

November 2, 2005

MEMORANDUM TO: Luis A. Reyes
Executive Director for Operations

FROM: Stephen D. Dingbaum/**RA**/
Assistant Inspector General for Audits

SUBJECT: STATUS OF RECOMMENDATIONS: AUDIT OF NRC'S
REACTOR PROGRAM SYSTEM (OIG-05-A-11)

REFERENCE: DIRECTOR, OFFICE OF NUCLEAR REACTOR
REGULATION, MEMORANDUM DATED
OCTOBER 14, 2005

Attached is the Office of the Inspector General's analysis and status of recommendations as discussed in the agency's response dated October 14, 2005. Based on these responses, recommendations 5 and 10 are closed. Recommendations 1 through 4 and 6 through 9 remain in resolved status. Please provide an update on all resolved recommendations by February 10, 2006.

If you have any questions or concerns, please call me at 415-5915.

Attachment: Status of Recommendations

cc: W. Dean, OEDO
M. Malloy, OEDO
P. Tressler, OEDO

Recommendation 1: Implement a tiered access level structure that allows users access to RPS modules based on the least privilege principle. This should include guidance on which users may receive what level of access.

Response Dated
October 14, 2005:

The Office of Nuclear Reactor Regulation (NRR) has implemented an access structure in the Reactor Program System (RPS) software in conjunction with the changes made to support recommendations 2, 3, and 4. Changes have been made in NRC Inspection Manual Chapter (IMC) 0306 and 0612 to support recommendations 1, 2, and 3 related to RPS access control and quality of the RPS data as detailed further below (see other recommendations)

OIG Analysis: The proposed corrective action addresses the intent of OIG's recommendation. Recommendation 1 will be closed once OIG has received the Inspection Manual Chapters that reflect the modified access structure.

Status: Resolved.

Recommendation 2: Implement a process for removing access rights from inactive Reactor Program System users.

Response Dated
October 14, 2005:

NRR is working with the four regions to develop and implement a consistent process for removing access from inactive RPS users. This policy document will include the formalization of the process to implement recommendations 2 and 7. NRR has provided each region a list of users and the number of times the user accessed the module.

The regions will use this information to determine who needs access and to remove the access rights of users who no longer need to use the modules. The RPS software automatically removes the access rights of users who leave an office or region. New procedures requiring the program offices and regions to remove rights have been incorporated into a revision to NRC IMC 0306, "Information Technology Support for the Reactor Oversight Process."

For the program offices, IMC 0306 now includes guidance in Section 04.01 stating that it is the responsibility of program offices to control access to RPS by program office users. Staff who no longer need access to RPS modules should be removed. A periodic review of authorized users for each RPS module should be conducted.

OIG Analysis:

The proposed corrective action addresses the intent of OIG's recommendation. Recommendation 2 will be closed once OIG has received the Inspection Manual Chapter that incorporates the process for removing user access.

Status: Resolved.

Recommendation 3: Implement a uniform quality control and Reactor Program System data entry review process that will ensure data accuracy and timeliness.

Response Dated
October 14, 2005:

A quality control program has been implemented that will improve data accuracy and timeliness in RPS. Procedures in Inspection Manual Chapters 0306 and 0612 have been strengthened and software changes were implemented on September 16, 2005, to ensure data accuracy and timeliness. Accuracy and quality control of data is ensured by requirements in the Reactor Oversight Program (ROP) guidance in Inspection Manual Chapter (IMC) 0306, Sections 04.01 and 04.02.

Section 04.01 requires that program offices verify the accuracy and timeliness of the data contained in RPS. Program offices also have a responsibility to "maintain and control the RPS Inspection Procedure Authority System (IPAS) module to ensure accuracy and compliance with the NRC Inspection Manual."

In Section 04.02, regional offices are responsible to ensure the timely and accurate entry of RPS data for all regional activities and to verify the accuracy and timeliness of the data maintained in RPS. Section 05.03(a) requires that, as soon as practical after completion of the inspection, the cognizant branch chief (or designee) must update the completed sample size of each inspection procedures used during the inspection (procedures referenced in the inspection report) in the RPS/Item Reporting (IR) module. Further guidance is provided in Section 05.03(g) which requires that the completed sample size and completion procedure status should be updated in RPS as soon as practical after the completion of the inspection, but no later than 14 days after the inspection report is issued. In order to preserve the integrity of reports generated after the end of the year, changing a "Complete" status to "Incomplete" or "N/A" will not be allowed more than 60 days after the end of the cycle.

In addition to the above, a revision to IMC 0612, "Power Reactor Inspection Reports," includes a specific requirement that inspection reports identify what was inspected and provide sufficient detail on which and how many samples were inspected.

