

REPORT NO.

U.S. DEPARTMENT OF ENERGY  
OFFICE OF INSPECTOR GENERAL

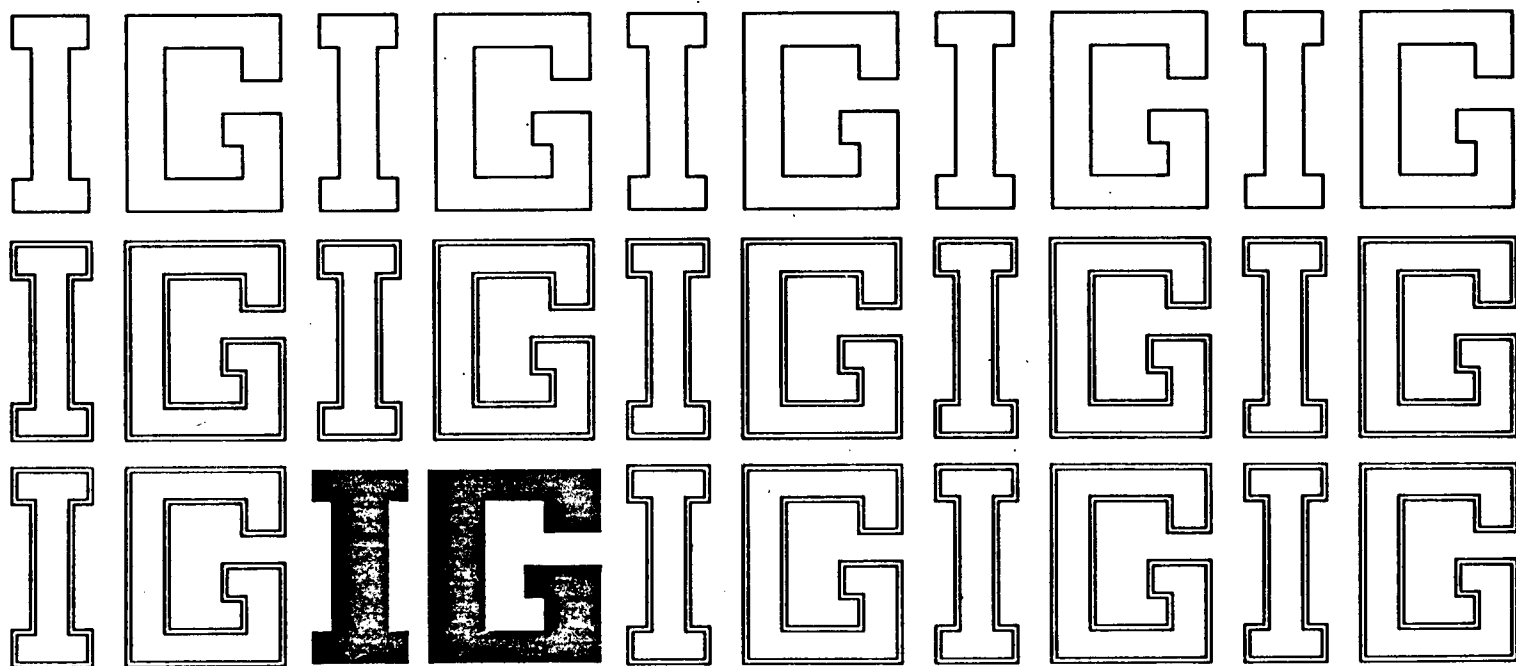
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CR-B-95-03

February 6, 1995



AUDIT OF THE DEPARTMENT OF ENERGY'S  
SECURITY POLICE OFFICER TRAINING



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Capital Regional Audit Office  
Germantown, Maryland 20585

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## PART I

### APPROACH AND OVERVIEW

#### INTRODUCTION

The safeguards and security program is designed to provide appropriate, efficient, and effective protection of the Department's nuclear weapons, nuclear materials, facilities, and classified information. To provide this protection, members of the protective force must be trained to deal with various threats including terrorist attacks and sabotage.

We conducted the audit to determine if training provided to the Department's security forces was justified and was accomplished in the most economical and efficient manner. Specifically, the purpose of our audit was to determine the appropriateness of the levels of training provided and the cost of that training.

#### SCOPE AND METHODOLOGY

The audit covered six sites in the nuclear weapons complex. These sites were the Sandia National Laboratory, the Rocky Flats Plant, the Nevada Operations Office, the Savannah River Site, and the Y-12 and K-25 Plants at Oak Ridge. Information was also gathered from Headquarters personnel associated with the training program and the Central Training Academy in Albuquerque, New Mexico. The review was conducted from September 20, 1993, to September 19, 1994, concentrating on training data current as of Fiscal Year 1993.

We reviewed applicable laws and Department of Energy orders, implementing procedures and practices at the six sites and Headquarters, established security training requirements, Master Training Plans in use at the sites, applicable site training records, the effectiveness of the controls over training records, cost estimates used in the crosscut budget, payroll records where available, and the manner in which the Central Training Academy identified and provided training to the Department. We compared and contrasted training practices at the different field sites and identified initiatives taken to standardize training at the sites and in Headquarters. We also conducted interviews with cognizant training personnel from Headquarters offices, sites visited, and the Central Training Academy. In

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SUMMARY

The Department of Energy's safeguards and security program is designed to provide appropriate, efficient, and effective protection of the Department's nuclear weapons, nuclear materials, facilities, and classified information. To provide this protection, members of the protective force must be trained to deal with various threats including terrorist attacks and sabotage.

