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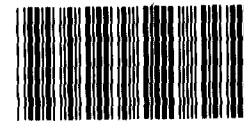
GAO

Report to the Chairman, Subcommittee
on Oversight and Investigations,
Committee on Energy and Commerce,
House of Representatives

October 1992

NUCLEAR SECURITY

Safeguards and Security Planning at DOE Facilities Incomplete



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B-249547

October 30, 1992

The Honorable John D. Dingell
Chairman, Subcommittee on
Oversight and Investigations
Committee on Energy and Commerce
House of Representatives

Dear Mr. Chairman:

On March 5, 1991, you requested that we evaluate the Department of Energy's (DOE) ability to plan for safeguards and security at numerous sensitive facilities and sites around the country. Significant weaknesses in protection measures at DOE's sensitive nuclear weapons facilities, including inadequately trained guard forces, came to national attention in the early 1980s. In response, in 1988 DOE implemented a comprehensive planning process. This process required that detailed security plans be developed for each of DOE's sensitive facilities—facilities having national-security-related functions. In addition, the process required the development of security plans for the geographical areas or sites surrounding these facilities.¹

As agreed with your office, this report focuses on the status of DOE's planning process for the agency's most sensitive facilities and sites. Specifically, we examined (1) the extent to which safeguards and security plans have been completed for sensitive facilities; (2) the extent to which such plans have been completed for the areas, or sites, surrounding these facilities; and (3) recently proposed modifications to DOE's safeguards and security planning process.

Results in Brief

As of September 1992, DOE had not completed safeguards and security plans for 15 of its 27 sensitive facilities. At the 12 facilities where plans were complete, the planning process often identified significant vulnerability to theft or sabotage; and, according to DOE officials, it is likely that additional vulnerabilities will be identified during preparation of plans for the remaining 15 facilities. However, many of the plans may not be completed for some time because vulnerability assessments, which analyze existing protection measures, remain unfinished for 8 of the 15 facilities. The reasons DOE field and headquarters officials most often cited for not completing the plans were (1) insufficient field office and

¹The precise geographical area, or site, included for planning purposes is determined by the responsible DOE field office.

headquarters staff to adequately support the planning effort and (2) evolving program guidance from DOE headquarters throughout the planning process.

Also, as of September 1992, DOE had not completed safeguards and security plans for overall protection at 22 of the 27 sites surrounding each of the sensitive facilities. Many of these plans have been in process for years and, because they incorporate the sensitive facility plans, will continue in process until the sensitive facility plans are completed. DOE's Office of Safeguards and Security (OSS) considers six of these sites with unfinished plans to be very important because of the number of weapons and the amounts of special nuclear material located there.

DOE has proposed modifying its existing safeguards and security planning to streamline and improve the process. The proposals include combining the sensitive facility and site plans into one summary document and issuing a guide to facilitate the preparation of a single overall planning document. However, additional work will be required in completing the overall planning document that could complicate the process and delay completion of the security plans. Furthermore, the proposals do not address an underlying problem that has delayed completion of the security plans—lack of commitment at all levels within DOE to safeguards and security planning.

Background

DOE has major research, development, and production responsibilities for the nation's nuclear weapons programs and owns a broad spectrum of facilities around the country to carry out these responsibilities. DOE considers 27 of these facilities to be sensitive because they house special nuclear materials used in making nuclear weapons and components or have other key national-security-related functions. These facilities and the immediate geographical areas surrounding them are subject to special DOE safeguards and security planning requirements. The surrounding areas are called sites by DOE and are defined at the discretion of DOE field offices.² To avoid serious consequences that could result from acts of sabotage or diversion of materials into the hands of adversaries, DOE must have effective safeguards and security measures in place at these facilities and

²For example, according to an OSS official, DOE's Richland, Washington, field office defined the entire Hanford reservation as a site, surrounding the one sensitive facility located there—the plutonium finishing facility. On the other hand, DOE's Savannah River, South Carolina, field office defined several geographical areas within the overall site as "sites" for purposes of safeguards and security planning. These "sites" surround several sensitive facilities located on the overall Savannah River Site.

surrounding sites.³ However, DOE's safeguards and security measures have been criticized in the past. In 1982 and again in 1989, the House Subcommittee on Oversight and Investigations found that protecting its sensitive nuclear weapons facilities was not a high priority for DOE.

