



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

AUDIT REPORT

Argonne National Laboratory Infrastructure
Projects

OAS-M-15-02

February 2015



Department of Energy
Washington, DC 20585

February 26, 2015

MEMORANDUM FOR THE DEPUTY DIRECTOR FOR FIELD OPERATIONS,
OFFICE OF SCIENCE
DIRECTOR, OFFICE OF MANAGEMENT
CHIEF FINANCIAL OFFICER

FROM: *April Stephenson*
April G. Stephenson
Assistant Inspector General
for Audits
Office of Inspector General

SUBJECT: INFORMATION: Audit Report on "Argonne National Laboratory
Infrastructure Projects"

BACKGROUND

The Office of Science (Science) is the steward of ten Department of Energy (Department) laboratories that provide essential support to various mission efforts. Despite past investments in infrastructure, the Department has noted that many Science laboratory facilities and utility systems are not adequate to support the scientific mission because they do not meet the infrastructure requirements to conduct modern research. Our special report *Management Challenges at the Department of Energy – Fiscal Year 2014* (DOE/IG 0899, November 2013) included infrastructure modernization as a watch list item warranting special attention.

Argonne National Laboratory (Argonne) maintains 99 buildings with 4.7 million total square feet of floor space. The age of buildings, about 40 years on average, along with historically low maintenance budgets, has created a large backlog of buildings and systems in need of revitalization or modernization. From October 2009 through January 2014, Argonne spent about \$127.2 million on 243 major repairs and minor construction projects that cost less than \$10 million. Some of these activities were accomplished through the use of direct funded General Plant Projects (GPPs) and indirect funded (funded through assessments of all programs) Institutional General Plant Projects (IGPPs).

Given the importance of infrastructure to the achievement of the Department's mission, we initiated this audit to determine whether Argonne appropriately managed its infrastructure projects.

RESULTS OF AUDIT

Argonne, for the most part, implemented appropriate controls over infrastructure projects. We found, for example, Argonne prioritized infrastructure projects; capitalized cost, if required; and ensured subcontracts complied with requirements of the *Davis-Bacon* and *Buy American Acts*. However, we found that Argonne may have inappropriately used, or planned to use, indirect

funding to complete four of ten minor construction projects funded as IGPPs contrary to Department Order 430.1B Change 2, *Real Property Asset Management*. According to Department policy, projects funded indirectly as IGPPs should benefit the site as a whole and be of a general institutional nature. IGPPs do not include projects whose benefit can be directly attributed to a specific or single program. The following four projects, totaling \$15.9 million, were in our view not of a general institutional nature but instead related to specific program needs:

- Expanding a building that houses the Argonne Wakefield Accelerator and serves as the main construction laboratory for High Energy Physics. Although Argonne identified other potential beneficiaries in project documents, the expansion was requested by High Energy Physics to increase accelerator performance and expand its research.
- Constructing a facility to house cryogenic equipment purchased for the Advanced Photon Source (APS) Upgrade Project for the Office of Basic Energy Sciences. While project documents indicated that other research programs could use liquid helium cryogenic systems, it is unlikely as the new facility is located inside the ring of the APS. Further, the project justification stated that without the facility, there would be no place to install the APS Upgrade Project's supplied liquid helium refrigeration system.
- Finishing a Laboratory Office Module at the APS. The justification for this project cited a shortage of office space to support scientific programs operating at the APS, a user facility funded by the Office of Basic Energy Sciences.
- Building a multiuser clean room at the Center for Nanoscale Materials, a user facility funded by the Office of Basic Energy Sciences. Communication within the project file revealed that the clean room was requested to support a project funded by the Laboratory Directed Research and Development (LDRD) program. Specifically, meeting notes in the project file stated that the new clean room was needed to produce as many as 15,000 telescope detectors for the LDRD project.

The use of indirect funds for these program-specific construction projects occurred because Science did not clearly communicate to its laboratories the availability of direct program funding for program-specific infrastructure projects. Although Science told us that it did not intend to eliminate direct program GPP funding for minor construction projects, an Argonne official told us that Argonne did not believe it was available. We also found that there were differing interpretations of the Department's IGPP requirements. The Argonne Site Office, for example, strongly contended that the multiprogram requirement of the Department Order was satisfied if the infrastructure project provided a benefit to a user facility. However, the Office of Acquisition and Project Management disagreed with this interpretation. Furthermore, various Argonne Site Office managers and project officers did not adequately review or enforce IGPP requirements in the Department Order. For example, little was done to confirm Argonne's claims that projects benefited multiple programs. We also found that Science was not reviewing IGPP certifications before the start of each project.

