



U.S. Department of Energy
Office of Inspector General
Office of Audits and Inspections

INSPECTION REPORT

Allegation Regarding Human Reliability
Program Unsuitable Reportable Behaviors at
the Office of Secure Transportation

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INS-O-15-02

November 2014

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Department of Energy
Washington, DC 20585

November 24, 2014

MEMORANDUM FOR THE UNDER SECRETARY FOR NUCLEAR SECURITY

A handwritten signature in black ink, appearing to read "Rickey R. Hass".

FROM: Rickey R. Hass
Deputy Inspector General
for Audits and Inspections
Office of Inspector General

SUBJECT: INFORMATION: Inspection Report on "Allegation Regarding Human Reliability Program Unsuitable Reportable Behaviors at the Office of Secure Transportation"

BACKGROUND

The Department of Energy's (Department) National Nuclear Security Administration, Office of Secure Transportation (OST), utilizes a professional force of Federal agents to transport nuclear weapons, weapon components and special nuclear material. The OST Agent Operations Eastern Command (Eastern Operations), located in Oak Ridge, Tennessee, currently has 128 agents responsible for preventing the theft, sabotage or takeover of protected materials by unauthorized persons. These agents participate in the Human Reliability Program (HRP), a security and safety reliability program designed to ensure that they meet the highest standards of reliability and physical and mental suitability.

We received an allegation that (b)(6),(b)(7)(C)
(Squad Commander (b)(6),(b)(7)(C)) (1) was engaged in unsuitable, reportable behavior and despite management's awareness of the problems, no disciplinary action was taken; (2) forced a medically restricted agent to participate in physical training; (3) falsified Federal documentation related to a work injury; (4) threatened to pull agents' HRP access rendering them unable to train or perform their duties; and (5) manipulated the promotion selection process to select a personal friend over another applicant. We initiated this inspection to determine the facts and circumstances surrounding the allegations.

RESULTS OF INSPECTION

The first element of the allegation was partially substantiated. Specifically, through extensive interviews with numerous OST agents, we found that Squad Commander (b)(6),(b)(7)(C) along with other (b)(6),(b)(7)(C) agents, engaged in unsuitable, reportable behavior such as uncontrolled anger, hostility or

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aggression toward fellow workers and authority figures. These incidents were not reported as required. While one of the incidents was relatively recent, many were dated, including one that occurred as much as 10 years prior to our inspection. Each of the seven incidents reported to us involved physical or verbal altercations, some of which occurred off duty. Senior OST officials told us that none of the incidents were reported to them, thus they were unable to take disciplinary or other action.

The most recent event involved an accusation that Squad Commander [redacted] threatened to kill [redacted] (b)(6),(b)(7)(C) [redacted] OST (b)(6),(b)(7)(C) [redacted], in early 2013.

(b)(6),(b)(7)(C) [redacted] While we confirmed that a heated discussion occurred between the parties, Squad Commander [redacted] denied the threat allegation. (b)(6),(b)(7)(C) [redacted] told us that (b)(6),(b)(7)(C) [redacted] the incident to (b)(6),(b)(7)(C) [redacted] and (b)(6),(b)(7)(C) [redacted] OST (b)(6),(b)(7)(C) [redacted], (b)(6),(b)(7)(C) [redacted] told us that (b)(6),(b)(7)(C) [redacted] (b)(6),(b)(7)(C) [redacted] did not desire to further elevate the issue. (b)(6),(b)(7)(C) [redacted] denied (b)(6),(b)(7)(C) [redacted] was told of the incident and thus, no immediate action was taken. Ultimately, some 5 months after the alleged threat and after our inspection began, the incident did become known to senior OST officials who took action to suspend Squad Commander [redacted] HRP access and investigate the matter.

(b)(6),(b)(7)(C) [redacted] While the specific allegation that Squad Commander [redacted] forced an agent to participate in strenuous training while under medical restriction was not substantiated, we did find that [redacted] (b)(6),(b)(7)(C) [redacted] allowed the agent to engage in this strenuous training exercise without proper medical clearance. Despite requirements to the contrary, the Site Occupational Medical Director was never contacted and did not provide the release required for the agent to engage in such exercise.

