

Office of the Inspector General

Defense Nuclear Facilities Safety Board

Annual Plan

Fiscal Year 2025



I am pleased to present the Office of the Inspector General's (OIG) fiscal year (FY) 2025 Annual Plan for our work pertaining to the Defense Nuclear Facilities Safety Board (DNFSB). The Annual Plan provides the audit and investigative strategies and associated summaries of the specific work planned for the coming year. In addition, it sets forth the OIG's formal strategy for identifying priority issues and managing its workload and resources for FY 2025.

Congress created the DNFSB in September 1988 as an independent Executive Branch agency to identify the

nature and consequences of potential threats to public health and safety at the U.S. Department of Energy's (DOE) defense nuclear facilities, elevate those issues to the highest levels of authority, and inform the public. The DNFSB strives to ensure implementation of safety standards at the DOE's defense nuclear facilities, conducts in-depth reviews of new DOE defense facilities to help ensure the early integration of safety into design and construction, and provides oversight to mitigate the possibility of an accidental detonation during the evaluation, maintenance, or dismantling of nuclear weapons.

The OIG prepared this Annual Plan to align with the OIG Strategic Plan for FYs 2024–2028, which is based, in part, on an assessment of the strategic challenges facing the DNFSB. The Strategic Plan identifies OIG priorities and establishes a shared set of expectations regarding the goals we expect to achieve and the strategies we will employ. The OIG based this Annual Plan on the foundation of the Strategic Plan and *The Inspector General's Assessment of the Most Serious Management and Performance Challenges Facing the Defense Nuclear Facilities Safety Board in Fiscal Year 2025.* In developing this Annual Plan, the OIG sought input from the DNFSB Chair, DNFSB Board members, DNFSB staff at headquarters and onsite at DOE defense nuclear facilities, and members of Congress. We have programmed all available resources to address the matters identified in this plan. This approach maximizes the use of our resources. However, it is sometimes necessary to modify this plan as circumstances, priorities, or resources warrant in response to a changing environment.

Robert J. Feitel

Robert J. Feitel Inspector General

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MISSION AND AUTHORITY

The NRC OIG was established as a statutory entity on April 15, 1989, in accordance with the 1988 amendments to the Inspector General Act, to provide oversight of NRC operations. In addition, the Consolidated Appropriations Act of 2014, provided that, notwithstanding any other provision of law, the NRC Inspector General (IG) would be authorized in 2014 and subsequent years to exercise the same authorities concerning the DNFSB, as determined by the NRC IG, as the IG exercises under the Inspector General Act of 1978 (5 U.S.C. 401–424) for the NRC.

The OIG's mission is to conduct independent and objective audits, evaluations, and investigations of DNFSB programs. In furtherance of this mission, and of particular importance to the OIG's Annual Plan development, the IG has identified what he considers to be the most serious management and performance challenges facing the DNFSB and assessed the DNFSB's progress in addressing those challenges. These challenges are:

- 1. Ensuring a Healthy Culture and Climate During Leadership Transitions and Reorganizations;
- 2. Managing Resources to Address Critical Skills; and,
- 3. Continuing to Prioritize the DNFSB's Focus on Technical Oversight and Reviews.

Through its Issue Area Monitoring program, the OIG staff monitor the DNFSB's performance on these management and performance challenges. These challenges help the OIG make informed decisions concerning which audits and evaluations it will conduct during the fiscal year.

PLANNING STRATEGY

The OIG links the FY 2025 Annual Plan with the OIG's Strategic Plan for FYs 2024–2028. The Strategic Plan identifies the significant challenges and critical risk areas facing the DNFSB so that the IG may direct optimal resources to these areas.

The Strategic Plan recognizes the mission and functional areas of the DNFSB and the significant challenges it faces in successfully implementing its regulatory programs. The Strategic Plan presents strategies for reviewing and evaluating

¹ The challenges are not ranked in any order of importance.