Because program-specific construction was accomplished as IGPPs, other Department programs shared in the cost of the projects that, based on the information we were furnished, may not have

provided benefit to them. Additionally, less IGPP funding was available to address other important general institutional infrastructure needs because the funds were diverted to the program-specific projects.

We made several recommendations to improve the Department's communication and oversight of laboratory minor construction projects. We also recommended that the Department make a formal determination as to whether the projects identified during our review were appropriately funded as IGPPs.

MANAGEMENT REACTION

Management concurred with the recommendations and proposed corrective actions to address the issues identified in this report. We consider management's comments and planned actions to be fully responsive to our findings and recommendations.

Management's comments are included in Appendix 3.

Attachment

cc: Deputy Secretary
Deputy Under Secretary for Science and Energy
Chief of Staff

AUDIT REPORT ON ARGONNE NATIONAL LABORATORY INFRASTRUCTURE PROJECTS

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ARGONNE NATIONAL LABORATORY INFRASTRUCTURE PROJECTS

DETAILS OF FINDING

Department of Energy (Department) Order 430.1B Change 2, *Real Property Asset Management* (Department Order 430.1B), establishes the requirements, responsibilities and reporting mechanisms for real property management. Real property assets must be maintained in a cost-effective manner that promotes safety, health, and environmental protection. Major construction projects or major items of equipment are funded by line-item appropriations. Repairs and minor construction projects under \$10 million do not require a line-item appropriation. There are two types of minor construction projects: General Plant Project (GPP) and Institutional General Plant Project (IGPP). GPPs adapt facilities to new or improved production techniques, affect economies of operations, or reduce or eliminate health, fire and safety problems. GPPs typically benefit a specific program and, thus, are directly funded by the specific program. On the other hand, IGPPs are of a general institutional nature whose benefits cannot be directly attributed to a specific or single program because they address general site-wide needs. Accordingly, IGPPs are funded through overhead by charging an indirect rate to direct program activities at the site. Examples of acceptable IGPPs include site-wide maintenance to facilities and utilities, such as roads and grounds, or a telephone switch that serves the entire facility.

Indirect Funding of Program-Specific Projects

Argonne National Laboratory (Argonne), for the most part, implemented appropriate controls over infrastructure projects. For example, we found Argonne prioritized infrastructure projects; capitalized costs, if required; and ensured subcontracts complied with the minimum wage requirements of the *Davis-Bacon Act* and the product sourcing requirements of the *Buy American Act*. However, based on our review, Argonne may have improperly funded, or planned to fund, some projects with indirect funds. Specifically, 4 of the 10 IGPPs we reviewed, totaling \$15.9 million, related to specific program needs and, in our view, were not of a general institutional nature as stipulated in Department Order 430.1B.

Building 366

The Building 366 Expansion Project was a \$2.1 million IGPP that Argonne's fiscal year (FY) 2010 Laboratory Plan identified as an urgent need because funding for future research at the Office of High Energy Physics (HEP) Argonne Wakefield Accelerator had already been received. According to the project files, the primary justification for this project was to expand the building to lengthen the accelerator for new experimental work. Although Argonne claimed other potential beneficiaries in the project business case document, the project file showed that the current space was not adequate and a building expansion was urgently needed. In addition, Argonne officials only asked its HEP Division whether the proposed conceptual design met its expectations, which further indicates the primary beneficiary of this project was HEP. Further, our observation of the building's addition concluded that the accelerator expansion left no room in the new space for additional users. When we brought this to the attention of Argonne officials, we were told that the space could later be used by other programs.

However, according to an official within the Department's Office of Acquisition and Project Management, this would not be an appropriate justification under the Department Order to fund a project as an IGPP.

