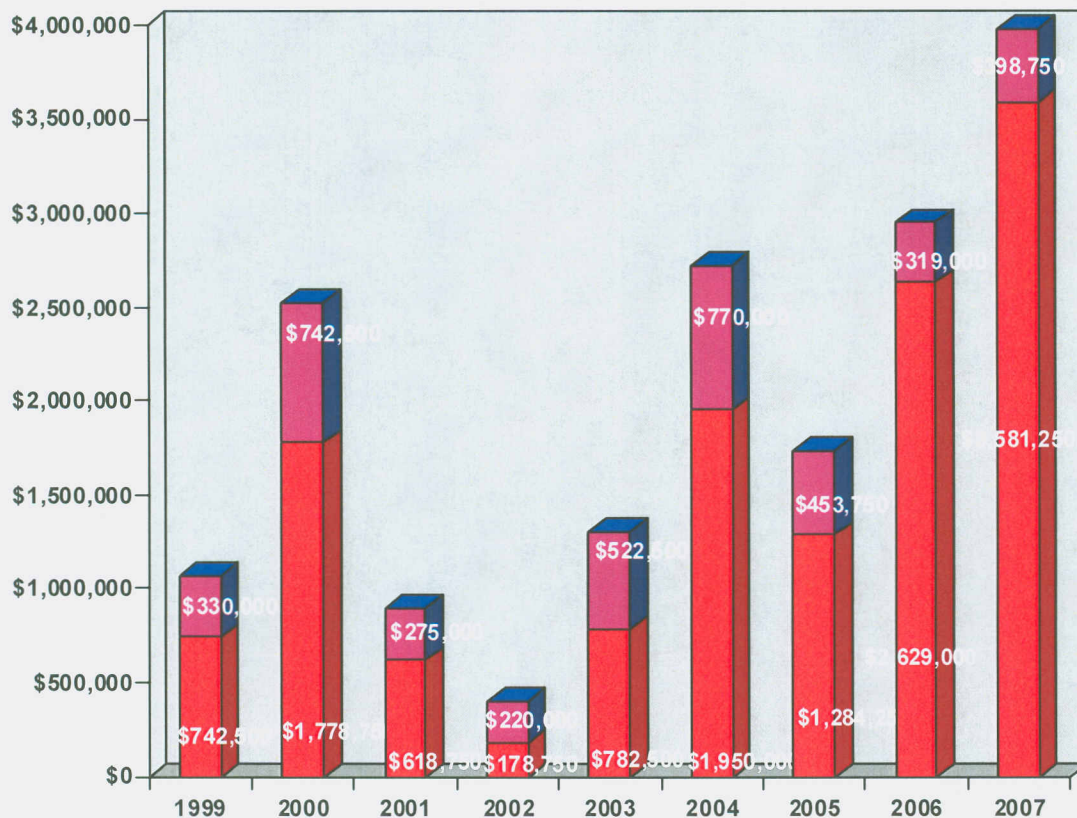
\* The details of the determination of penalties and mitigation for these enforcement actions are discussed in the applicable notices of violation.

Figure 3-3 shows the number of enforcement actions in 2007 and prior years. As shown in this figure, the number of enforcement actions per year has been in the same range (i.e., five to ten per year) in recent years since 1999.



**Figure 3-3: Number of Enforcement Actions**

Figure 3-4 shows the amounts of civil penalties in 2007 and prior years. As shown in this figure, the assessed penalties and the amounts mitigated vary considerably from year to year and were higher in 2007 than any previous year. The variation is attributed to a number of factors. For example, in some years, there are one or more enforcement actions that include large civil penalties.



**Figure 3-4: Final Civil Penalty Amounts and Amount Mitigated**

Note: Some of the penalties from 1999 to 2006 were waived by statute. The Energy Policy Act of 2005 repeals the exemption to civil penalties for listed nonprofits upon signing of a new contract. In 2007, no penalties were waived by statute.

