

NEVADA TEST SITE DRAFT GENERAL WORKFORCE RESTRICTING PLAN DATED SEPTEMBER 26, 2007
COMMENT RESOLUTION (11-07-07)

NOTIFICATION OF WORKFORCE RESTRICTING ACTION

<p>Comment 1</p>	<p>Section II.C.2, "Communications": "Contractors are expected to comply in all respects with the requirements of DOE and NNSA orders and guidelines regarding announcement of workforce restructuring actions.": The Contractor's Division Manager of Emergency Services and Operations Support (ESOS) released information (both verbally and in writing) to staff of ESOS Division on August 30, 2007, prior to National Security Technologies (the Contractor) receiving DOE/NNSA's approval to release such information according to the representative at the Contractor all hands meeting of September 10, 2007; the Contractor representative stated, during the all hands meeting, that the Contractor was forbidden (by DOE/NNSA) to advise Contractor employees of possible workforce restructuring prior to September 10, 2007. The ESOS Division Manager's release of information on August 30, 2007, was premature and was in direct violation of DOE's mandate to the Contractor.</p>
<p>Response</p>	<p>Due to the strong possibility of not having an enacted FY 2008 Budget and the effect this would have at NNSA sites, the NNSA Administrator directed the NNSA contractors to provide general information to their employees regarding the possibility of work force restructuring at their sites. All other actions have been consistent with the requirements described above. In addition, contractors may provide information to their employees at any time, however, NNSA requested that all communications be coordinated with the Site Office to ensure consistent and accurate information is provided.</p>
<p>Comment 2</p>	<p>Section III.B, "Timing of Notification of Workforce Restructuring": "Advance notification of intent to implement workforce restructuring actions should be provided as early as possible... with an objective of 120 days notice to employees and the community for development of a workforce restructuring plan prior to the involuntary separation... of employees.": Contractor employees have NOT been given 120 days notice. Does this mean that 120 days is the "objective" goal and that fewer than 120 days is adequate for notification? The first notification to employees was given on August 30, 2007, (by the Contractor ESOS Division Director), and was then officially given September 10, 2007 (by the Contractor). The Contractor has advised employees via email of September 26, 2007, that out-processing for voluntary separations will begin October 17, 2007, and the involuntary process will begin October 19, 2007. Thus DOE's mandate will have been violated in the event involuntary separations begin October 19, 2007 (less than 2 months after the Contractor's notification to employees).</p>
<p>Response</p>	<p>The referenced 120-day notice is an objective, intended to facilitate public comment on the Plan. No involuntary separation program will take place until the Plan has been finalized. A prime objective of Section 3161 of the National Defense Authorization Act for Fiscal Year 1993 is to mitigate the impact of workforce restructuring on the affected work force and specifically to minimize the number of involuntary separations needed. Accordingly, Section 3161 has been consistently interpreted to permit voluntary separation programs to be begun before the Section 3161 Plan is finalized, so as to minimize the need for separations generally and involuntary separations in particular. Consistent with these policies, the decision was made to announce the work force restructuring action and publicize the Draft NSO Work Force Restructuring Plan at the earliest opportunity.</p>

CONSIDERATION OF ALTERNATIVES

<p>Comment 3</p>	<p>Has there been any discussion or consideration on offering employee's a voluntary reduction in hours. I'm sure many people with a family</p>
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and not using NSTec or other contractor health insurance programs may consider taking that option. Instead of a 40 hour work week have a 25 hour work week if the Department Manager's approve of it. It seems this may also save some jobs for employees who need a FT position with benefits. Thanks for your time.

Comment 4	Has there been any discussion or consideration on offering employee's a voluntary reduction in hours. I'm sure many people with a family and not using NSTec or other contractor health insurance programs may consider taking that option. Instead of a 40 hour work week have a 25 hour work week if the Department Manager's approve of it. It seems this may also save some jobs for employees who need a FT position with benefits. Thanks for your time.
Comment 5	Possibly also to allow and encourage buying more than 40 hrs of PTO.
Comment 6	The use of "furlough status" that could be PTO and/or time without pay would allow the decisions to be made in advance of the termination and pay-out date.
Response	The contractor considered a variety of options before moving forward with this process. After reviewing the options, the contractor decided reductions were necessary rather than effecting temporary solutions.