DNFSB programs under the strategic goals that the OIG established. The OIG's three DNFSB-specific strategic goals are individual and distinct; together, they allow the OIG to assess its success in fulfilling its vision. The OIG's strategic goals for the DNFSB are:

- Safety—Strengthen the DNFSB's efforts to oversee the safe operation of DOE defense nuclear facilities;
- Security—Strengthen the DNFSB's efforts to address evolving security threats; and,
- Corporate Support—Increase the economy, efficiency, and effectiveness with which the DNFSB manages and exercises stewardship over its resources.

To ensure that each audit, evaluation, and investigation carried out by the OIG aligns with the Strategic Plan, in Appendices A and B the OIG has cross-walked the program areas selected for audit, evaluation, and investigation from the Annual Plan to the Strategic Plan.

AUDIT AND INVESTIGATION OVERVIEW

Congress established the DNFSB, an independent executive branch agency, in September 1988. The DNFSB is charged with providing technical safety oversight of the DOE's defense nuclear facilities and activities to provide adequate protection of the health and safety of the public and workers. Its mission is to provide independent analysis, advice, and recommendations to the Secretary of Energy, in the Secretary's role as operator and regulator of the DOE's defense nuclear facilities, on matters pertaining to the adequate protection of public health and safety at these facilities.

When fully staffed, the DNFSB's board is composed of five presidentially appointed, Senate-confirmed members who are required by law to be respected experts in the field of nuclear safety with demonstrated competence and knowledge relevant to the DNFSB's independent investigative and oversight functions. The agency's budget request for FY 2025 includes \$47,210,000 and 128 FTEs to carry out the DNFSB's mission.

The DNFSB's enabling legislation assigns specific functions to the agency for accomplishing its safety oversight mission, including:

 Reviewing and evaluating the content and implementation of standards relating to the design, construction, operation, and decommissioning of DOE defense nuclear facilities and recommending to the Secretary of Energy specific measures needed to ensure that public health and safety are adequately protected;

- Investigating any event or practice at a DOE defense nuclear facility which the DNFSB determines has adversely affected, or may adversely affect, public health and safety;
- Reviewing the design of new DOE defense nuclear facilities before construction begins and recommending modifications of the design deemed necessary to ensure public health and safety; and,
- Making recommendations to the Secretary of Energy with respect to DOE defense nuclear facilities—including recommendations related to the operation of such facilities, standards, and research needs—as the Board determines are necessary to ensure adequate protection of public health and safety and the health and safety of employees and contractors at such facilities. In making its recommendations, the DNFSB shall consider, and specifically assess, risk and the technical and economic feasibility of implementing the recommended measures.

The OIG's audit and investigation oversight responsibilities relate to the array of programs, functions, and support activities the DNFSB employs to accomplish its mission.

AUDIT STRATEGY

Effective audit planning requires current knowledge of the DNFSB's mission and the programs and activities used to carry out that mission. Accordingly, the OIG continually monitors specific issue areas to strengthen its internal coordination and overall planning process. Under the Issue Area Monitoring program, the OIG assigns responsibilities to staff, designated as issue area monitors, to keep abreast of major DNFSB programs and activities. The broad monitoring areas address information management, nuclear safety, and corporate support.

The audit planning process yields audit assignments that identify opportunities for increased efficiency, economy, and effectiveness in the DNFSB's programs and operations; detect and prevent fraud, waste, abuse, and mismanagement; improve program and security activities; and, respond to emerging circumstances and priorities. The OIG prioritizes audits based on:

- Legislative requirements;
- Critical agency risk areas;
- Emphasis by the President, Congress, Board Chair, or other Board members;

- A program's susceptibility to fraud, manipulation, or other irregularities;
- Amount of financial or other resources involved in a program area;
- Emerging areas of heightened risk, changed conditions, or sensitivity of an organization, program, function, or activities;
- Prior audit experience, including assessments of the adequacy of internal controls; and,
- Availability of audit resources.

INVESTIGATIVE STRATEGY

OIG investigative strategies and initiatives add value to the DNFSB programs and operations by identifying and investigating allegations of fraud, waste, and abuse that may lead to criminal, civil, and administrative penalties and recoveries. The OIG has designed specific performance targets focusing on effectiveness.