Building 400A

Under IGPP, Argonne expanded Building 400A to house cryogenic equipment purchased for the Office of Basic Energy Sciences (BES) Advanced Photon Source (APS) Upgrade Project. The total cost to expand the facility was \$2.8 million. The project justification stated that without the facility there would be no place to install the APS Upgrade Project's supplied liquid helium refrigeration system. Although the project documents indicate that other research programs that use, or could use, liquid helium cryogenic systems could benefit, it is unlikely as the facility is located inside the ring of the APS. We discussed the project with Argonne Site Office officials who stated that because the APS is a user facility that many programs use, it would be an appropriate IGPP. However, when we raised this question with the Office of Science (Science), we were told that BES was the "landlord" of the APS and, thus, should fund the project. As part of its mission, BES conceives, plans, designs, constructs and operates the APS, a user facility. According to Department Order 522.1, *Pricing of Departmental Materials and Services*, Science's user facilities are made available to users at no cost for research, which is of Department programmatic interest. When we brought this issue to the attention of the Office of Acquisition and Project Management, it questioned why improvements to a user facility, built with appropriated funds for the express purpose of being available for research by a broad community of qualified users, would be funded with indirect funds, and whether using such funds may effectively supplement BES appropriations. Finally, we concluded that this project should have been part of the APS Upgrade Project, as it was necessary to house the equipment purchased for that line-item project.

Laboratory Office Module 437

The justification for this \$2.7 million laboratory office module buildout cited a shortage of office space to support scientific programs operating at the APS. As mentioned earlier, the APS is a user facility operated by BES. The original APS construction project included an initial set of modules. The unfinished areas of the APS were to be built out by the users as demand for the facility's accelerator increased. During our tour, we learned that the new module was intended for APS Upgrade Project personnel; however, they remained in the main building. The offices were occupied by other users to allow easy access to their experiments running at the APS. Accordingly, the module was not providing general office space for the site; instead, offices were directly tied to research at the APS. As stated previously, per Department Order 522.1, Science's user facilities are made available to users at no cost for research, which is of Department programmatic interest.

Multiuser Clean Room

This IGPP plan is to build an \$8.3 million clean room at the Center for Nanoscale Materials (CNM), another BES user facility. Our analysis of the project file found that the clean room was not intended to benefit the CNM but rather another project supported by the Laboratory Directed

Research and Development (LDRD) program. Specifically, meeting notes in the project file state that the new clean room was needed to produce as many as 15,000 telescope detectors for the LDRD project. The project file further indicated that there was no funding for the tools needed for the clean room and no strategy to obtain the funding, violating another requirement to provide a complete and usable facility to satisfy mission need at the site. The Argonne Site Office provided additional information from Argonne's analysis of clean room siting options, which indicated that using the CNM's existing clean room space was fulfilling the telescope detector project's needs; however, new space would be required by January 2016 as the CNM space would be returned to the user facility and no longer be available for use. Argonne's analysis also justified expanding the clean room space at the CNM based on expected growth in the Mesoscience program in 2018.

Although each of the IGPPs above identified other potential users beyond the primary program, it was unclear to us how much benefit would be afforded to the other programs. We presented a description of these projects to the Department's Office of Acquisition and Project Management and were told the projects, as described, did not seem to be an appropriate use of IGPP funding. Further, officials pointed out that Department Order 430.1B does not reference emerging program needs as an acceptable justification for using IGPP funding.

Management of Infrastructure Projects

The indirect funding of program specific infrastructure at Argonne occurred, in part, because Science did not clearly communicate the appropriate funding mechanisms available for minor construction projects. Additionally, there were differing interpretations of the multiprogram requirements for funding IGPPs. Lastly, ineffective reviews by managers and project officers allowed these projects to commence despite the requirements of the Department Order.

Communication Issues

We found that Science did not clearly communicate the appropriate mechanisms for funding minor construction projects. Initially, Science officials told us that GPP funding was not available to multiprogram sites like Argonne. Corroborating these statements, we found that Science's FY 2009 Congressional Budget Request stated that "IGPP funding increases significantly in FY 2009 reflecting the elimination of direct funded GPP for multi-program sites, as that funding is transferred to the Science Laboratories Infrastructure program to support increased line item construction under the Office of Science Infrastructure Initiative." An Argonne official we spoke to also indicated that it was their belief that GPP funding was not available. In subsequent conversations, Science officials stated that GPP funding was still available to multiprogram laboratories and that there was no intent for programmatic funding of GPPs to go away. However, these officials acknowledged that they should have provided guidance to help sites interpret when it was appropriate to use IGPP funding or necessary to request GPP funding. Further, an official from the Science budget office noted that budget constraints have reduced the funding available for GPPs and that, although GPP could be requested, sites would likely be told to accomplish the project with existing program funds or through efficiencies. We concluded that the confusion over the availability of GPP funding created pressure for sites to use indirect funding to accomplish the projects as IGPPs.