We conducted the audit to determine if training provided to the Department's security forces was justified and was accomplished in the most economical and efficient manner. Specifically, the purpose of our audit was to determine the appropriateness of the levels of training provided and the cost of that training.

We found that the Department had not established standardized annual refresher training requirements for its security forces and that individual sites were developing and implementing training programs and course plans without emphasis on standardization. The absence of specific annual training requirements allowed the field sites to independently develop training programs and to interpret the annual training requirements differently.

Our review also showed that the training plans at the six sites visited needed improvements to ensure that the plans were complete and that they addressed the training needs of the Department. We found that training plans were not approved in advance by Departmental personnel, did not clearly describe the types and duration of training required or needed, did not correspond with the completed training recorded for the officers, and did not include an estimate of the costs necessary to carry out the training. In addition, the training plans did not identify the different categories of officers, the training courses they were to receive, or the descriptions of those

courses. Site training records showed that the officers' actual training varied significantly from the courses outlined in the training plans.

The Office of Safeguards and Security within the Office of Nonproliferation and National Security provided comments on our conclusions and recommendations. The Director, Office of Safeguards and Security generally agreed with the overall intent of the recommendations, but the planned actions will not ensure their effective implementation.

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addition, we took a judgmental sample of training records at each site visited to evaluate the number of hours spent in training, training received versus training planned, and the accuracy of records. These areas were measured against the information included in the sites' annual training plans.

Since the audits, "Management and Cost of the Department of Energy's Protective Forces" and "Pantex Plant Construction Activities," addressed the physical fitness program and its facilities, our audit scope did not include physical fitness training.

The audit was made 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 audit objective. We assessed the significant internal controls to determine whether the Department's Headquarters and field organizations had exercised adequate management control over protective force operations. 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 consider computer-processed data crucial to accomplishing our audit objectives and, therefore, did not assess its reliability.

The Office of Nonproliferation and National Security waived the exit conference.

#### BACKGROUND

In the mid-1980's, the Office of Safeguards and Security determined that improvement was needed in the area of security officer training with an emphasis on standardization. The Central Training Academy (Academy) was established to provide effective, consistent, standard training throughout the Department. The Department directed the Academy to help achieve standardization, where prudent, and to aid in the realization of economy and efficiency through the elimination of duplicative efforts. In 1986, a committee that was responsible for making recommendations to standardize training was formed. This committee, called the Cerberus Project, stated that the Academy had responsibility for regulating, structuring, evaluating, and approving all forms of site-specific training. It also set out the procedures to be used to ensure that all security related

training within the Department and the Office of Safeguards and Security was appropriately standardized and centralized.

#### OBSERVATIONS AND CONCLUSIONS

The Department had efforts underway to aid in the standardization and evaluation of training. Security Affairs had issued a Guide for Implementation of Safeguards and Security Directives to be used for evaluating the field facilities. It identified basic, broad topics to be covered in initial training courses. Also, the Central Training Academy developed an initial training program for the training of new protective force recruits. These training program courses were intended to be the standard curriculum for training the new officers at individual field training facilities.

However, we found that the Department had not established standardized annual refresher training requirements for its security forces and that individual sites were developing and implementing training programs and course plans without emphasis on standardization. The absence of specific annual training requirements allowed the field sites to independently develop training programs and to interpret the annual training requirements differently.

Our review also showed that the training plans at the six sites visited needed improvements to ensure that the plans were complete and that they addressed the training needs of the Department. We found that training plans were not approved in advance by Departmental personnel, did not clearly describe the types and duration of training required or needed, did not correspond with the completed training recorded for the officers, and did not include an estimate of the costs necessary to carry out the training. In addition, the training plans did not identify the different categories of officers, the training courses they were to receive, or the descriptions of those courses. Site training records showed that the officers actual training varied significantly from the courses outlined in the training plans.

Failure to provide standardized training and accurate training costs represents an internal control weakness that should be considered by management in preparing the year-end assurance memorandum on management controls.



## PART II

### FINDINGS AND RECOMMENDATIONS

#### 1. Establishing Annual Training Requirements

##### FINDING

Departmental regulations provide for the development of standardized safeguards and security training for the security forces. The Central Training Academy is responsible for developing standardized training courses to meet these needs. However, we found that the Department had not established standardized annual refresher training requirements for its security police officers. Also, sites were developing and implementing their own individual training programs without emphasis on standardization. These conditions existed because Departmental guidance did not clearly define annual refresher training requirements for security forces and the development and implementation of the training programs was not adequately monitored by the Department. As a result, the Department could not ensure that the protective forces received the appropriate amount of training for the least cost to the Government.

##### RECOMMENDATIONS

We recommend that the Director, Nonproliferation and National Security, in coordination with the responsible program offices:

1. Standardize the annual refresher training requirements for security forces.
2. Conduct reviews of safeguards and security training programs Departmentwide to ensure compliance with the training plan and minimize individual site development of courses.

## MANAGEMENT REACTION

The Director, Office of Safeguards and Security agreed with the second recommendation, but disagreed with the first recommendation maintaining that the Central Training Academy provides adequate assistance to the field organizations. A summary of management and auditor comments is contained in Part III of this report.

## DETAILS OF FINDING

### TRAINING REQUIREMENTS

Department of Energy Order 5630.15 requires the development of standardized safeguards and security training programs for the security forces. The order is intended to provide sites with the opportunity to conduct a full range of safeguards and security training with reduced development efforts. Departmental safeguards and security objectives include the sharing of training curriculum to minimize development efforts and resources.

The Director of Safeguards and Security must assure that safeguards and security training is developed, conducted, and managed in a uniform and effective manner by providing adequate direction to the field through the issuance of appropriate guides and directives. Complete course outlines will be provided by the Office of Safeguards and Security through the Academy.

