



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

Inspection Report

Follow-up Review of Security at the Strategic Petroleum Reserve

INS-O-12-01

October 2011



Department of Energy
Washington, DC 20585

October 27, 2011

MEMORANDUM FOR THE PROJECT MANAGER, STRATEGIC PETROLEUM RESERVE

A handwritten signature in cursive script, appearing to read "Sandra D. Bruce".

FROM: Sandra D. Bruce
Assistant Inspector General
for Inspections
Office of Inspector General

SUBJECT: INFORMATION: "Follow-up Review of Security at the Strategic Petroleum Reserve"

BACKGROUND

The Department of Energy's (Department) Strategic Petroleum Reserve (SPR) has the largest stockpile of Government-owned emergency crude oil in the world and exists foremost as an emergency response tool the President can use should the United States be confronted with an economically-threatening disruption in oil supplies. Established in the aftermath of the 1973-74 oil embargo, SPR can store approximately 727 million barrels of oil in underground salt caverns located in Louisiana and Texas. The Department is required to ensure adequate security is provided to safeguard one of our nation's critical infrastructures. The SPR Project Management Office responsible for ensuring this security is located in New Orleans, Louisiana. SPR is operated for the Department under its contract with the DM Petroleum Operations Company.

In June 2005, the Office of Inspector General (OIG) issued a report on "[Review of Security at the Strategic Petroleum Reserve](#)," (DOE/IG-0693). Our report concluded that additional measures could be implemented to improve physical security of SPR sites in the areas of the insider threat, deadly force authority, protective force performance test realism, Security Police Officers (SPO) performance testing programs and that a comprehensive security review was needed. Management concurred with the recommendations and stated that it took corrective actions in response to our report. Additionally, in August 2010, the OIG Hotline received a complaint alleging that the protective force performance test realism had not improved and that SPR training program did not provide a clear understanding as to whether or not a SPO should shoot to kill to protect personnel or property.

Given the recent complaint and the importance of maintaining effective security, we initiated this inspection to determine if SPR had improved selected aspects of its security and to assess the facts and circumstances surrounding the allegation.

RESULTS OF INSPECTION

SPR officials have generally implemented corrective actions in response to our earlier report; however, our inspection revealed a concern regarding SPOs' understanding of situations in which the use of deadly force was permitted at three of the four SPR sites we visited. Specifically, we

determined that contrary to the Federal regulation which limits the use of deadly force to the protection of personnel from imminent death or serious bodily harm, 9 of 36 SPOs we interviewed mistakenly believed that they should use deadly force to protect SPR infrastructure.

We confirmed that Department officials have generally taken corrective actions to improve SPR's processes regarding the insider threat, deadly force authorities, protective force performance test realism; and had completed a comprehensive security review and reviewed SPO performance testing programs. Specifically, Department officials:

- Ensured that a process was in place for permanent SPR employees to complete a Federal background investigation and took additional steps during our fieldwork to control and limit access to critical equipment by temporary employees;
- Conducted a review and determined that the current use of deadly force authority provided a sufficient level of protection;
- Made improvements in the realism of SPO performance tests involving simulated explosives and helicopters, controllers and evaluators, opponent instructions and SPO security levels and staffing; and,
- Conducted a comprehensive review of SPR security and a review of SPO performance testing programs which identified issues and corrective actions that were taken to address the issues.

Additionally, we were unable to substantiate the August 2010 allegation. Our review determined that SPR made improvements in the realism of the SPO performance test and that SPR training program provided a clear understanding that a SPO should only shoot to kill to protect personnel and not property. Despite these improvements, confusion as to when deadly force may be used continues to exist.

The weakness we identified in this report occurred, in part, because Department management at SPR had not concentrated their attention on ensuring that responsible facilities contractors appropriately applied Department's deadly force policy. Contractor officials charged with managing the security program had also not ensured correct knowledge of deadly force Federal regulations. For example, Federal officials did not ensure that the SPO deadly force training provided by SPR contractors would make certain that all SPOs uniformly understood the use of deadly force. Department requirements expressly stipulate that deadly force may only be used to protect personnel at the SPR, not equipment and infrastructure.