(b)(6),(b)(7)(C) [redacted] The remaining allegations against Squad Commander [redacted] were not substantiated. Independent (b)(6),(b)(7)(C) [redacted] of our review, the promotion selection that was the subject of this allegation was rescinded and reopened for application by the National Nuclear Security Administration Office of Human Capital Management. Consequently, we did not pursue the allegation that Squad Commander [redacted] (b)(6),(b)(7)(C) [redacted] manipulated the promotion selection process to select a personal friend over another applicant.

(b)(6),(b)(7)(C) [redacted] Even though OST had a number of internal controls in place designed to prevent the type of problematic behavior we substantiated, we found them not to be completely effective. Agents, both staff and more senior officials, appeared to ignore reporting requirements based on their own views of whether a particular incident was worthy of notification. These actions by HRP-certified individuals contributed to OST management being unaware of all incidents and reliability concerns related to employee performance. Additionally, we found that (b)(6),(b)(7)(C) [redacted] (b)(6),(b)(7)(C) [redacted] not Squad Commander (b)(6),(b)(7)(C) [redacted] failed to obtain the required Site Occupational Medical Director approval prior to allowing an agent under medical restriction to participate in training. Similar to the attitude adopted for reporting issues, (b)(6),(b)(7)(C) [redacted] told us that (b)(6),(b)(7)(C) [redacted] to (b)(6),(b)(7)(C) [redacted] override existing controls because [redacted] did not believe that a timely medical response would be (b)(6),(b)(7)(C) [redacted] provided. As such, [redacted] improperly chose to rely on the agent's personal doctor's opinion. A short time thereafter, the agent was injured during a training event and has filed a claim for injury.

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We recognize that a number of the reporting issues we identified during the course of our inspection were dated. However, we are concerned that the failure to report such activity could expose the Department to unnecessary risk. HRP-certified individuals are required to report related incidents and adhere to HRP requirements. Otherwise there is an increased risk that unsuitable individuals could be allowed to protect nuclear weapons, weapon components and special nuclear material, raising possible national security concerns. We made recommendations designed to strengthen controls in this important area.

During the course of our inspection, we learned that OST had also received the same allegations and that it would complete its own independent review pending the outcome of our review. The officials further stated that based on our review and its own independent review, if warranted, appropriate disciplinary action would be taken.

MANAGEMENT REACTION

Management concurred with our recommendations and indicated in subsequent correspondence that it was in the process of implementing corrective actions. We found management's comments and planned corrective actions to be responsive to our report findings and recommendations. Management's formal comments are included in Appendix 4.

cc: Deputy Secretary
Chief of Staff
General Counsel
Assistant Deputy Administrator for Secure Transportation

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**INSPECTION REPORT ON ALLEGATION REGARDING
HUMAN RELIABILITY PROGRAM UNSUITABLE
REPORTABLE BEHAVIORS AT THE OFFICE OF SECURE
TRANSPORTATION**

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ALLEGATION REGARDING HUMAN RELIABILITY PROGRAM UNSUITABLE REPORTABLE BEHAVIORS AT THE OFFICE OF SECURE TRANSPORTATION

HUMAN RELIABILITY PROGRAM

The Office of Secure Transportation's (OST) Federal agents participate in the Human Reliability Program (HRP), a security and safety program designed to ensure that the highest standards of reliability and physical and mental suitability are met. This objective is accomplished through a system of continuous evaluation that identifies individuals whose judgment and reliability may be impaired by physical or mental/personality disorders, alcohol abuse, use of illegal drugs, or any other condition or circumstance that may be of a security or safety concern. Agents are required to maintain their HRP access in order to perform a substantial portion of their duties for OST. The temporary loss of HRP access adversely impacts the Department of Energy (Department). Further, the temporary loss of HRP access may have a financial impact on the agents because they are unable to work overtime even though overtime is not guaranteed.¹