To improve its safeguards and security posture, DOE, in 1985, established a safeguards and security planning process with these key elements: First, DOE's field offices perform vulnerability assessments of the protection measures in place at a sensitive facility. This assessment is aimed at identifying weaknesses that need to be addressed. Second, the field offices develop two separate but related planning documents, a sensitive facility plan and a site plan. The sensitive facility plan (referred to by DOE as a master safeguards and security agreement) addresses weaknesses identified by the vulnerability assessment. This plan, which requires headquarters' approval, describes basic protection strategies at the facility as well as ways in which each weakness will be corrected. The site plan, prepared and approved by the field offices and subject to headquarters' review, describes the overall safeguards and security posture of the site surrounding the facility. The site plan incorporates information drawn from the sensitive facility plan, such as facility descriptions and operational plans, resources needed to address vulnerabilities, and protection measures.

Various DOE offices share responsibility for safeguards and security management and oversight, including plan preparation and review. Since 1988, DOE headquarters program managers and field office managers have been assigned line responsibility and accountability for implementing effective safeguards and security measures at DOE's facilities and sites. In addition, DOE's OSS is responsible for formulating safeguards and security policy guidance for DOE. This office reviews all the facility and site plans for compliance with DOE policy. The field offices, through their security survey and inspection effort, evaluate whether the protection measures in place comply with the basic safeguards and security policy requirements in DOE's orders. Finally, DOE's Office of Security Evaluations (OSE) provides independent assurance of the field offices' compliance with the order requirements through inspections and evaluations.

DOE's own evaluations have found that progress on completing safeguards and security plans has been slow. In 1990, OSE reported in its annual safeguards and security oversight report that the program line

³In this regard, DOE spends about \$1 billion a year to protect its nuclear weapons facilities from acts that could endanger the nation.

management had not sufficiently emphasized the safeguards and security issues encompassed by its program responsibilities. This issue was reiterated in its 1991 annual report when OSE pointed out that the sensitive facility plans, site plans, and vulnerability assessments remained problem areas because only a few facilities had approved plans with supporting vulnerability assessments. OSE also pointed out that field offices and headquarters often responded slowly with comments, validation, and approval for those plans that were submitted.

Status of DOE's Safeguards and Security Plans for Sensitive Facilities

Fewer than half of the safeguards and security plans have been completed for DOE's 27 sensitive facilities. DOE officials at headquarters and at field offices cited various reasons—such as lack of staff, evolving planning requirements, and changing facility missions—to explain why the plans have not been completed. According to OSS officials, because these plans, and many of their key supporting vulnerability assessments, are not completed, high-risk vulnerabilities may exist undetected at the facilities.

Status of the Plans

DOE headquarters first requested in 1985 that field offices voluntarily prepare sensitive facility plans. In 1988, DOE headquarters required that they be done, and in 1989, OSS set a target date of October 1990 for completing them. Nevertheless, as of September 1992, plans for 15 of DOE's 27 sensitive facilities were still unfinished, according to an OSS official. These plans are still being developed by the field offices, reviewed by headquarters, or revised by the field offices. (See app. I for details on the status of the unfinished plans.)

Many of these 15 unfinished sensitive facility plans may not be completed for some time because vulnerability assessments have not been completed by the field offices for 8 of the 15 facilities. These assessments form the essential support for each plan because they identify safeguards and security strengths and weaknesses at each facility and provide a measure of the risk associated with an attempted theft or sabotage at the facility, based on the identified vulnerabilities. As of September 1992, the eight unfinished vulnerability assessments had not been completed because they were still being prepared or validated by the field offices. Once completed, the vulnerability assessments must be reviewed and independently evaluated by DOE headquarters.

To ensure that its facilities are properly safeguarded, DOE needs both vulnerability assessments and sensitive facility plans. DOE's orders identify

the base level of protection with which the field offices must comply. The vulnerability assessments and sensitive facility plans identify and examine particular weaknesses in safeguards and security measures at the facilities. Without them DOE does not have the necessary assurance that the appropriate protection measures are in place. To illustrate this, at the 12 sensitive facilities for which DOE has completed plans to date, an OSS official told us that DOE had identified numerous high-risk vulnerabilities during the assessment process. The specific vulnerabilities identified are classified, but they generally dealt with situations in which unauthorized access to nuclear material would not be detected in a timely manner. For example, at two separate locations, the vulnerability assessment identified weaknesses in controlling access at a nuclear material storage facility and a nuclear weapons production facility. At another facility, the vulnerability assessment determined that the system used to detect anyone trying to sneak into the facility was not reliable. According to OSS officials, additional high risks are likely to be identified at other sensitive facilities as the remaining assessments and plans are completed.

