



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



**August 27, 2025**

Mr. Eric Wollerman  
President & Chief Executive Officer  
Honeywell Federal Manufacturing & Technologies, LLC  
14520 Botts Road  
Kansas City, Missouri 64147

SSA-2025-01

Dear Mr. Wollerman:

The Office of Enforcement has completed its investigation into the facts and circumstances associated with three incidents of unauthorized disclosure of classified information to personnel without the proper access authorization or a need-to-know at the Department of Energy's (DOE) National Nuclear Security Administration, Kansas City National Security Complex in Kansas City, Missouri. These incidents occurred in June 2023, September 2023, and February 2024. Honeywell Federal Manufacturing and Technologies, LLC (Honeywell FM&T) identified the security incidents and reported the incident closures in DOE's Safeguards and Security Information Management System (SSIMS) in January 2024, March 2024, and April 2024.

In January 2024, Honeywell FM&T closed an incident of security concern (IOSC) involving an unauthorized network-based transmission of classified information outside of the Honeywell FM&T firewall that occurred in Fiscal Year 2023. Honeywell FM&T took appropriate containment actions to removed classified files from the unclassified network and halted certain classified activities to prevent recurrence for the subject organization. Although containment actions were taken, loss/compromise of classified information did occur.

In March 2024, Honeywell FM&T closed a second IOSC, which involved a tour that took place in September 2023 in an area which houses Sigma information, however the visitors lacked the appropriate authorization for Sigma access. The Honeywell FM&T inquiry and the Office of Enforcement investigation determined that, although there was improper vetting, Sigma information was not disclosed during the tours, and loss/compromise of classified information did not occur.

In April 2024, Honeywell FM&T closed a third IOSC that involved an Enterprise Secure Network application hosted by Honeywell FM&T, Enterprise Content Management, which did not verify authorization for access to Sigma information by members of the workforce. The ECM coding has been corrected to validate user access authorization at

every login and create a managed access control role for classified information to validate need-to-know. A forensic examination revealed that after the software implementation, seven personnel had accessed the ECM application, all of whom held the appropriate security clearance, were authorized for Sigma access, and had a need to know. Although there were deficiencies in the ECM application, loss/compromise of classified information did not occur.

In accordance with 10 Code of Federal Regulations (C.F.R.) § 824.4(e), *Civil Penalties*, the Office of Enforcement and the DOE's National Nuclear Security Administration (DOE/NNSA) have elected to resolve potential noncompliances with requirements enforceable under 10 C.F.R. Part 824, *Procedural Rules for the Assessment of Civil Penalties for Classified Information Security Violations*, through execution of a Settlement Agreement. In deciding to enter into this Settlement Agreement, DOE/NNSA has considered Honeywell FM&T's inquiries, causal analyses, and associated corrective actions taken since the submission of the SSIMS reports identified above, DOE/NNSA has elected to enter into settlement.

DOE reserves the right to re-open this investigation if DOE later becomes aware that Honeywell FM&T provided any false or materially inaccurate information. Further, if there is a recurrence of classified information security deficiencies similar to those identified in this Settlement Agreement, or a failure to comply with the terms and conditions prescribed in the Settlement Agreement (or other related actions that Honeywell FM&T subsequently determines to be necessary) to prevent recurrence of the identified issues, then the Office of Enforcement may pursue additional enforcement activity.

The Office of Enforcement, NNSA Program Office, and Kansas City Field Office will continue to closely monitor Honeywell FM&T's implementation of classified information security requirements until the issues associated with this Settlement Agreement are fully resolved.

Enclosed please find the Settlement Agreement for your signature. Within 1 week from the date of receipt, sign and return the Settlement Agreement to the Office of Enforcement. Please follow all instructions specified in the enclosure and keep a copy for your records. By signing this Settlement Agreement, you agree to comply with all terms, including payment of the settlement sum, specified in section IV of the Settlement Agreement and in the manner prescribed therein.

If you have any questions concerning this Settlement Agreement, please contact the Office of Enforcement at 301-903-7707, or your staff may contact Ms. Carrienne Zimmerman, Director, Office of Security Enforcement, at (301) 351-1186.