Without improvements in the implementation of appropriate security practices, SPR lacks assurance that deadly force would be properly applied. Should the SPOs who held the mistaken belief on the use of deadly force act to apply their incorrect interpretation, severe and unacceptable consequences for personnel and the Department could occur. As such, a goal of ensuring that all SPOs thoroughly understand such rules is, in our opinion, an appropriate strategy at all SPR sites. Even though the responses at the last three facilities we visited

significantly improved from those received during our initial testing, certain SPO, still expressed incorrect interpretative of the deadly force policy. As such, we recommend that the Project Manager, Strategic Petroleum Reserve Project Management Office, ensure that all SPOs understand when it is appropriate to use deadly force.

MANAGEMENT REACTION

The Project Manager, Strategic Petroleum Reserve Project Management Office, concurred with the recommendation and considers them closed. Management indicated that they had taken corrective action to address the SPOs' awareness of deadly force use and will continue intensive oversight and improvement efforts to ensure that each SPO fully understands when deadly force is justified. We consider management's comments and corrective action responsive to our recommendation. Management comments are included in their entirety in Appendix 2.

Attachment

cc: Deputy Secretary
Under Secretary of Energy
Chief of Staff
Acting Assistant Secretary for Fossil Energy
Chief Health, Safety, and Security Officer, Office of Health, Safety, and Security
Deputy Assistant Secretary for Petroleum Reserves

REPORT ON THE FOLLOW-UP REVIEW OF SECURITY AT THE STRATEGIC PETROLEUM RESERVE

TABLE OF CONTENTS

Security Management

Details of Finding	1
Recommendation	8
Management and Inspector Comments	8

Appendices

1. Scope and Methodology	9
2. Management Comments	11

SECURITY MANAGEMENT

SPR officials have generally implemented corrective actions in response to our earlier report; however, our inspection revealed a concern regarding SPOs' understanding of situations in which the use of deadly force was permitted at three of the four SPR sites we visited. Specifically, we determined that contrary to the Federal regulation which limits the use of deadly force to the protection of personnel from imminent death or serious bodily harm, 9 of 36 SPOs we interviewed mistakenly believed that they should use deadly force to protect SPR infrastructure.

Program Improvements

We confirmed that SPR officials had generally taken corrective actions in response to the five recommendations from our 2005 OIG Report to improve SPR's processes regarding insider threat, deadly force authorities, protective force performance test realism; and had completed a comprehensive security review and reviewed SPO performance testing programs. Specifically, Department officials:

- Ensured that a process was in place for permanent SPR employees to complete a Federal background investigation and took additional steps during our fieldwork to control and limit access to critical equipment by temporary employees;
- Conducted a review and determined that the current use of deadly force authority provided a sufficient level of protection;
- Made improvements in the realism of SPO performance tests involving simulated explosives and helicopters, controllers and evaluators, opponent instructions and SPO security levels and staffing; and,
- Conducted a comprehensive review of SPR security and a review of SPO performance testing programs which identified issues and corrective actions that were taken to address these issues.

Additionally, we were unable to substantiate the August 2010 allegation. Our review determined that SPR made improvements in the realism of the SPO performance test and that SPR training program provided a clear understanding that a SPO should only shoot to kill to protect personnel and not property.

Deadly Force Awareness

Despite program improvements and the clarity of training materials, our review revealed that some SPOs at three of the four SPR sites we visited were not aware of the limited circumstances in which the use of deadly force was justified. Specifically, 9 of 36 SPOs told us that they would use deadly force to protect site equipment and infrastructure. However, 10 Code of Federal Regulations Part 1049, limits the use of deadly force at the SPR to the protection of personnel from imminent death or serious bodily harm.

During our inspection, we did not find any evidence to substantiate the August 2010, OIG Hotline allegation that the SPR training program did not provide a clear understanding as to whether or not a SPO should shoot to kill to protect personnel or property. While we did not attend an actual lecture, class or force-on-force exercise; our review of the SPR deadly force training program determined that the training was consistent with the SPR deadly force policy. Specifically, the policy limits the use of deadly force to the protection of personnel from imminent death or serious bodily harm. Based on an examination of various records, we also determined that the training was given to all SPOs at least annually.

