



U.S. Department of Energy
Office of Inspector General
Office of Audit Services

Audit Report

The Department's Basic Protective
Force Training Program



Department of Energy

Washington, DC 20585

March 12, 2004

MEMORANDUM FOR THE SECRETARY

FROM:


Gregory H. Friedman
Inspector General

SUBJECT:

INFORMATION: Audit Report on "The Department's Basic Protective Force Training Program"

BACKGROUND

The emphasis on homeland security and protection of national assets, especially since September 11, 2001, has prompted the Department of Energy to take a number of actions to enhance its security posture. A critical component of this effort is the cadre of over 4,000 armed personnel responsible for securing the Department's nuclear materials, weapons, and national security-related information.

The importance of the security mission, combined with a rapidly increasing number of officers, imposes a considerable burden on the Department to ensure that its protective force is well trained. For a number of years, the Department's goal has been to deliver a standardized, core curriculum designed to train its protective forces to deal with a broad spectrum of threats and to ensure interoperability across the complex.

Originally, the Department centralized the conduct of basic security police officer training at the Nonproliferation and National Security Institute in Albuquerque, New Mexico. However, in May 2001, the Department authorized individual sites to conduct basic security police officer training at their own sites, provided it was in accordance with the core curriculum. In that context, we initiated this audit to determine whether sites were meeting the Department's standardized, basic protective force core training curriculum.

RESULTS OF AUDIT

The audit disclosed that the core basic training curriculum, despite its design and purpose, had been applied inconsistently throughout the complex. At 10 of the 12 sites included in our review, significant modifications to the Department's core curriculum had been made. For example:

- Each of the 10 sites eliminated or substantially modified 2 or more blocks of instruction. At one site, about 40 percent of the required 320 hours of basic security police officer training had been eliminated by deleting courses and modifying delivery methods;



- None of the 10 sites included instruction in rappelling even though it was part of the special response team core curriculum and continued to be offered by the Nonproliferation and National Security Institute;
- Only one site conducted basic training on use of a shotgun, despite the fact that a number of sites used the weapon for breaching exercises and other purposes; and,
- Seven of the sites modified prescribed training techniques by reducing the intensity or delivery method for skills that some security experts characterized as critical, such as handcuffing, hand-to-hand combat, and vehicle assaults.

We found that the Department's facilities were not required to report departures from the core curriculum to either the responsible program office or to the Office of Security. Thus, from a central perspective, there was no effective way to evaluate the impact of these actions on the national security interests of the Department. Site security managers indicated that modifications to the core curriculum had been made for reasons related to applicability or safety. However, the Department had conducted significant analyses prior to the adoption of the core curriculum as policy, including safety risk analyses.

While some level of deviation from the core curriculum to meet local conditions was understandable, the relatively large number of curriculum modifications identified during the audit raised concern as to the curriculum's validity and its usefulness as a benchmark for evaluating the performance of protective force training. In this vein, we made a series of recommendations intended to help the Department evaluate the impact of observed training modifications and determine whether the security police officer core curriculum needs to be updated. We also recommended that the Department's program offices provide additional guidance clearly defining the modifications that would require prior Departmental approval and/or notification.

Security force training has been the focus of a number of other recent Office of Inspector General reviews. In a report on *Management of the Department's Protective Forces* (DOE/IG-0602, June 2003), we noted that declining training opportunities may have affected security officer morale and retention. Also, in our inspection of *Protective Force Performance Test Improprieties* (DOE/IG-0636, January 2004), we reviewed "force-on-force" exercises at the Department's Y-12 site and determined that the training test results had been compromised.

MANAGEMENT REACTION

Consolidated comments were provided covering the views of the affected program and administrative offices and the National Nuclear Security Administration. Although the comments varied from office to office, management generally concurred with our

recommendations. Management's comments are discussed in more detail on page 6 of the report and are included in their entirety as Appendix 4.