Reasons Sensitive Facility Plans Have Not Been Completed

DOE headquarters and field office officials gave several reasons for the slow progress in completing plans. The reasons most often cited were (1) lack of field office and headquarters staff to adequately support the planning effort and (2) evolving program guidance throughout the planning process. DOE officials also cited as another reason the recent changes in the mission of some DOE facilities. However, an underlying cause has been DOE's lack of commitment to safeguards and security planning.

Staffing problems at both the field offices and DOE headquarters have affected the pace of safeguards and security planning. During the years, according to DOE officials, OSS has lacked sufficient qualified staff to develop detailed guidance on plan preparation or to review the plans in a timely manner. The current Director, OSS, said that before 1989, the OSS staff was preoccupied with preparing policy guidance documents and had only three staff members involved with reviewing the plans. OSS reorganized in 1990 and, as of May 1992, had about 13 staff members in two divisions providing assistance to the field offices. The Director told us that he believes an additional six staff members are needed to enable OSS to carry out its responsibilities.

Limited staffing has also posed a problem at the Savannah River field office—which has completed only one of the nine required plans for its

sensitive facilities. Officials there told us that just one field office and one contractor staff member were assigned to develop these plans during 1987 to 1990. They said that since then the contractor at the site has increased the staff to 29, including 12 subcontractor employees, who are responsible for preparing the safeguards and security plans.

DOE headquarters and field officials also said that program guidance from DOE headquarters was continually evolving during the planning process, contributing to the lack of progress. DOE's program guidance evolved between 1985 and 1992 from being rather sketchy to being elaborate and detailed. Officials at the Oak Ridge site said that the cumulative effect of the changing requirements and guidance, rather than any one change, delayed the planning process because it forced them to periodically regroup in response to the changes. For example, the changing requirements and guidance, along with local internal reviews, caused Oak Ridge to prepare four versions of the Y-12 Plant facility plan between 1987 and June 1992.

DOE field office officials also told us that recent mission changes affecting some of the facilities have delayed completing the required safeguards and security plans. Officials at one location told us that a facility was removed from the weapons material production program, but DOE headquarters was uncertain about the facility's role as a possible storage site for nuclear material. Until that decision was made, the field office delayed completing the safeguards and security plan for the facility.

In addition to these problems, an underlying reason that has contributed to delays in completing the sensitive facility plans has been DOE's lack of commitment to the safeguards and security planning process. In this regard, despite congressional attention focused on the process during the 1980s, DOE has allowed staffing problems related to safeguards and security planning to persist for years at headquarters and at the field level. Also, DOE program officials told us that unless OSS—or some other oversight group—identifies and documents significant vulnerabilities at a sensitive facility, they have no obligation to expedite the safeguards and security planning process. In addition, OSS' target completion dates for the plans were seldom met by the program offices. Furthermore, as discussed earlier in this report, in 1990 and 1991, DOE's OSE reported that line management had not sufficiently emphasized safeguards and security issues and that the safeguards and security planning process was slow.

Status of Site Safeguards and Security Plans

In addition to incomplete sensitive facility planning, more than three-fourths of the safeguards and security plans for the sites surrounding the sensitive facilities were not complete as of September 1992. The site plan incorporates the sensitive facility plan at a given location and is intended to summarize the overall safeguards and security posture of the location as well as aid in prioritizing corrective actions for weaknesses identified during the planning process. The primary reason these site plans are not finished is because their sensitive facility plans are unfinished.

DOE requires that a site plan be completed for the area surrounding a sensitive facility, according to an oss official. For planning purposes, DOE's field offices have discretion in defining the precise geographical area surrounding the facility to be considered as a site. Hence, DOE's field offices have determined that 27 site plans are to be prepared for the 27 sensitive facilities. As of September 1992, however, only five site plans were completed. According to an oss official, most of the unfinished site plans are awaiting completion of sensitive facility plans. According to this official, because the facility plan is the "driving force" of the safeguards and security planning process and is critical to the site plan, a field office cannot complete a site plan until the facility plan is completed and approved. Thus, unfinished facility plans prevent finishing the site plans.

oss has described six of the sites with unfinished plans as very important locations for protection because of the large quantities of weapons or nuclear material processed or stored there. They include Rocky Flats, Pantex, Y-12, Hanford, the Los Alamos National Laboratory, and a precise geographical area surrounding the FB-line operation at Savannah River (as defined by the Savannah River field office). Although oss has designated these as very important locations, five of the six site plans are still being developed by the field offices.