Because the DNFSB's mission is to protect public health and safety, the main investigative concentration involves alleged DNFSB misconduct or inappropriate actions that could adversely impact health and safety-related matters. These investigations typically relate to allegations of:

- Misconduct by high-ranking DNFSB officials and other DNFSB officials, such as managers and inspectors, whose positions directly impact public health and safety;
- Failure by the DNFSB's management to ensure that health and safety matters are appropriately addressed;
- Conflict-of-interest and ethics violations; or,
- Indications of management or supervisory retaliation or reprisal.

The OIG will also monitor specific high-risk areas within the DNFSB's corporate support program management that are most vulnerable to fraud, waste, abuse, and mismanagement. A significant focus will be on emerging information technology and national security issues that could negatively impact the security and integrity of the DNFSB's data and operations. The OIG is committed to improving the security of the constantly changing electronic business environment by investigating unauthorized intrusions and computer-related fraud and by conducting computer forensic examinations. Other proactive initiatives will focus on identifying instances of procurement fraud, theft of property, insider threats, and misuse or abuse of government travel charge and government purchase cards.

The OIG will meet with the DNFSB's internal and external stakeholders to identify systemic issues or vulnerabilities as part of these proactive initiatives. This approach will allow for the identification of potential vulnerabilities and the opportunity to improve agency performance.

OIG personnel will routinely interact with public interest groups, individual citizens, industry workers, and DNFSB staff to identify possible lapses in the DNFSB's oversight that could impact public health and safety. The OIG will also conduct proactive initiatives and reviews into areas of current or future regulatory safety or security interest to identify emerging issues or address ongoing concerns regarding the quality of the DNFSB's oversight. Appendix B provides investigative priorities, objectives, and initiatives for FY 2025. Specific investigations are not included in the Annual Plan because investigations are primarily responsive to reported violations of law and misconduct by DNFSB employees and contractors, as well as allegations of irregularities or abuse in the DNFSB's programs and operations.

PERFORMANCE MEASURES

For FY 2025, the OIG will use several key performance measures and targets for gauging the relevance and impact of our audit, evaluation, and investigative work. The OIG calculates these measures relative to each of its strategic goals to determine how well it is accomplishing its objectives. The performance measures are:

- Percentage of OIG audit products and activities that (1) cause the agency to
 take corrective action to improve agency safety, security, or corporate
 support programs; (2) result in the agency strengthening adherence to
 agency policies, procedures, or requirements; (3) identify actual dollar
 savings and monetary benefits; or, (4) in appropriate cases, result in the
 agency taking action to reduce regulatory burdens;
- Percentage of audit recommendations agreed to by the agency;
- Percentage of final agency actions taken within two years of audit recommendations;
- Percentage of OIG investigative products and activities that identify opportunities for improvements to agency safety, security, or corporate support programs; strengthen adherence to policies/procedures; or, confirm or disprove allegations of wrongdoing;

- Percentage of agency actions taken in response to investigative reports;
 and,
- Percentage of cases completed in less than 18 months.

OPERATIONAL PROCESSES

The following sections detail the approach used to carry out the audit and investigative responsibilities previously discussed.

AUDITS

The audit process begins with the development of this Annual Plan. The Annual Plan lists the audits planned to be initiated during the year and their general objectives. The Annual Plan for Audits is a "living" document that may be revised as circumstances warrant, with a subsequent redistribution of staff resources.

The OIG performs the following types of audits:

- **Performance** audits focus on the DNFSB's administrative and program operations and evaluate the effectiveness and efficiency with which managerial responsibilities are carried out, including whether the programs achieve intended results;
- **Financial** audits, including the annual financial statement audit, attest to the reasonableness of the DNFSB's financial statements, and evaluate financial programs; and,
- **Contract** audits evaluate the costs of goods and services procured by the DNFSB from commercial enterprises.

The OIG's audit process involves specific steps, ranging from annual audit planning to audit follow-up activities. The underlying goal of the audit process is to maintain an open channel of communication between the auditors and DNFSB officials to ensure that audit findings are accurate and fairly presented in OIG reports.

The audit process comprises the steps summarized in Figure 1.