Attachment

cc: Deputy Secretary
Administrator, National Nuclear Security Administration
Under Secretary for Energy, Science and Environment
Director, Office of Security
Director, Office of Independent Oversight and Performance Assurance

THE DEPARTMENT'S BASIC PROTECTIVE FORCE TRAINING PROGRAM

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BASIC PROTECTIVE FORCE TRAINING PRACTICES

Background

The Department of Energy (Department), through its Nonproliferation and National Security Institute (NNSI) in Albuquerque, New Mexico, developed a standardized training curriculum for on-site training of basic security police officers and special response teams. The basic core curriculum includes critical elements that are based on the results of job analyses of major tasks and skill requirements and requires 320 hours of training. Courses, in topics such as the use of batons, handcuffs, shotguns, and hand-to-hand combat, are part of the curriculum. These training requirements were supported by risk and safety analyses and were officially adopted by the Department.

In November 1999, the Department established policy to centralize the conduct of the Basic Security Police Officer Training (BSPOT) at the NNSI. Training was centralized because of concerns over variations in delivery and to ensure uniform force readiness and interoperability among the protective forces. Subsequently, in May 2001, the Secretary authorized sites to provide BSPOT training locally to new hires, provided that training was in accordance with the current standardized Security Police Officer BSPOT curriculum. Furthermore, the Secretary specified that changes to the standardized curriculum could only be made for site-specific requirements where a portion of the curriculum was not applicable to the site. To aid in ensuring delivery of the standardized curriculum, the Office of Independent Oversight and Performance Assurance agreed to incorporate the curriculum in its site-level review.

Training and Delivery Methods

Our review disclosed that the BSPOT and the special response team¹ standardized core curriculum was being delivered inconsistently. Specifically, many sites included in our review had eliminated or modified significant portions of the training while others were not using realistic training delivery methods (see Appendix 3). At some locations, these modifications had a significant impact on the level and intensity of training. For instance, one site reduced its core training hours by about 40 percent, as a result of eliminating or modifying training in areas such as shotgun use and baton techniques.

In addition, we observed that training and practical application methods were inconsistently delivered even though the delivery methods had been previously evaluated, deemed safe, and incorporated in the core

¹ Basic special response team training is required for selected security police officers. The training is separate from, and in addition to, the basic core curriculum required for a security police officer position. Special response team members must be capable of effective, aggressive, and timely resolution of adversary actions using appropriate force and team techniques.

requirements. More than half of the sites reviewed used reduced force or instructor demonstrations, rather than realistic practical application training methods in certain areas. Officials at some sites told us that tactical skills were taught only in classroom settings or at a limited force level to avoid injuries. In particular, one site security official told us that practical application of defensive tactics such as hand-to-hand combat, take downs, or suspect restraint were performed in slow motion or at a reduced level of force. An official at another site stated that the site did not follow a specific standard for conducting defensive tactics training and permitted instructors to reduce speed or force based on needs and experience of the student. At another location, security officials indicated that the site provided no practical application in handcuffing and instead had instructors demonstrate techniques only on other instructors. Some sites also did not provide a realistic setting for vehicle assault training because they used wooden mockups or removed all vehicle glass prior to the exercise. Office of Security officials commented that sites that use unrealistic training methods did not meet Departmental requirements because the skills acquired by the officers cannot be adequately measured.

Additionally, we noted that none of the sites reviewed conducted special response team training for rappelling even though it is contained in the required curriculum for special response team members and is currently taught by the NNSI. Security officials disagreed on the importance of this training module. Following a fatal accident in 1995, sites eliminated rappelling from special response team training because of concerns over safety and the importance of the skill to mission needs. A security official told us that a Quality Panel had recommended eliminating rappelling from the core curriculum because sites no longer included it in their special response team training, however, rappelling remains part of the core curriculum. Office of Security officials told us that rappelling training was important for team and confidence building skills and that it had been the subject of a safety risk analysis. As a result, NNSI continues to provide the training and has trained approximately 434 officers in rappelling since 1998. We were not provided a full and definitive explanation for the inconsistent application of the training requirement for rappelling.

Core Curriculum

Modifications to the core curriculum and the training delivery methods occurred because site security managers eliminated certain courses in response to applicability or safety concerns. However, these variations were not always detected or their impact on readiness assessed because the Department did not require the sites to report departures from the core training requirements to either the responsible program office or the Office of Security.