Proposed Modifications in Safeguards and Security Planning

DOE has proposed three modifications to streamline and improve its safeguards and security planning process. First, oss has proposed combining the sensitive facility and site plans into one overall summary document. Second, oss is issuing a guide to facilitate the preparation of the document. Third, the program offices are reorganizing to better monitor field offices' compliance with safeguards and security requirements. However, the field offices believe the modifications that oss has proposed will increase the amount of up-front vulnerability assessment work they must do to complete the plans and will delay their completion.

oss recently issued a draft safeguards and security order to the field offices and program offices for review and advance comment. Most importantly, the draft order combines DOE's existing requirements for the sensitive facility and site planning requirements into a single overall site plan containing detailed information for each sensitive facility. The order also sets specific time limits for completing the plans (180 days) and reviewing the plans (60 days). Furthermore, the order requires that vulnerability assessments cover some security areas, such as computer operations and technical surveillance countermeasures, that were not emphasized in the past. Officials at the three field offices we visited were unanimous in their belief that the proposed order represented a significant increase in the amount of work to develop the vulnerability assessments that form the basis for the facility and site plans and to obtain approval of the plans themselves. Although officials at the Richland field office believe that the existing planning process could and should be streamlined, it is their belief that emphasis should be placed on educating the field offices concerning the correct, or expected, usage of the existing safeguards and security planning process rather than imposing a new system.

Furthermore, officials at the program and field offices believed that the draft order's time limits were not realistic. One program official believed that the proposed preparation time of 180 calendar days was not realistic unless time needed to complete the vulnerability assessment work was not included. Another program official said that the proposed time of 60 calendar days to review the plans was adequate if it did not include the time needed to test the plan on-site or the time needed for field offices to respond to his review comments. The Savannah River Program Manager for Safeguards and Security Planning said that oss had not been able to quickly review material submitted in the past and would not likely do so in the future. Savannah River officials also pointed out in a memorandum to the Director, oss, that, in their opinion, organizing all these plans in a single volume within the time frames imposed would be resource-intensive and therefore not cost-effective. The Director, Defense Programs Office of Field Security Oversight, which is responsible for monitoring the field offices' efforts, believed that the time frames might be achievable if the planning process remained the same.

In addition to the draft order, oss has drafted a format and content guide for preparing the new site plan. The proposed guide places all DOE guidance in one document. With this single source document for plan preparation, oss intends to aid the field offices in plan preparation and minimize review and approval delays caused by incomplete or inadequate

information. The draft guide also describes the format the field offices should use in preparing the plan, as well as the content for each segment. The three field offices we contacted generally agreed that the proposals significantly increased the level of detail required for the planning document. For example, the Savannah River Program Manager for Safeguards and Security Planning commented that it would be difficult to complete their plans in a timely manner under the proposed format because the large number of sensitive facilities at the site would make one overall summary site plan too cumbersome. A DOE-Oak Ridge official told us that the contractor at Oak Ridge believed that the proposed guidance would cause extensive revisions of existing plans and program documents but could make future maintenance of the documentation easier.

OSS acknowledges some of the concerns expressed by the field offices but believes the proposals to be a refinement of requirements under DOE's existing order. According to OSS, the revised process has been reduced to the essential elements, mainly focusing on the vulnerability assessment. In this regard, OSS stated that OSS personnel will assist in overcoming any perceived obstacles to completing the plans under the revised process. In our view, while the overall impact of the modified planning process OSS has proposed is uncertain, implementation of the revised process could potentially further delay the completion of facility and site plans because it will require specific coverage of operational areas in vulnerability assessments that were not previously emphasized, such as computer operations and technical surveillance countermeasures. This work, along with format revisions required under the new process, could involve the field offices in time-consuming plan revisions.