The allegation that (b)(6),(b)(7)(C) (b)(6),(b)(7)(C) (Squad Commander (b)(6),(b)(7)(C) engaged in unsuitable reportable (b)(6),(b)(7)(C) behaviors was substantiated in part. We received conflicting information, however, as to whether (b)(6),(b)(7)(C) was notified of the behavior. Additionally, we found that other agents engaged in unsuitable reportable behavior as well. Because these incidents were not reported as required, senior OST management indicated that they were unable to take disciplinary or other actions concerning any of the incidents. We did not substantiate the allegations that Squad Commander (b)(6),(b)(7)(C) forced a (b)(6),(b)(7)(C) medically restricted agent to participate in physical training, falsified Federal documentation or misused the HRP by threatening the agents' HRP access.

Unsuitable Reportable Behaviors

Our inspection substantiated certain elements of the allegation that Squad Commander (b)(6),(b)(7)(C) engaged in unsuitable reportable behaviors. Additionally, we found that other agents had engaged in unsuitable behavior as well. We noted that a number of these incidents were dated, including one that occurred approximately 10 years prior to our inspection. We confirmed that the incidents occurred through witness interviews. However, the incidents were not reported, as required, to HRP or Personnel Security officials by Squad Commander (b)(6),(b)(7)(C) OST management, (b)(6),(b)(7)(C) or other HRP-certified individuals or non-HRP personnel who witnessed the incidents. As a consequence, senior OST management asserted that they were unaware of these matters and were therefore unable to address the issues and/or take any necessary disciplinary action.

Title 10 Code of Federal Regulations (CFR) § 712.12 (h)(4) as well as *The Office of Secure Transportation Human Reliability Program Implementation Plan* requires that individuals

¹ Audit Report on *Office of Secure Transportation Capabilities* (OAS-M-12-05, June 2012). In this report, the Department of Energy's Office of Inspector General determined that Office of Secure Transportation agents are working significant amounts of overtime to meet current mission requirements. The review determined that OST agents averaged 712 hours of overtime and 38 percent of the agents averaged 902 hours of overtime.

assigned HRP duties report any observed behavior or condition that could indicate a reliability concern to a supervisor, the Designated Physician, the Designated Psychologist, the Site Occupational Medical Director or the HRP management official.² Additionally, 10 CFR §712.13 (c) lists 12 unsuitable reportable behaviors (see Appendix 3), including hostility or aggression toward fellow workers or authority. Further, OST training specialists, although not HRP-certified and not required to report incidents per Title 10 CFR § 712, are required to report these types of incidents under Department Order 472.2, *Personnel Security*. The Order states that individuals with a clearance are required to report personnel security-related matters as they occur to the Department's Cognizant Personnel Security Office immediately upon becoming aware of the situation or incident and never later than 2 working days after the event.

We identified seven incidents of reportable behavior by Squad Commander [redacted] and other agents that occurred since 2004. Based on our fieldwork and interviews with 19 of the 128 [redacted] agents, we confirmed that the incidents were, in our view, acts of reportable behavior involving Squad Commander [redacted] and other agents. As previously noted, some incidents were dated; however three had occurred since July 2012. The behavior included hostility or aggression toward fellow workers or authority figures and uncontrolled anger. Examples of the incidents included:

- According to [redacted] in early 2013, Squad Commander [redacted] threatened to kill [redacted]. While we confirmed that a heated discussion occurred between the parties, Squad Commander [redacted] denied the threat allegation. [redacted] told us that [redacted] the incident to [redacted] and [redacted] [redacted] told us that [redacted] did not desire to further elevate the issue, so no further action was taken. [redacted] disputed that [redacted] reported the incident to [redacted]. Ultimately, some 5 months after the alleged threat and after our inspection began, the incident did become known to [redacted] and other senior OST officials who took action to suspend Squad Commander [redacted] HRP access and investigate the matter.
- At a training event in or around 2008, an after-hours incident occurred, while in nonduty status, between Squad Commander [redacted] and [redacted]. Squad Commander [redacted] claimed that Agent [redacted] physically struck [redacted] other agents who witnessed the incident forcibly restrained Agent [redacted]. Conversely, Agent [redacted] claimed that Squad Commander [redacted] physically struck [redacted]. The agents present at the gathering told us that no one saw who started the incident but that Agent [redacted] was restrained and removed from the premises. Squad Commander [redacted] told us [redacted] verbally reported the incident to [redacted] the following day. However, [redacted] told us that [redacted] was never informed that [redacted]