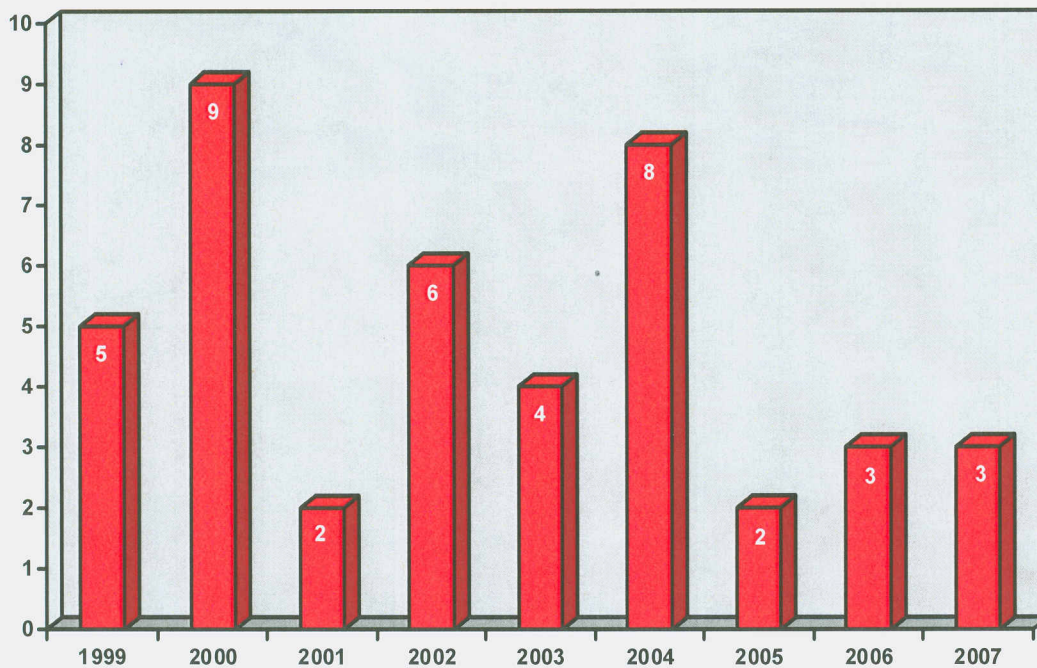
### Compliance Orders

In accordance with the regulations governing enforcement, the Secretary of Energy may issue a compliance order that requires action to correct non-compliant conditions. One compliance order was issued in 2007 under 10 C.F.R. 824. Specifically, the Secretary directed the contractor for the Los Alamos National Laboratory – Los Alamos National Security, LLC – to remediate deficiencies that contributed to a breach of classified information security controls and to correct longstanding deficiencies in classified information security and in both classified and unclassified cyber security programs.

### Enforcement Letters

DOE uses enforcement letters to notify contractors of significant concerns that, if not addressed, could lead to notices of violation. Three enforcement letters were issued to contractors in 2007. In two of the three cases, the Office of Enforcement identified potential violations of nuclear safety requirements but elected to apply discretion based upon the contractors' early detection, comprehensive investigation and causal analysis, and appropriate corrective actions. In one case, the

enforcement letter communicated a positive message about a contractor’s improved performance. Figure 3-5 shows the history of enforcement letters issued by DOE.



**Figure 3-5: Number of Enforcement Letters**

### Program Reviews

The Office of Enforcement conducts program reviews of contractor processes for assessments and identification, screening, reporting, and correction of issues. The purpose of these reviews is to ensure that contractors apply a sound process to identify noncompliances, make proper decisions on reportability, and undertake timely steps to correct noncompliances. With regard to contractors’ assessment processes, the Office of Enforcement’s review focuses on their effectiveness in identifying issues and on specific improvements in those processes.

The Office of Enforcement performed program reviews of two contractors in 2007. In one review, the results showed that the contractor processes had a number of program strengths and were generally adequate, although some weaknesses warranted increased management attention. The other contractor program had all of the required elements, but the program was not mature and implementation weaknesses needed to be addressed.

The two reviews performed in 2007 focused on contractor processes for assessments and managing issues and events in the area of nuclear safety. As discussed in section 3, the Office of Enforcement plans to implement integrated program reviews in 2008, which will examine processes in all three areas of the enforcement program (i.e., worker safety and health and classified information security, in addition to nuclear safety).