Figure 1: Steps in the Audit Process

Audit Process Step	Action
Audit Notification	The OIG formally notifies the office responsible for a specific program, activity, or function of its intent to begin an audit.
Entrance Conference	The OIG meets with agency officials to advise them of the objective(s) and scope of the audit and the general methodology it will follow.
Survey	The OIG conducts exploratory work to gather data for refining audit objectives; documenting internal control systems; becoming familiar with the activities, programs, and processes to be audited; and, identifying areas of concern to management.
Audit Fieldwork	Based on the results of the survey work, the audit team recommends to the Assistant Inspector General for Audits (AIGA) whether to proceed with the audit. If the AIGA decides to proceed with the audit, the OIG then performs a comprehensive review of selected areas of a program, activity, or function using an audit program developed specifically to address the audit objectives.
End of Fieldwork Briefing with the Agency	At the conclusion of audit fieldwork, the audit team discusses the preliminary report findings and recommendations with the auditee.
Discussion Draft Report	The OIG provides a discussion draft copy of the report to agency management to enable them to prepare for the exit conference.
Exit Conference	The OIG meets with the appropriate agency officials to review the discussion draft report and provide agency management the opportunity to confirm information, ask questions, and clarify data.
Formal Draft Report	If requested by agency management during the exit conference, the OIG provides a final draft copy of the report that includes comments or revisions from the exit conference and invites agency management to provide formal written comments.

Final Audit Report	The final report includes, as necessary, any revisions to the facts, conclusions, and recommendations in the draft report discussed in the exit conference or as a result of written comments on the draft by agency managers. Formal written comments by agency management are included as an appendix to the report, when applicable. Final audit reports will be publicly issued, except for those containing sensitive or classified information.
Response to Report Recommendations	Offices responsible for the audited program or process provide a written response, usually within 30 calendar days, on each recommendation contained in the final report. If agency management agrees with the recommendation, the response describes corrective actions taken or planned, with actual or target completion dates. However, if agency management disagrees, the response provides reasons for disagreement and may propose alternative corrective actions.
Impasse Resolution	If the responsible office and the OIG reach an impasse over a recommended action, or the office's response to a recommendation is in the OIG's view unsatisfactory, the OIG may request the intervention of the Chair to achieve resolution.
Audit Follow-up and Closure	This process ensures that recommendations made to management are implemented.

Source: OIG Audit Manual

In its Semiannual Report to Congress, the OIG reports on the status of unimplemented audit recommendations and the expected timetable for agency implementation of final corrective actions.

INVESTIGATIONS

The OIG's investigative process typically begins with the receipt of a complaint of fraud, mismanagement, or misconduct. Because the OIG must decide whether to initiate an investigation within a few days of such receipt, the OIG does not schedule specific investigations in its annual investigative plan.

The OIG opens an investigation following both its investigative priorities as outlined in the OIG Strategic Plan and the prosecutorial guidelines established by the U. S. Department of Justice. In addition, the Quality Standards for Investigations issued by the Council of the Inspectors General on Integrity and Efficiency, the OIG's Investigations Division Manual, and various guidance provided periodically by the DOJ govern the OIG's investigations.

Only four individuals in the OIG can authorize opening an investigation: the IG, the Deputy IG, the Assistant IG for Investigations (AIGI), and the Special Agent in Charge (SAC). Every complaint received by the OIG is given a unique identification number and entered into the OIG case management system. Some complaints result in investigations, while the OIG retains others as the basis for audits, refers them to DNFSB management, or, if appropriate, directs them to another law enforcement agency.

When the OIG opens an investigation, the SAC or the Assistant Special Agent in Charge assigns it to a special agent or investigator who prepares a plan of investigation. This planning process includes reviewing relevant criminal and civil statutes, program regulations, and applicable agency policies. The OIG special agent or investigator then investigates using a variety of techniques to ensure completion.

Where an OIG special agent determines that a person may have committed a crime, the agent will discuss the investigation with a federal, state, or local prosecutor to determine if prosecution will be pursued. If the prosecuting attorney decides to proceed with a criminal or civil prosecution, the special agent assists the attorney in any preparation for court proceedings that may be required.

