



Department of Energy
Washington, DC 20585

September 21, 2015

Mr. John M. Lawrie
President and Chief Executive Officer
Computer Sciences Corporation
3170 Fairview Park Drive
Falls Church, Virginia 22042

Dear Mr. Lawrie:

Pursuant to 10 C.F.R. Part 851, *Worker Safety and Health Program*, the Department of Energy (DOE) is considering enforcement action against Computer Sciences Corporation (CSC) for retaliating against two former CSC employees at DOE's Hanford site in Richland, Washington. CSC was under contract with DOE from January 6, 2004, through September 30, 2012, to provide occupational medicine services at the Hanford site. In two November 25, 2014, letters sent to CSC's Senior Assistant General Counsel, the Secretary of Labor conveyed the Department of Labor's (DOL) determination that CSC retaliated against two employees for engaging in activities protected under the Energy Reorganization Act of 1974 (ERA). These DOL findings that CSC retaliated against its employees for raising safety concerns is evidence that violations of 10 C.F.R. §§ 851.20(a)(6) and 851.20(b)(7) occurred.

DOE's Office of Enforcement hereby offers CSC the opportunity to submit any information that may impact an enforcement decision or the mitigation factors DOE considers when it determines whether a penalty should be assessed. See 10 C.F.R. § 851.40(g) and Section IX, *Enforcement Actions*, of Appendix B to Part 851. Since this office has access to the records provided to the DOL relating to this matter, we request that any CSC information provided to supplement the record be limited to documents not previously submitted to DOL. Please provide any materials you deem pertinent within 30 calendar days of the date of this letter. Your submission, if any, should be sent to the Director, Office of Enforcement, Attention: Office of the Docketing Clerk, EA-10, U.S. Department of Energy, 19901 Germantown Road, Germantown, Maryland 20874-1290. Upon completion of the Office of Enforcement's review of received documentation, CSC will be given the opportunity to further present its position.

This letter also serves as notification of the Office of Enforcement's decision to conduct an investigation pursuant to Part 851 into the facts and circumstances associated with the underlying safety concerns expressed by those former CSC employees. The concerns relate to an electronic medical record system that CSC was implementing at the Hanford site in 2012.



The Office of Enforcement will conduct this investigation pursuant to the authority set forth in 10 C.F.R. § 851.40, *Investigations and inspections*, at Subsection (a). The investigation will include a review of relevant documents and interviews of CSC personnel. A request for documents to support the investigation will be provided separately via e-mail. Your cooperation to ensure timely submission of documents to our office by the requested date is appreciated.

Under the Major Fraud Act (MFA), as amended, 41 U.S.C. § 4310, this investigation may be a proceeding commenced by the United States that relates to a violation of, or the failure to comply with, a Federal regulation. Costs incurred in connection with such a proceeding are subject to the reimbursement restrictions of the MFA implemented at 48 C.F.R. § 31.205-47. As a result, CSC should track any costs incurred that are directly attributable to supporting DOE's investigation, subsequent to receipt of this letter, and segregate them from other potentially allowable costs.

If you have any questions concerning this letter, please contact me at (301) 903-7707, or your staff may contact Mr. Kevin Dressman, Director, Office of Worker Safety and Health Enforcement, at (301) 903-0100.

Sincerely,



Steven C. Simonson

Director

Office of Enforcement

Office of Enterprise Assessments

cc: Stacy Charboneau, DOE-RL
Cheri Cameron, CSC
Hollie Mooers, HPM Corporation