### **3. ENFORCEMENT FOCUS AREAS AND ACCOMPLISHMENTS**

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The Office of Enforcement accomplishes its mission by means of a broad spectrum of activities in addition to enforcement investigations and issuance of enforcement actions. These activities support effective communication, share lessons learned, and promote improvement within DOE and the contractor community. In addition, DOE's enforcement program has gained knowledge about the status of worker safety, nuclear safety, and security programs across DOE and important lessons learned about contractor compliance and enforcement program activities. This knowledge is used to identify focus areas for further improving the enforcement program, including both internal (focused on strengthening the Office of Enforcement's internal infrastructure and capabilities) and external (focused on interfaces with field elements and other external stakeholders) focus areas.

This section describes program accomplishments and focus areas for each of the three major programs (worker safety and health, nuclear safety, and security) and for the cross-cutting functions in support of all three programs.

#### **Worker Safety and Health**

Office of Worker Safety and Health Enforcement accomplishments in 2007 included:

- Completing the first investigation of worker safety noncompliances under 10 C.F.R. 851. An enforcement action for these noncompliances will be issued in early 2008.
- Routinely facilitating in-depth discussions of the worker safety noncompliance reporting thresholds using case studies in both group settings, such as Energy Facility Contractors Group (EFCOG) working groups, and individual settings.
- Providing technical expertise and support to other Office of Health, Safety and Security and DOE organizations on matters relating to implementation of 10 C.F.R. 851.

Office of Worker Safety and Health Enforcement focus areas for 2008 and beyond include:

- Continuing to refine the approach used to evaluate NTS reports and other data sources for events and issues that may warrant enforcement action. The Office of Worker Safety and Health Enforcement continues to be concerned about contractor consistency in NTS reporting and ensuring that contractors and subcontractors evaluate all available data sources, including incident investigations and assessment results, to determine whether regulatory noncompliances have occurred.
- Improving the timeliness of selection of events/issues for investigation to help ensure that enforcement evaluations are aligned with field element timelines for considering and assessing contract penalties.
- Increasing communication with stakeholders through various mechanisms to share lessons learned from the first year of program implementation, with a focus on ensuring that contractors

and subcontractors at all levels are familiar with the requirements of 10 C.F.R. 851 and DOE expectations for identifying and reporting non-compliant conditions.

- Continuing to interface with working groups and committees established to address specific worker safety disciplines and actively engaging in discussions to resolve 10 C.F.R. 851-related compliance issues.
- Identifying opportunities for enforcement staff to increase their familiarity with those sites and contractors for which they have been assigned safety performance monitoring responsibilities.

### **Nuclear Safety**

Office of Price-Anderson Enforcement accomplishments in 2007 included:

- Conducting five nuclear safety investigations, each of which resulted in an enforcement action (one of the five actions was issued in early 2008).
- Conducting two program reviews and a follow-up program review. The latter review resulted in an enforcement letter that was issued in early 2008.
- Developing and adopting the use of a more streamlined investigation report format, which will expedite the documentation and issuance of Office of Enforcement investigation reports.

Office of Price-Anderson Enforcement focus areas for 2008 and beyond include:

- Continuing to emphasize (through enforcement activities and integrated program reviews) improvement of contractor assessment, causal analysis, and corrective action programs.

### **Security**

Office of Security Enforcement accomplishments in 2007 included:

- Completing the first investigations and enforcement actions for classified information security noncompliances. Two enforcement actions were completed in 2007; these are the first actions under the enforcement provisions of 10 C.F.R. 824 for classified information.
- Revising and updating the Implementation Guide for classified information security enforcement.
- Enhancing the functionality and implementation of SSIMS for reporting security noncompliances and tracking the associated corrective actions, including developing a process for screening security incidents to identify issues that should be monitored and potentially investigated.
- Communicating with members of the security, intelligence/counterintelligence, and safety communities through various mechanisms to enhance understanding of security enforcement requirements and processes, including such mechanisms as:
  - Working with DOE field elements and contractors to communicate and reinforce expectations for self-reporting of noncompliances through the Incidents of Security Concern Program and SSIMS.

- Working with the DOE National Training Center to enhance blocks of instruction on security enforcement to existing courses and partnering with the EFCOG working groups to develop security enforcement training, guidance, and review criteria.
- Fostering information exchange on event-driven cases with the Department of Justice, U.S. Attorneys, and other government agencies.

