



**UNITED STATES  
NUCLEAR REGULATORY COMMISSION**  
WASHINGTON, D.C. 20555-0001

**OFFICE OF THE  
INSPECTOR GENERAL**

February 10, 2017

**MEMORANDUM TO:** Victor M. McCree  
Executive Director for Operations

**FROM:** Dr. Brett M. Baker */RA/*  
Assistant Inspector General for Audits

**SUBJECT:** STATUS OF RECOMMENDATIONS: AUDIT OF NRC'S  
REACTOR OVERSIGHT PROCESS: REACTOR SAFETY  
BASELINE INSPECTION PROCEDURES (OIG-16-A-12)

**REFERENCE:** OFFICE OF NUCLEAR REACTOR REGULATION  
DIRECTOR, MEMORANDUM DATED JANUARY 17, 2017

Attached is the Office of the Inspector General's analysis and status of recommendations as discussed in the agency's response dated January 17, 2017. Based on this response, all of the recommendations for this audit are now closed.

If you have questions or concerns, please call me at (301) 415-5915 or Paul Rades, Team Leader, at (301) 415-6228.

Attachment: As stated

cc: R. Lewis, OEDO  
H. Rasouli, OEDO  
J. Jolicouer, OEDO  
J. Bowen, OEDO  
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## Audit Report

### AUDIT OF NRC'S REACTOR OVERSIGHT PROCESS: REACTOR SAFETY BASELINE INSPECTION PROCEDURES

OIG-16-A-12

#### Status of Recommendations

Recommendation 1: Develop and implement controls to ensure mandatory and discretionary language used in inspection procedures is clear and consistent.

#### Agency Response

Dated January 17, 2017: Action Complete. Controls have been developed and implemented via revision and issuance of Inspection Manual Chapter (IMC) 0040, "Preparing, Revising and Issuing Documents for the NRC Inspection Manual." IMC 0040 has been revised and issued, effective January 01, 2017, providing strengthened provisions and controls associated with establishing mandatory and discretionary inspection language in inspection documents. IMC-0040 now contains clear governance, regarding the use of mandatory and discretionary language, which shall be followed by inspection program document leads when revising, updating, or creating new inspection manual chapters and inspection procedures. The Division of Inspection and Regional Support, in the Office of Nuclear Reactor Regulation, considers the actions described above are fully responsive to Recommendation 1, with this manual chapter change and associated controls in place, procedure revisions are underway to ensure that discretionary and mandatory language used in existing inspection procedures is in alignment with the strengthened provisions in IMC-0040. These procedure revisions are expected to be completed by December 31, 2017. Finally, as part of the ROP's continuing periodic assessment process, outlined in Appendix B to Inspection Manual Chapter (IMC) 0307, "Reactor Oversight Process Baseline Inspection Procedure Reviews," the staff has undertaken actions to ensure that baseline inspection procedures continue to be reviewed, and if necessary, revised to ensure mandatory and discretionary language remains clear and consistent.

Point of Contact: Christopher G. Miller, Director, NRR/DIRS  
(301) 415-1004.

## Audit Report

### AUDIT OF NRC'S REACTOR OVERSIGHT PROCESS: REACTOR SAFETY BASELINE INSPECTION PROCEDURES

OIG-16-A-12

#### Status of Recommendations

##### Recommendation 1 (cont.)

**OIG Analysis:**                      OIG reviewed documentation and actions referenced in the agency response, and verified that they fulfill the intent of this recommendation. This recommendation is now closed.

**Status:**                                Closed.

## Audit Report

### AUDIT OF NRC'S REACTOR OVERSIGHT PROCESS: REACTOR SAFETY BASELINE INSPECTION PROCEDURES

OIG-16-A-12

#### Status of Recommendations

Recommendation 2: Notify staff and managers of controls developed to ensure that mandatory and discretionary language used in inspection procedures is clear and consistent.

**Agency Response**

Dated January 17, 2017: Action Complete. IMC-0040 has been revised to incorporate more stringent controls and provisions to ensure that mandatory and discretionary language used in inspection procedures is clear and consistent. The revised IMC-0040 was issued with an effective date of January 01, 2017. Regional management was formally notified of the revision to IMC-0040 through a memorandum, from the Director, Division of Inspection and Regional Support, Office of Nuclear Reactor Regulation.

Point of Contact: Christopher G. Miller, Director, NRR/DIRS  
(301) 415-1004

OIG Analysis: OIG reviewed documentation referenced in the agency response and verified the agency has taken appropriate steps to fulfill the intent of this recommendation. This recommendation is now closed.

**Status:** Closed.