For investigations that do not result in a prosecution but are handled administratively by the agency, the special agent or investigator prepares a report summarizing the facts gathered during the investigation. The OIG distributes the report to agency officials who need to know the investigative results. For investigative reports provided to agency officials regarding substantiated administrative misconduct, the OIG requires a response within 120 days regarding any potential action that may be taken due to the investigative findings. For all other investigative products, such as referrals of allegations and findings requiring a review of agency processes and procedures, the OIG requires a 90-day response, unless the agency and the OIG agree to an alternate deadline. For certain non-criminal investigations, OIG special agents involve the senior engineers from the OIG's Technical Services Section to assist in the review of complaints.

The OIG summarizes the criminal and administrative actions taken because of its investigations and includes this data in its Semiannual Report to Congress.

HOTLINE

The OIG Hotline Program provides NRC employees, contract employees, and the public with a confidential means of reporting to the OIG instances of fraud, waste, and abuse relating to agency programs and operations.

Please Contact:

E-mail: Online Form

Telephone: 1.800.233.3497

TDD: 1.800.201.7165, or 7-1-1

Address: U.S. Nuclear Regulatory Commission

Office of the Inspector General Hotline Program

Mail Stop O12-A12 11555 Rockville Pike

Rockville, Maryland 20852-2746

APPENDIX A

AUDITS PLANNED FOR FY 2025

Audit of the Defense Nuclear Facilities Safety Board's Fiscal Year 2025 Financial Statements

DESCRIPTION AND JUSTIFICATION: Under the *Accountability of Tax Dollars Act of 2002*, the DNFSB is required to submit audited financial statements annually. To facilitate the DNFSB's compliance with this requirement, the OIG has contracted with an Independent Public Accounting firm to conduct the audit of the DNFSB financial statements. The financial statements and accompanying audit report are due no later than November 17, 2025.

OBJECTIVES: The audit objectives are to:

- Express an opinion on whether the DNFSB's financial statements are presented fairly, in all material respects, in accordance with U.S. generally accepted accounting principles;
- Express an opinion on whether the DNFSB maintained, in all material respects, effective internal control over financial reporting; and,
- Report on compliance with certain provisions of laws, regulations, contracts, and grant agreements.

SCHEDULE: Initiate in the third quarter of FY 2025.

STRATEGIC GOAL 3: Corporate Support—Increase the economy, efficiency, and effectiveness with which the DNFSB manages and exercises stewardship over its resources.

STRATEGY 3-1: Identify areas of corporate support risk within the DNFSB and conduct audits and/or investigations that lead to improvements in DNFSB programs and operations.

Audit of the Defense Nuclear Facilities Safety Board's Fiscal Year 2024 Compliance with the Payment Integrity Information Act of 2019

DESCRIPTION AND JUSTIFICATION: The *Payment Integrity Information Act of 2019* (PIIA) requires federal agencies to annually assess and report on improper payments in their programs. Agencies must conduct risk assessments to identify programs vulnerable to improper payments and establish controls to prevent and detect such payments. The PIIA requires the OIG to review and report on the agency's compliance with the Act, including the implementation of corrective actions to reduce improper payments.

OBJECTIVES: The audit objectives are to:

- Assess the DNFSB's compliance with the PIIA; and,
- Report any material weaknesses in internal control.

SCHEDULE: Initiate in the second quarter of FY 2025.

STRATEGIC GOAL 3: Corporate Support—Increase the economy, efficiency, and effectiveness with which the DNFSB manages and exercises stewardship over its resources.

STRATEGY 3-1: Identify areas of corporate support risk within the DNFSB and conduct audits and/or investigations that lead to improvements in DNFSB programs and operations.

Audit of the Defense Nuclear Facilities Safety Board's Implementation of the Federal Information Security Modernization Act of 2014 for Fiscal Year 2025

DESCRIPTION AND JUSTIFICATION: The Federal Information Security Modernization Act (FISMA) outlines the information security management requirements for agencies, including the requirement for an annual independent assessment by the agency's Inspector General. In addition, FISMA includes provisions, such as those pertaining to the development of minimum standards for agency systems, aimed at further strengthening the security of federal government information and information systems. The annual assessments provide agencies with the information needed to determine the effectiveness of overall security programs and develop strategies and best practices for improving information security.

