

AUDIT  
REPORT

TRANSPORTATION SAFEGUARDS  
DIVISION COURIER WORK  
SCHEDULES AND ESCORT  
VEHICLE REPLACEMENTS



DECEMBER 1998

U.S. DEPARTMENT OF ENERGY  
OFFICE OF INSPECTOR GENERAL  
OFFICE OF AUDIT SERVICES

MEMORANDUM FOR THE MANAGER, ALBUQUERQUE OPERATIONS OFFICE

FROM: Lawrence R. Ackerly  
Regional Manager, Western Regional Audit Office  
Office of Inspector General

SUBJECT: INFORMATION: Audit Report on "Transportation Safeguards Division Courier Work Schedules and Escort Vehicle Replacements"

BACKGROUND

The Office of Inspector General's (OIG) April 1995 report, *Audit of Transportation Safeguards Division Couriers' Work Schedules*, found that couriers received too much overtime and incurred too much unproductive time. This finding occurred because the Transportation Safeguards Division (TSD) employed a traditional work schedule that did not meet the demands of the job. The report recommended implementing an alternative work schedule that corresponded more closely to the couriers' actual work requirements. Management agreed to conduct a comparative analysis of work schedules to evaluate potential savings. The objectives of this audit were to (1) follow up on actions taken as a result of the OIG's previous report, (2) determine if courier work schedules are cost effective, and (3) determine the cost effectiveness of escort vehicle replacements.

RESULTS OF AUDIT

Since April 1995, TSD has enhanced management controls but did not implement alternative work schedules. Consequently, the couriers still incurred more overtime and unproductive time than necessary. Implementation of an alternative work schedule could reduce overtime by as much as \$1.7 million annually and also reduce unproductive time. Further, TSD also needs to examine Southeast section's staffing in relation to the workload requirements in the respective vicinity. Also, TSD erroneously paid couriers about \$130,000 annually for time spent commuting between their temporary duty station and lodging. We identified a potential problem with replacements of escort vehicles on which management has initiated corrective actions. Therefore, this issue was detailed in the "Other Matters" section of the report. We recommended (1) implementing an alternative work schedule for couriers which would achieve savings in overtime and unproductive time, while efficiently and cost effectively fulfilling TSD's mission; (2) reexamining and adjusting the staffing level of each courier section in relation to the workload requirements in the area; and (3) discontinuing payment for travel time between courier lodging and temporary duty stations.

MANAGEMENT REACTION

The Albuquerque Operations Office agreed with our findings and recommendations.

# **TRANSPORTATION SAFEGUARDS DIVISION COURIER WORK SCHEDULES AND ESCORT VEHICLE REPLACEMENTS**

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# OVERVIEW

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## INTRODUCTION AND OBJECTIVE

The Albuquerque Operations Office (Operations Office) established the Transportation Safeguards Division (TSD) in 1975. In Fiscal Year (FY) 1997, TSD employed 237 nuclear material couriers who act as Special Agents in transporting nuclear weapons, components, and material for the Department of Energy (DOE). The couriers are divided into three sections located in Albuquerque, NM (Albuquerque); Amarillo, TX (Pantex); and Oak Ridge, TN (Southeast). The sections are further divided into units consisting of about 30 to 37 couriers. The Pantex section has 3 units, whereas the Albuquerque and Southeast sections have 2 units each.

In April 1995, the Office of Inspector General (OIG) issued a report, *Audit of Transportation Safeguards Division Couriers' Work Schedules* (WR-B-95-05), that concluded that couriers received too much overtime and incurred too much unproductive time each pay period. The principal reason for that finding was that TSD used an 8-hour, 5-day, 40-hour a week work schedule (traditional schedule) that did not meet the demands of the job. The report recommended that TSD implement an alternative work schedule that corresponded more closely to the couriers' actual work requirements. Management agreed to conduct a comparative analysis of work schedules to evaluate potential savings.

The objectives of this audit were to (1) follow up on actions taken as a result of the OIG's previous report, (2) determine if courier work schedules are cost effective, and (3) determine the cost effectiveness of escort vehicle replacements.