Interpretation of Requirements

We found that there were differing interpretations of the IGPP requirements in the Department Order 430.1B. During our audit, Argonne Site Office officials strongly contended that the four projects above were appropriate uses of IGPP funding and referenced "multi-programmatic/interdisciplinary scientific laboratory and office space" as an example of IGPP from the Department Order. To Argonne Site Office officials, this meant IGPP funding could be used in those instances where infrastructure upgrades are intended to provide institutional type capabilities that support Argonne's current and/or emerging scientific needs. However, according to the Department's Office of Acquisition and Project Management, the Department Order 430.1B does not reference "emerging needs," i.e., anticipated needs, as an acceptable purpose of IGPPs as procurement principles usually include the concept of a "bona fide need." U.S. Code Title 31, Section 1502, "the Bona Fide Need Rule" requires appropriated funds be used only for goods and services for which a need arises during the period of that appropriation's availability for obligation. Furthermore, Argonne Site Office officials interpreted the multiprogram requirement of the Department Order to mean "multiuser" and, thus, considered the requirement satisfied if the infrastructure project provided a benefit to a user facility. However, the Office of Acquisition and Project Management disagreed with that interpretation, specifically noting that user facilities were built by BES as part of its mission and questioned whether the use of funds collected through overhead accounts effectively supplemented BES' appropriations. According to Department Order 522.1, Science's user facilities are made available to users at no cost for research, which is of Department programmatic interest.

Project Reviews

Argonne Site Office managers and project officers did not adequately review or enforce the requirement of Department Order 430.1B that projects be of a general institutional nature prior to their start. Argonne personnel reviewed IGPP projects to ensure they were of a general institutional nature and suggested, in justifications, the existence of other potential users of the projects beyond the primary program. However, when we asked Argonne Site Office officials about these justifications, they stated that they had general discussions with Argonne personnel regarding how the projects would benefit other programs but accepted the claims without requesting further support. In fact, the officials stated that Argonne's Budget Office makes determinations regarding how a project is funded. We learned that the Budget Office personnel did not conduct any further reviews themselves but merely passed along the justifications made by the project officers. Finally, although the Department was to receive certifications on the appropriateness of IGPPs before the projects started, an Argonne Site Office official stated that they only sent the required certifications to Science once a year as part of its fourth quarter maintenance report. Since we brought this issue to their attention, Argonne Site Office officials indicated that they realigned their reporting procedures, beginning in July 2014, to send the Science representative a copy of the approval and certification letter for each IGPP project prior to the project start and thus, they believe they are now meeting the requirement.

Cost and Planning Impact

By funding some program-specific construction projects as IGPPs through indirect rates, other Department programs may have paid for a share of projects that provided no benefit to them. Additionally, IGPP indirect funding may have been used for program-specific needs, less funding was available for completing other general purpose infrastructure improvements. Argonne's site planning process and its Annual Laboratory Plans identified a number of other important general purpose infrastructure projects that did not receive IGPP funding. Finally, as an IGPP, these projects received less visibility and funding control. In particular, the Building 400A Cryogenics Facility would have been managed as part of the larger APS Upgrade Project and subject to additional requirements in Department Order 413.3B, *Program and Project Management for the Acquisition of Capital Assets*.

RECOMMENDATIONS

To strengthen controls over minor infrastructure projects, we recommend that the Director, Office of Management, in coordination with the Chief Financial Officer:

1. Review policy requirements relating to IGPPs and revise them as necessary to clarify the appropriate use of indirect funds for construction and the Departmental controls over the approval of those projects; and
2. Make a determination on whether the four projects discussed in our report appropriately used IGPP funding.

We also recommend that the Deputy Director for Field Operations, Office of Science, take into consideration any clarifications on the requirements and, as appropriate:

3. Communicate the availability and process for requesting programmatic funding for minor construction projects;
4. Direct the Manager, Argonne Site Office, to perform thorough reviews of IGPP requests and verify that justifications meet Departmental requirements; and
5. Direct the Manager, Argonne Site Office, to adhere to the requirements of Department Order 430.1B to certify the appropriateness of IGPPs to the Headquarters program office before the start of each project.