Sincerely,

A handwritten signature in black ink, appearing to read "Teresa M. Robbins". The signature is fluid and cursive, with the first name being the most prominent.

Teresa M. Robbins

Acting Under Secretary for Nuclear  
Security and Administrator, NNSA

A handwritten signature in black ink, appearing to read "Robin M. Keeler". The signature is fluid and cursive, with the first name being the most prominent.

Robin M. Keeler

Acting Director

Office of Enforcement

Office of Enterprise Assessments

Enclosures: Settlement Agreement (SSA-2025-01)  
Electronic Funds Transfer Instructions

cc: Scott Pohlman, Honeywell Federal Manufacturing & Technologies, LLC  
Anthony George, NA-KC



In the matter of	) Report Nos. KCFO-06/2023-0006, KCFO-09/2023-0008,
	) and KCFO-02/2024-0002
	)
	)
	)
Honeywell Federal Manufacturing	)
and Technologies, LLC	)
	)
	) Settlement Agreement SSA-2025-01

SETTLEMENT AGREEMENT AMONG THE U.S. DEPARTMENT OF ENERGY,  
THE NATIONAL NUCLEAR SECURITY ADMINISTRATION,  
AND HONEYWELL FEDERAL MANUFACTURING AND TECHNOLOGIES, LLC

I

Honeywell Federal Manufacturing and Technologies, LLC (Honeywell FM&T) is responsible for the management and operation of the U.S. Department of Energy, National Nuclear Security Administration's (DOE/NNSA) Kansas City National Security Campus (KCNSC). Honeywell FM&T is the prime contractor under Contract No. DENA0002839 (Contract) entered into with the DOE/NNSA Kansas City Field Office (KCFO).

II

In 2024, Honeywell FM&T reported three separate security incidents in DOE's Safeguards and Security Information Management System (SSIMS). In January 2024, Honeywell FM&T closed an incident of security concern (IOSC) (KCFO-06/2023-0006) in SSIMS involving an unauthorized network-based transmission of classified information outside of the Honeywell FM&T firewall that occurred in Fiscal Year 2023. An organization within Honeywell (subject organization) transmitted a classified report to uncleared external recipients prior to a derivative classifier review, and that transmission was not limited to government email addresses. As a result, loss/compromise of classified information did occur.

In August 2023, Honeywell FM&T developed a corrective action report (CAR) and began identifying and implementing containment actions. Given the complexity of the matter, Honeywell FM&T requested elevation of the CAR to KCFO, and the request was approved in June 2024. Honeywell FM&T is working with KCFO to implement a solution to the identified root cause and briefed the recommended plan of action and milestones to KCFO leadership in August 2024. Honeywell FM&T provided KCFO with an updated plan in October 2024, and KCFO approved the plan.

In June 2023, Honeywell FM&T took the following containment actions: (1) removed classified files from the unclassified network; and (2) halted certain classified activities to prevent

recurrence for the subject organization. In July 2024, Honeywell FM&T implemented security access controls for the subject organization.

In June 2023, as a corrective measure, Honeywell FM&T requested the external organization to provide cleared personnel to continue with the work being performed for the subject organization. In March 2024, Honeywell FM&T completed an update to the subject organization's process documentation, and in April 2024 classified work instructions were developed for the subject organization. In June 2024, Honeywell FM&T implemented a manual process for classified work conducted by the subject organization.

In March 2024, Honeywell FM&T closed a second IOSC (KCFO-09/2023-0008), which involved a tour that took place in September 2023 in an area which houses Sigma information, however the visitors lacked the appropriate authorization for Sigma access. During the Honeywell FM&T IOSC inquiry, it was identified that the Honeywell FM&T tour request form did not contain all levels of access that may be required for the visit. The internal inquiry and an Office of Enforcement investigation determined that Honeywell FM&T has appropriate training, handbooks, and work instructions to ensure compliance with protecting classified information during tours. The root cause was an electronic form that did not alert all relevant stakeholders to conduct the appropriate clearance check.