## CONCLUSIONS AND OBSERVATIONS

In response to the prior audit, TSD enhanced management controls over the traditional schedules but did not implement an alternative work schedule for the couriers. The improved management controls reduced average overtime from 39 to 27 hours per pay period and reduced unproductive time from 22 to 13 hours per pay period. Despite these improvements, couriers still received more overtime and incurred more unproductive time than necessary. Our analysis showed that Federal regulations allow for the use of alternative work schedules to fit the demands of the job where traditional schedules are inefficient or ineffective. It also showed that if TSD used an alternative schedule, the couriers' work would more closely fit the demands of the job. Thus, the costs of overtime could be reduced by as much as \$1.7 million annually and unproductive time would also be reduced.

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Courier work requirements in the vicinity of the Southeast section has declined over the years without a corresponding reduction in the number of couriers at this location. TSD needs to further examine the Southeast section's staffing in relation to the workload requirements in that area.

Additionally, TSD erroneously paid couriers for time spent commuting between their temporary duty station and temporary lodging. According to the Office of Personnel Management (OPM) and Comptroller General Decisions, time spent commuting should not be considered hours of work. Payments of such costs total about \$130,000 annually.

Between December 1995 and February 1996, TSD acquired 30 escort vehicles and 14 of these remained virtually unused as of July 1998. The criteria used by TSD for vehicle replacement was date purchased rather than a combination of time and mileage on the vehicle. The vehicle tracking system used by TSD did not include the date vehicles were actually put into service. Subsequently, TSD modified its tracking system to include date-placed-in-service and has agreed to modify its replacement criteria. The reason for the delay in placing the last 14 vehicles in service was because of a security modification needed on all vehicles. A more detailed discussion of this subject is included in the "Other Matter" section of the report.

Since the first finding is a repeat finding, the OIG believes that it represents a material internal control weakness within DOE that should be considered when preparing the yearend assurance memorandum on internal controls.

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Office of Inspector General

## **COURIER WORK SCHEDULES**

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### **Excessive Overtime And Unproductive Time**

When TSD couriers prepare for or embark upon a trip, train to maintain proficiency as a Special Agent, or perform other assigned duties they are considered to be performing productive work. Conversely, when couriers are not performing one of the duties described above, they are considered to be unproductive. When a courier is assigned to a trip, it may last from 1 to 14 days with the average being about 4 days. For all hours of duty beyond 8 hours per day, the courier is paid overtime. If the courier leaves or returns from a trip on a weekend or holiday, time is likewise recorded as overtime. Therefore, a degree of overtime is expected to occur in performing the job of a TSD courier.

Although TSD reduced overtime and unproductive time since our previous audit, its couriers still earn more overtime and incur more unproductive time than necessary. Currently, those couriers who routinely traveled earned an average of 27 hours of overtime per pay period (every 2 weeks) and were paid for about 13 hours of unproductive time during the same period of time. In total, TSD incurred about 180,000 hours of overtime and about 73,000 unproductive hours in FY 1997.

The couriers in the Southeast section generally earn more overtime per trip and incur more unproductive time per pay period than their coworkers in the other two courier sections. That occurs in spite of the fact that the Southeast couriers spend only about 39 percent of their time on trips compared to almost 60 percent for the other two sections. Couriers assigned to the Southeast section took fewer trips because most destinations are in Western states which are more easily accessible to the other 2 courier sections. When the Southeast couriers are assigned, however, these trips last longer, which in turn increases the amount of overtime earned per trip. Because the Southeast couriers go on fewer trips, they also incur more unproductive time -- 18 percent versus 10 percent for the other sections.

A Review Group commissioned by Defense Programs also found that TSD couriers had extensive overtime. Its final report showed that couriers boost their earnings by 60 percent over their base salary with overtime pay. Consequently, the Review Group felt that overtime use should be examined.

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**Alternative Work Schedules Available**

DOE Orders require Federal managers to take systematic and proactive measures to establish appropriate management controls. Developing work schedules that reduce overtime and unproductive time and that match work requirements to human resources are ways managers can fulfill these responsibilities. In fact, Federal regulations allow managers to use alternative work schedules for jobs when traditional schedules are inefficient and ineffective. As part of an effort to publicize alternative work schedules, OPM issued a handbook which described various types of work schedules. These alternative work schedules vary in their degree of flexibility. The flexibility ranged from those that required employees to work during certain bands of time to those that only required employees to work 80 hours in a pay period without limits on the number of hours each day.