FISMA provides the framework for securing the federal government's information technology, including both unclassified and national security systems. All agencies must implement FISMA requirements and report annually to the OMB and Congress on the effectiveness of their security programs. To comply with this requirement, the OIG has contracted with an Independent Public Accounting firm to conduct the review.

OBJECTIVE: The audit objective will be to conduct an independent assessment of the DNFSB's FISMA implementation for Fiscal Year 2025.

SCHEDULE: Initiate in the second quarter of FY 2025.

STRATEGIC GOAL 2: Security—Strengthen the DNFSB's efforts to address evolving security threats.

STRATEGY 2-1: Identify risks in maintaining secure facility, personnel, and cyber security infrastructure, and conduct audits and/or investigations that lead to improvements in DNFSB programs and operations.

Audit of the Defense Nuclear Facilities Safety Board's Drug-Free Workplace Program

DESCRIPTION AND JUSTIFICATION: Executive Order 12564, Drug-Free Workplace, issued in September 1986, requires federal executive agencies to develop a plan for achieving the objective of a drug-free workplace and establish a program to test for the use of illegal drugs by employees in sensitive positions.

Public Law 100-71, enacted in July 1987, stipulates in Section 503 that the Department of Health and Human Services (HHS) establishes standards for federal workplace drug-testing programs. The Substance Abuse and Mental Health Services Administration (SAMHSA), an operating division of HHS, has developed the Drug Free Workplace Toolkit, which provides information to help employers develop and sustain successful drug-free workplace programs.

Because much of the work of the Board involves highly sensitive information that must not be compromised, it is prudent to verify that the DNFSB has a practicable drug-free workplace program that is consistent with Executive Order 12564.

OBJECTIVE: To determine if the DNFSB is effectively managing the Drug-Free Workplace program.

SCHEDULE: Initiate in the first quarter of FY 2025.

STRATEGIC GOAL 1: Safety—Strengthen the DNFSB's efforts to oversee the safe operation of DOE defense nuclear facilities.

STRATEGY 3-1: Identify areas of corporate support risk within DNFSB and conduct audits and/or investigations that lead to DNFSB program and operational improvements.

MANAGEMENT CHALLENGE 1: Ensuring a Healthy Culture and Climate During Leadership Transitions and Reorganizations.

Audit of the Defense Nuclear Facilities Safety Board's Information Technology Asset Management

DESCRIPTION AND JUSTIFICATION: Asset management gives an organization a snapshot of all the assets within the infrastructure at any given time. Effective information technology (IT) asset management is essential for maintaining the integrity, security, and efficiency of the DNFSB's IT infrastructure. The IT asset lifecycle consist of five phases: planning, acquiring, deploying, managing, and retiring and disposing. The management phase includes the monitoring of an asset's maintenance needs and performance, as well as continuous assessment of the asset's use and functionality.

The DNFSB's IT assets are important for the agency to execute its mission. Staff use laptops and mobile devices to perform day-to-day tasks at headquarters and other worksites. As such, the agency must provide its employees current and operational equipment.

OBJECTIVE: To determine the effectiveness of the DNFSB's processes and controls for managing and safeguarding its IT inventory.

SCHEDULE: Initiate in the third quarter of FY 2025.

STRATEGIC GOAL 2-3: Security—Strengthen the DNFSB's efforts to address evolving security threats; and, Corporate Support—Increase the economy, efficiency, and effectiveness with which the DNFSB manages and exercises stewardship over its resources.

STRATEGY 3-1: Identify areas of corporate support risk within the DNFSB and conduct audits and/or investigations that lead to DNFSB program and operational improvements.

Audit of the Defense Nuclear Facilities Safety Board's Contract Management and Oversight

DESCRIPTION AND JUSTIFICATION: The Federal Acquisition Regulation (FAR) is the primary regulation that all executive branch agencies must follow when acquiring products and services with appropriated funds. According to FAR section 2.101, acquisition begins when agency needs are established and includes the description of requirements to satisfy agency needs, solicitation and selection of sources, award of contracts, contract financing, contract performance, contract administration, and technical and management functions directly related to the process of fulfilling agency needs by contract.