Also, we interviewed 36 of 150 SPOs who attended the deadly force training. During our initial September 2010 fieldwork, six of seven SPOs at the first facility visited, told us that they would use deadly force to protect SPR equipment and infrastructure. The OIG immediately reported this concern to a senior SPR security manager, who took immediate action by providing deadly force training to SPOs at all four sites in November and December 2010. In addition to the training, we determined that SPR officials continually provide deadly force briefings at shift change and have posters that outline deadly force rules in the meeting and change out rooms. In May 2011, while conducting follow-up fieldwork, we interviewed an additional 29 SPOs at the remaining sites and found that 3 SPOs continued to respond to a series of scenarios that they would inappropriately use deadly force to protect SPR equipment and infrastructure.

Even though the responses at the last three facilities we visited significantly improved, just one instance of incorrect use of deadly force could result in severe and unacceptable consequences for

personnel and the Department. As such, a goal of zero tolerance is, in our opinion, an appropriate strategy at all Department facilities.

Insider Threat

We discovered that SPR officials had taken action to mitigate insider threat for both permanent and temporary employees.^{1, 2} Specifically, SPR management mitigated insider threat by:

- Requiring permanent employees to undergo a Federal background investigation; and,
- Installing fences with locks or card badge readers around critical infrastructure which limited and controlled temporary employees' access. During our inspection, SPR completed installation of these fences around critical infrastructure.

Although SPR conducted local investigations for both permanent and temporary employees, we found that the Federal background investigations provided a more comprehensive assessment of an employee's background. Specifically, the Federal background investigation includes a National Agency Check, finger print check and a review of the Federal Bureau of Investigation's national criminal history database. The implementation of Homeland Security Presidential Directive 12 (HSPD-12), *Policy for a Common Identification Standard for Federal Employees and Contractors*, requires a Federal background investigation to mitigate insider threat for permanent employees. In reviewing a Federal database report that identified the status of SPR employees' background investigation adjudication, we determined that approximately 87 percent, 910 of the 1,046 permanent employees, were provided a Federal background investigation. Our review of this report and discussions with SPR officials revealed that the remaining 136 employees were either awaiting completion of their investigation or were no longer employed at SPR. We also found that SPR officials implemented additional security measures for

¹ An "insider" is anyone with authorized, unescorted access to DOE facilities. The insider threat could entail use of violence or physical force and could be active or passive. Active support could be provided by direct participation, passive support by simply providing information to outsiders.

² Employees are considered permanent if they are expected to be employed longer than six consecutive months; temporary employees are employed six consecutive months or less. Some temporary employees had access to SPR periodically for short visits while others were on site for eight hours a day for weeks at a time.

approximately 100 temporary employees who did not require a Federal background investigation and were allowed unescorted access to the SPR facilities where critical infrastructure are located. Specially, SPR employed a local background investigation comprising of a social security number check and a criminal background check of the counties where a potential employee had lived for the past seven years prior to permitting access by temporary employees.

To help further mitigate the issue of limited and controlled access of temporary employees, SPR installed fences to ensure positive control over their critical infrastructure. As a result, these temporary employees do not have access to the critical infrastructure areas. Prior to our review, three of the SPR sites had installed fences around critical infrastructure; one had not. During the inspection, the fourth site completed the fence installation, thereby ensuring that critical infrastructure was protected and secured with a lock or card badge reader. Future improvements at these sites included the application of badge card readers to all fenced areas protecting critical infrastructure, a measure which is scheduled for completion by December 2011.

Protection Authorities

Our inspection revealed that the previous Principal Deputy Assistant Secretary for Fossil Energy (FE) concluded that the present authority, 10 CFR Part 1049, to use deadly force provided a sufficient level of protection in light of SPR's designation as critical infrastructure. This authority requires that SPR SPOs only use deadly force when protecting personnel from imminent death or serious bodily harm. In our 2005 OIG report, we asked FE officials to determine if the Department's policy regarding the protection of nuclear weapons, nuclear explosive devices and or special nuclear material, also designated as critical infrastructure, would be appropriate at SPR sites. This authority authorized the use of deadly force to protect not only personnel, but also property.

In response to our recommendation, SPR conducted a review which was included in a September 2005 memorandum approved by the previous FE Principal Deputy Assistant Secretary. Specifically, management's decision regarding the SPR deadly force policy was based on the inherent danger of the property being protected. An attachment to this memorandum stated that the loss of SPR assets, that is oil, does not pose grave danger to the public sufficient to warrant the use of deadly force as even a

catastrophic event at SPR would have limited effect outside the boundaries of a SPR site. Also, the attachment noted that there was no need to recapture stolen oil because there was no feasible way for an opponent to steal sufficient quantities of oil to significantly endanger the public or environment. Although the Department designated SPR equipment as critical infrastructure, our discussions with SPR officials at each of the four sites inspected confirmed that there was no indication of nuclear materials present. Additionally, our physical inspection at each site did not identify the presence of nuclear materials.