² The Site Occupational Medical Director is the physician responsible for the overall direction and operation of the occupational medical program at the particular site.

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there was an incident, only that Agent (b)(6),(b)(7)(C) was forcibly restrained and removed. In terms of being an HRP reportable matter, only (b)(6),(b)(7)(C) believed the matter rose to this level.

(b)(6),(b)(7)(C) In 2004, Squad Commander (b)(6),(b)(7)(C) and (b)(6),(b)(7)(C) OST (b)(6),(b)(7)(C) (b)(6),(b)(7)(C) at the time, engaged in an after-hours physical altercation.

(b)(6),(b)(7)(C) Squad Commander (b)(6),(b)(7)(C) acknowledged the occurrence of only one incident since about 2008. Other agents, including (b)(6),(b)(7)(C) managers and training specialists, disputed Squad Commander (b)(6),(b)(7)(C) account and identified seven incidents which were not reported to the appropriate HRP officials as required. We noted that if handled properly, the incidents should have been reported and included in the individual's HRP file for consideration by HRP officials. HRP officials would then have been required to determine whether the agent should continue to have HRP access.

(b)(6),(b)(7)(C) After we began our inspection, we learned that (b)(6),(b)(7)(C) reported Squad Commander (b)(6),(b)(7)(C) alleged threat to kill (b)(6),(b)(7)(C). This report was made in July 2013, some 5 months after the incident. An HRP management official told us that as a result of (b)(6),(b)(7)(C) (b)(6),(b)(7)(C) report, Squad Commander (b)(6),(b)(7)(C) HRP access was suspended. Our review of the supporting documentation used to suspend Squad Commander (b)(6),(b)(7)(C) revealed that the HRP management official did not have access to historical and behavioral information going back to 2004. We verbally provided information not previously reported to the HRP management official who indicated that such information was critical to making an informed decision and that the information demonstrated that Squad Commander (b)(6),(b)(7)(C) had a long established pattern of anger issues.

Medical Restrictions

(b)(6),(b)(7)(C) The allegation that an agent at OST (b)(6),(b)(7)(C) was forced to participate in strenuous training while under medical restriction was not substantiated. However, we found that (b)(6),(b)(7)(C) (b)(6),(b)(7)(C) not Squad Commander (b)(6),(b)(7)(C) had allowed this agent to participate in the training exercise prior to being released by the Site Occupational Medical Director. The Office of Secure Transportation Human Reliability Program Supervisor Handbook states that any HRP individual removed for injury or illness must be released to return to work by his or her personal physician and the HRP Designated Physician prior to participating in a detail assignment. Further, the statement of duties in the request for Temporary Detail assignment must be approved by the Site Occupational Medical Director. The Office of Secure Transportation Human Reliability Program Implementation Plan states a medical evaluation of HRP employees whose HRP certification has been temporarily removed for medical issues (including, but not limited to, extended sick leave, rehabilitation and imposed medical restrictions) will be conducted to determine if the medical issues affecting the certification have been resolved. If resolved, the Site Occupational Medical Director will recommend reinstatement of the agent to the HRP management official.

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On January 31, 2013, an OST Operations agent attempted, but failed to satisfactorily complete the required Physical Performance Qualification run due to "feeling dizzy" resulting in a call for emergency medical assistance. On February 1, 2013, the agent's personal physician allowed [redacted] (b)(6),(b)(7)(C) to resume full duties. However, the HRP Designated Physician did not concur with the personal physician's recommendation.