Additionally, the host of the tour did not validate access authorization for the participants prior to the tour and relied on the visitors to vet their own access authorization. Tours occurred throughout calendar years 2023 and 2024 including hundreds of individuals who were Q cleared but whose Sigma access authorization was undetermined. Honeywell FM&T amended the form, and it was placed into daily operations on November 15, 2024. The Honeywell FM&T inquiry and the Office of Enforcement investigation determined that, although there was improper vetting, Sigma information was not disclosed during the tours, and loss/compromise of classified information did not occur. However, the Office of Enforcement identified a lack of thorough description of the facts and circumstances surrounding this event in the inquiry report submitted by Honeywell FM&T in SSIMS.

In April 2024, Honeywell FM&T closed a third IOSC (KCFO-02/2024-0002) that involved an Enterprise Secure Network (ESN) application hosted by Honeywell FM&T, Enterprise Content Management (ECM), which did not verify authorization for access to Sigma information by members of the workforce. The Honeywell FM&T inquiry revealed the root cause as a limitation in the ECM software program that created an environment where authorized users could access the classified application after no longer having a need-to-know. If a member of the workforce no longer required Sigma access, the ECM application did not remove the user.

When the issue was identified, approximately 300 authorized users did not require access to Sigma information, many of whom had retired at the time. The ECM coding has been corrected to validate user access authorization at every login and create a managed access control role for classified information to validate need-to-know. A forensic examination revealed that after the software implementation, seven personnel had accessed the ECM application, all of whom held the appropriate security clearance, were authorized for Sigma access, and had a need to know. Although there were deficiencies in the ECM application, loss/compromise of classified



information did not occur. However, the Office of Enforcement identified a lack of thorough description of the facts and circumstances surrounding this event in the inquiry report submitted by Honeywell FM&T in SSIMS.

Pursuant to DOE regulations under Title 10, Code of Federal Regulations (C.F.R.), Part 824, *Procedural Rules for the Assessment of Civil Penalties for Classified Information Security Violations*, and based on discussions with the NNSA Program Office and Field Office, the Office of Enforcement initiated an investigation into the three security events. On September 4, 2024, the Office of Enforcement notified Honeywell FM&T of its decision to investigate the facts and circumstances associated with potential deficiencies of the Honeywell FM&T security programs. The Office of Enforcement conducted an onsite investigation during October 8 through 10, 2024.

In a November 14, 2024, letter to the Office of Enforcement, Honeywell FM&T requested a Settlement Agreement to settle these matters under investigation. The settlement request and corrective action plan outlines an open action to prevent recurrence of concerns identified in the KCFO-06/2023-0006 IOSC.

### III

Pursuant to 10 C.F.R. § 824.4(e), DOE/NNSA may enter into a settlement, with or without conditions, at any time during an enforcement proceeding if the settlement is consistent with the objectives of the Atomic Energy Act of 1954, as amended, and DOE classified information protection requirements enforceable under 10 C.F.R. Part 824.

To resolve potential noncompliances with DOE classified information security requirements identified by the investigation and in consideration of Honeywell FM&T's inquiries, causal analyses, and associated corrective actions taken since the submission of the SSIMS reports identified above, DOE/NNSA has elected to enter into settlement. DOE/NNSA and Honeywell FM&T have reached agreement to resolve this matter through execution of this Settlement Agreement.

### IV

Accordingly, the terms of this Settlement Agreement are as follows:

In consideration of the mutual agreements set forth in this section, the sufficiency and adequacy of which are acknowledged by DOE/NNSA and Honeywell FM&T (hereinafter the "Parties"), the following terms represent agreement by the authorized representatives of the Parties to resolve by settlement the potential noncompliances at KCNSC, in lieu of an enforcement action that DOE/NNSA may issue pursuant to 10 C.F.R. § 824.6.

1. Honeywell FM&T shall fully implement the corrective and improvement action outlined in the Honeywell FM&T Request for Settlement, dated November 14, 2024, and notify the Office of Enforcement and KCFO in writing upon completion of the action.
2. Honeywell FM&T shall complete a final effectiveness review of the corrective and improvement action specified in item 1. above in accordance with Honeywell FM&T's issue

management process and shall provide the results of the review(s) to the Office of Enforcement and KCFO.