The Academy has responsibility for developing training requirements, while program offices and site field managers have the authority to implement the training programs. The order specifies that the field sites will: (1) assess annually the status of training; (2) review training programs under their cognizance; and (3) develop and issue site-specific guidance for the implementation of DOE Order 5630.15. Sites are required to develop Annual Training Plans which implement Headquarters policies and outline the training goals for that year.

### Current Progress toward Standard Training Courses

Security Affairs issued a Guide for Implementation of Safeguards and Security Directives (called Standards and Criteria) to be used for evaluating the field facilities. It identifies basic, broad topics to be covered in initial training courses.

The Academy has developed an initial training program for the training of new protective force recruits. The courses contained within this program are intended to be the standard curriculum for training new officers at individual field training facilities. It includes material equivalent to about 10 weeks of classroom and range instruction and was designed to be adaptable into a recurring training format to reduce the need for sites to develop their own training course plans.

#### SECURITY TRAINING

We found that the Department had not established standardized annual refresher training requirements for its security forces and that sites were developing and implementing their individual training programs and course plans without emphasis on standardization. Although the Academy had recently developed the standardized initial security training curriculum, these courses were for new recruits in the field and the training program did not specify which of the courses should be taught on a recurring basis. The absence of specific annual requirements allowed the field sites to develop their own individual training programs and interpret the annual refresher training requirements differently.

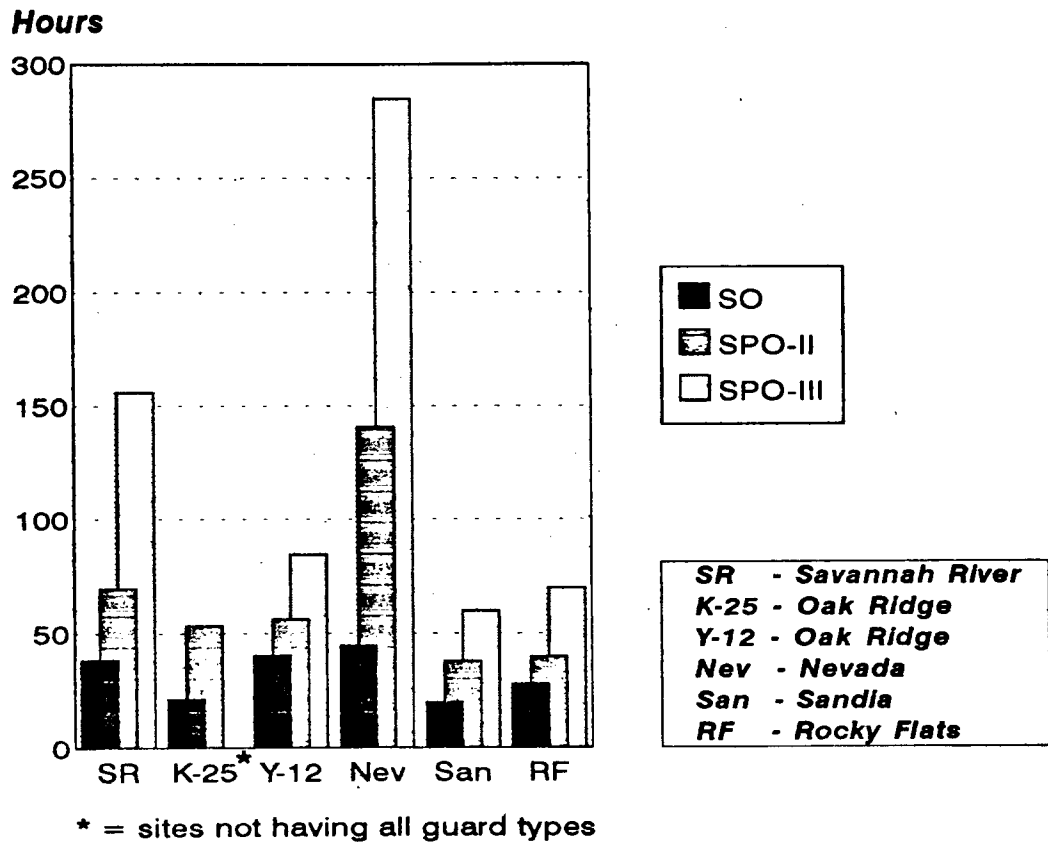
#### Hours of Training Programmed

Security Police Officers have specific responsibilities and duties which are outlined in Departmental Orders. Facility patrol, site knowledge, and post operations are among the responsibilities common to all protective force personnel. Security Police Officer II's (SPO II) have additional responsibilities including weapons use and safety, appropriate use of deadly force, and investigation procedures. A Security Police Officer III (SPO III) is expected to be skilled in all of the previous duties, in addition to crisis entry and hostage rescue, among other things.

Although the orders do not differentiate between the duties and responsibilities of officers at different sites, planned annual training at the six sites visited varied significantly from one site to another. For example, based on our estimate, the Fiscal Year 1993 annual planned training for a SPO III at Y-12 was 84.5 hours, while at Nevada it was 284.7 hours. An SPO II was expected to train

for approximately 54 hours per year at K-25 while at Nevada the SPO II was to train 140.7 hours. And while all Security Officers (unarmed guards) were to train less than 45 hours, some sites trained as little as 20 hours. Differences in planned hours of training are illustrated in the following table.