Further, on February 1, 2013, the Site Occupational Medical Director recommended, and the HRP management official concurred, that this agent be medically removed from HRP duties and [redacted] (b)(6),(b)(7)(C) be performed. Four days later, [redacted] (b)(6),(b)(7)(C) allowed this agent to engage in a strenuous training exercise even though the agent had still not been medically released by the Site Occupational Medical Director. The agent participated in the exercise that [redacted] (b)(6),(b)(7)(C) to be armed and outfitted in full tactical gear weighing approximately 80 pounds. While participating in this exercise, the agent [redacted] (b)(6),(b)(7)(C) injured resulting in a claim being filed for a work related injury.

Falsification of Federal Documentation

(b)(6),(b)(7)(C) The allegation that Squad Commander [redacted] falsified a U.S. Department of Labor Form CA-1, *Federal Employee's Notice of Traumatic Injury and Claim for Continuation of Pay/Compensation*, when recording the February 5, 2013, injury was not substantiated. The Form CA-1 indicated that on February 5, 2013, an OST [redacted] (b)(6),(b)(7)(C) agent fell while training resulting in an injury. We were told during our interviews with the agent and responsible officials that the agent voluntarily participated in training without any outside influence when the incident occurred, and that the information provided was an accurate account of the injury.

Threats of Removing HRP Access

During our interviews with OST management and agents, there was no indication that the HRP had been misused by threatening to pull agents' access.

Contributing Factors and Impact

Even though OST had a number of internal controls in place designed to prevent the type of problematic behavior we substantiated, we found them not to be completely effective. Agents, both staff and more senior OST officials, appeared to ignore HRP reporting requirements based on their own views of whether a particular incident was worthy of notification. Clearly, at least in part due to these actions, OST management was unaware of a series of incidents that indicated reliability concerns related to employee performance.

Additionally, we found that there was a failure to obtain the required Site Occupational Medical Director approval prior to allowing an agent under medical restriction to participate in training. Similar to the attitude adopted for reporting issues, [redacted] (b)(6),(b)(7)(C) decided to override existing controls because [redacted] (b)(6),(b)(7)(C) did not believe that a timely medical response would be provided. As such, [redacted] (b)(6),(b)(7)(C) inappropriately chose to rely on the agent's personal doctor's opinion rather than obtaining the required medical clearance.

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OST's core mission is to protect nuclear weapons, weapon components and special nuclear material in the interest of public safety and national security. Procedural and personal failures such as those identified in this report could, if not addressed and resolved, reduce OST's operational effectiveness.

RECOMMENDATIONS

To address the issues identified in this report, we recommend that the Under Secretary for Nuclear Security:

1. Re-emphasize to all individuals the requirements to report HRP and personnel security-related matters to Department officials as required.
2. Ensure adherence of Agency procedures regarding agents returning to work following medical restrictions.

MANAGEMENT RESPONSE AND INSPECTOR COMMENTS

Management concurred with our recommendations and indicated in subsequent correspondence that it was in the process of implementing corrective actions. We found management's comments and planned corrective actions to be responsive to our report findings and recommendations. The Office of Secure Transportation's Human Reliability Program staff plans to conduct annual Site Assistance Visits at each command and provide refresher training on reporting requirements and discuss program issues with all Human Reliability Program certified employees. Further, during the Site Assistance Visits at each command, emphasis will also be placed on procedures and requirements concerning individuals put on restricted duties due to medical conditions.

Management's formal comments are included in Appendix 4.

OBJECTIVE, SCOPE AND METHODOLOGY

Objective

The objective of our inspection was to determine the facts and circumstances concerning allegations involving (b)(6),(b)(7)(C)

(b)(6),(b)(7)(C) (Squad Commander (b)(6),(b)(7)(C) Specifically, it was alleged (b)(6),(b)(7)(C) that Squad Commander (b)(6),(b)(7)(C) (1) engaged in unsuitable reportable behavior and despite management's awareness of the problems, no disciplinary action was taken; (2) forced a medically restricted agent to participate in physical training; (3) falsified Federal documentation related to a work injury; (4) threatened to pull agents' Human Reliability Program access rendering them unable to train or perform their duties; and (5) manipulated the promotion selection process to select a personal friend over another applicant.