CLASSIFICATION OF EMPLOYEES - Regular

Comment 7	Section V.C.1, "Hiring Preference" and Appendix B: The definition of "Regular Employees" (bulleted list) implies that Contractor employees must meet all three criteria to be considered "eligible" by inclusion of the word "and" at the end of the second bullet. Should not the word "or" be replaced with the word "and" since, as written, Contractor employees must meet all three criteria before being considered "eligible"? In other words, as the Plan reads currently, if a Contractor employee was not employed on or before September 27, 1991, was employed at the Nevada Test Site in a full-time/part-time capacity on the date the workforce restructuring notice was given, <u>AND</u> was involuntarily separated, Contractor employees not meeting ALL three criteria are not covered under the Plan. Please clarify. In addition, the definition of "regular employees" in the Plan directly contradicts the definition of a "regular employee" as stated in the Contractor's Human Resources Department documentation.
Comment 8	On page 8 (13 of the PDF) it states that a "Regular Employee" must have worked here prior to 1991. It then defines an "Intermittent Employee" using the same date. Is this correct? If so, how do you classify employees who started working after that date?
Comment 9	Page 10, on Page 14 (Appendix B), definition of Regular employees: Do you have to meet all three of the bullets in order to be classified as qualified, eligible employee?
Comment 10	OK, I just read the Workforce Reduction Plan draft of 9/26/07. The "Regular Employee" definition in part C (1) and the definition given in appendix B seem to contradict. Is it a requirement that an employee must have been "Employed at a DOE defense nuclear facility on or before September 27, 1991" to be considered a "Regular Employee", or not?
Response	Although set forth in the document in slightly different formats, the information in Section V.C.1, and Appendix B are consistent. In order for separated employees to be categorized as "Regular" employees and thereby eligible for the Section 3161 Rehiring Preference, they must meet all three of the criteria specified in both Section V.C.1, and Appendix B. The September 27, 1991 date also applies to intermittent employees. The Department and the NNSA have consistently used this "attachment test" in order to define employees entitled to the preference in hiring. The final document will be updated so that this information is reflected consistently in both places.

VOLUNTARY SEPARATION

Comment 11	The NTS 3161 plan certainly meets the letter of the DOE requirements but not necessarily the spirit in that the plan does little or nothing to maximize participation in the voluntary part of the RIE in order to minimize an involuntary program (page 7 of the 09/26/07 restructuring plan: "In order to minimize the number of involuntary separations and mitigate the impact on affected employees, the contractor should consider in consultation with the Site Office the use of a Self-Select Voluntary Separation Program (SS VSP) before consideration is given to conducting an Involuntary Separation Program (ISP) when workforce restructuring is necessary.")
Comment 12	The only thing which can be done to minimize involuntary separations is to maximize voluntary separations. The number of layoffs (and why don't we call it that instead of trying for some fancy politically correct way to say "you're gone". To the person who is involuntary separated, it feels just like a layoff) will be dictated on the lack of funding to support the current workforce. Unless NNSA has some last minute plan to get an influx of funding, how do you plan on minimizing the involuntary separations?
Response	A Self-Separation Process was initiated on October 11, 2007.
Comment 13	Section III.C.3, "Workforce Planning and Restructuring Strategy": "Attrition will be managed to minimize the need for involuntary separations." This provision is vague. Please specify how the Contractor will "manage" attrition. Is the implication that some Contractor employees will voluntarily separate and Contractor employees of retirement age will be encouraged to voluntarily separate even though they may not wish to retire?
Response	Contractors manage attrition by minimizing the replacement of employees who have voluntarily separated from employment, so that their separations represent net decreases in the size of the work force. In addition, the Self-Select Voluntary Separation Program was initiated to maximize voluntary reductions in the work force and minimize the need for involuntary separations. The SS VSP is purely voluntary. No employees will be pressured to participate in the SS VSP and the contractor will be required to minimize the number of people hired after the SS VSP.
Comment 14	What form needs to be filled out for voluntary separation? I will be on PTO next week but I want to make sure I'm included in the voluntary separation.
Response	This has already been announced as part of the Self-Select Voluntary Separation Program on October 11, 2007. Information is available on the NSTec website at https://nswweb.ny.doe.gov/tops/WR_VSPforms.pdf .
Comment 15	This Workforce Restructuring Plan has nothing new in it. The NSTec contract already laid out the medical and severance plan, where is the added incentive for employees to take the voluntary RIE?
Response	No additional incentives are being offered as a part of this process but employees who want to voluntarily select themselves for separation will receive severance in accordance with their years of service, and will be entitled to continue medical benefits under the Department's Displaced Workers Medical Benefit Program.
Comment 16	If SS VSP candidates lack incentive to volunteer but rather remain part of the workforce for a short period to avoid the above "penalties" and then leave (retire or terminate), the NTS workforce ends up losing two people instead of one, potentially resulting in a skill loss much more problematic that it needed to be if the above issues could be addressed.
Response	Comment noted. No action required.
Comment 17	My supervisors (first 3 levels) are taking a self volunteer plan and there is no succession plan in place. Is there a process to ensure that experience and performance can be maintained?