**FY 1993**  
**Planned Hours of Training at the DOE Field Sites**  
 Guard Type Hours



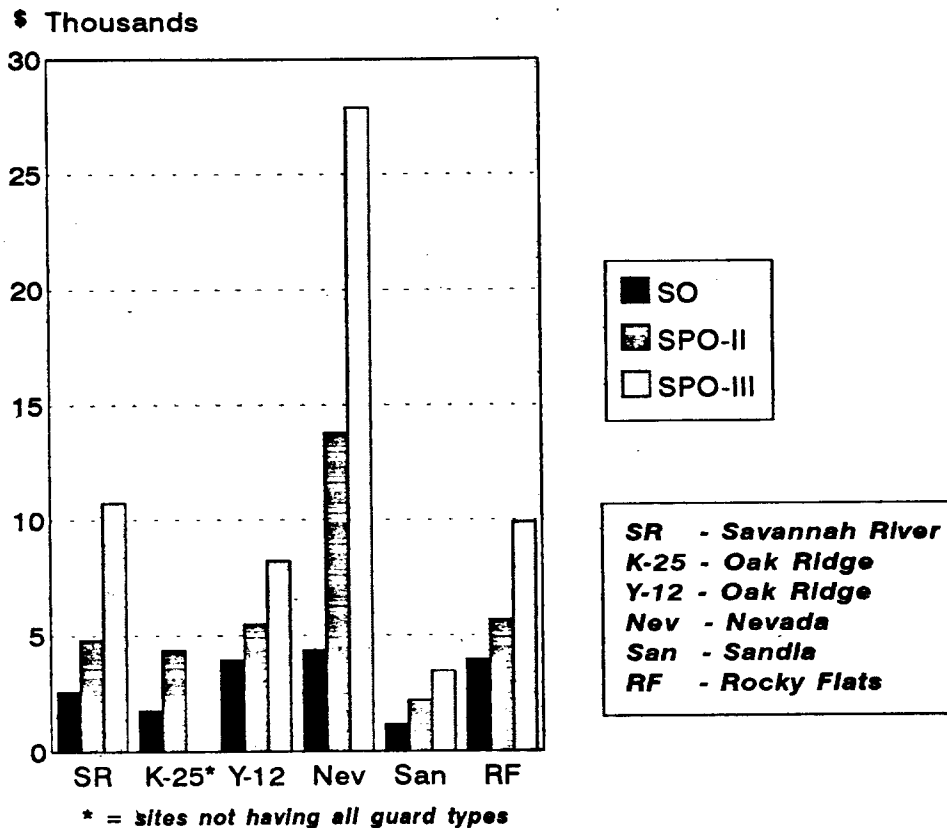
Costs of Programmed Training

The estimated hourly costs associated with training varied significantly from site to site as well. These difference were due to a combination of different wage rates

and fringe benefit multipliers. The following chart shows the estimated cost to train one officer for one year at each site. The annual cost to train a Y-12 SPO III was \$8,217 versus \$27,882 for a Nevada SPO III, a difference of \$19,665 per officer per year.

### FY 1993

Estimated Cost of Protective Force Training per Guard  
Dollars shown in Thousands



The higher costs of training officers at Nevada was partially attributed to the site's current mission. The site's mission was to be ready to conduct a nuclear test with 6 months advance notice and, therefore, the site must maintain a larger protective force than currently needed to man the required guard posts for each work shift. The personnel that report for work that are not needed to man a post use their time to train.

## Various Courses Offered by Field Sites

Although all sites visited were Class A facilities with critical elements, including Special Nuclear Material to protect, the number of courses given to the officers at the sites visited varied considerably. Using Nevada and Sandia as examples, we compared courses planned at one site to courses planned at the other. The following table shows the result of that comparison, depicting two of the most diverse sites with respect to classes offered.

### **Comparison of Number of Courses and Titles**

#### ***Nevada and Sandia Security Police Officer IIs***

##### ***Nevada SPO IIs:***

- o Protective Force Annual Training*
- Administrative/Written Tests*
- Weaponless Self Defense*
- Use Force/Deadly Force*
- Combat Stress Shooting*
- Aberrant Behavior*
- Recognition of Special Nuclear Materials*
- Driver's Safety*
- Counterintelligence*
- Handcuffing & Restraint Devices*
- o Semiannual Weapons Qualification*
- o Sensitive Assignment Specialist Refresher*
- Administrative*
- Firearms Safety*
- Bomb/Explosive Recognition*
- Observation and Reporting*
- Convoy Exercises*
- Ground Zero Exercises*
- Armored Vehicle Familiarization*
- o Sensitive Assignment Specialist Qualification*

##### ***Sandia SPO IIs:***

- o Fire Protection*
- o Prohibited Items*
- o Generic Threat*
- o CPR/First Aid*
- o Use of Force*
- o Baton*
- o Semiannual Firearm Requalification*

Since each site designed their own training program, the duration, cost, and the number of courses offered differed. The absence of specific annual requirements allowed the field sites to develop individual training programs and interpret the annual refresher training requirements differently.

## REASON FOR VARYING TRAINING REQUIREMENTS

The sites had interpreted the training requirements differently because Departmental guidance did not clearly define annual refresher training requirements. Also, the responsibility to develop and the authority to implement the training programs was decentralized.

### Departmental Guidance

Specific annual training requirements were not outlined in Departmental guidance provided to the field. DOE Orders did not provide a listing which identified recurring courses by title and/or length. The Academy's security police officer initial training curriculum dictates that the sites are individually responsible for ensuring that officers receive "adequate" annual refresher training, but adequate was not defined within the curriculum or within Departmental Orders. In addition, the Safeguards and Security Standards and Criteria addressed only basic topics for initial courses, but did not mention specific annual recurring training topics or courses.

