

**Doc. No. 5**

D00015060



Department of Energy  
Washington, DC 20585

September 2, 2008

MEMORANDUM FOR CAMILLE C. YUAN-SOO HOO  
MANAGER  
LIVERMORE SITE OFFICE  
NATIONAL NUCLEAR SECURITY ADMINISTRATION

FROM: WILLIAM A. ECKROADE *W.A. Eckroade*  
DIRECTOR  
OFFICE OF INDEPENDENT OVERSIGHT  
OFFICE OF HEALTH, SAFETY AND SECURITY

SUBJECT: Comments on the Interim Corrective Action Plan – Office of Independent Oversight Safeguards and Security and Cyber Security Inspection of the Lawrence Livermore National Laboratory, March – April 2008

The Office of Independent Oversight, within the Office of Health, Safety and Security, has reviewed the interim corrective action plan (CAP) submitted in response to our reports, *Office of Independent Oversight's Safeguards and Security Inspection of the Livermore Site Office and the Livermore National Laboratory*, and *Independent Oversight's Classified and Unclassified Cyber Security Inspection of the Livermore Site Office and the Livermore National Laboratory*. Independent Oversight agrees with the majority of Livermore Site Office comments on the Lawrence Livermore National Laboratory interim CAP. However, some of the corrective actions require additional clarification or detail to ensure the root cause analysis appropriately addresses the findings. Attached are specific comments on individual corrective actions. We look forward to receiving your final CAP.

If you have any questions please contact me at (301) 903-5781, or you may contact John Hyndman, Acting Director, Office of Security Evaluations, at (301) 903-5895, or John Boulden, Director, Office of Cyber Security Evaluations, at (301) 903-0324.

Attachment

cc: Glenn Podonsky, HS-1  
Michael Kilpatrick, HS-1

E-Mail cc: Bradley Peterson NA-70  
Thomas Pyke, IM-1  
Gerald Talbot, NA-10  
Duane Gordon, LSO  
John Hyndman, HS-61  
John Boulden, HS-62  
Linda Wilbanks, NA-65

**CONFIRMED TO BE UNCLASSIFIED**

DOE/OCS  
BY: J. L. Brodey, HS-93 (DR)  
Date: 3-20-09

WITH ATTACHMENTS/ENCL

*2 copies*



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**Comments on the Interim Corrective Action Plan to the  
Office of Independent Oversight's Safeguards and Security Inspection and  
Cyber Security Inspection of the Livermore Site Office and the Lawrence  
Livermore National Laboratory, March-April 2008**

FINDING	COMMENT
08APR24-LSO-4699-OA-IP.5-001-121	The proposed corrective actions, if appropriately implemented, appear adequate to address the findings.
08APR24-LSO-4699-OA-IP.5-001	
08APR24-LSO-4699-OA-IP.5-002	Milestone number 6 is scheduled in excess of 15 months to create a validated process for changing combinations of repositories when a person knowledgeable of the combination transfers or departs employment. This timeline seems excessive since the changing of combinations for personnel transfers and departures has been a long established requirement.
08APR24-LSO-4699-OA-IP.5-002-121	The proposed corrective actions, if appropriately implemented, appear adequate to address the findings.
08APR24-LSO-4699-OA-IP.5-003-121	
08APR24-LSO-4699-OA-IP.5-004-121	
08APR24-LSO-4699-OA-IP.5-003	
08APR24-LSO-4699-OA-IP.5-005-121	
08APR24-LSO-4699-OA-IP.5-006-121	
08APR24-LSO-4699-OA-PSP.2-001-121	The proposed corrective actions, if appropriately implemented, appear

	adequate to address the findings.
08APR24-LSO-4699-OA-PSP.2-002-121	The stated corrective actions will only partially address the identified deficiency. There are no proposed actions related to how Lawrence Livermore National Laboratory (LLNL) will deal with situations in which the Human Reliability Program Certifying Official approves recertification before the beginning of the month of the administratively established certification date. Without a process to change or modify the administratively established certification date, the potential exists for the next year's recertification to be completed after 12 months since the last certification date. Recommend establishing a milestone to address this issue.
08APR24-LSO-4699-OA-PSP.2-003-121	The proposed corrective actions, if appropriately implemented, appear adequate to address the findings.
08APR24-LSO-4699-OA-PSP.2-004-121	
08APR24-LSO-4699-OA-PSS.1-001-121	HS-61 agrees with the comment provided by Livermore Site Office (LSO).
08APR24-LSO-4699-OA-PSS.2-001-121	The proposed corrective actions, if appropriately implemented, appear adequate to address the findings.
08APR24-LSO-4699-OA-PSS.3-001-121	
08APR24-LSO-4699-OA-PSP.3-002-121	HS-61 agrees with the comment provided by LSO.
08APR24-LSO-4699-OA-PSS.2-002-121	The corrective action appears to be adequate; however, it is somewhat confusing. Milestone 2 states that compensatory measure will be implemented until the issue is resolved, while milestone 3 states; "... and determine if physical and/or technical security enhancements are required." Please clarify or provide additional information regarding these two