Site-Level Modifications

Sites excluded or modified certain courses from the standardized core curriculum in response to applicability or safety concerns. This despite the fact that NNSI conducted safety risk analyses for each of the courses in the standardized core curriculum. For example, a number of sites excluded shotgun and baton training because those items of equipment were not used at their site. Additionally, sites routinely utilized alternative methods in performing certain tactical exercises due to safety considerations. As previously discussed, certain sites deviated from the curriculum by eliminating glass windshields during vehicle assault training because of concerns related to shattering glass. However, we were told that the glass windshields provided a realistic setting so that protective force trainees could obtain a better understanding of ballistic and refraction properties.

Certain sites determined that courses were unsafe while others delivered the same courses without modification. SO training officials indicated that they were aware of the inconsistencies and informed us that they could not understand how personnel at one site could deem a practice acceptable while others would refuse to administer the block of training using prescribed levels of force. In some of these cases, Department and contractor security officials indicated that site management was concerned because there was a correlation between the number of injuries incurred at a site and the contractor's performance evaluation rating and subsequent fee determination. At some sites instructors were specifically told to limit force used during training to avoid injuries.

Approval and Reporting Guidance

We further noted that Federal managers could not assess the impact of training changes on the Department's goal of uniform force readiness because sites were not required to report to program offices or the Office of Security on modifications made to the core curriculum. A few of the sites we reviewed had requested and received approval from the Office of Security to modify the standardized core curriculum. However, officials at other sites told us that they were not required to go through an approval process before eliminating courses not considered applicable to their site or for safety reasons. Additionally, some site-level security officials indicated that as long as the course goal was satisfied, they were free to modify delivery methods as they saw fit.

The Office of Security, which has policy responsibility for security police officer training, indicated that modifications did not require approval other than at the site-level. Based on information they gathered, Office of Security officials believed that site-level security managers should be fully cognizant of departures from the core curriculum because such changes were approved by Federal officials as part of the site's annual training program. Our review of these training programs, however, disclosed that they frequently lacked detail necessary to identify or inform management or program officials of significant changes in the level of training intensity. In fact, a National Nuclear Security Administration (NNSA) official indicated that they were unable to fully assess the impact on the training programs and force readiness because they were not provided with specific information regarding modifications to site-level training programs. Additionally, Office of Science program officials pointed out that the modifications in training curricula and differences in training delivery methods should be identified and monitored by the programs.

Core Curriculum Integrity

We also determined that the Department had not specifically reviewed site-level training programs to ensure that they conformed to the core curriculum. Based on a Department analysis completed in 2001, the Secretary authorized sites to conduct new-hire basic security police officer training provided they adhered to the core curriculum. As previously discussed, the Department's Office of Independent Oversight and Performance Assurance (OA) agreed to incorporate the basic training curriculum as a topical area in its reviews of site-level programs. Even though OA includes certain aspects of the BSPOT in their assessments of the site protective force training programs, to date, they have been unable to begin curriculum reviews because of a workload increase associated with the events of September 11, 2001. Such reviews could identify core curriculum modifications and assist the Department in assessing safety and applicability concerns expressed by site security officials.

Force Readiness

Inconsistent training methods may increase the risk that the Department's protective forces will not be able to safely respond to security incidents or will use excessive levels of force. As noted by NNSI and a private protective force organization, most tactical skills can only be learned by repetitive practice in an appropriately realistic setting. Specifically, defensive tactics training should be as realistic as possible. Anything less may rob the trainee of the exposure to the

levels of force, panic, and confusion that are usually present during an actual attack and increase the possibility of an inappropriate response in high stress situations.

RECOMMENDATIONS

We recommend that the Under Secretary for Energy, Science and Environment, and the Administrator, National Nuclear Security Administration:

1. Determine the extent of and reasons for curriculum modifications and differences in training delivery methods throughout the Department's complex; and,
2. Provide additional guidance, based on the above determination, defining modifications requiring prior Departmental approval and/or notification.