Response	The contractor has the discretion to decide whether to accept an employee's application for the Self-Select Voluntary Separation program. Applications for voluntary separations will not be accepted if the loss of the employee would require a backfill action.
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BENEFITS ACROSS THE COMPLEX

Comment 18	The NNSA restructuring of M&O's is a complex-wide initiative, primarily necessitated by Congressional scope and funding mandates. Therefore, the benefits and incentives provided for RIE should be equitable and fair, complex-wide.
Comment 19	The proposed NSTec Draft 3161 and RIE package needs to be coordinated by NNSA/DOE to provide standardization between M&O contractors. The draft plans now being discussed with LLNL and LANL seem to be quite different. Proper coordination should help preclude "class action" risks.
Comment 20	Nevada/NTS' workforce restructuring plan is demonstrated to be inferior in benefits to plans being offered by other NNSA sites. To minimize the size of involuntary adjustment, NSO should consider why the NTS plan cannot be made more equitable to plans at other sites. Currently there is no plan to mitigate this negative impact such as offering a retirement incentive or more generous separation adjustment. Please consider adding one.
Response	No additional incentives will be offered.

RETIREMENT/RETIREMENT INCENTIVES

Comment 21	The plan in place does not really address any offers for early retirement. Options could be to provide an early vesting and or crediting a few extra years of service. There are a significantly high number of people who are in this category that probably would accept if it was offered. When the operator of Lawrence Livermore National Laboratory (LLNL) changed from Univ. of Calif. to a consortium of UC and Bechtel, they offered the option of retiring on the UC plan. A large number took it so they are probably not faced with many separations now.
Comment 22	You should add retirement incentives to the plan.
Comment 23	If DOE/NNSA and NSTec are trying to reduce the amount of involuntarily laid-off employees, why is there no early retirement incentive package? Some employees have been working at the site for 20 to 45 years! I personally know of 4 people who have told me that they only want to work until the end of 2008 to get their full benefits, help us all out and give the people close to retirement something to think about! PLEASE!!!
Comment 24	If you really want to minimize involuntary RIFs, offer a 2+2 (Two years to age and two years to service). I suspect that if that were available, there would be enough volunteers so that a minimum number of involuntary would be required. In fact, I would not be surprised that no involuntary RIFs would be required. Consider that there are a number employees who are at age 60 that would be tempted to take an early retirement. Anyone at 63 or over is going to be very, very tempted. The Goodwill that is generated from this is priceless. This can put the whole RIF in a much more positive light instead of being the Grinch that stole Christmas. I still find people who talk favorably about the last 3+3 that the National Labs offered their personnel. The remaining workforce doesn't feel bad about what just happened and believe me they do when it is an involuntary RIF. The survivors of a RIF have their own feelings of guilt, sadness, and anger over what has happen to their friends and co-workers following an involuntary RIF. Productivity generally suffers for several months. A large part of the cost for this is pushed to the out-years when things may not be as bad.
Comment 25	Remember that the number of RIFs is determined by the lack of funding. Employees in this age group are generally fairly highly compensated so it could easily be that for every highly compensated person who voluntarily leaves, you can afford to keep two younger

	employees. Voluntary RIFs in this age group drastically limits the potential liability from lawsuits for age discrimination. The older workforce is volunteering to leave, not being forced out before they can retire or forced into an early retirement.
Response	No additional incentives will be offered.