### Responsibility and Authority

The responsibility to develop and the authority to implement the training programs was decentralized. The Academy has responsibility for developing training requirements, while program offices and site field managers have authority for implementing the training programs. The field sites were also given flexibility to develop and administer training programs on their own. Since the sites had implementing authority, they developed training programs based on their own needs analyses without adequately considering training programs developed by other sites.

Although the Implementation Guide for DOE Order 5630.15 specifically stated that the Departmental safeguards and security training objectives include the sharing of training curriculum to minimize development efforts and conserve resources, both the Academy and the field sites maintained the authority to design and develop protective forces training courses. Sites were relatively autonomous with respect to this development. At the time the Academy was established, reciprocity was anticipated for different

courses offered at various sites; but, Headquarter's guidance was not specific enough and allowed for varying interpretations.

#### RESULTS OF NON-STANDARD REQUIREMENTS

The Department could not ensure that the protective forces received the appropriate amount of training for the least cost to the government. Since the sites developed and implemented widely varying training programs with differing annual hourly requirements, no one site's training program could be used as a benchmark to ensure that officers did not receive too much or too little training. While in training an officer generally must be relieved from duty by another officer or paid overtime for the time spent in training. If a site provides more hours of training than necessary, costs are greater than necessary. If a site provides less training than necessary, then site security could be at risk.

Also, because development and implementation of training courses was decentralized, a duplication of effort between the Academy and the field offices may have existed. The Central Training Academy was responsible for standardizing security training and aiding in the realization of economy and efficiency through the elimination of duplicative efforts. However, three of the five sites maintained a development staff to design and implement the curriculum at their site. The staffs used in Fiscal Year 1993 ranged from less than 1 full-time equivalents to about 17 full-time equivalents. The Academy estimates that for each hour of class, about 7 hours must be spent to prepare for that class. If a standardized annual curriculum is adopted, we believe that development staffs could be consolidated, decreased, or eliminated altogether at the site level.



## 2. Security Training Plans

To aid in the evaluation of the overall adequacy of training provided, DOE Order 3410.1B requires the development of annual training plans that include the types and sources of training, the estimated number of employees to be trained, and the estimated resources needed to carry out the plan. However, we found that training plans were not adequate because they did not include the types and duration of training planned and deviated substantially from training actually conducted. Also, the plans did not include estimates to show how much the planned training would cost. Further, the training records at some sites did not accurately record training received by security officers. These conditions existed because guidance provided to the field sites did not adequately address the development of training plans and did not provide an effective process which ensured that Department officials evaluated whether training plans were completed and complied with the guidance. As a result, the Department did not accurately report and could not determine the cost of training its protective force. In addition, the Department could not always determine the amount of training the security officers received.

### RECOMMENDATIONS

We recommend that the Director, Nonproliferation and National Security, work in coordination with responsible program offices to ensure that:

1. Site training plans include the amount and types of training to be given, the estimated number of employees to be trained, the courses to be taught, and the course durations.
2. Training plans are reviewed and approved by the responsible operations office officials prior to the beginning of the period to which the plan applies.
3. Contractors provide accurate financial information regarding the total cost of training to the Department.
4. Accurate training records for protective force members are maintained by the sites' training departments.

## MANAGEMENT REACTION

The Director, Office of Safeguards and Security, generally agreed with the findings and recommendations, but their proposed actions will not ensure effective implementation of the recommendations. A summary of management and auditor comments is contained in Part III of this report.

## DETAILS OF FINDING

### REQUIREMENTS FOR DEVELOPING TRAINING PLAN

DOE Order 3410.1B requires that sites develop annual training plans that include the annual needs assessment for training, the types and sources of training, the estimated number of employees to be trained, and the estimated resources required to implement the training program. The order further requires that records of training be maintained and that training officers are responsible for accurate and complete data entries. A review of produced records should be completed to ensure validity.

The Safeguards and Security Standards and Criteria also calls for the development of a training plan by the sites and requires that the plan be approved by appropriate security program managers at the sites. Departmental officials are responsible for ensuring site security training plans identify training needs of the security forces. Training plans are to serve as a tool for field officials to monitor and approve the cost, scope, and adequacy of site training programs. The plans provide a basis for evaluating the adequacy of the overall training program.

### SITE TRAINING PLANS

Training plans at the six sites visited showed that improvements were needed to ensure that the plans were completed and that they addressed the training needs of the Department. We found that training plans were not approved in advance by Departmental personnel; in several cases, did not clearly describe the types and duration of training required or needed; did not correspond with the completed training recorded for the officers; and did not include an estimate of the costs necessary to carry out the training. In addition, the training plans from various sites contained deficiencies including not identifying the different categories of officers, the training courses they were to receive, or the descriptions of those courses. Training

records for most sites showed that the officers received training courses significantly different from the courses that were outlined in the training plans.

### Training Plan Approval

Training plans should be reviewed and approved by operations office officials before implementation. However, site training plans for Fiscal Year 1993 were either not approved by operations office officials before the start of the training period or were approved after the training period started. For example, the Fiscal Year 1993 Rocky Flats training plan was implemented but not approved. Further, the Rocky Flats Fiscal Year 1994 plan had not been approved at the conclusion of our field work. Both the Savannah River and Nevada Test Site plans were not approved for Fiscal Year 1993, but their Fiscal Year 1994 plans were approved in October 1993. The Sandia National Laboratory, Y-12, and K-25 plans were not approved until 9 months or more into the fiscal years that they were intended to cover.