Performance Test Realism

Our inspection did not substantiate the allegation concerning performance test realism. We found that SPR officials had taken several steps to improve the realism of performance tests conducted at SPR facilities. Specifically, in response to our recommendation, SPR officials took actions to improve performance test realism regarding simulated explosives and helicopters, controllers and evaluators' visibility, opponent instructions and SPO security levels and staffing. The performance tests evaluate the readiness of protective forces to defend the Department and its critical infrastructure. We were unable to observe a performance test during our fieldwork; however, we tested these improvements through SPO interviews and document reviews.

Our review included interviews with 36 SPOs regarding specific aspects of performance testing realism and the improvements made to these tests. Specifically we found that:

- Twenty-seven of the 36 SPOs commented that the use of simulated helicopters and explosives did not detract from an exercise's realism. On one occasion the exercise involved a real helicopter; however, due to the cost, a decision was made to use simulated helicopters in subsequent exercises. We also found that the simulated explosives used during performance testing had been upgraded to be almost identical to real explosives.

-
- Sixteen of the 36 SPOs commented that controllers and evaluators who wore orange vests detracted from the realism of an exercise. Specifically, the orange vests could provide the general location of the opposition forces. DOE Order 473.3, *Protection Program Operations*, requires the presence of both controllers and evaluators to ensure safety during force-on-force exercises and assess exercise results. A SPR Security Specialist said that controllers and evaluators are provided a pre-exercise brief. During this briefing they are advised to maintain contact with an exercise participant but move to a distance that would not identify the SPO positions.
 - None of the 36 SPOs were able to overhear opposition force performance test information or instructions. During our interviews, the SPOs said that the pre-exercise briefs were conducted for protective forces and opposition forces separately which could not be overheard and briefs were not conducted during exercises.
 - SPR management also included additional exercise enhancements to include canine release authority, upgrades to opposition force weaponry and use of an independent opposition force during one of the performance tests.

Additionally, our review included an evaluation of SPR security and staffing levels reports for calendar years (CY) 2008, 2009 and 2010. We determined that during these 3 years, 55 exercises had been conducted, of which 45 had been conducted at heightened security and staffing levels and 10 had been conducted at normal security and staffing levels. Exercises conducted at heightened security levels increase the number of SPOs available to defend the site during the test. At least one exercise had been conducted at each SPR facility at normal staffing and security levels for CY 2008 and 2009; but none at these levels during CY 2010. A SPR Security Specialist said that CY 2010 did not include normal level exercises due to information being gathered regarding the SPR vulnerability analysis validation. The Security Specialist said that once this information had been obtained, exercises would be conducted at normal staffing and security levels at all sites. Overall, through our interviews and document reviews, we found that performance tests realism had generally improved.

Office of Independent Oversight Review

The Department's Office of Health, Safety and Security's Office of Independent Oversight (OIO) took steps to evaluate the protective force performance testing program and to conduct a comprehensive review of security at SPR. The OIO conducted a review of the SPR performance test program and a review of security had been conducted by OIO in January and February 2007. The review included several force-on-force and limited scope performance test exercises, an evaluation of SPR training and training records, examination of routine and emergency duties and an analysis of physical, cyber and personnel security. The review also included an evaluation at each of the SPR sites. OIO issued a report that identified 57 issues; the overall conclusion of the report was a rating of "Effective Performance."

We also reviewed an evaluation of a February 10, 2009, Corrective Action Plan final report completed by SPR. This report provided the status of the corrective actions of the 57 issues identified in the 2007 OIO report and we determined that corrective actions for all 57 issues were reported closed by SPR Management. During our discussions, we found that SPR officials had requested that an independent security subject matter expert (SME) review SPR's corrective actions and validate that these activities were adequate. Our review of the SME documents determined that the SME had validated all 57 corrective actions. Further, we spoke with an OIO official and received confirmation that the corrective actions taken by SPR, if appropriately implemented, would meet OIO's expectations and all issues had been closed.