TIMING OF PERSONNEL REDUCTIONS

Comment 26	Coordination of voluntary and involuntary termination dates could be effected. Say, January 1, 2008. A common date, after January, would provide a "substantial" benefit and incentive to employees, NSTec, and NNSA.
Comment 27	Termination of staff at the year-end, before January 1st, greatly impacts cost-benefits to the employee terminating under the proposed 3161 and RIE. Individual taxes and retirement benefits are unnecessarily impacted.
Comment 28	Back to the subject of a voluntary RIF (reduction in force). Unless an employee has another job already lined up and is going to quit anyway, there is nothing that I can see in the plan which would encourage an employee to volunteer. As a result of a number of conversations with a wide range of employees, all I can see are disadvantages for a person to volunteer. Consider these: <ul style="list-style-type: none"> ▪ Unless an employee can continue service until the end of the year, this year will not count as one of the high five years in their retirement pay calculations. A quick estimate said that this would be a 4%-5% reduction in my retirement for the rest of my life. Not a very good deal. ▪ The severance pay would be paid as a lump sum along with any outstanding PTO. Using the tax tables, payroll will tax this at around 25%+. You will get some of this back when you file your taxes next year, but will be denied the use of that money until then. Also not a really good deal.
Comment 29	Keep people on the payroll while they use their separation pay and PTO up. Yes this might cost you a few extra days of vacation, but it would help to get people past December 31 so they would not lose this year as one of their high five. It would also minimize the amount of money that the IRS would be taking since the tax rate will be what the employee is currently paying. It would also keep their clearances active if they are interested in looking for other work. This one thing would make it attractive for a number of people I know.
Comment 30	Allow volunteers (as well as non-volunteers) to collect their vacation pay after the beginning of the calendar year (to minimize the impact of federal income taxes).
Comment 31	Allow both those taking the voluntary as well as those involuntarily separated to include that portion of their severance paid to make up the difference in what they would have earned to the end of the calendar year, and then allow them to include this calendar year in their retirement benefit calculation. (this would eliminate a sacrifice made by them retiring instead of just waiting to see if they are rIf'd).
Comment 32	While such a SS VSP has been offered, it has some attributes of a dis-incentive for employees who have been contemplating retirement or accepting another position: <ul style="list-style-type: none"> ▪ Being executed in October, SS VSP candidates permanently lose an entire year of experience on their retirement calculations ("high five"), suffering a reduction in retirement payments for the rest of their lives. Currently there is no plan to mitigate this negative impact. Please consider adding one. ▪ Receiving a lump-sum separation package accompanied by payment for PTO immediately upon separation in a tax year during which an SS VSP candidate was mostly employed likely will result in a crushing tax burden that could consume a significant portion of the separation package. Currently there is no plan to mitigate this negative impact such as enabling postponement of PTO

	payment until next tax year. Please consider adding one.
Response	The budget situation necessitates reductions as early in the fiscal year as possible in order to reduce the number of involuntary separations. Funding is currently available to pay severance costs.
Comment 33	The decision to accept a voluntary RIE is a complex and individual analysis that can only be made upon finalization of the 3161 and detailed benefit provisions of the RIE. The proposed period of decision making needs to be extended to allow proper communications with those interested in the voluntary program.
Response	The Self-Select Voluntary Separation Program was initiated on October 11, 2007. Information was made available via the NSTec website, and internal Human Resources personnel are available to provide required assistance.

PLACEMENT

Comment 34	Will there be an educational assistance incentive?? During the 1994 RIF, educational funding (to a maximum of \$10K) was available to help some individuals pickup additional job skills or education if they so desired. Not everyone is going to be interested, so it is a benefit that looks good but will not be utilized by everyone.
Comment 35	Will it address continuing education (college classes, etc.) for displaced workers? Generally there is an amount allowable for workers to return to school for additional training to continue in their career path or change paths if the opportunities do not present themselves.
Response	No additional incentives will be offered.
Comment 36	Is the Parent Organization, Northrup Grumman, willing to review resumes of people to see if there is a fit to one of their openings? Lockheed martin did this during the transition.
Comment 37	How practical is it to hire within when NSTEC removed all the opening positions on their website and both national labs are reducing?
Response	Employees will be provided links to the Parent Organization's job listings in order to assist displaced employees in their job search, if applicable. The Parent Organizations will also be holding a job fair in the near future.
Comment 38	Why isn't there an outplacement service being offered in California and New Mexico?
Response	A reference to the services available in the other locations will be obtained and added to the plan.
Comment 39	Your clearance will be terminated immediately upon your termination. Why not hold the clearance open to give the individuals an opportunity to find employment elsewhere within the NNSA complex (yes, I know that layoff are everywhere, but the possibility is always open for the right mix of skills and position).
Response	DOE Manual 470.4-5, Personnel Security, requires the termination of security clearances immediately upon an employee's termination of employment. If employment is found at another NNSA site within one year, the clearance can be reactivated in a relatively short period of time, if necessary.
Comment 40	I have only one comment with regards to the plan, that being the identified locations of the JobConnect offices. Because there is an adequate number of NTS personnel who live in Pahrump to warrant bus services for Pahrump, the Pahrump JobConnect office should be included with the other offices that are listed.
Response	A reference to the services available in the other locations will be obtained and added to the plan.