We recommend that the Director, Office of Security:

3. In conjunction with the program offices and the information gathered in response to Recommendation 1, complete evaluations of the applicability of the current core curriculum for basic security police officers and special response team training to ensure that training is properly aligned with job and policy requirements; and,
4. Request that the Assistant Secretary for Environment, Safety and Health review the safety oversight of protective force training activities to ensure there is consistency in safety oversight as it relates to protective force training.

We recommend that the Director, Office of Independent Oversight and Performance Assurance:

5. Incorporate basic security police officer training as a topical area of review in all future field activity reviews as discussed in the Secretary's memorandum of May 2001 .

MANAGEMENT REACTION

The Offices of Security; Science; Environmental Management; Nuclear Energy, Science and Technology; Independent Oversight and Performance Assurance; and Environment, Safety and Health, along with the NNSA commented on a draft of this report. Comments from the responding organizations varied in degrees of concurrence and non-concurrence on the draft report's recommendations. Overall, the program offices concurred with the recommendations to review curriculum modifications and differences and to issue additional guidance defining Departmental notification levels. NNSA also strongly supported a review of the protective force core curriculum to ensure that it met current requirements that include changes in mission and threat scenarios.

The Office of Security fully concurred with the recommendation to include basic security training as a topical area of review by OA. However, it stated that the recommendation on evaluating the applicability of the core curriculum was not needed because "such an evaluation is conducted on a practically on-going basis and the curricula is current." The applicable protective force job analyses and curricula have been reviewed and updated by the NNSI and the Office of Security quality panels. As an example, the Office of Security pointed out that the NNSI is conducting a comprehensive review of the BSPOT curriculum to ensure it meets current job task analyses and mission requirements.

Finally, the program offices and the Office of Security pointed out the need for the sites to be able to modify their training programs to reflect their job and mission needs. The Office of Security also indicated that security police officers supporting mission requirements at other sites is not an issue for training because (1) labor issues prohibit security police officers who are members of bargaining units from acting as augmentees at other sites, and (2) augmentees would receive site-specific training before commencing work at another site. Management's consolidated comments to this report have been incorporated verbatim in Appendix 4. Based on management's comments, where appropriate, adjustments have been made to the body of the report and the recommendations.

AUDITOR COMMENTS

Management comments were generally responsive to our recommendations.

Regarding the Office of Security's disagreement with the need for the recommendation on evaluating the applicability of the core curriculum,

we believe that the NNSI and Office of Security evaluations cited above should continue. Furthermore, the evaluations should be conducted in conjunction with the program offices and reflect information gathered by those offices regarding how sites have modified the core curriculum and the reasons for the modifications. The intent of the recommendation is to evaluate the standardized core curriculum developed by the NNSI, and approved by the Department; to determine which portions of the training, if any, should be eliminated; and to determine if training is properly aligned with Departmental job and policy requirements.

Based on the number of modifications that we identified during the audit, we believe that changes may need to be made to the core curriculum, or sites may need to revisit their modifications of the curriculum. We recognize that quality panels play an important role in evaluating the core curriculum; however, they can only recommend that changes be made. The Office of Security has the final approval over any recommended changes. As previously discussed, in the case of rappelling, there is a difference of opinion among security officials about the importance of this training block. In spite of this disagreement, NNSI continues to include rappelling training in the core curriculum, but no other site is instructing that portion of the curriculum.

We have modified the recommendation pertaining to safety oversight to reflect the Office of Security's concerns about the consistency of protective force training safety oversight. However, it is, in our judgment, the Office of Security's responsibility to request a review by the Assistant Secretary for Environment, Safety and Health because the initial safety risk analyses supporting the core curriculum were conducted by the NNSI.

Regarding concerns expressed by the program offices and the Office of Security that sites have the authority to modify the core curriculum to meet their specific needs, given the Department's ongoing commitment to enhancing security at its key facilities, such modifications should have higher level visibility as envisioned in the first two recommendations. In that regard, we recognize that the Secretary of Energy's May 15, 2001, memorandum permits sites to conduct new hire BSPOT training and allows sites to make changes to the standard curriculum for site-specific requirements where a portion of the curriculum is not applicable. However, that memorandum, as well as relevant Department orders, were issued prior to the events of

September 11, 2001. Since then, the emphasis on homeland security and the protection of national assets has increased significantly. For example, the Department has developed a new Design Basis Threat - policy and has increased the number of protective force personnel by about 500 officers. Additionally, it has been the Department's policy to train its security forces to deal with a broad spectrum of threats by providing a standardized, core training curriculum that ensures interoperability across the complex.