In addition to the draft order and draft OSS guide, DOE has changed its safeguards and security management structure. Before 1991, DOE's program offices were not organized to provide line management monitoring of field offices' compliance with safeguards and security requirements. In 1991, the Secretary of Energy resolved the uncertainties between field office and headquarters program office relationships dealing with management oversight by specifically pairing program offices and field offices. After this, the Deputy Assistant Secretary for Defense Programs established the Office of Field Security Oversight to oversee operational safeguards and security activities at field office sites under his jurisdiction. One other program office, the Office of Environmental Restoration and Waste Management, has since established similar organizational links with its safeguards and security interests at the field offices.

DOE had not fully staffed these oversight offices at the time of our review. The Defense Programs Office of Field Security Oversight had seven staff members at headquarters, relying on OSS or contractors to provide the necessary additional staff for its oversight work. The Office of Environmental Restoration and Waste Management had a safeguards and security officer and, like Defense Programs, relied on OSS for the necessary staff to carry out its oversight duties. Defense Programs has been significantly involved in safeguards and security planning work since the summer of 1991, and the Savannah River field office believed it had expedited the review of the K-Reactor plan. Similarly, Oak Ridge believed the contributions of Defense Programs, while limited to date, were beneficial.

Conclusions

High-risk vulnerabilities may exist undetected at DOE field facilities because of ineffective DOE safeguards and security planning. Protection plans remain incomplete for many of DOE's sensitive facilities and most of its sites. Many of these plans have been in process for years. While DOE has cited various reasons—such as lack of staff or changes in mission—to explain why these plans have not been done, in our view the underlying problem is DOE's lack of commitment to the planning process. In this regard, DOE's planning process has been evolving since 1985. The Secretary made it clear in 1989 that headquarters program managers were responsible for implementing effective safeguards and security programs. Yet, we found that the basic form of the planning process was still not resolved. In addition, staffing problems have been allowed to persist at headquarters and in the field. Furthermore, DOE has not enforced compliance with OSS' target dates for completing the plans. OSE also pointed out the general lack of commitment to this planning by DOE's line management in OSE's 1990 and 1991 annual safeguards and security oversight reports.

According to DOE field officials, DOE's proposals to improve the process by requiring a new overall plan may actually further complicate the process. In their view, the modified planning process could further delay the safeguards and security plans because many plans now being prepared will have to be rewritten and because work required to develop vulnerability assessments will be increased. DOE's Office of Safeguards and Security acknowledges some of the concerns expressed by the field offices but believes that the new overall process will not be significantly more complicated. In our view, there is potential that implementation of the revised process could increase the amount of vulnerability assessment

work and thereby further delay the completion of plans. In this regard, because DOE has identified significant vulnerabilities through the existing planning process, we believe that it is important for DOE to complete the remaining sensitive facility plans, particularly at those sites OSS has identified as very important.

Recommendation

To ensure that safeguards and security planning is completed in a timely fashion, we recommend that the Secretary of Energy direct DOE's program offices to complete the facility plans on a priority basis. This may necessitate setting milestones and adjusting staffing levels at headquarters and in the field and delaying starting the new planning process.

Agency Comments

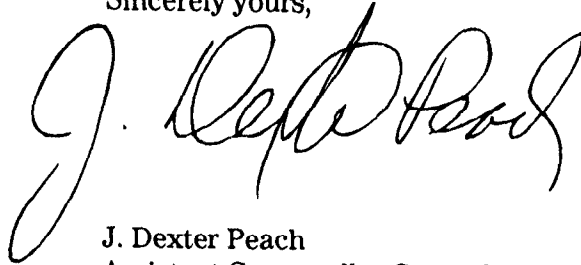
As agreed, we did not obtain written agency comments on a draft of this report. We did, however, discuss the facts presented with responsible DOE officials, including the Director, OSS, and incorporated their suggestions where appropriate. In general, these officials agreed with the facts presented. In commenting on this report, however, they stressed the progress that has been made in completing the sensitive facility plans. They pointed out that DOE's safeguards and security planning process continues to have senior management interest, as evidenced in reports of the status of safeguards and security submitted to the Secretary of Energy every 2 months. There was general agreement that the sensitive facility plans should be completed as soon as possible.

We performed our work from June 1991 to September 1992 in accordance with generally accepted government auditing standards. Appendix II provides a discussion of our objectives, scope, and methodology.

As arranged with your office, unless you publicly announce its contents earlier, we plan no further distribution of this report until 30 days from the date of this letter. At that time, we will send copies to the appropriate congressional committees; the Secretary of Energy; and the Director, Office of Management and Budget. We will also make copies available to others upon request.