DISPLACED WORKER MEDICAL BENEFITS PROGRAM

Comment 41	A worker who is eligible for medical coverage under the spouse's employer medical plan is not treated the same monetarily as a worker who does not have medical plan eligibility through the spouse. The worker with spouse eligibility must pay the entire medical plan cost, but the
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	worker who does not have spouse eligibility has a three year graded medical plan payment assistance plan.
Comment 42	The displaced worker may temporarily have access to medical coverage through the spouse eligibility option, but the loss of employment may force relocation of both the spouse and the displaced worker. At that point in time, the displaced worker no longer has medical coverage, including the worker, spouse, and children.
Comment 43	A worker may have medical plan eligibility through a previous employer's retirement plan, but the spouse and children may not be covered. Is another employer's retirement health plan included in the group labeled "another employer's group health plan?"
Comment 44	The health insurance benefit is clearly tied to the COBRA insurance extension process, which makes sense but leaves a small gap in the process for those selected for the RIE and are eligible for retirement but less than 65. It seems that to accept a retirement with the RIE you would have to accept the normal insurance plan for retirees or lose it. Premiums offered for retiree health insurance for those under 65 are substantial and this draft plan does not seem to provide an equivalent benefit for those in that situation. So if I were selected for the RIE, at age 62, and apply for my retirement, I would have to pay \$800/mo. the first year while those who are selected that are not going to retire are offered the COBRA at current rates the first year and would pay about \$240/mo. If I were to take the COBRA option to get the subsidized rate, in three years when I need the retirement insurance plan, I would not be able to get it and be without insurance to supplement my medicare. It would seem to me, in order to offer a fair benefit to everyone selected for the RIE that you should allow for a reduced premium the first and second year using the retirement insurance program for those accepting retirement that are under 65.
Response	All employees should contact their Human Resources Office for specific information relative to these benefits.

OTHER COMMENTS

Comment 45	Section II.B, "DOE and NNSA Responsibilities": This section refers to "... minorities and other protected classifications of employees." The reference to "minorities and protected classifications of employees" is vague. Please include, in the Plan, an explicit definition of minorities and protected classifications of employees.
Response	The word "classifications" will be changed to "classes." Title VII of the Civil Rights Act of 1964, as amended, Age Discrimination in Employment Act of 1967, as amended, and Americans with Disabilities Act of 1990, set forth the classes.
Comment 46	Section III.C.1, "Skills Inventory": "Contractors will complete an updated skills inventory and assessment of skills needed prior to any workforce restructuring involving employee separation. Employees should be encouraged to ensure that the information available accurately reflects all their education, retraining, certifications, etc.": The Contractor has not conducted any such "skills inventory" (to include education, retraining, certifications, etc.) prior to this proposed workforce restructuring.
Response	The contractor conducted the skills inventory as part of the Human Capital Management Plan earlier in 2007. All employees are encouraged to submit information regarding education, certifications, etc. for placement in their official personnel files.
Comment 47	Section III.C.3, "Workforce Planning and Restructuring Strategy": "The Department strongly disapproves hiring from the outside which has the effect of 'backfilling' the positions of individuals separating as part of either a voluntary or involuntary separation program." The Contractor routinely hires from the outside as demonstrated by its documented policy of posting open positions both internally and externally simultaneously; therefore, it is the Contractor's common practice to hire individuals from the outside when there are on-roll employees who have applied for open positions, meet the qualifications specified in the posted job description, but are not hired for open positions. Cronyism prevails and I have no confidence the Contractor will abide by this provision (even though this provision is in bold type for emphasis) without NNSA oversight.