Regarding the Office of Security's position that interoperability of the protective forces is not a training issue, we disagree. Specifically, a work stoppage caused by labor issues is only one event that could necessitate the transfer of protective forces to another site. Other events, non-labor related, could lead to the transfer of protective forces and not provide the time to train the augmentees in the specific site's equipment or needs.

Appendix 1

OBJECTIVE

To determine whether sites were meeting the Department's standardized, basic protective force core training curriculum.

SCOPE

We conducted the audit from February 2003 to September 2003, at Department of Energy Headquarters in Washington, DC; the Nonproliferation and National Security Institute in Albuquerque, New Mexico; the Oak Ridge Complex in Oak Ridge, Tennessee; the Lawrence Livermore National Laboratory in Livermore, California; and the Nevada Test Site in Nye County, Nevada. We also interviewed officials from the following organizations:

Federal Law Enforcement Training Center, Cheltenham, MD
National Aeronautics and Space Administration
Department of State
Nuclear Regulatory Commission

METHODOLOGY

To accomplish the audit objective, we:

- Reviewed applicable Federal regulations, Departmental orders, and implementing procedures and practices;
- Reviewed performance evaluation reports and/or performance measures at selected sites;
- Reviewed protective force annual training budgets at selected sites;
- Obtained and reviewed Office of Security strength reports since 1992;
- Obtained and reviewed the National Nuclear Security Administration quarterly strength report for April 2003;
- Collected and analyzed training hours and cost data for the Nonproliferation and National Security Institute;
- Collected and analyzed training hours and cost data for 12 of the Department's sites:
 - Lawrence Livermore National Laboratory,
 - Nevada Test Site,
 - Oak Ridge Complex,

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- Rocky Flats Environmental Technology Site,
 - Hanford Site,
 - Pantex Plant,
 - Savannah River Site,
 - Los Alamos National Laboratory,
 - Idaho National Engineering and Environmental Laboratory,
 - Sandia National Laboratories (New Mexico),
 - Sandia National Laboratories (California), and
 - Sandia National Laboratories (Tonapah Test Range);
- Reviewed performance related information to determine compliance with the Government Performance and Results Act of 1993;
 - Held discussions with Headquarters and other Federal Government officials regarding the Department's protective forces; and,
 - Held discussions with officials from Lawrence Livermore and Oak Ridge National Laboratories, as well as, the Nevada Test Site and the Nonproliferation and National Security Institute regarding protective forces.

The audit was performed in accordance with generally accepted Government auditing standards for performance audits and included tests of internal controls and compliance with laws and regulations to the extent necessary to satisfy the audit objective. Accordingly, the assessment included reviews of Departmental and regulatory policies, procedures, and performance measures related to the Department's protective forces. Because our review was limited, it would not necessarily have disclosed all internal control deficiencies that may have existed at the time of our audit. We did not conduct a reliability assessment of computer-processed data because only a very limited amount of computer-processed data was used during the audit.

The exit conference was held with management on March 1, 2004.