**Traditional Work Schedules Do Not Fit Requirements**

TSD continued to use the traditional 40-hour per week work schedule for couriers and paid its couriers overtime when they worked more than 8 hours a day or when they worked on weekends. Thus, the job requirements of a courier did not closely match the work schedule used by TSD. For instance, if couriers depart on a 4-day trip on Wednesday, they were still expected to report to work on Monday and Tuesday even if they did not have any work assignment. As a result, their time on the first 2 days of the week may be unproductive, yet later in the week, they could earn overtime for the hours that exceeded 8 per day.

Since the courier's primary responsibility is focused on trips involving the transport of nuclear materials, courier work hours should be centered around the trip rather than a traditional work schedule. Further, since trips are generally scheduled 2 weeks in advance, TSD could plan couriers schedules to minimize overtime and unproductive time if an alternative work schedule was used.

Among the possible alternative work schedules available are maxiflex, variable day, and first-40. The maxiflex system is the most flexible alternative because it allows employees to work 80 hours in less than 10 days every 2 weeks. The variable day system allows employees to work 40 hours in a week and vary the length of their day within limits. Finally, the first-40 system allows employees to be paid straight time for the first-40 hours they work and overtime for all additional hours. However, the first-40 option only produces substantial savings if couriers are required to come to work only when they have productive work scheduled. We discussed these options with a work schedule researcher and were told that the right work schedule can improve

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general job satisfaction and productivity, whereas inappropriate work schedules can be detrimental. According to the researcher, the right work schedules can improve employees' quality of life. Also, in responding to our draft report, Operations Office management agreed that the implementation of an alternative work schedule has the potential to reduce the amount of overtime and further reduce unproductive time.

Another factor which contributed to the excessive overtime and unproductive time was that the number of couriers assigned to the Southeast section had not been fully adjusted to fit the workload requirements. The workload for couriers in proximity of the Southeast section has declined over the years. TSD records show that over the last 2 years, couriers traveled to only 7 sites east of the Mississippi River and 21 sites west of the River. Of 28 travel destinations in FY 1997, 9 are over 2000 miles from the Southeast section. Due to distances from travel destinations, Southeast couriers earned the most overtime per trip -- an average of almost 700 hours per trip versus less than 600 hours per trip for the other 2 sections. TSD has made some efforts to correct this situation. For example, over the past year, TSD transferred 9 couriers from the Southeast section to the Albuquerque section. Further courier reductions in the Southeast section are planned by the end of FY 2000. Although further reductions are planned, TSD needs to more aggressively assess workload requirements in the vicinity of the Southeast section to ensure efficient staffing of this section.

### **Alternative Schedules Can Achieve Savings**

We analyzed the use of different alternative work schedules and determined that if the maxiflex schedule is used, TSD can save as much as \$1.7 million annually in overtime pay and reduce the amount of unproductive time. Savings are also achievable with other schedules but not to the same extent. Finally, TSD may achieve reductions in overtime and unproductive time through realignment of couriers among the 3 courier sections.

TSD officials expressed concern that if an alternative schedule is used, couriers may not use their annual and sick leave to avoid unproductive time. Thus, there may be a need to hire additional personnel. We examined this issue and found some basis for management's concern. However, we believe that the need for additional personnel will be minimal. Instituting an alternative work schedule that guarantees 80 hours over a 2-week period based primarily on productive work should significantly reduce unproductive time.

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hours over a 2-week period based primarily on productive work should significantly reduce unproductive time.

## **RECOMMENDATIONS**

We recommend that the Manager, Albuquerque Operations Office, require the Director of TSD to:

1. Implement an alternative work schedule for couriers which would achieve savings in overtime and unproductive time while efficiently and cost effectively fulfilling the TSD mission.
2. Reexamine and adjust the staffing level of each courier section in relation to the workload requirements in the area.

## **MANAGEMENT REACTION**

The Operations Office concurred with the recommendations and stated that TSD has made progress in reducing the amount of overtime and unproductive time.