OIG Analysis: The proposed corrective actions address the intent of OIG's recommendation. Recommendation 3 will be closed once OIG has received the final Inspection Manual Chapters that reflect these changes.

Status: Resolved.

Recommendation 4: Develop a process to lock down Reactor Program System inspection data fields after the inspection report has been issued.

Response Dated
October 14, 2005

The September 16, 2005, release of RPS implemented a process to lock down inspection sample data after it has been reviewed, approved, and certified. An explanation of the IMC guidance is included in the response to Recommendation 3.

OIG Analysis: The corrective action addresses the intent of OIG's recommendation. Recommendation 4 will be closed once OIG has received the final Inspection Manual Chapters that reflect these changes.

Status: Resolved.

Recommendation 5: Formalize a process for handling Reactor Program System Help requests.

Response Dated
October 14, 2005:

NRR has implemented a process for recording and monitoring RPSHELP e-mails requests from RPS users. All RPSHELP e-mails received since May 9, 2005, are in the database. This database is being monitored to ensure all requests are responded to within two days of the request. Implementation of some requests includes a benefit-cost analysis and a discussion at the next regional counterpart meeting. For those requests that require further analysis the requester will be notified within a week of the decision to approve or reject the request. Requests which require software changes are included in the next software release.

OIG Analysis:

The corrective action addresses the intent of OIG's recommendation. Recommendation 5 is closed.

Status: Closed.

Recommendation 6: Create performance metrics to assess timeliness and user satisfaction of Reactor Program System Help.

Response Dated
October 14, 2005:

The data collected in the database created in response to Recommendation 5 is being used to assess timeliness in response to RPSHELP e-mails. The metric being used is to respond to the requester within two work days of the request. During the period from May 9 to August 16, 2005, 59 percent of the RPSHELP e-mails were responded to, resolved, and closed on the same day they were received. In addition, the RPS user survey developed in response to Recommendation 8 will be used to measure user satisfaction of RPS help requests.

OIG Analysis: The corrective actions address the intent of OIG's recommendation. Recommendation 6 will be closed when NRR provides information on how frequently the metric will be checked and documentation indicating that this assessment has been integrated into office procedures.

Status: Resolved.

Recommendation 7: Develop a formal process for Reactor Program System regional counterparts to proactively gather user concerns prior to counterpart meetings.

Response Dated

October 14, 2005:

NRR is working with the four regions to develop a consistent policy that will include the formalization of the process to implement recommendation 2 and 7. The RPS regional counterparts will send an e-mail to the regional RPS users periodically and just prior to counterpart meetings to gather concerns and comments.

OIG Analysis:

The proposed corrective action addresses the intent of OIG's recommendation. Recommendation 7 will be closed once OIG has received documentation that a formal process for Reactor Program System regional counterparts to proactively gather user concerns prior to counterpart meetings has been implemented.

Status:

Resolved.

Recommendation 8: Conduct an annual Reactor Program System user survey to determine the needs of the users.

Response Dated

October 14, 2005:

NRR developed an on-line RPS survey which was e-mailed to regional RPS users on September 8, 2005. Users had until September 30, 2005, to submit their responses. This survey will be conducted annually.

OIG Analysis:

The corrective action addresses the intent of OIG's recommendation. Recommendation 8 will be closed when NRR provides a copy of the survey questions and documentation indicating that this annual survey has been integrated into office procedures.

Status:

Resolved.

Recommendation 9: Implement a formal Reactor Program System training program that includes periodic refresher training and classes tailored to different user responsibilities.

Response Dated

October 14, 2005:

The survey created in response to Recommendation 8 will be used to gather information on the training needs of RPS users. The Headquarters Reactor Program Team will continue to provide training to the regional counterparts. Training in the regions will normally be conducted by the regional counterparts. The Headquarters Reactor Program Team will provide training at the regions when requested.

OIG Analysis:

The proposed corrective action addresses the intent of OIG's recommendation. Recommendation 9 will be closed once OIG has received documentation that a formal training program has been implemented.

Status:

Resolved.

Recommendation 10: Complete the efforts to provide users with current system information in the form of online tutorials.

Response Dated
October 14, 2005:

NRR has developed on-line "How-do-I" tutorials for the most used features of RPS. "How-do-I" tutorials are being developed for new and changed features and will be made available when new releases are deployed. This is an on-going effort that will continue for the life of RPS as new features are added to the system.

OIG Analysis:

The corrective action addresses the intent of OIG's recommendation. OIG reviewed the online tutorials and found that they address the commonly used features, therefore, recommendation 10 is closed.

Status:

Closed.