Response	The contractor is responsible for filling vacancies with the most qualified candidate which may mean an individual from outside the company will be hired to fill a vacancy. Backfilling of positions vacated as a result of this workforce restructuring process is generally not allowable and will be monitored by NNSA.
Comment 48	Section IV.C, "Involuntary Separation Program (ISP)": "Examples of factors that may be relevant are: Documented individual performance, seniority..." The word "may" in this excerpt gives the Contractor free reign to use any criteria of their choosing to determine which employees will be involuntary separated. In addition, during the September 10, 2007, all hands meeting, the Contractor advised employees that possession of a DOE Q clearance by employees would be considered in their decision, but there is no mention of this in the Plan.
Comment 49	One stated policy needs further study. "The Department strongly disapproves hiring from the outside which has the effect of "backfilling" . . . Since involuntary separation is based upon performance, one would expect that better candidates could be available as outside hires, perhaps from National Laboratories who are also reducing staff as part of a NNSA wide restructuring plan.
Response	The contractor is responsible for determining how to restructure their workforce in order to best meet future requirements and is therefore permitted to consider all relevant, objective and neutral criteria to conduct the work force restructuring action.
Comment 50	Section III.C.3, "Workforce Planning and Restructuring Strategy": "Contractors are responsible for implementation of DOE workforce restructuring policy, oversight of restructuring affecting their workforce..." The intent of this clause is understood; however, is it not NNSA/NNSO who ultimately has oversight over the Contractor and its actions especially since NNSA is the owner of the "Workforce Restructuring Plan"? I have no confidence that the Plan will be carried out appropriately and as directed by NNSA by the Contractor without NNSA oversight.
Comment 51	Section V.C.1, "Hiring Preference": "Eligible employees who are involuntarily separated as a result of outsourcing or privatization will be covered by hiring preference and other provisions of this Plan..." I have no confidence that the Contractor will follow this provision of the Plan. As I indicated in Comment 7 above, cronyism prevails in the hiring practices of the Contractor, and there is no reasonable expectation that this practice will cease.
Response	The work force restructuring action will be conducted in coordination with DOE/NNSA. However, the contractor is ultimately responsible for implementing the work force restructuring action and, specifically, for the terminations of their employees.
Comment 52	The DOE should protect its employees and implore Congress to pass a budget. I don't vote in every election to send representatives to Congress to snooze and read the paper. Stand up for the people that work hard for your efforts everyday and tell Congress to get in touch with reality.
Response	NNSA has submitted a budget request deemed sufficient to meet the needs of the agency.
Comment 53	Instead of laying off so much of your work force, how about executives take a pay cut? I know this is a downright HORRIBLE and NASTY thing to suggest, but believe it or not, there are some companies where this is done. I work for one of them. Part of the job of the executive is to look out for the people below him, even if it means he can't afford his beach house next summer.
Response	The contractor has explored all options regarding cost savings to minimize the impact of any workforce restructuring actions.
Comment 54	Before you sought approval on this proposal, you should have put out a document on just how you plan to continue your efforts at the Nevada Test Site with the decreased work force. Because last time I checked, the staff was already overworked and underpaid--you've already given them a pay cut and now are going to cut the workforce, too? Are you out of your minds? Did you ask the workers if this was OK with them? Do you [care] whether or not they already have more work than they can handle without having to pick up the slack for the "involuntarily" fired workers? Oh, wait, let me guess: The remaining workers should be on their knees thanking you for your benevolence