PRIOR AUDIT REPORTS

Office of Inspector General Related Reports

- *Management of the Department's Protective Forces* (DOE/IG-0602, June 2003). Although the Department had taken steps to improve the management of its protective forces, it still faced a number of challenges that could adversely affect the program. These challenges included delays in processing security clearances, increasing overtime costs, potential retention problems, and operational vulnerabilities associated with unscheduled work stoppages. Management generally concurred with the findings and recommendations and agreed to initiate corrective actions.
- *The Restructure of Security Services by the Oak Ridge Operations Office* (DOE/IG-0487, October 2000). The Oak Ridge Operations Office (Operations Office) did not manage the restructuring of its security services in a way that would have achieved its goals. Specifically, the Operations Office did not perform an analysis of security service staffing levels, determine the scope of work to be transferred, or develop cost-reduction measures or incentives to ensure efficient contractor performance. In addition, the Operations Office did not consider cost as a ranking factor in the selection of security services. Management concurred with the finding and recommendations and agreed to initiate corrective actions.
- *Audit of Construction of Protective Force Training Facilities at the Pantex Plant* (WR-B-95-06, May 1995). Construction of a physical training facility at the Department's Pantex Plant was not necessary to fulfill mission needs, and the Department did not consider all viable alternatives to constructing a weapons tactics and training facility. These conditions occurred because a Justification for New Start was never prepared and approved for these two projects. Management did not concur with all of the recommendations.
- *Audit of the Department of Energy's Security Police Officer Training* (CR-B-95-03, February 1995). The audit disclosed that the Department had not established standardized annual refresher training requirements for its security forces and individual sites were developing and implementing training programs and course plans without emphasis on standardization.
- *Audit of the Management and Cost of the Department of Energy's Protective Forces* (DOE/IG-0354, July 1994). The audit noted several opportunities for the Department to improve the operational efficiency of the protective forces, including eliminating overtime paid to officers prior to completion of the basic 40-hour workweek. Management concurred with the findings and recommendations and agreed to take appropriate actions to improve the efficiency of managing protective forces.

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- *Management of the Central Training Academy, Albuquerque, New Mexico* (DOE/IG-0309, May 1992). The audit disclosed that Wackenhut (1) was provided credentials and shields that improperly identified employees as being Federal agents and officers, and used the Department's official seal without proper authorization, (2) incurred costs not necessary for performing contract work, (3) performed work outside the general scope of its contract, and (4) operated a souvenir store on Government property. All of these activities occurred with the knowledge of Department officials. Management generally agreed with the findings and recommendations.

General Accounting Office Related Reports

- *Nuclear Security, NNSA Needs to Better Manage Its Safeguards and Security Program* (GAO-03-471, May 2003). NNSA has not been fully effective in managing its safeguards and security program in four key areas. As a result, NNSA cannot be assured that its contractors are working to maximum advantage to protect critical facilities and material from individuals seeking to inflict damage. The four areas are as follows: (1) Defining clear roles and responsibilities; (2) Assessing sites' security activities; (3) Overseeing contractors' corrective actions; and (4) Allocating staff. NNSA disagreed with GAO's conclusion that NNSA was not ensuring the comprehensive, annual assessments of contractors' performance that DOE policy requires. GAO continues to believe that NNSA's current efforts do not ensure conformance to DOE policy.
- *Department of Energy, Key Factors Underlying Security Problems at DOE Facilities* (GAO/T-RCED-99-159, April 1999). Physical security controls involve the protection, primarily through security personnel and fences, of facilities and property. In 1991, GAO reported that security personnel were unable to demonstrate basic skills such as the apprehension and arrest of individuals who could represent a security threat. Prior to that report, in 1990, GAO reported that weaknesses were occurring with security personnel, as some security personnel could not appropriately handcuff, search, or arrest intruders or shoot accurately.

Appendix 3

Core Curriculum Modifications by Site

X indicates a modification has been made to curriculum

Site Locations	Shotgun	Baton	Rappelling	Modified Defensive Tactics	Other courses excluded or modified
Lawrence Livermore National Laboratory	X		X	Information not available at time of audit	
Nevada Test Site	X	X	X		Vehicle assaults
Oak Ridge Complex	X	X	X		
Rocky Flats Environmental Technology Site	X		X	X	
Hanford Site		X	X	X	Moving vehicle assault
Sandia National Laboratories (California)	X		X		Rifle, vehicle stops, aerosol/chemical spray
Pantex Plant	X	X	X	X	
Savannah River Site	X		X	X	Vehicle assaults
Los Alamos National Laboratory	X	X	X	X	Reloading drills
Idaho National Engineering and Environmental Laboratory	X		X	X	Vehicle assaults

NOTE: Training at Sandia National Laboratories (New Mexico and Tonopah Test Range) was not conducted on-site, therefore was not included in the above chart.