MANAGEMENT RESPONSE

Management concurred with the report's findings and recommendations and provided corrective actions to address the issues identified in this report. The Office of Management, in coordination with the Chief Financial Officer, agreed to review Department Order 430.1B as it relates to IGPPs. Further, the Office of Management determined that Argonne's expansion of the use of indirect funds to include construction projects supporting Department user facilities was not consistent with the plain reading of the Order, and agreed, in coordination with Office of Science, to review the unexecuted multiuser clean room project to ensure compliance with Department Orders and Program direction. The Office of Science also agreed to issue guidance related to funding of minor construction projects and to review its internal processes and update, as necessary, to ensure appropriate review and oversight.

AUDITOR COMMENTS

We consider management's comments and planned corrective actions to be fully responsive to our findings and recommendations.

OBJECTIVE, SCOPE AND METHODOLOGY

Objective

The objective of this audit was to determine whether the Argonne National Laboratory (Argonne) appropriately managed its infrastructure projects.

Scope

The audit was performed February 2014 through February 2015. We conducted work at Argonne in Argonne, Illinois, and the Office of Science (Science) Headquarters in Germantown, Maryland. The scope of the audit included infrastructure projects active October 2009 through January 2014. The audit was conducted under Office of Inspector General Project Number A14CH025.

Methodology

To accomplish our audit objective, we:

- Obtained and reviewed relevant laws, regulations, policies, procedures, and contractual requirements related to infrastructure activities at the national laboratories.
- Reviewed relevant Office of Inspector General and Government Accountability Office reports.
- Interviewed key personnel from Argonne, Science, the Office of the Chief Financial Officer, and the Office of Acquisition and Project Management.
- Evaluated site-specific infrastructure planning and management documents.
- Judgmentally selected and reviewed a sample of 25 infrastructure projects totaling \$32.1 million conducted at Argonne during the audit scope. The projects were selected based on attributes, such as estimated project costs and project types, among other attributes. We evaluated the projects for compliance with laws, regulations, policies, procedures, and contractual requirements related to infrastructure projects. Because we did not use statistical samples during this audit, we could not project the results of our analyses to the population.
- Toured the site and observed a number of the projects selected for review to gain understanding of the scope and nature of the projects.
- Judgmentally selected 24 subcontracts associated with sample projects. For this analysis, we selected subcontracts based primarily on cost. We evaluated the subcontracts and supporting documentation for compliance with contractual requirements. Because we did not use statistical samples during this audit, we could not project the results of our analyses to the population.

We conducted this performance audit in accordance with generally accepted Government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objective. We believe the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objective. Accordingly, we assessed significant internal controls and compliance with laws and regulations necessary to satisfy the audit objective. In particular, we assessed the implementation of the *GPRA Modernization Act of 2010* and found that the Department had not established Department-wide performance measures related to the management of infrastructure projects. 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. Finally, we conducted an assessment of computer-processed data relevant to our audit objective and determined that the data was sufficiently reliable for the purposes of our report.

An exit conference was held with Department officials on February 9, 2015.

PRIOR REPORTS

- Audit Report on [*The Department's Infrastructure Modernization Projects under the Recovery and Reinvestment Act of 2009*](#) (OAS-RA-L-11-04, March 2011). This audit reviewed six Office of Science (Science) General Plant Projects and three Science Laboratories Infrastructure projects at the Oak Ridge National Laboratory and the Lawrence Berkeley National Laboratory (LBNL) that received funding under the *American Recovery and Reinvestment Act of 2009* (Recovery Act). The audit found one instance where LBNL planned to purchase a switching station that would not be needed or fully operable until future construction was completed. The audit found that this occurred because LBNL did not adequately ensure that Recovery Act spending yielded the optimum benefit to the Department of Energy due to its efforts to promptly spend surplus Recovery Act funds.
- Audit Report on [*Relativistic Heavy Ion Collider Project*](#) (DOE/IG-0543, March 2002). This audit found that the Relativistic Heavy Ion Collider (RHIC) Project at Brookhaven National Laboratory (Brookhaven) did not fully meet performance and cost expectations when it was designated as an operating facility. Specifically, the audit found that Brookhaven undercharged about \$20 million of overhead costs to the RHIC Project by not using the full overhead rates. Additionally, Brookhaven inappropriately used at least \$12 million of General Plant Projects and maintenance funds for RHIC Project work.