In responding to the first recommendation, the Operations Office noted that TSD has made progress in reducing the amount of overtime and unproductive time. Further, the implementation of an alternative work schedule (1) has the potential to reduce the amount of overtime and further reduce unproductive time and (2) is in line with governmental initiatives in the area of family friendly work schedules and comments received from Headquarters Defense Programs. The Operations Office has tasked a compensation team with the development and implementation of an alternative work schedule. The compensation team will require a 9-month period to develop the "right" work schedule. TSD is also evaluating a 6-month trial work and training schedule and a rotational duty schedule to determine if unproductive time can be further reduced.

In responding to the second recommendation, the Operations Office stated that TSD has been proactive in this area by continually evaluating their resource requirements and will continue to evaluate and adjust manpower as necessary. TSD plans to further reduce staffing of the Southeast section to one unit by the end of FY 2000.

The Operations Office partially concurred with the estimated savings saying that the final decision on which work schedule is most suited for implementation will ultimately determine the overall cost savings.

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The Operations Office also provided comments on unproductive time which are addressed below.

## **AUDITOR COMMENTS**

Management's response meets the intent of the recommendations. We applaud management's decision to assign a team to develop and implement a new alternative work schedule. We recognize that alternative work schedule development is a time consuming process and believe that 9 months is reasonable. The results of TSD's 6-month and 9-month evaluations should be closely coordinated to determine the most efficient and cost effective schedule to achieve TSD's mission.

We changed the wording of the example in the first full paragraph on page 4 to "may be unproductive" to avoid any implication that the first two days of the week would always be unproductive. This is an example of what could happen.

In rechecking the number of hours of unproductive time per pay period, source documents showed that this average is about 13 hours per pay period or about 6.5 hours per week. The report has been changed to reflect the new figure. The Operations Office cited two studies in an attempt to explain unproductive time. We believe that 73,000 hours of paid unproductive time is more than should be incurred. The number of hours of unproductive time identified during the audit did not include paid administrative leave provided by TSD when a trip ends after midnight. Better scheduling and better planning are the key ingredients to a more efficient operation.

## **WAGES FOR COMMUTING**

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### **Wages For Travel To And From Temporary Duty Locations**

TSD paid couriers for the time spent traveling to and from temporary lodging locations. Couriers may travel up to 36 hours before having an overnight rest stop. Prior to making an overnight rest stop, the couriers will secure their vehicles and cargo at a Government location. This should be the end of the couriers' workday. However, TSD included the travel time to and from the temporary lodging as part of the workday.

Travel to and from temporary duty locations is similar to commuting to and from an employees' home. Title 5 of the U.S. Code states that commuting time between lodging and temporary duty locations is not duty time unless it (1) involves the performance of work, (2) is under arduous conditions, or (3) could not be scheduled or controlled administratively. The Comptroller General of the United States has also ruled that, in order to be arduous, the travel must be over unusually adverse terrain during severe weather conditions, or to remote barely accessible facilities by foot, horseback, or truck. Furthermore, neither the time at which travel is performed nor the amount of time spent traveling makes the conditions arduous.

### **Paying For Travel Time Is A Long Standing Practice**

TSD personnel pointed out that the payment of travel time to and from temporary lodging is a long-standing practice. Furthermore, TSD personnel referenced an April 1976 Federal Personnel Manual System Letter as support for this practice. In examining TSD's documentation, we found that letters issued by both the Energy Research and Development Administration in July 1976 and the United States Civil Service Commission in March 1977 related to the issue. Both letters stated that travel to and from temporary lodging would not be considered hours of work and would be equivalent to commuting to work. Despite these rulings, TSD continued to pay couriers for the time spent traveling to and from temporary lodging.

### **Funds Unnecessarily Spent**

As a result of TSD's practice of paying for this commuting time, TSD unnecessarily overpaid its couriers by about \$130,000 annually. to a more efficient operation.

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**RECOMMENDATION**

We recommend that the Manager, Albuquerque Operations Office, require TSD to discontinue paying couriers for travel time between their lodging and temporary duty locations.

**MANAGEMENT  
REACTION**

The Operations Office concurred with the recommendation and cost savings. TSD will brief all of its personnel on the finding that the policy of paying for commuting time is not allowable. The practice will be discontinued by the week of November 12, 1998.

**AUDITOR COMMENTS**

Management's comments are responsive to the recommendation.

## **OTHER MATTERS**

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Through its normal vehicle replacement process, TSD purchased and took delivery of 30 escort vehicles between December 1995 and February 1996. As of April 1998, however, 14 of the 30 vehicles had neither undergone required modifications nor been placed into service. During the almost 2.5 years since delivery of the 14 vehicles, each vehicle accumulated less than 1 mile per month.