### Types and Duration of Training Courses

The majority of the training plans did not identify types and durations of the training courses to be provided. For example, K-25 and Y-12's plans did not outline the amount of time the officers would spend in training. Y-12's plan also did not list the courses planned for their officers. Rocky Flats' plans included course titles and durations, but did not specify what type of officers (SOs, SPO-Is, SPO-IIIs or SPO-IIIs) would be attending them. Savannah River's training plan contained some course titles with their corresponding hours, however, the majority of the information dealt directly with task requirements, which were not converted into courses titles. Nevada's Fiscal Year 1993 plan was missing details of the planned courses, but their Fiscal Year 1994 plan was much improved. Lastly, Sandia's plan showed good detail on both the courses and the recipients.

Training plans at the sites visited outlined training tasks to be accomplished, but these requirements did not always translate into specific training courses. Sandia, Y-12, and Savannah River included tentative course schedules in their plans, but did not identify what requirements the officers' would meet by attending the scheduled courses. Specifically, the plans did not show if training requirements were being met by the courses scheduled and did not always provide a description of those courses.

In addition, several plans did not include an outline of the team exercises required during the year. All the sites visited were required to run team exercises, but four of the training plans did not include an outline of the training exercises to be performed. The sites ran training exercises of various types, including: "Force-On-Force," in which an attack of the site was simulated using an opposing force to simulate the attackers and a convoy exercise, in which the protective force simulates the transportation of Special Nuclear Material. The exercises are designed to maintain skills and assess individual and team competency levels.

Of the six sites visited, only Nevada Test Site and Y-12 included the exercises in their training plans. The Nevada Test Site plan listed some exercises by name within an annual training course, but did not describe the exercise or provide details of amount of resources required to run them. Nevada ran a major exercise in Fiscal Year 1993, which was not detailed in the plan but required over 3200 labor hours to complete. Y-12 briefly described what the exercises were and provided a schedule of monthly drills. However, the schedules did not provide details on the number of participants, duration of the exercise, or the resources required to run them. Two sites' plans included schedules for the exercises, but did not provide descriptions or list resources required to run them. K-25 ran all their exercises on-shift and did not require additional resources.

#### Planned and Recorded Training

A comparison between the planned training and a sample of training records showed a significant difference between planned and recorded training for the security force. We discovered a number of examples where course titles used and the hours listed in the training plans were not the same as titles and hours listed in the records.

After reviewing a sample of the training records of officers at each site visited, we found that they consistently showed that the officers received significantly more or less training than was outlined by their training plans. We developed an estimate of the training hours required by each of the six plans and verified this estimate with site personnel. By comparing the information provided in the site records with this estimate, we determined that 75 percent of the officers sampled did not receive training as outlined by their training plan. Of this amount, 48 percent received more and 27 percent received less training than planned. For example, at Rocky Flats many officers in

our sample received double the amount of training specified in the training plan, all on overtime, including a few officers who received up to five iterations of the same course within 2 months. In Nevada, every officer sampled received more hours of training than required by their plan, although a few did not receive a 48-hour course they were required to have. At K-25 in Oak Ridge, every officer in our sample received less hours than required by their plan, some were more than 40 hours deficient. Savannah River had examples at both extremes with some officers in the sample being deficient in their hours and some being substantially over, including one officer who was 317 hours over.

Further, the course titles in the plans often differed from what was listed in the officers' records. For example, one course in the plan would be designated by several different course titles in the training records. In addition, the annual hourly requirements did not coincide with hours recorded in the training records. Because the training plans did not clearly identify training courses actually provided, the plans alone could not be used to determine whether the officers received the appropriate training courses. To identify the link between the tasks listed, the courses scheduled, and the courses recorded, it was necessary to obtain assistance from site training personnel.

#### Estimated Costs of Training

We found that the training plans did not include an estimate of the costs needed to fulfill the requirements of the training plans. Of the six sites visited, only the protective force contractor at the Nevada Test Site provided a training plan that contained relevant cost estimates. The two Oak Ridge sites visited, Y-12 and K-25, developed plans that did not adequately address the cost of training. The Fiscal Year 1993 training plan for Y-12 only contained data on resources used in the previous fiscal year. This data documented costs of dedicated training personnel, but did not include the cost of the officer's time spent in training. It also did not contain Y-12's portion of the cost of the training facility shared by all the Oak Ridge sites. The K-25 training plan detailed a cost saving initiative that used on the job training to meet some training requirements; however, the plan did not adequately address the cost of training because it did not show the cost of dedicated training personnel or the support provided

to the Oak Ridge training facility. The plans from Sandia National Laboratory, Rocky Flats, and Savannah River did not include adequate cost estimates.

Since we could not determine the cost of training using the training plans, we requested training cost estimates from the field sites, independent from the training plans. These estimates did not include all resources necessary to conduct their training. An estimate of the cost of training is vital in the process to approve the year's training. A cost estimate provides an approving official with a standard by which the performance of the training division may be measured. The cost estimate should include the salaries of personnel dedicated to training, such as, instructors, curriculum developers, the training manager, and administrative staff. The estimate should also include the officers' wages incurred during the training. In most cases, while an officer is training another officer must be posted in relief or the officer in training must be paid overtime. We found that the sites visited did not include all cost elements in their estimates. Sandia National Laboratory's estimate included only the cost of dedicated training personnel and supplies. The Rocky Flats estimate did not include most of the cost of the training management division or the total amount of overtime incurred by the officers while training. The Y-12 estimate did not include the cost of Oak Ridge personnel dedicated to training the protective force. Both the Savannah River and Nevada estimates left out the cost of fringe benefits, which made up over 40 percent of the wage costs. Savannah River did include fringe benefit calculations for their relief force, but the relief force made up only 28 out of the 845 officers at the site.