The Office of the General Manager supports the Board by providing expertise in the fields of human resources, budget and finance, information technology (including cybersecurity), physical security, contracting, and records management. From October 1, 2020, to May 31, 2024, the DNFSB obligated approximately \$27 million to contracts. The DNFSB's budget provides funding for training of the Board's engineers and scientists, as well as technical service contracts. The budget's other services category includes \$6.3 million to fund a wide range of recurring information technology and administrative support needs of the Board in FY 2025 in areas such as physical and cybersecurity, information technology, administrative support, recruiting, and training of the Board's professional and administrative staff, including members of the Senior Executive Service.

OBJECTIVE: To determine if the DNFSB is providing effective management and oversight of all its contracts.

SCHEDULE: Initiate in the first quarter of FY 2025.

STRATEGIC GOAL 3: Corporate Support – Increase the economy, efficiency and effectiveness with which the DNFSB manages and exercises stewardship over its resources.

STRATEGY 3-1: Identify areas of corporate support risk within the DNFSB and conduct audits and/or investigations that lead to DNFSB program and operational improvements.

APPENDIX B

IN PROGRESS AUDITS

IN PROGRESS APPENDIX B

IN PROGRESS AUDIT

<u>Audit of the Defense Nuclear Facilities Safety Board's Review</u> <u>Agendas</u>

DESCRIPTION AND JUSTIFICATION: Under the Atomic Energy Act of 1954, as amended (AEA), the DNFSB is charged with providing independent safety oversight of the DOE defense nuclear facilities complex—a complex with the mission to design, manufacture, test, maintain, and decommission nuclear weapons and weapons production facilities, as well as other national security priorities. The AEA mandates that the DNFSB review the content and implementation of DOE standards, facility and system designs, and events and practices at DOE defense nuclear facilities. Based on its reviews, the DNFSB provides independent analysis, advice, and recommendations to inform the Secretary of Energy regarding issues of adequate protection of public health and safety and the health and safety of employees and contractors at DOE defense nuclear facilities. The DNFSB prioritizes its safety oversight activities based on risk to the public and workers, the types and quantities of nuclear and hazardous material at hand, and hazards of the operations involved.

As part of its oversight process, DNFSB staff create review agendas. A review agenda is the DNFSB's plan for conducting reviews at each of the DOE nuclear facilities. Developing agendas is a core function of the DNFSB's technical staff, as the reviews cover a wide range of technical areas. The review agendas serve as the road maps for the reviews, and they are used for both onsite and virtual reviews. The agendas are vital to performing effective DNFSB technical staff reviews, as planned and executed under the requirements contained in the DNFSB's Policy Directive I-530.1, Execution of Technical Staff Reviews.

OBJECTIVE: To determine the DNFSB's effectiveness in developing and applying its review agendas.

APPENDIX C

<u>INVESTIGATIONS – PRIORITIES,</u> <u>OBJECTIVES, AND INITIATIVES FOR FY 2025</u>

INTRODUCTION

The AIGI is responsible for developing and implementing an investigative program that furthers the OIG's objectives. The AIGI's primary responsibilities include investigating possible violations of criminal statutes relating to the DNFSB's programs and activities, investigating allegations of misconduct by DNFSB employees, interfacing with the DOJ on OIG-related criminal matters, and coordinating investigations and OIG initiatives with other federal, state, and local investigative agencies and other AIGIs.

Investigations cover various allegations concerning criminal wrongdoing or administrative misconduct affecting various DNFSB programs and operations. Investigations may be initiated because of allegations or referrals from private citizens; DNFSB employees; Congress; other federal, state, and local law enforcement agencies; the OIG Audits & Evaluations Division; the OIG Hotline; and, proactive efforts directed at areas bearing a high potential for fraud, waste, abuse, and mismanagement.

The OIG developed this investigative plan to focus investigative priorities and to use available resources most effectively. It provides strategies and plans for investigative work for FY 2025, in conjunction with the OIG Strategic Plan. As identified by the OIG, the most serious management and performance challenges facing the DNFSB were also considered in the development of this plan.