Office of Security Enforcement focus areas for 2008 and beyond include:

- Establishing and implementing a process to systematically analyze site-specific and complex-wide performance data to identify trends and potential security-significant noncompliances.
- Using the information about performance data to prioritize enforcement resources and improve the process of selecting potential violations for investigation, with a focus on longstanding deficiencies that remain uncorrected and the ineffectiveness of some corrective actions.
- Developing and providing training on security enforcement to selected DOE sites across the complex and increasing communication with field organizations to ensure their understanding of 10 C.F.R. 824 provisions.
- Developing and implementing an improved process for screening noncompliance reports and events in order to improve the depth, rigor, and efficiency of the screening process and to ensure that enforcement resources are applied effectively.

### **Cross-cutting and Programmatic**

In addition to the above accomplishments for the specific enforcement programs, the Office of Enforcement's programmatic and cross-cutting accomplishments in 2007 included:

- In keeping with the Secretary of Energy's commitment that creating the Office of Enforcement would result in integration of safety and security programs, applying techniques employed in one area, such as nuclear safety, to another enforceable area, such as security enforcement. For example:
  - In the first security enforcement investigation, using human performance improvement techniques, commonly used to analyze safety conditions, in evaluating security procedures and implementation.
  - In the Secretary's Compliance Order, which was part of the first security enforcement case, incorporating the "extent of condition" approach in formulating compliance order milestones that would result in comprehensive contractor corrective actions and, if implemented effectively, could fix longstanding, systemic deficiencies.
- Revising and updating the Enforcement Process Overview to include information security enforcement as well as the worker safety and nuclear safety enforcement programs. The Enforcement Process Overview now provides a comprehensive description of all three enforcement programs and is more useful to Enforcement Coordinators and other stakeholders.
- Streamlining investigation reports to focus on the actions and events that constitute apparent noncompliances in order to improve timeliness (e.g., providing reports to contractors sooner) and

increase the efficiency of the enforcement process (e.g., minimizing the amount of information that needs to be reviewed by all affected parties).

- Communicating with DOE contractors and field elements about systemic deficiencies and enforcement decisions through various mechanisms, including participation in EFCOG meetings, site visits, website updates, and attendance at various safety and security conferences.
- Adding qualified staff to fill vacancies and enhance internal office functions and support capabilities, including hiring new personnel and obtaining new contractor support in such areas as document control/docketing, analytical support, and legal and administrative support.

In addition to the above focus areas for the specific enforcement programs, the Office of Enforcement's programmatic and cross-cutting focus areas for 2008 and beyond include:

- Establishing and implementing a revised approach to program reviews, including:
  - Using the program review to promote effective contractor programs for identifying noncompliances, determining the causes and the extent of the condition of noncompliances, and implementing effective corrective actions to prevent recurrence.
  - Integrating the reviews of the three enforcement areas to minimize the impact on sites while promoting effective integration of the Enforcement Coordinator functions.
  - Performing the first set of integrated program reviews at four sites, all of which have volunteered to participate in the new, integrated approach: Lawrence Livermore National Laboratory, Pacific Northwest National Laboratory, Savannah River Site, and Sandia National Laboratories.
- Improving analysis and trending of safety and security events/incidents, as reported in NTS, Occurrence Reporting and Processing System, and SSIMS reports, with a focus on evaluating potential gaps in the analysis of events/incidents and identifying contractor performance trends that could result in serious noncompliances.
- Conducting regular conference calls with site Enforcement Coordinators to ensure open communication, solicit feedback, and identify issues that need to be addressed.
- Continuing to evaluate the adequacy of contractor reporting of noncompliances, with emphasis on contractor processes for evaluating events with respect to consequence thresholds including an evaluation of the effectiveness of contractors in applying reporting thresholds during 2008 integrated program reviews.
- Continuing communication of enforcement activities and lessons learned through presentations at various workshops, meetings with EFCOG working groups, and the Office of Enforcement's annual Enforcement Coordinator training workshop.
- Enhancing staff capabilities by ensuring that recent staff additions are fully trained and mentored to ensure their understanding of the enforcement program process and management expectations and hiring new personnel to fill a number of vacancies and enhance the Office's ability to perform multiple concurrent activities.