#### TRAINING PLAN PROCESS

Site training plans were not complete because the guidance developed by Security Affairs did not incorporate several of the key requirements in DOE Order 3410.1B. Security Affairs developed the Guide for Implementation of Safeguards and Security Directives (Standards and Criteria) to interpret Departmental orders on security. However, the Standards and Criteria did not adequately cover the development of the training plans or provide an adequate process to ensure the training plans were complete and complied with the guidance.

The Standards and Criteria was developed as a guide to evaluate the Department's security operations and was employed by some of the sites to prepare their Protective

Forces Annual Training Plan. It outlines the requirements for the training plan and contains some elements of DOE Order 3410.1B, but omits the requirements for the estimated cost of training and the estimated number of employees to be trained. We recognize that Security Affairs' has developed two orders which discuss security training, DOE Order 5630.15, "Safeguards and Security Training Program" and DOE Order 5632.7, "Protective Forces," but they do not address requirements for the training plans.

The Standards and Criteria also do not provide an effective process for the Department to ensure that the site training plans were completed and complied with the guidance. The Standards and Criteria requires the protective force to have a comprehensive, well-documented formal training program. In order to accomplish this, a plan must be developed that includes the purpose and objective of the training, a training needs analysis, and approval by the security program manager. The Standards and Criteria do not specify that the courses to be taught be matched to the tasks which they satisfy. It does not specify when the plan must be approved or if it can be implemented without approval. In addition, while the Standards and Criteria requires a training schedule, it does not require a curriculum be developed for each officer type that could be used to measure the training an officer received.

#### BENEFITS OF COMPLETE TRAINING PLANS

The Department did not accurately report and could not determine the cost of training its protective force. In addition, the Department could not determine the amount of training the protective force received.

Because the training plans were not complete, the Department does not know how much it spent on training its protective force, how much to budget for training, and how it performed against budgeted amounts. We estimated that the cost of training the protective force was understated by the Safeguards and Security crosscut budget by over 62 percent or over \$8.8 million for the six sites we visited. We also estimated that the average cost of training the protective force at the sites visited was 11.2 percent of the total cost of maintaining the force or \$20.4 million. However, since the amount and cost of training was not included in the training plans and not captured otherwise by the sites, the appropriate cost figures were not presented to or approved by the Department.

Since many of the annual training plans at the sites were not approved by the beginning of the fiscal year or at all and training records did not clearly identify training courses actually provided, the Department cannot accurately determine the amount of training the protective force received. Therefore, the Department cannot determine if officers were appropriately trained. In addition, without sufficient, reliable cost data, Departmental managers cannot measure the cost effectiveness of new training initiatives.



### PART III

#### MANAGEMENT AND AUDITOR COMMENTS

The Office of Safeguards and Security within the Office of Nonproliferation and National Security provided comments on our conclusions and recommendations.

The Director, Office of Safeguards and Security, concurred with five of the six recommendations, but a number of the planned actions on the recommendations are not considered responsive. Management stated that it issues policy and guidance but that the program offices are responsible for implementing this policy. Duplication of effort in the safeguards and security implementation process was previously recognized by management as an internal control weakness. More detailed management comments along with our responses are included below.

#### GENERAL COMMENTS

Management Comments. The Office of Safeguards and Security provides support to the operations of Departmental training activities. This office develops, interprets, and maintains policy; provides programmatic assistance to field organizations; and develops and conducts standard training. The Office of Safeguards and Security has no authority to ensure implementation of its policies.

Departmental safeguards and security audit authority--inspections and evaluations--is the responsibility of the Deputy Assistant Secretary for Security Evaluations. Other than policy development, the Office of Security Affairs has only limited input into the enforcement function. Within the current Departmental organizational structure, the Office of Security Affairs cannot ensure that field organizations perform at a recommended level.

In the Fiscal Year 1994 Federal Managers' Financial Integrity Act Assurance Memorandum, the Office of Nonproliferation and National Security reported that duplication of effort among Headquarters Program Offices in the safeguards and security area was an internal control weakness. This duplication of effort has also been cited by the House Appropriations Committee's Energy and Water Development Subcommittee, the Deputy Assistant Secretary for Security Evaluations, and the Inspector General's report IG-0354, "Audit of the Management and Cost of the Department

of Energy's Protective Forces." The reportable problem with the program is that one office--the Office of Security Affairs--provides policy and policy interpretation to field elements, and multiple program offices subsequently offer inconsistent policy implementation guidance to the same field elements.

Because the safeguards and security program is not consolidated at the Headquarters program level, the Office of Nonproliferation and National Security, through the Office of Security Affairs, will not be able to ensure consistent safeguards and security policy implementation.

Auditor Comments. We recognize that Security Affairs is responsible for establishing policies and that program offices are responsible for implementing this policy. We considered this problem by directing the recommendations to the Office of Nonproliferation and National Security in coordination with responsible program offices. As pointed out in the report, field elements were interpreting training requirements differently because Departmental guidance did not clearly define standardized training requirements. Further, the responsibility to develop and the authority to implement the training programs was decentralized. Our basic intent of directing recommendations to Nonproliferation and National Security was to allow Security Affairs to work directly with the different program offices to develop standardized training programs that vary little from site to site. Adoption of standardized training requires the cooperation of Security Affairs and the program offices.

As discussed in management's general comments, the Congressional subcommittee is concerned about the duplication of efforts throughout the Department as each program organization has established its own safeguards and security program rather than relying on the capabilities and advice of the central Departmental safeguards and security organizations. This supports the need for Security Affairs to become proactive and work with the program offices to make sure consistent and standard training policies are implemented.

