January 31, 2001

MEMORANDUM TO: Chairman Meserve

FROM: Hubert T. Bell/**RA/**
                    Inspector General

SUBJECT: THE SPECIAL EVALUATION OF NRC'S MOST SERIOUS
                    MANAGEMENT CHALLENGES (OIG-01-A-04)

Attached is the Office of the Inspector General's report titled, *Special Evaluation of NRC's Most Serious Management Challenges*.

This report responds to a congressional request regarding the most serious management challenges facing the Nuclear Regulatory Commission (NRC). The report provides the following information: (1) the seven management challenges facing the agency as identified by the Inspector General, (2) an open audit recommendation related to the financial management challenge, (3) the agency's efforts to address the 1999 list of most serious management challenges through its strategic plan, (4) a comparison of the previous lists of challenges and how the lists have evolved, and (5) the questionable results associated with the Agencywide Documents Access and Management System (ADAMS). This report makes no recommendations.

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

Attachment: As stated

cc: Commissioner Dicus
       Commissioner Diaz
       Commissioner McGaffigan
       Commissioner Merrifield

cc: R. McOsker, OCM/RAM
B. Torres, ACMUI
B. Garrick, ACNW
D. Powers, ACRS
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K. Cyr, OGC
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S. Reiter, Acting CIO
J. Funches, CFO
P. Rabideau, Deputy CFO
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A. Vietti-Cook, SECY
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P. Bird, HR
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F. Congel, IRO
H. Miller, RI
L. Reyes, RII
J. Dyer, RIII
E. Merschoff, RIV
OPA-RI
OPA-RII
OPA-RIII
OPA-RIV

**OFFICE OF
THE INSPECTOR GENERAL**

**U.S. NUCLEAR
REGULATORY COMMISSION**

Special Evaluation of NRC's Most
Serious Management Challenges

OIG-01-A-04   January 31, 2001

SPECIAL EVALUATION
REPORT

EXECUTIVE SUMMARY

Purpose

In response to congressional requests and consistent with the goal of improving agency programs and operations, the Inspector General (IG) at the U.S. Nuclear Regulatory Commission (NRC) directed the initiation of a special evaluation to (1) identify the current most serious management challenges facing the agency and (2) assess its efforts in addressing the IG's December 1999 management challenges list. Also, the IG directed that the special evaluation focus on determining similarities and differences between his previous management challenges lists and the most current list, and identifying any related agency programs that have had questionable success in achieving the intended results. In conducting this evaluation, OIG interviewed over 75 people were interviewed, including senior NRC executives, congressional staff members, and officials from other IG offices.

Background

In December 1997, Congressman Armey requested that Inspectors General independently identify the 10 most serious management problems in their respective agencies to help Congress target key problem areas for attention. NRC's IG complied with the request in January 1998. For subsequent lists, congressional members changed the word "problems" to "challenges." On December 1, 1998, the IG revised his management challenges list and, a year later, reaffirmed it with Congress. Most recently, the IG provided Congress with his currently revised list of NRC's most serious management challenges on November 22, 2000.

Results in Brief

The IG's current list identified seven most serious management challenges facing NRC. In addition, to better focus his list of management challenges, the IG defined the term "management challenges" and set out criteria for adding and removing challenges from the list.

The IG has also identified one open audit recommendation relating to the management challenge regarding the agency's administration of financial management. On a positive note, NRC has included a crosswalk in an appendix to its new strategic plan, which clearly shows the connection of the management challenges with appropriate steps the agency is taking to address them.

Furthermore, the IG identified the Agencywide Documents Access and Management System (ADAMS) as a program that has experienced questionable success in achieving its intended results. The agency is aware of the shortcomings with ADAMS, an electronic information system, and is working to resolve these issues. The IG will continue to monitor this program. This report makes no recommendations.

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PURPOSE

In response to congressional requests and consistent with the goal of improving agency programs and operations, the Inspector General (IG) at the U.S. Nuclear Regulatory Commission (NRC) developed and later updated what he considered to be the most serious management challenges facing NRC. The IG evaluated the overall work of the Office of the Inspector General (OIG), the OIG staff's general knowledge of agency operations, and other relevant information to develop his list of management challenges. Moreover, the IG directed the initiation of a special evaluation to assess the agency's efforts to address the management challenges, to determine similarities and differences between the IG's previous management challenges lists and the most current list, and to identify any related agency programs that have had questionable success in achieving the intended results.