This work was performed under the direction of Victor S. Rezendes, Director, Energy and Science Issues, who can be reached on (202) 275-1441 if you or your staff have any questions. Major contributors to this report are listed in appendix III.

Sincerely yours,

A handwritten signature in black ink, appearing to read "J. Dexter Peach". The signature is written in a cursive style with a large, looping initial "J".

J. Dexter Peach
Assistant Comptroller General

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Abbreviations

DOE	Department of Energy
GAO	General Accounting Office
OSE	Office of Security Evaluations
OSS	Office of Safeguards and Security

Status of Unfinished Sensitive Facility Plans

Facility (Field Office)	Status of plan
Los Alamos National Laboratory (Albuquerque)	Field office is developing the plan. Estimated completion date is June 1993.
Mound Plant (Albuquerque)	Headquarters is reviewing the plan. Estimated completion date is December 1992.
Rocky Flats Plant (Rocky Flats)	Field office is developing the plan. Estimated completion date not available.
L-Reactor (Savannah River)	Field office is reviewing contractor's plan. Estimated completion date is April 1993.
HB-Line/H-Canyon Operation (Savannah River)	Field office is revising plan based on headquarters review and comment. Estimated completion date is April 1994.
Tritium Facility (Savannah River)	Field office is reviewing contractor's plan. Estimated completion date is March 1994.
FB-Line/F Canyon Operation (Savannah River)	Field office is revising plan based on headquarters review and comment. Estimated completion date for the FB-Line part of the plan is May 1993, and for the FB-Canyon part February 1994.
235-F Area (Savannah River)	Field office is revising plan based on headquarters review and comment. Estimated completion date is November 1993.
247-F Area (Savannah River)	Field office is reviewing contractor's plan. Estimated completion date is September 1993.
321-M Area (Savannah River)	Field office will develop a plan based on new mission for facility. Presently on hold until FB-Line plan is completed. Estimated completion date is May 1994.
Intra-site Transportation (Savannah River)	Field office is developing the plan. Estimated completion date is November 1993.
K-25 Facility (Oak Ridge)	Headquarters is reviewing the plan. Estimated completion date is January 1993.
Portsmouth Gaseous Diffusion Plant (Oak Ridge)	Headquarters is reviewing the plan. Estimated completion date not available.
Y-12 Plant (Oak Ridge)	Headquarters is reviewing the plan. Estimated completion date is December 1992.
Plutonium Finishing Plant (Richland)	Headquarters is reviewing the plan. Estimated completion date not available.

Objectives, Scope, and Methodology

Objectives

As agreed with the requester, we focused our review on the status of recent Department of Energy (DOE) attempts to improve safeguards and security planning for its most sensitive facilities and sites. Specifically, our objectives were to determine (1) the extent to which safeguards and security plans have been completed for sensitive facilities, (2) the extent to which such plans have been completed for the areas, or sites, surrounding these facilities, and (3) the status of recently proposed modifications to DOE's safeguards and security planning process.

Scope

We visited the Office of Safeguards and Security; the Office of Security Evaluations; the Office of Field Security Oversight, Defense Programs; the Office of Environmental Restoration and Waste Management; and the Office of the Strategic Petroleum Reserve at DOE's headquarters offices in Germantown, Maryland, and Washington, D.C., and discussed with representatives of those offices their roles in safeguards and security planning. We also visited DOE's Oak Ridge, Richland, and Savannah River field offices, which were major nuclear weapons production sites and as such were responsible for 18 of the 27 facilities that DOE identified as its most sensitive. We discussed with DOE field office and contractor representatives their roles in safeguards and security planning. We also contacted DOE's Albuquerque and Rocky Flats field offices by telephone to discuss specific aspects of their safeguards and security planning. We reviewed DOE's past, current, and proposed guidance for safeguards and security planning.

Methodology

To determine the extent to which DOE has completed the safeguards and security plans for its sensitive facilities, we examined the quarterly status reports prepared by the Office of Safeguards and Security. We also discussed the plans' status with the Safeguards and Security representatives at each of the field offices we visited. To determine the extent to which DOE has completed the safeguards and security plans for the field office sites, we obtained from the Office of Safeguards and Security a current list of those sites with unfinished plans and had the field offices verify that information. We examined the DOE orders and guidance manuals in effect at the time of our review concerning the safeguards and security planning process. To determine the status of DOE's proposed modifications to the planning process, we examined the draft order and guidance manual and discussed the proposed modifications with representatives of the DOE offices listed above.