3. Honeywell FM&T shall pay the amount of \$102,375 reflecting an agreed upon monetary remedy in lieu of the issuance of an enforcement action with the proposed imposition of a civil penalty pursuant to 10 C.F.R. § 824.6.
4. Honeywell FM&T agrees to return a signed copy of this Settlement Agreement, within one week from the date of receipt, via email, to the Director, Office of Enforcement at [enforcementdocketclerk@hq.doe.gov](mailto:enforcementdocketclerk@hq.doe.gov).
5. The Effective Date of this Settlement Agreement shall be the date upon which Honeywell FM&T signs this Settlement Agreement.
6. Honeywell FM&T shall remit the monetary remedy of \$102,375 by electronic funds transfer (EFT) or automated clearing house (ACH) transfer to the Department of Energy through the U.S. Treasury within 30 calendar days after the effective date of this Settlement Agreement. The Office of Enforcement must be copied at [enforcementdocketclerk@hq.doe.gov](mailto:enforcementdocketclerk@hq.doe.gov) when the electronic payment is submitted to the U.S. Treasury. Instructions for sending payment in U.S. dollars via EFT or ACH transfer are enclosed.
7. This Settlement Agreement shall constitute a full and final settlement of the potential noncompliances identified in the referenced SSIMS reports and Office of Enforcement investigation subject to the following: (a) Honeywell FM&T's payment of the monetary remedy in accordance with item 3 above; and (b) Honeywell FM&T's completion of all actions set forth in items 1 and 2 above within 30 days of the effective date as defined in item 5 above to the satisfaction of the Office of Enforcement.
8. Neither the monetary remedy nor any costs, as defined in the Federal Acquisition Regulation 48 C.F.R. § 31.205-47, incurred by, for, or on behalf of Honeywell FM&T relating to coordination and cooperation with DOE concerning the investigation of matters covered by this Settlement Agreement, shall be considered allowable costs under the Contract. However, cost incurred by, for, or on behalf of Honeywell FM&T relating to the development and implementation of corrective actions, including costs associated with the effectiveness review required under item 2 above, may be considered allowable costs under the Contract.
9. This Settlement Agreement does not preclude DOE from re-opening the investigation nor preclude DOE/NNSA from issuing an enforcement action under 10 C.F.R. § 824.6 with respect to a potential noncompliance if: (a) after the Effective Date (as defined in item 5 above), DOE/NNSA becomes aware of any false or materially inaccurate facts or information provided by Honeywell FM&T; (b) there is a recurrence of classified information security deficiencies similar to those identified above; or (c) Honeywell FM&T fails to complete all actions identified in items 1 and 2 above in the time agreed upon by Honeywell FM&T and the KCFO.
10. Any modification to this Settlement Agreement requires the written consent of all Parties.



11. Honeywell FM&T waives any and all rights to appeal or otherwise seek judicial or administrative review of the terms of this Settlement Agreement. DOE/NNSA retains the right to judicially enforce the provisions of this Settlement Agreement by all available legal means.
12. This Settlement Agreement is issued pursuant to DOE's authority under Section 234B of the Atomic Energy Act of 1954, as amended (42 U.S.C. § 2282b), and the implementing provisions of 10 C.F.R. Part 824 governing enforcement of DOE classified information security requirements.
13. This Settlement Agreement shall become a Final Order after the signed copy, referenced in item 4 above, is filed by the Office of Enforcement's Office of the Docketing Clerk.

On behalf of my respective organization, I hereby agree to and accept the terms of the foregoing Settlement Agreement.

FOR National Nuclear Security  
Administration


 Date 8/25/2025  
Teresa M. Robbins  
Acting Under Secretary for Nuclear Security  
and Administrator, NNSA

FOR Honeywell Federal Manufacturing  
and Technologies, LLC

ERIC WOLLERMAN  
(Affiliate)  
Eric Wollerman  
President and Chief Executive Officer  
Honeywell Federal Manufacturing  
and Technologies, LLC

Digitally signed by ERIC  
WOLLERMAN (Affiliate)  
Date: 2025.08.28 11:30:53 -05'00'

FOR Office of Enforcement

 Date 8/26/2025  
Robin M. Keeler  
Acting Director  
Office of Enforcement  
Office of Enterprise Assessments