Department of Energy
Washington, DC 20585

NOV 07 2003

MEMORANDUM FOR FREDERICK D. DOGGETT
ASSISTANT INSPECTOR GENERAL
FOR AUDIT SERVICES
OFFICE OF INSPECTOR GENERAL

FROM: *Marshall O. Combs*
MARSHALL O. COMBS, ACTING DIRECTOR
OFFICE OF SECURITY

SUBJECT: Consolidated Comments on Office of Inspector General
Draft Audit Report, *The Department's Basic Protective
Force Training Program*

Below, for your review are the Department's consolidated comments to the above subject draft report. These comments are very brief and general in nature as a result of your direction to attempt to limit the Department's "Management Reaction" to only two pages. However, as permitted, you will also find attached each responding organization's detailed and unabridged comments for your review and consideration. As you will see, there are varying degrees of concurrence and non-concurrence on the draft report's recommendations from the responding organizations.

The Office of Security (SO) Comments.

Regarding sites deviating from protective force (PF) "core curricula," the Department of Energy (DOE) directives require that all PF training be based on site-specific job analyses (JAs) of PFs' assigned duties and criteria established by the DOE Nonproliferation and National Security Institute (NNSI)/Central Training Academy (CTA). In May 2001, the Secretary of Energy authorized sites to conduct basic PF training, while meeting specific criteria and allowed changes to be made to the standard curriculum for site-specific requirements where a portion of the curriculum is not applicable. In response to a Type A, Accident Investigation Board, investigating a PF rappelling fatality, all rappelling operations at DOE sites were suspended in 1995. Based upon lessons learned from the investigation, the sites were required to review their rappelling operations to ensure they were mission-essential. As a result, all sites determined rappelling was not required to meet site response mission requirements. Therefore, if the sites' PF JAs do not identify a portion of a curriculum as a site-specific PF task or mission requirement, then the sites are not required to teach it.

Deviations are required, by policy, to be submitted where it is justifiable to not meet a directive's requirement. While basic PF training is based on criteria



established by the NNSI CTA (the approved curricula), this criteria is not a directives requirement. There is no existing DOE requirement for sites to submit a "deviation" request in order to depart from the standard PF curriculum. Finally, DOE directives require that site PF training programs be approved by the cognizant local DOE authority for safeguards and security, which also has the direct responsibility to ensure the training is properly implemented as required.

It is SO's position that Draft Recommendation 3 is not applicable and should be revised to read: "... the Under Secretary for Energy, Science and Environment, and the Administrator, National Nuclear Security Administration (NNSA): ... Ensure that the cognizant local NNSA and Program Office officials that are responsible for oversight of PFs conduct a thorough review of their respective PFs annual training plans to ensure that all applicable core curriculum and site-specific areas are included, prior to the annual training plan's approval."

It is SO's position that Draft Recommendation 4 is not applicable and should be deleted due to the fact that the applicable PF JAs and curricula have been reviewed and updated regularly by the NNSI and SO PF Quality Panels.

It is SO's position that Draft Recommendation 5 should be revised to state: "We recommend that the Assistant Secretary for Environment, Safety, and Health: ... Conduct a review of the safety oversight of sites' PF training activities to ensure there is standardization, that oversight is implemented in a consistent manner at all sites conducting the same types of operational and training activities, and the use of PF injury/illness rates in PF contract award fee determinations is being appropriately applied."

The Office of the Assistant Secretary for Environmental Management.

Recommendation 1. The report identifies sites as deviating from the core curriculum for basic PF officer and special response teams. It is this Office's understanding that as a result of the rappelling death in 1995, the Department issued a notice to cease all rappelling activities. The sites should not be penalized for following the Department's guidelines. Another issue identified in the report is that shotgun training is not being conducted at all sites. During the developmental stages of the PF training program, it was decided that each course of instruction would be conducted only if applicable to the site.

Recommendation 2. As a result of this report, it is clear that the Department needs to define the process for deviating from the basic curriculum. It is the Department's responsibility to provide clear guidance as to whether the approved deviation process is to be followed, or, if not, what process is to be used.

Recommendation 3. The Department's approved deviation procedure identifies the proper reporting channels. If the deviation process (or a similar process), is to

be used for deviating from the PF training curriculum, it should be followed and enforced.

The Office of Nuclear Energy, Science and Technology Comments.