CONTRIBUTING FACTORS AND IMPACT

The weakness identified in this report occurred, in part, because Department management at SPR had not concentrated their attention on ensuring that responsible facilities contractors appropriately applied Department's deadly force policy. Contractor officials charged with managing the security program had also not ensured correct knowledge of deadly force Federal regulations. For example, Federal officials did not ensure that the SPO deadly force training provided by SPR contractors would make certain that all SPOs uniformly understood the use of deadly force. Without improvements in the implementation of appropriate security practices, SPR lacks assurance that deadly force would be properly applied. Should SPOs act to apply their incorrect interpretation of deadly force rules, severe and unacceptable

consequences for personnel and the Department could occur. As such, a goal of ensuring that all SPOs thoroughly understand such rules is, in our opinion, an appropriate strategy at all SPR sites.

RECOMMENDATION

To help address the issue with the use of deadly force we identified in this report, we recommend that the Project Manager, Strategic Petroleum Reserve Project Management Office, ensure that all SPOs understand when it is appropriate to use deadly force.

**MANAGEMENT AND
INSPECTOR
COMMENTS**

The Project Manager, Strategic Petroleum Reserve Project Management Office, concurred with the recommendations in this report and considers the recommendation closed. Management indicated that had they taken corrective action to address the SPOs awareness of deadly force use and will continue with their intensive oversight and improvement efforts to ensure that each SPO fully understands when deadly force is justified. We consider management's comments and corrective actions responsive to our recommendation. Management comments are included in their entirety in Appendix 2.

Appendix 1

SCOPE AND METHODOLOGY

This inspection was primarily performed from May through September 2011 at the SPR Project Management Office, New Orleans, Louisiana; Bayou Choctaw, Louisiana; West Hackberry, Louisiana; Big Hill, Texas; and, Bryan Mound, Texas. Fieldwork for this inspection was also conducted in August 2010 and then placed in suspension due to resource constraints until May 2011. This was a follow-up performance inspection to our previous report on "[*Review of Security at the Strategic Petroleum Reserve*](#)," (DOE/IG-0693, June 2005), which also included information from an Office of Inspector General (OIG) Hotline allegation. Given the past security concerns, the recent complaint and the importance of maintaining effective security, we initiated this inspection to determine if SPR had improved selected aspects of its security and to assess the facts and circumstances surrounding the allegation. To accomplish the inspection objective, we:

- Reviewed and analyzed the SPR response and corrective actions related to the previous OIG report recommendations in the Departmental Audit Report Tracking System;
- Reviewed and analyzed Federal regulations, Departmental directives, and other guidance pertaining to deadly force, HSPD-12 badges and an Office of Health, Safety and Security inspection report; and,
- Interviewed Federal and Contractor staff at the SPR to review changes and improvements to physical security, procedures and training, including 36 SPOs.

We conducted this performance inspection in accordance with the Council of the Inspectors General on Integrity and Efficiency's *Quality Standards for Inspection and Evaluation*. Those standards require that we plan and perform the inspection to obtain sufficient, appropriate evidence to provide a reasonable basis for our results of inspection based on our objective. We believe the evidence obtained provides a reasonable basis for our results based on our inspection. The inspection included tests of controls to comply with laws and regulations to the extent able to satisfy the inspection objective. Because our review was limited, it would not necessarily have disclosed all internal control deficiencies that may have existed at the time of our inspection. Also, we assessed SPR's compliance with Government Performance and Results Act

Appendix 1 (continued)

of 1993 (GPRA) and found that performance measures had been established relating to security management. Based on the information provided by the Department, we determined that SPR met their 2010 GPRA metric for security management. Specifically, the contractor assurance program regarding security was awarded a score of 100 by SPR. We noted that the Performance Fee Board Report identified opportunities for improvement at Big Hill and West Hackberry regarding design efforts for security upgrades. Finally, we relied on computer processed data to some extent to satisfy our objective related to security management. We also relied on the data from a Federal database report to quantify the number of personnel that had requested and obtained an HSPD-12 background investigation. We confirmed the validity of such data, as appropriate, by conducting interviews and reviewing source documents.

Management waived the Exit Conference.