The Inspector General's report IG-0354, "Audit of the Management and Cost of the Department of Energy's Protective Forces" did not address duplication of effort in the area of security police officer training.

FINDING 1. Establishing Annual Training Requirements

We recommend that the Director, Nonproliferation and National Security, in coordination with the responsible program offices:

Recommendation 1.

Standardize the annual refresher training requirements for security forces.

Management Comments. Management did not concur with this recommendation. The Office of Security Affairs maintained that the Department's Central Training Academy provides assistance to field organizations in the development and presentation of subjects related to protective force tasks. Generic job analyses for nearly all critical protective force positions have been developed and the training academy has offered assistance to field organizations to apply the generic tasks to site-specific conditions. Additionally, the Office of Security Affairs has promulgated policy to assist field organizations in training program development in a standardized manner. These efforts are tools intended to be used by field organizations to develop site programs in the most efficient and cost effective manner. However, evaluation and implementation responsibility for the policy does not currently rest with the Office of Security Affairs or the Office of Nonproliferation and National Security.

Auditor Comments. Departmental sites are providing widely divergent amounts of refresher training because the training policy issued by Security Affairs does not provide standard annual refresher training requirements. We recognize that there are certain site-specific, as well as some remedial training, that will obviously be required. However, refresher training requirements should not be materially different from one site to another. Further, once clearly defined refresher training requirements are established, the Deputy Assistant Secretary for Security Evaluations would be expected to monitor compliance by program offices.

Recommendation 2.

Conduct reviews of safeguards and security training programs Departmentwide to ensure compliance with the plan and minimize individual site development of courses.

Management Comments. Management concurred with the recommendation, but stated that the Training Approval Process, prescribed by DOE Order 5630.15, provides for reviews of the safeguards and security training programs on a site-by-site basis.

Auditor Comments. The Training Approval Process does not provide the necessary oversight to ensure that individual site development of training courses is minimized. At the minimum, periodic reviews Departmentwide are necessary to provide assurance that sites are standardizing their training needs and making use of standardized training courses. Further, DOE Order 5630.15 does not take effect until the end of Fiscal Year 1995.

## FINDING 2. Security Training Plans

We recommend that the Director, Nonproliferation and National Security, work in coordination with responsible program offices to ensure that:

### Recommendation 1.

Site training plans include the amount and types of training to be given, the estimated number of employees to be trained, the courses to be taught, and the course durations.

Management Comments. Management concurred with the recommendation and stated that the Training Approval Process, implemented with DOE Order 5630.15 will answer this recommendation. The Training Approval Process reviews the safeguards and security training programs on a site-by-site basis.

Auditor Comments. Although sites were required to develop training plans, these training plans were generally inadequate. The site training plans did not include the information required to establish a benchmark to measure the adequacy of training performed. Although the guidance used referenced DOE Order 3410.1B for establishing training plan requirements (amounts of training, numbers of employees to be trained, and related information), it did not specifically outline these requirements. The Office of Nonproliferation and National Security should incorporate the contents of DOE Order 3410.1B into its guidance and, in coordination with the responsible program offices, ensure that the policy is met.

Recommendation 2.

Training plans are reviewed and approved by the responsible operations office officials prior to the beginning of the period to which the plan applies.

Management Comments. Management concurred with the recommendation and stated that the Code of Federal Regulations contains these requirements. The Training Approval Process, implemented with the safeguards and security training order, answers this recommendation. The Training Approval Process reviews the safeguards and security training programs on a site-by-site basis. However, actual implementation is a program office responsibility, regardless of the source of the requirement or regulation.

Auditor Comments. Although management concurred, the proposed action will not effectively implement the recommendation. While the current policy required approved training plans, several sites operated with unapproved training plans and one was approved after the fact. The Office of Nonproliferation and National Security, in coordination with the responsible program offices, needs to take a more active role to ensure that adequate training plans are approved prior to implementation. This role would include requesting this area to be given coverage during security evaluations.

Recommendation 3.

Contractors provide reliable, accurate financial information regarding the total cost of training to the Department.

Management Comments. Management concurred with the recommendation and agreed that it is imperative to maintain accurate cost records. The cross-cut budget data obtained and maintained by the office is a source of cost information. However, in order to have exact accounting, the Controller would have to establish cost centers in the Department's financial management system.

Auditor Comments. We agree with management that it is important to maintain accurate cost records. However, management's action is necessary to ensure that contractors provide the Department accurate financial information regarding the total cost of training. Meeting this requirement should be a task that contractors, through responsible program offices, are already accomplishing. Although the cross-cut budget provides a relatively accurate picture of the total estimated security costs, it does not normally provide accurate breakdowns of more specific costs, such as training costs. Management must evaluate the different possibilities, including modifying the Department's financial management system, in deciding how best to obtain the needed accurate cost information.

Recommendation 4.

Accurate training records for protective force members are maintained by the sites' training departments.

Management Comments. Management concurred with the recommendation and stated that the Central Training Academy has developed the Training Assessment Reporting and Utilization System, a computer-based training records management system that is available to all field organizations. This is a tool to assist field organizations in accurately maintaining training records. Under the current Departmental organizational configuration, implementation and oversight of this recommendations resides with programmatic offices.

Auditor Comments. Management's proposed actions do not ensure that sites maintain accurate training records for their protective force members. As discussed in the finding, sites were not always following or using the best available methods to maintain and report training records of its protective forces. Unless Security Affairs takes an active role in working with responsible program offices to ensure that sites maintain accurate training records, this problem will continue to occur.

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