PRIORITIES

The OIG estimates it will initiate approximately five investigations in FY 2025. Reactive investigations into allegations of criminal and other wrongdoing and allegations of safety significance will take priority with respect to the OIG's use of available resources. Because the DNFSB's mission is to protect public health and safety, the AIGI's main concentration of effort and resources involves investigations of alleged DNFSB employee misconduct that could adversely impact matters related to public health and safety.

OBJECTIVE

To facilitate the most effective and efficient use of limited resources, the Investigations Division has established specific initiatives aimed at preventing and detecting fraud, waste, abuse, and mismanagement, as well as optimizing the DNFSB's effectiveness and efficiency. The Investigations Division will focus its investigative efforts in areas that include possible violations of criminal statutes relating to the DNFSB's programs and operations, and allegations of misconduct by DNFSB employees and managers.

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INITIATIVES

- Investigate allegations of misconduct by DNFSB employees and contractors in accordance with federal statutes, regulations, and DNFSB directives;
- Investigate alleged violations of government-wide ethics regulations and possible conflicts of interest;
- Conduct fraud awareness briefings and information presentations to provide a practical and implementable knowledge base for DNFSB employees and external stakeholders that supports anti-fraud activities;
- Conduct activities to protect the DNFSB's Information Technology (IT)
 infrastructure against both internal and external computer intrusions by
 working in close coordination with agency IT staff;
- Attempt to detect possible wrongdoing perpetrated against the DNFSB's
 procurement and contracting program. This will include periodic meetings
 with DNFSB management officials, contract specialists, project managers,
 project officers, and other relevant identified employees;
- Proactively review government travel charge card and government purchase card programs to prevent, detect, and investigate alleged misuse and abuse; and,
- Proactively review and maintain awareness in areas of DNFSB emphasis to identify emerging issues that may require future OIG involvement.

The OIG Hotline

- Promptly process complaints received via the OIG Hotline; and,
- Initiate investigations when warranted and properly dispose of allegations that do not warrant OIG investigation.

INVESTIGATIONS APPENDIX C

The Freedom of Information Act (FOIA) and the Privacy Act

 The OIG is an independent component in relation to the DNFSB and responds to requests for records that are exclusively OIG-related, such as FOIA requests for reports of OIG inspections, audits, or investigations relating to the programs and operations of the DNFSB; and,

 The General Counsel to the IG is the principal contact point within the OIG for advice and policy guidance on matters pertaining to the administration of FOIA and the Privacy Act. All FOIA/Privacy Act requests are handled professionally and expeditiously.

Liaison Program

- Maintain close working relationships with the Intelligence Community and other law enforcement agencies, public interest groups, and Congress, through periodic meetings with pertinent Congressional staff, public interest groups, and appropriate Intelligence Community and law enforcement organizations; and,
- Conduct liaison visits with DNFSB staff and stakeholders at sites within the DNFSB's jurisdiction to discuss and identify potential safety-related issues and future avenues of investigative interest.

ALLOCATION OF RESOURCES

The OIG's Investigations Division undertakes both proactive initiatives and reactive investigations. Approximately 85 percent of available investigative resources will be used for reactive investigations. The balance will be allocated to proactive investigative efforts such as reviews of DNFSB contract files, examinations of agency IT systems to identify weaknesses or misuse by agency employees, reviews of delinquent government travel and purchase card accounts, and other initiatives.

APPENDIX D

ABBREVIATIONS AND ACRONYMS

AIGA Assistant Inspector General for Audits & Evaluations

AIGI Assistant Inspector General for Investigations

DNFSB Defense Nuclear Facilities Safety Board

DOE U.S. Department of Energy

DOJ U. S. Department of Justice

FAR Federal Acquisition Regulation

FISMA Federal Information Security Modernization Act

FOIA Freedom of Information Act

FTE Full-Time Equivalent

FY Fiscal Year

HHS Department of Health and Human Services

IG Inspector General

IT Information Technology

NRC U.S. Nuclear Regulatory Commission

OIG Office of the Inspector General

PIIA Payment Integrity Information Act

SAC Special Agent in Charge

SAMHSA The Substance Abuse and Mental Health Services Administration