MANAGEMENT COMMENTS

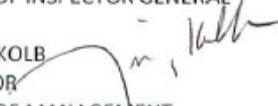


Department of Energy

Washington, DC 20585

January 20, 2015

MEMORANDUM FOR APRIL G. STEPHENSON
 ASSISTANT INSPECTOR GENERAL FOR AUDITS
 OFFICE OF INSPECTOR GENERAL

FROM: INGRID KOLB 
 DIRECTOR
 OFFICE OF MANAGEMENT

SUBJECT: Response to Inspector General's Draft Report, "Argonne National Laboratory Infrastructure Projects" (A14CH025, OAS-M-15-XX)

Thank you for the opportunity to review and comment on the subject draft report. The following responses to your recommendations have been appropriately staffed with personnel from the Office of Science and the Chief Financial Officer. The Office of Management (MA) responses to recommendations 1 and 2 follow:

Recommendation 1: *Review policy requirements relating to Institutional General Plant Projects and revise them as necessary to clarify the appropriate use of indirect funds for construction and the Departmental controls over the approval of those projects.*

Response: Concur. The Office of Management, in coordination with the Chief Financial Officer, agrees to review and amend Department of Energy Order 430.1B, Real Property Asset Management (RPAM), Attachment 6, Institutional General Plant Projects, and applicable Departmental procedures as necessary to ensure authorized uses of the Secretary's minor construction authority have adequate controls.

Recommendation 2: *Make a determination on whether the four projects discussed in our report appropriately used IGPP funding.*

Response: Criteria for appropriate use of indirect funding to complete minor construction projects is specified in Department Order 430.1B, Real Property Asset Management, Attachment 6, Institutional General Plant Projects.



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IGPP Criteria (per DOE O430.1B, Attachment 6)
<p>Each IGPP project must achieve all of the following criteria:</p> <ul style="list-style-type: none"> • Benefits “multiple cost objectives.” • Serves “general-purpose site wide needs.” • Directly benefits more than one program. • Provides beneficial cost impact on site’s operations. • Replaces or upgrades a core utility, land or facility. • Improves productivity or efficiency in a core utility, land or facility. • Enables world-class science and technology. • Provides a complete and usable facility.

Based on the information included in the draft report and a document titled *Argonne Infrastructure Projects Coordination Draft Response*, dated October 17, 2014, the Office of Management finds that the Argonne National Laboratory has expanded the use of indirect funds to include construction projects supporting DOE user facilities, a use not anticipated by a plain reading of DOE O 430.1B. The concept of IGPP will be reviewed as part of the response to recommendation 1, and appropriate applicability will be included in order revisions.

Applying the current IGPP criteria and working collaboratively, the Office of Science and the Office of Management will review the unexecuted “Multi-User Clean Room” project to ensure compliance with Departmental Orders and Program direction.

Please direct any questions regarding this response, to Ms. Monja Vadnais, Director, Facilities and Infrastructure Division, Office of Property Management. She may be reached at (202) 586-6199.

Office of Science responses to Recommendations 3, 4, and 5 follow.

Recommendation 3: *Communicate the availability and process for requesting programmatic funding for minor construction projects.*

Response: Concur. The Office of Science uses its Annual Laboratory Planning (ALP) process to communicate expectations for infrastructure planning and as a key input to budget formulation. This year’s ALP guidance will be issued by April 2015, and it will include this clarification.

Recommendation 4: *Direct the Manager, Argonne Site Office, to perform thorough reviews of IGPP requests and verify that justifications meet Departmental requirements.*

Response: Concur. The Office of Science will take this opportunity to review its internal processes and procedures across all of its field sites, and update them as

necessary to ensure all Site Offices are providing thorough reviews, proper oversight, and appropriate notifications to SC Headquarters. Updates will be published in the Office of Science Management System (SCMS) by June 2015.

Recommendation 5: *Direct the Manager, Argonne Site Office, to adhere to the requirements of Department Order 430.1B to certify the appropriateness of IGPPs to the Headquarters program office before the start of each project.*

Response: Concur. The Office of Science will take this opportunity to review its internal processes and procedures across all of its field sites, and update them as necessary to ensure all Site Offices are providing thorough reviews, proper oversight, and appropriate notifications to SC Headquarters. Updates will be published in SCMS by June 2015.

Please direct any questions regarding SC's responses to Ms. Stephanie Short, Associate Deputy Director for Field Operations, on (202) 586-2827.

FEEDBACK

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