MANAGEMENT COMMENTS



Department of Energy
Strategic Petroleum Reserve Project Management Office
900 Commerce Road East
New Orleans, Louisiana 70123

October 7, 2011

MEMORANDUM FOR: Sandra Bruce
Assistant Inspector General for Inspections
Office of the Inspector General

FROM: William C. Gibson, Jr. *William C. Gibson, Jr. 10/7/11*
Project Manager
Strategic Petroleum Reserve Project Management Office

SUBJECT: Management Response to Office of Inspector General's
Draft Inspection Report "Follow-up Review of Security at
the Strategic Petroleum Reserve" (OIG Job Number
S10IS014)

The Project Management Office welcomes the opportunity to review the Office of the Inspector General's Draft Inspection Report "Follow-up Review of Security at the Strategic Petroleum Reserve." We appreciate the thorough review of the extensive corrective actions taken in response to the June 2005 Review of Security at the Strategic Petroleum Reserve (DOE/IG-0693). The corrective action the SPR implemented in response to the June 2005 findings were designed to fully address the issues identified in that review.

The Draft Report largely confirms the effectiveness of the corrective actions to improve SPR's processes regarding:

- the insider threat
- deadly force authorities
- protective force performance test realism
- comprehensive security reviews, and
- SPO performance testing programs.

We concur with the Report's recommendation that the "Strategic Petroleum Reserve require that all SPR facilities ensure that all protective force members understand when it is appropriate to use deadly force."

Sandra Bruce
Assistant Inspector General for Inspections
Office of the Inspector General

2

Our robust oversight program requires both compliance and performance assurance. It provides each Security Police Officer-1 (SPO-1) with 31 hours and each SPO-2 with over 50 hours of training on the “use of deadly force” annually. The total training package costs approximately \$196,000 annually, and this training is documented in a Training Approval Program (TAP) plan that is submitted to the DOE National Training Center (NTC) for approval. NTC approved the most current TAP in March 2011.

The SPR oversight program also includes the semiannual weapons qualification training that covers the “use of deadly force.” This weapons qualification training is conducted at Camp Beaugard or other approved locations.

The Force-on-Force exercise is an annual training requirement for every protection force officer that stresses the officer’s ability to make “deadly force” decisions under contingency conditions.

Although the Wackenhut Security Protection Force Management Office and DM Petroleum Operations Security Program Office conduct Organizational Assessments and Self-Assessments of the protection force annually, the SPR Project Management Office Security and Emergency Operations Division (SEOD) also conducts security surveys at each site annually. During the course of the security surveys at all five sites, SEOD conducts protection force officer performance tests on the “rules of engagement,” “access control,” and “response to emergencies,” which are all critical elements of the “use of deadly force.”

Accordingly, we will continue with our intensive oversight and continuous improvement efforts to ensure that through annual training, daily shift change briefings, force-on-force exercises, and other creative approaches that each SPO fully understands when deadly force is justified.

We consider this recommendation closed as of the date of this response.

CUSTOMER RESPONSE FORM

The Office of Inspector General has a continuing interest in improving the usefulness of its products. We wish to make our reports as responsive as possible to our customers' requirements, and, therefore, ask that you consider sharing your thoughts with us. On the back of this form, you may suggest improvements to enhance the effectiveness of future reports. Please include answers to the following questions if they are applicable to you:

1. What additional background information about the selection, scheduling, scope, or procedures of the inspection would have been helpful to the reader in understanding this report?
2. What additional information related to findings and recommendations could have been included in the report to assist management in implementing corrective actions?
3. What format, stylistic, or organizational changes might have made this report's overall message more clear to the reader?
4. What additional actions could the Office of Inspector General have taken on the issues discussed in this report which would have been helpful?
5. Please include your name and telephone number so that we may contact you should we have any questions about your comments.

Name _____ Date _____

Telephone _____ Organization _____

When you have completed this form, you may telefax it to the Office of Inspector General at (202) 586-0948, or you may mail it to:

Office of Inspector General (IG-1)
Department of Energy
Washington, DC 20585

ATTN: Customer Relations

If you wish to discuss this report or your comments with a staff member of the Office of Inspector General, please contact Felicia Jones at (202) 253-2162.

This page intentionally left blank.

The Office of Inspector General wants to make the distribution of its reports as customer friendly and cost effective as possible. Therefore, this report will be available electronically through the Internet at the following address:

U.S. Department of Energy Office of Inspector General Home Page
<http://energy.gov/ig>

Your comments would be appreciated and can be provided on the Customer Response Form.