Scope

We conducted our inspection fieldwork from July 2013 through November 2014 at Department of Energy Office of Secure Transportation facilities in Oak Ridge, Tennessee, Albuquerque, New Mexico and Washington, DC. This inspection was conducted under Office of Inspector General Project Number S13IS014.

Methodology

Inspection activities included:

- Evaluated Department of Energy and local policies, procedures and guidance.
- Interviewed and conducted meetings with Federal and Contractor officials, including Office of Secure Transportation managers, agents, an Internal Affairs Officer, Contracting Officer's Representative, the Site Occupational Medical Director and Counsel.
- Obtained and reviewed documents and emails concerning various aspects of the allegation.

We conducted this allegation-based inspection in accordance with the Council of the Inspectors General on Integrity and Efficiency's *Quality Standards for Inspection and Evaluation*, January 2012. Those standards require that we plan and perform the inspection to obtain sufficient, appropriate evidence to provide a reasonable basis for our conclusions and observations based on our inspection objective. We believe the evidence obtained provided a reasonable basis for our conclusions and observations based on our inspection objective. Accordingly, the inspection included tests of controls and compliance with laws and regulations to the extent necessary to satisfy the inspection objective. Because our inspection was limited, it would not necessarily have disclosed all internal control deficiencies that may have existed at the time of our

inspection. Finally, we relied on computer-processed data, to some extent, to satisfy our objective. We confirmed the validity of such data, when appropriate, by reviewing source documents.

Management waived the exit conference.

PRIOR REPORTS

- Inspection Report on Management of Certain Aspects of the Human Reliability Program and Incident Reporting within the Office of Secure Transportation (DOE/IG-0919, September 2014). In this report, we found that certain aspects of the Office of Secure Transportation (OST) Human Reliability Program (HRP) were not effectively managed. In particular, we identified problems related to notification and consideration of HRP status prior to assigning OST staff to missions. In addition, we identified a failure of OST officials to report and properly assess a deliberate example of unauthorized access. This report is OOU.
- Audit Report on Office of Secure Transportation Capabilities (OAS-M-12-05, June 2012). In this report, the Department of Energy's (Department) Office of Inspector General (OIG) determined that OST agents are working significant amounts of overtime to meet current mission requirements. The review determined that OST agents averaged 712 hours of overtime and 38 percent of the agents averaged 902 hours of overtime. In the OIG's view, the overtime levels currently experienced by OST agents raises concerns about their ability to safely and securely meet the expected increases in workload over the next 7 years.
- Inspection Report on Inspection of Allegations Relating to Irregularities in the Human Reliability Program and Alcohol Abuse within the Office of Secure Transportation (INS-L-11-01, November 2010). In this report, the Department's OIG identified certain improvements in the administration of the HRP. Specifically, improvements were in the areas of HRP certification, re-certification, and maintenance of derogatory information files and processing of HRP disclosure forms. The OIG substantiated specific alcohol-related incidents within OST involving current agents and agent candidates. OST appeared to have been proactive in addressing the use of alcohol. However, it was suggested OST determine whether more aggressive actions, similar to a zero tolerance policy for agent candidates, is warranted in order to address concerns expressed by OST Management.
- Audit Report on Management Controls over Selected Aspects of the Department of Energy's Human Reliability Program (OAS-M-10-01, November 2009). In this report, the Department's OIG identified inconsistencies in the application of HRP requirements throughout the Department complex. These inconsistencies involved alcohol and drug-related duty restrictions and the certification of HRP managers. The audit also noted that the Department conducted a review in response to a previous report on drug testing weaknesses at Lawrence Livermore National Laboratory. However, the Department concluded that adding additional drugs to the screening process was neither cost-effective nor necessary. The ultimate decision not to screen for additional drugs may have contributed to delays in discovering steroid use by HRP-certified protective force personnel at the Oak Ridge Complex.