The 14 new escort vehicles were not modified for service in a timely manner. This delay was in part caused by a decision in 1996 to perform a security modification on all existing vehicles, including the new ones. Consequently, TSD did not start modifying the 14 vehicles until May 1998. The last few of the 14 vehicles are scheduled to be placed into service in October 1998 -- almost 3 years after they were received.

In researching this matter, we determined that TSD was using only date purchased as a basis for purchasing replacement escort vehicles. TSD's planning guidance in effect in December 1995 called for replacing escort vehicles every 4 years or 150,000 miles. (The guidance has since been revised to 6 years or 200,000 miles.) We examined the age and mileage of the escort vehicles replaced by 1996 Ford vans and found that none of the vehicles met the mileage threshold. We discussed this with TSD officials and were told that, in fact, they only considered the age of the vehicles (based on date-of-purchase) and the availability of funds. Further discussion showed that TSD's Tracking Assets Inventory and Maintenance System did not include the date vehicles are actually placed into service. During the audit, TSD modified its tracking system to include date placed-in-service and has agreed to modify its replacement criteria. Thus, we are making no recommendations at this time.

## Appendix 1

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### SCOPE

The audit was performed at Transportation Safeguards Division, Albuquerque, New Mexico, from March 1998 to September 1998.

### METHODOLOGY

To accomplish the audit objective, we:

- obtained and examined TSD's *First Forty Comparative Study* and supporting documentation;
- interviewed current and former TSD personnel;
- reviewed trip reports, time schedules, and payroll records for the Albuquerque, Pantex, and Southeast courier sections for the period July through September 1997;
- interviewed personnel with the Texas Motor Transportation Association; New Mexico Motor Carriers Association; J. B. Hunt Transport, Inc.; Compensation Administration Division, U.S. Office of Personnel Management; Albuquerque Police DOE; Albuquerque Fire DOE; Burlington Northern Santa Fe Railroad; Airline Pilots Association; and Mason & Hanger, Silas-Mason Co. (Pantex Plant);
- interviewed a professor of Industrial Psychology, who is the Director of the Ergonomics Laboratory, University of Connecticut, Storrs, CT;
- interviewed the president and chief executive officer of Circadian Technologies, Inc., Cambridge MA, and reviewed his report, *Development of Criteria to Assess Adequacy of Time Available for Sleep in U.S. Department of Energy Transportation Safeguard Division Courier Trip Schedules*;
- obtained and reviewed the Department of Energy TSD Review Group's final report, *PSR Report 2772*; and
- reviewed documentation related to the purchase and use of escort vehicles.

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The audit was conducted 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 objective of the audit. 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 rely extensively on computer processed data and, therefore, did not fully examine the reliability of that data.

We discussed the findings with TSD managers on September 18, 1998. The Operations Office waived the exit conference.

## Appendix 2

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# memorandum

Albuquerque Operations Office

DATE October 27, 1998

REPLY TO TSD

SUBJECT: AL's Comments on the OIG's Official Draft Report: Audit of Transportation Safeguards  
Division Courier Work Schedules and Escort Vehicle Replacements A98AL002

TO Ray B. Richardson, Team Leader, Albuquerque Audit Group, OIG

Attached are our comments and position on the report finding and recommendation

If you have any questions on this matter, please contact Debby Miller at

(505) 845-6692

/s/

Buce G Twining  
Manager

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Department of Energy  
Albuquerque Operations Office  
Position on Office of Inspector General  
Official Draft Report of Recommendations  
Audit of Transportation Safeguards Division  
Couriers' Work Schedules

**Recommendation No. 1**

We recommend the Manager, Albuquerque Operations Office require the Director of TSD to implement an alternative work schedule for couriers which would achieve savings in overtime and unproductive time, while efficiently and cost-effectively fulfilling the TSD mission.

**AL's Position**

**Concur.**

The Transportation Safeguards Division (TSD) has made progress in reducing the amount of overtime and unproductive time. The implementation of an alternative work schedule has the potential to reduce the amount of overtime and further reduce unproductive time. The implementation of an alternative work schedule is in line with governmental initiatives in the area of family friendly work schedules and comments received from the Headquarters Defense Program independent audit of the TSD.