	in letting them stay on-board. Yeah.
Response	The contractor has assured NNSA of their capability to continue to meet the needs of the contract.
Comment 55	If an employee feels that the reduction is unfair or unjust, can the employee refer to the NSTEC legal department for review of the process and fairness.
Response	The contractor's legal staff has been involved in the development of the workforce restructuring program.
Comment 56	Please identify the total number of people that NSTEC needs to reduce. Since the budgets are not known, how do you ensure that reductions are not greater than necessary?
Response	The Specific Plan approved on October 11, 2007 provides information related to the possible reductions that might be necessary over the next fiscal year. Appendix B of the Plan discussed the possibility of up to 450 reductions in the workforce. Employees have expressed concern that this means NSTec is intending to lay off 450 employees during FY08. This is not the case. Based on our current knowledge, NSTec will reduce the work force by about 200 employees. However, we cannot be certain whether other workforce adjustments might be necessary later in the year to continue to meet mission requirements
Comment 57	Why does NNA have to approve the people involved in the reduction since NSTEC is an independent company?
Response	NNSA does not approve or disapprove individual separations.
Comment 58	What is the message that you would give to a young person coming to NSTEC under these conditions?
Response	Despite the immediate workforce restructuring, there is a long-term, continuing need for the services conducted at the Nevada Test Site.
Comment 59	Regarding the issue of backfilling, will those individuals who have previously separated from the organization, and have returned to positions as contractors, be the first people separated under the ISP?
Response	The contractor will select bargaining unit employees for separation in accordance with the applicable provisions of the relevant collective bargaining agreements. With respect to the non-bargaining unit employees, the contractor is responsible for determining how to restructure their workforce in order to best meet future requirements and is therefore permitted to consider all relevant, objective and neutral criteria to conduct the work force restructuring action.
Comment 60	It is suggested the revised draft be published and a follow-on period of comment be scheduled.
Response	There will not be an additional comment period.
Comment 61	Restructuring planning and policies should be clearly stated in the final plan. The strategy contained in the draft does not adequately address the document purposes of responding to changing missions and contracture structure and mitigating potential workforce reductions.
Response	The objectives set out in the Plan are the purposes of the workforce restructuring. More specific information will be provided in connection with each, specific restructuring program conducted under the Section 3161 Plan.
Comment 62	Please provide a forecast of the future work structure conditions as result of Complex 2030, transformation of the weapons complex, and a Congress that can't resolve budget in a timely manner.
Response	The future state of the NNSA complex is still being developed. It is too soon to determine whether future workforce restructuring actions (and their magnitude) will be necessary.
Comment 63	If you are from out of state and reside at the test site what will happen to you if you are selected for restructuring?
Response	At the time the employees are terminated, they will be required to vacate the premises.

Comment 64	Your pathetic little press release has three typos in it.
Comment 65	Thank you for hard work on a short schedule to address the NTS' funding challenges.
Response	Comment noted. No action required.

EDITORIAL / TYPOGRAPHICAL/ OTHER GENERAL EDITS

Comment 66	I am sure this was an oversight, but should be corrected to reference the Contractor's Human Resources Department.
Comment 67	You have a typo on page 13, Appendix A, middle of form, ... I understand that ... I am required to inform Pantex Plant Staffing.... Delete Pantex Plant Staffing and insert us.
Comment 68	Quick look reveals Appendix A has applicant informing Pantex Plant Staffing of the desire to maintain section 3161 employment eligibility.
Comment 69	Page 13, Appendix A: The statement on this form indicated a requirement to inform Pantex Plant Staffing. Is this Correct?
Comment 70	Appendix A: Reference is made to "Pantex Plant Staffing."
Comment 71	Appendix A refers to Pantex instead of NTS.
Comment 72	Preferential Hiring Statement: "I hereby request that my name be placed... I understand that I am required to inform Pantex Plant Staffing...": Text should be revised to address cognizant NSO and/or NSTec POCs as appropriate versus Pantex Plant Staffing.
Response	All incorrect references to Pantex will be corrected in the final document.
Comment 73	See Appendix B, "Contractor Preference in Hiring Procedures": Referenced Attachment is entitled "Nevada Site Office Contractor Preference in Hiring Procedures". Page 14, Appendix B, 1 st paragraph: "Pursuant to the Interim Planning Guidance for Contractor Workforce Restructuring, eligible...". Supporting discussion for the referenced guidance could not be located in the balance of this draft.
Response	The Interim Planning Guidance for Contractor Workforce Restructuring that was established in 1993 and modified in 1998 provides the basic instruction for workforce restructuring implementation. This guidance can be found at the DOE Office of Legacy Management website at: http://www.lm.doe.gov/benefits/restructuring/restructuring.htm
Comment 74	Page 13, Appendix A- COCS Codes: Expanded meaning for this acronym should be provided. Note: It appears that this acronym is referencing Common Occupational Classification System.
Comment 75	COCS Codes: (see attached form): Form should be provided or statement deleted.
Response	COCS is the acronym for Common Occupational Classification System. A COCS Form will be attached to the final plan.