UNSUITABLE REPORTABLE BEHAVIORS

Per the Office of Secure Transportation's *Human Reliability Program Physician Reference Manual*, Fiscal Year 2013, the types of behavior and conditions that would indicate a concern include, but are not limited to:

1. Psychological or physical disorders that impair performance of assigned duties.
2. Illegal conduct, arrest or conviction.
3. Indications of deceitful or delinquent behavior.
4. An attempt or implied threat to destroy property or life.
5. Suicidal tendencies or attempted suicide.
6. Use of illegal drugs, the abuse of alcohol, or
7. The abuse of legal drugs.
8. Recurring financial irresponsibility.
9. Irresponsibility in performing assigned duties.
10. Inability to deal with stress or the appearance of being under unusual stress.
11. Evidence of failure to understand work directive, hostility or aggression toward fellow workers or authority, uncontrolled anger, willful violation of safety or security procedures or repeated absenteeism.
12. Significant behavioral changes, moodiness, depression or other evidence of loss of emotional control.

MANAGEMENT COMMENTS



Department of Energy
Under Secretary for Nuclear Security
Administrator, National Nuclear Security Administration
Washington, DC 20585



October 27, 2014

MEMORANDUM FOR GREGORY H. FRIEDMAN
INSPECTOR GENERAL

FROM: FRANK O. KLOTZ *FK* 10/27/14

SUBJECT: Comments on the Office of Inspector General Draft Report
Titled "Allegation Regarding Human Reliability Program
Unsustainable Reportable Behaviors at the Office of Secure
Transportation" (SI315014 / 2014-01699)

Thank you for the opportunity to review and comment on the subject draft report. The National Nuclear Security Administration concurs with the recommendations provided in the report and is in the process of implementing corrective actions. The Office of Secure Transportation (OST) will leverage annual Site Assistance Visits and enhanced refresher training to ensure awareness of and adherence to the requirements of the Human Reliability Program. In addition, OST will thoroughly investigate any additional information provided by the Office of the Inspector General on previously unreported incidents identified in this review.

The attachment to this memorandum summarizes the planned actions and timelines for addressing the recommendations, as well as technical and general comments for your consideration to enhance the clarity and factual accuracy of the report. If you have any questions regarding this response, please contact Dean Childs, Director, Audit Coordination and Internal Affairs, at (301) 903-1341.

Attachment

Attachment

NATIONAL NUCLEAR SECURITY ADMINISTRATION
Response to Report Recommendations

Allegation Regarding Human Reliability Program Unsuitable Reportable Behaviors at the Office of Secure Transportation

The Office of Inspector General recommended the National Nuclear Security Administration:

Recommendation 1: Re-emphasize to all individuals the requirement to report Human Reliability Program (HRP) and personnel security related matters to Department officials as required.

Management Response: Concur

The Office of Secure Transportation's HRP staff conducts annual Site Assistance Visits (SAVs) at each command to meet with all HRP certified employees, conduct refresher training, and discuss general program issues. The SAVs for fiscal year (FY) 2015 will place additional emphasis during the refresher training and general discussions on reporting requirements. Additionally, all Office of Secure Transportation (OST) HRP certified employees are required to take, and pass, an annual computer based training (CBT) on program procedures, roles, responsibilities and reporting requirements. The FY 2015 CBT has already been enhanced with a new instructional video and testing questions which address reporting requirements. Based on the modification of the CBT and the existing, structured process for conducting SAVs, NNSA considers this recommendation closed.

Recommendation 2: Ensure adherence to Agency procedures regarding agents returning to work following medical restrictions.

Management Response: Concur

As part of the FY 2015 SAVs, the OST HRP staff will place additional emphasis on the procedures and requirements that must be followed before an employee who has been placed on restricted duties due to a medical condition can return to unrestricted duties. Based on the existing, structured process for conducting SAVs, NNSA considers this recommendation closed.

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