The implementation of a new work schedule requires a significant effort on the behalf of the TSD and AL Human Resources Division. A compensation team which includes members of both organizations has been formed. The development and implementation of an alternative work schedule will be tasked to the team which is currently working other courier compensation issues. The development and

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implementation of the alternative work schedule will require extensive research, documentation and training. As indicated in the IG report "the right work schedule can improve general job satisfaction and productivity, whereas inappropriate work schedules can be detrimental." The compensation team will require a nine month period to develop the "right" work schedule.

**Cost Savings:**

**Partially Concur.**

The final decision on which work schedule is most suited for implementation will ultimately determine the overall cost savings. The projections are based on a review of potential schedules which may not be conducive to the efficient operations of the TSD. The estimated cost savings are based on a historical statistical sampling that may not accurately depict the actual future savings. The nature of the operation is not static. Changes in shipping schedules and the locations involved are dynamic and constantly changing. Trip length, training schedules and other dynamics of an operational unit complicate the task of anticipated savings.

TSD is developing a trial work and training schedule which will be more conducive to assignment of duties and further reduce the amount of unproductive time. The current system assumes that all units are available for all activities to include shipments and training. The TSD is developing a rotational duty status for evaluation to determine if unproductive time can be further reduced by identifying when personnel will be in training or travel status. The trial schedule will be implemented in December

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1998, and evaluated for effectiveness six months following implementation. Although not measured in dollars the reduction of unproductive time will result in savings to the government.

AL concurs that the potential exists for a savings. Since the projected savings do not include further reduction of unproductive time and are based on analysis of historical data, the final savings may not fall within the projections

The TSD will conduct a 6-month study to determine the effectiveness the unit training and work schedule and report on the effectiveness of the system in reducing unproductive time. Implementation of a new work schedule will show savings in overtime costs which will be documented.

**Recommendation No. 2**

Reexamine and adjust the staffing level of each courier section in relation to the workload requirements in the area.

**AL's Position:**

**Concur.**

The TSD has been proactive in this area by continually evaluating the resource requirements to efficiently manage TSD operations. The TSD will continue to evaluate and adjust manpower as necessary.

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**Recommendation #3:**

We recommend that the Manager, Albuquerque Operations Office require TSD to discontinue paying couriers for travel time between their lodging and temporary duty locations.

**AL's Position:**

**Concur**

The TSD will brief all personnel on the finding by the IG and validation by AL HRD that the policy of paying for commuting time is not allowable. The practice will be discontinued by the week of November 12.

**Cost Savings:**

**Concur**

**Report Comments:**

The OIG correctly identifies that “courier work requirements in the vicinity of the Southeastern Section has declined over the years without corresponding reduction in the number of couriers at this location”.

The TSD has recognized this as an issue and has been proactive in this area. The number of units at the SCS have been reduced from three units in 1993 to the current two with plans to further reduce to one unit. Personnel have been transferred to those units at Albuquerque Courier Section and Pantex Courier Section, which were short of personnel. The process will continue based upon the decrease

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in workload, retirements, etc. This is in line with the plan to downsize the section to one unit by the end of FY-2000.

The IG implies in COURIER WORK SCHEDULES paragraph 6, last sentence: "As a result, his time on the first 2 days of the week would be unproductive". This sentence assumes that there will be no work performed on the first two days in the week which is not the case.

The report correctly identifies that management controls have reduced "unproductive" time. According to the analysis current "unproductive" time amounts to only five hours per week. The high stress, physically demanding positions can not be compared to sedentary office positions where every hour is accounted for as productive or unproductive time. According to a sleep study conducted in 1985 by Moore-Ede Associates, Inc, "prolonged experience with unusual hours of work makes coping (with unusual hours of work) more difficult, rather than less, (i.e., the physiological systems involved do not 'learn' to cope)." The Courier requires this time to adjust or cope, reported as "unproductive" time, in the office setting to recover from the continual travel, and psychologically readjust prior to the next trip assignment. A 1993 study conducted by the Institute of Aerobics recommended "A schedule allowing four (4) days minimum between trips would allow at least two (2) days for training (with one day rest in between) at the section." This one day of rest would equate to eight hours vs. the five hours identified by the OIG.

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