Congress of the United States
Washington, DC 20515

November 20, 2026

Ms. Orice Williams Brown
Acting Comptroller General of the United States
U.S. Government Accountability Office
441 G Street, NW
Washington, DC 20548

Dear Ms. Brown:

We write to request that the U.S. Government Accountability Office (GAO) conduct a comprehensive review of the Department of Energy's (the Department or DOE) sweeping "Project Velocity" initiative announced on August 13, 2026, which revised 46 operating directives and cancelled four other directives across the Department's National Laboratories, nuclear production plants, and defense nuclear sites.[1]

GAO has raised concerns over the Department's contract management and project oversight for decades, making this recent wholesale rewrite by the Department of dozens of operating directives highly concerning. Since 1990, GAO has designated acquisition management for DOE and the National Nuclear Security Administration (NNSA) as "high risk" due to persistent vulnerabilities in contractor oversight, cost overruns, and schedule delays. Most recently, GAO's examination of DOE's earlier project management streamlining efforts (GAO-26-108520) revealed that the Department failed to establish specific performance measures or empirical baselines, creating serious risks that project cost increases and schedule slips would go undetected. Additionally, GAO's August 2026 reporting on contractor assurance systems (GAO-26-107850) underscored that DOE lacks clear criteria and definitions to evaluate whether contractor assurance systems are effective, leaving Federal field offices ill-equipped to tailor oversight or enforce accountability.

Project Velocity represents a massive expansion of regulatory rollback across dozens of orders and directives. While DOE characterizes these changes as a transition from "procedural compliance" to "performance-based accountability," we are deeply concerned that the scale and speed of these alterations weaken critical safety protections, undermine independent Federal oversight, shift core responsibilities to Management and Operating (M&O) contractors without adequate safeguards, and potentially increase taxpayer liabilities and costs.

We are also mindful of GAO's body of work examining the interface between DOE and the Defense Nuclear Facilities Safety Board (the Board or DNFSB), including GAO's 2020 findings (GAO-21-141), which included recommendations intended to preserve transparent communication between the Board and DOE and to ensure Board access across DOE defense facilities. Given this history, and in light of recent access concerns raised by the DNFSB, we specifically request that GAO evaluate the degree to which Project Velocity's structural and directive changes—(1) impair, constrain, or otherwise diminish the DNFSB's operational

[1] [1] https://www.energy.gov/articles/energy-department-modernizes-national-laboratory-operations-strengthen-americas-scientific

visibility, access to technical data, and oversight capabilities, (2) hinder the Board's ability to fulfill its core statutory mission.

In light of these concerns, we request that GAO conduct an in-depth review examining the following areas:

1. **Justification, Empirical Baselines, and Risk Analysis:**
    - Examine whether DOE conducted empirical safety reviews, risk assessments, or cost-benefit analyses prior to executing these changes.
    - Determine the extent to which these regulatory rollbacks were driven by validated safety or efficiency improvements or based primarily on contractor efforts to lower operating costs, eliminate administrative burden, and reduce reporting requirements.

2. **Impact on Federal Oversight and Contractor Accountability:**
    - Assess how the modified and cancelled directives affect DOE's operational authority, contractual enforcement tools, and technical capacity to conduct independent Federal oversight of M&O contractors across DOE's labs, plants, and sites.
    - Analyze whether delegating greater authority to M&O contractors or shortening review timelines (such as reducing Quality Assurance Program approval times from 90 days to 30 days) reduces the ability of the Department to verify contractor performance.

3. **Safety Culture, Occurrence Reporting, and Whistleblower Mechanisms:**
    - Evaluate the operational impact of wholesale cancelling DOE Order 231.1B (*Environment, Safety and Health Reporting*), DOE Order 232.2A (*Occurrence Reporting and Processing of Operations Information*), and DOE Order 442.2 (*Differing Professional Opinions for Technical Issues Involving ES&H*).
    - Determine how the changes to standardized enterprise-wide databases (such as ORPS, CAIRS, and REMS) driven by Project Velocity impact early-warning detection, complex-wide trend analysis, transparency, and the ability of workers to challenge technical safety decisions without fear of retaliation or reprisal.

4. **DNFSB Interface and Statutory Oversight Access:**
    - Evaluate whether any revised directives, altered contractor requirements, or newly established localized processes restrict, delay, or impede the DNFSB's statutory right of access to facilities, safety-related information, and site personnel.
    - Assess how these changes align with or undermine past DOE-DNFSB interface protocols and agreements, and determine what formal role (if any) DOE has established for DNFSB or other internal oversight bodies to monitor long-term safety trends resulting from Project Velocity.

5. **Taxpayer Risk, Cost Metrics, and Risk Management:**
    - Evaluate whether DOE has established outcome-oriented performance metrics, baseline data, or monitoring frameworks to track the cumulative impact of Project Velocity on project costs, schedules, worker safety, and contractor performance.
    - Assess whether these changes aggravate long-standing high-risk vulnerabilities across NNSA and DOE facilities, exposing the Federal Government and American taxpayers to higher long-term fiscal liabilities or unmitigated operational and/or safety risks.

6. **Stakeholder Engagement and Decision-Making Process(es):**
    - Evaluate the process(es) used by DOE to select, draft, review, adjust, refine, and approve the 46 directive revisions and four directive cancellations.
    - Examine whether contractors exercised disproportionate or undue influence over the selection, drafting, or refinement of modified and/or cancelled orders.

Thank you for your prompt attention to this critical oversight matter and GAO review request. Our staff points of contact on this matter are Scott McKee and Amanda Wyma-Bradley. They can be reached by email at scott.mckee@mail.house.gov and Amanda_Wyma-Bradley@appro.senate.gov, respectively.

Sincerely,



Marcy Kaptur
Ranking Member, Subcommittee on Energy and Water Development
House Committee on Appropriations



Patty Murray
Ranking Member, Subcommittee on Energy and Water Development
Senate Committee on Appropriations