“The report should specify the sites included in the review. The results section indicates that 12 sites were reviewed; however, in the scope description only the Oak Ridge Complex, Lawrence Livermore National Laboratory, and the Nevada Test Site are noted.”

The Office of Science (SC) Comments.

The draft report does not address the PF job task analyses and training needs assessments that help define each site's Training Approval Program (TAP). These analyses form the basis for the mode, frequency, and duration of blocks of instruction, and provide opportunities for sites to tailor training programs to site-specific conditions.

In the Secretary of Energy's memorandum dated May 15, 2001, deviations from the standardized basic PF curriculum were authorized when aspects of the training were determined to be not locally applicable. The TAP process validates these determinations. In the case of the SC PF training program at the Oak Ridge complex, deviations from the standardized curricula were approved by SO in August 2001.

The first two recommendations appear reasonable; however, SC sees no need for the development of additional procedures (Draft Recommendation 3) to further explain that which is clearly delineated in DOE Order 470.1 -- and which would be reiterated in the guidance promulgated by Recommendation 2 -- regarding requirements for processing and approving deviations.

The Office of the Associate Administrator for Management and Administration, National Nuclear Security Administration Comments.

A manifestation of increased efforts in protective measures and their associated costs relative to overtime wages has been the trade-off in training hours for overtime hours. The NNSA will use the recommendations within this report to increase the focus on training, and to resume appropriate levels and types of training.

Overall, the NNSA agrees with the recommendations in the report. As part of NNSA's reengineering effort, it is defining roles and responsibilities, and issuing clarifications, via NNSA policy letters, to existing Departmental directives. The process for submitting deviations will be reiterated to all NNSA field elements.

Augmentee forces are trained in site-specific weapons and tactics upon arrival and prior to performing their duties. Arrangements are made in advance to do this. Experience has taught that these perishable skills are more beneficial when learned on a "Just In Time" basis using site-specific equipment.

A review of the PF core curriculum is strongly supported. Currently, many sites are using curricula tailored to site-specific needs. Changes in mission and threat scenarios warrant a thorough review of the curriculum to meet today's requirements.

The Office of Environment, Safety, and Health Comments.

This Office informed SO that it did not have any comments to the subject draft report.

Should you have any questions regarding this subject, please contact Mr. Ronnie Edge, of my staff, at (301) 903-4247.

Attachments

Appendix 4 (continued)



Department of Energy

Washington, DC 20585

November 4, 2003

MEMORANDUM FOR: Gregory H. Friedman
Inspector General
Office of Inspector General

FROM: Glenn S. Podonsky, OA-1

SUBJECT: Inspector General Report on Basic Security Police Officer Training Program

We appreciate the opportunity to review and comment on your report summarizing the results of the Basic Security Police Officer Training (BSPOT) Program audit. We generally agree with the findings and recommendations in the report. However, as stated in our previous comments on the draft report, OA does review some elements of the BSPOT program as part of the overall review of site training programs for protective forces. Specifically, OA evaluates the site's Training Approval Program (TAP), which includes elements of the BSPOT program, such as annual training plans, course objectives, instructor qualifications and weapons training. Our current approach should be added to the report for factual accuracy.

We note that the recommendation made to OA in the audit report suggests expanding our review of the BSPOT program. We also recognize the value of this approach. Our proposed steps are to continue reviewing the site BSPOT programs by evaluating site vulnerability assessments, safeguards and security plan development, and response/protection strategy in determining the appropriateness of established training needs, individual protective force member job task analyses and assessing the quality of the actual training being conducted. In addition, we plan to analyze the Nonproliferation and National Security Institute (NNSI) core BSPOT curriculum and compare the core program with the site BSPOT curriculum, where applicable. Not all sites have a BSPOT program since some sites rely on NNSI for this training. Where site training programs deviate from the core curriculum, we will assess if the differences make sense based on the sites' protection missions.

We appreciate your suggestions. I am available to discuss this matter further at your convenience.


Glenn S. Podonsky, Director
Office of Independent Oversight
and Performance Assurance

cc:
R. Speidel, NN-66
M. Kilpatrick, OA-1



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