Appendix II
Objectives, Scope, and Methodology

We discussed the facts presented in this report with DOE officials in the Office of Safeguards and Security. They generally agreed with the information but offered some clarifications, which we incorporated where appropriate. Our work was conducted during the period of June 1991 to September 1992 in accordance with generally accepted government auditing standards.

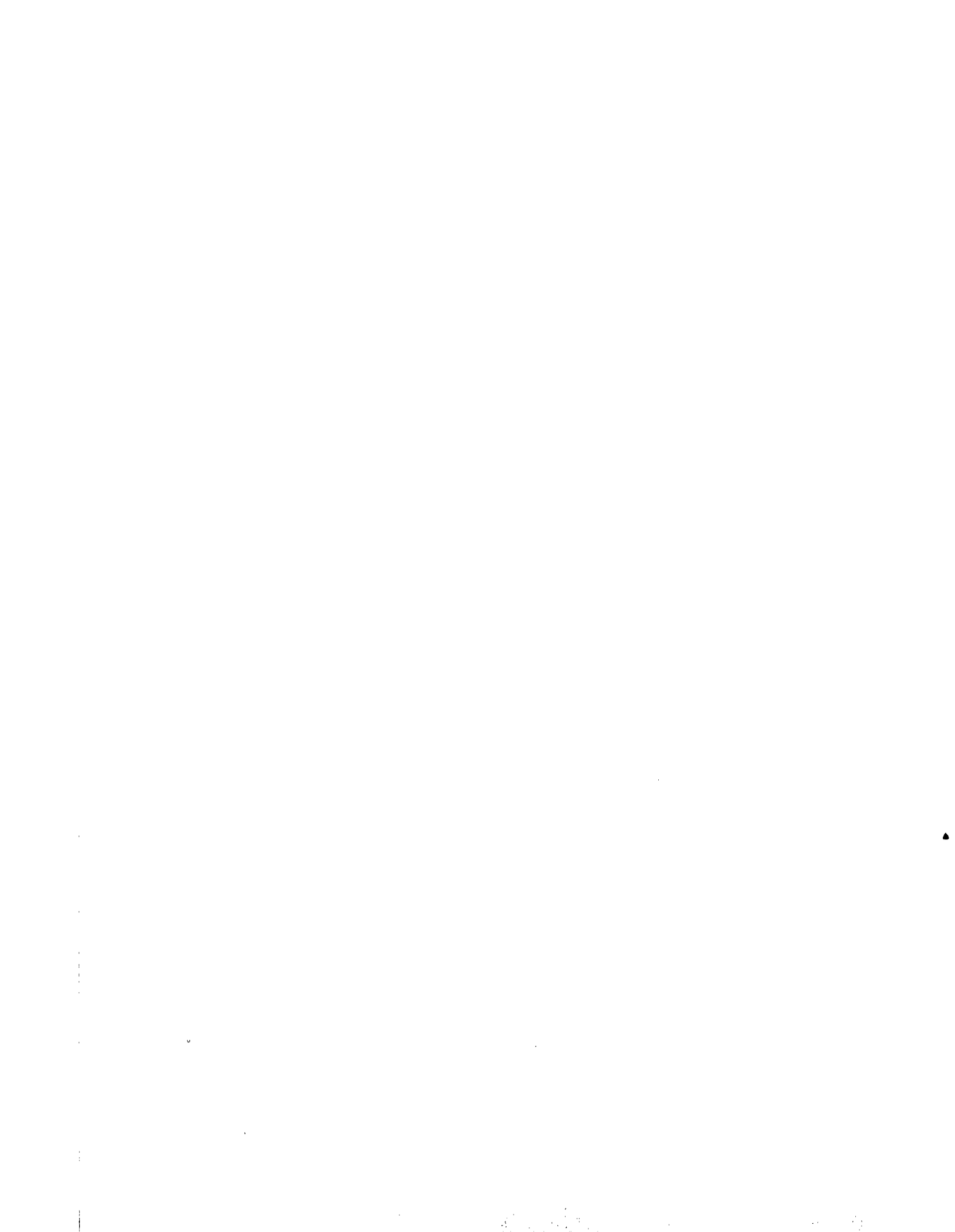
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