As part of the special evaluation, OIG interviewed over 75 people including NRC's Chairman, Commissioners, office directors, and regional administrators to obtain their views on what challenges the agency is facing and what efforts the agency has taken to address previously identified management challenges. These officials generally believed that the IG's 1999 list (see Appendix II) fairly reflected the primary challenges facing the agency. The IG considered the views of NRC officials in updating his list for 2000. OIG also talked with congressional staff members to obtain their insights in this area. Additionally, OIG interviewed staff members from 12 other Federal agency OIGs to learn what approaches they were taking to address Congress' request to identify management challenges for their agencies.

BACKGROUND

In December 1997, Congressman Armey requested that IGs independently identify the 10 most serious management problems in their respective agencies to help Congress target key problem areas for attention. NRC's IG complied with the request in January 1998.

Congressional members changed the word "problems" to "challenges" and, in August 1998, Congressmen Armey and Burton requested the IGs to update their 10 most serious management challenges lists. The Congressmen also asked the IGs to provide a summary description of each challenge on the list together with references to reports written by their offices and "any other sources" that contain additional information. Later, Senator Thompson requested the IGs to provide him with the same information.

In September 1999, congressional members (from both the Senate and the House) again requested that the IGs update the lists[1] of the most serious management challenges facing their agencies. Also, they requested that the IGs assess their agency's efforts to address the challenges, identify open audit recommendations

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[1]   IGs are no longer required to provide 10 management challenges. They may provide more or fewer challenges, depending on what their agency is facing.

relating to the challenges, compare and contrast the new management challenges listing with previous listings, and identify programs that "have had questionable success in achieving results." The congressional members further stated that the information provided by the IGs in the past had been extremely valuable in focusing congressional and agency attention on mission-critical management problems and stimulating action to resolve the problems. In his December 1999 response to the congressional request, the IG stated that the list of most serious management challenges provided in December 1998 continued to be the most serious challenges facing NRC. To be more responsive to their request and in anticipation of revising the management challenges list for the year 2000, the IG stated that OIG would conduct a special evaluation to review, in depth, the areas of congressional interest and to determine the extent to which NRC is addressing the management challenges. In October 2000, Congress requested the IGs to update their management challenges information.

EVALUATION RESULTS

The NRC's mission is to regulate the Nation's civilian use of byproduct, source, and special nuclear materials to ensure adequate protection of public health and safety, to promote the common defense and security, and to protect the environment. Successfully carrying out its mission is a demanding task and in doing so NRC, like other Federal agencies, faces management challenges. This year, the IG identified seven most serious management challenges for NRC.

A. The Revised List of Most Serious Management Challenges

Congress has not officially defined the term "management challenge." Instead, it has left the determination and threshold of what constitutes a serious management challenge to the discretion of the IGs. To better focus his list of management challenges, the IG at NRC defines "management challenges" as follows:

> Serious management challenges are mission critical areas or programs that have the <u>potential</u> for a perennial weakness or vulnerability that, without substantial management attention, would seriously impact agency operations or strategic goals.

Serious management challenges may be, but are not necessarily, areas that are problematic for the agency. They are critical areas or difficult tasks that warrant high-level management attention. Some challenges, in areas such as financial management and information management, have inherent risks associated with them. Because high dollar amounts are generally devoted to these types of challenge areas, the possibility of fraud, waste, and abuse is especially present. As such, these challenges will most likely continue to appear on the IG's list of most serious management challenges.

Congress provided the overarching criteria for developing and revising the most serious management challenges lists as based on work done by the IG's office, the OIG staff's general knowledge of NRC operations, and other relevant information. Congress also instructed the IGs, when considering management challenges, to think along the lines of fraud, waste, error, or mismanagement, or agency programs and activities that otherwise pose a significant risk. Additionally, the IG at NRC takes into consideration if the issue is long-term in nature and not generally handled during a business year.

When a challenge falls below the threshold described, the IG may remove the issue from the list of most serious management challenges. Removing an issue from the list does not mean that the issue is no longer a challenge for the agency. While the issue may no longer rise to the threshold of a most serious management challenge, it may still warrant management attention.

Based on the aforementioned definition and criteria, following is the IG's revised list of most serious management challenges facing NRC. The list is in no rank order of importance. The IG issued this list to Congress and the NRC Chairman on November 22, 2000. The following chart provides a quick overview of the seven management challenges. The sections that follow provide more detailed descriptions of the challenges, descriptive examples related to the challenges, examples of initiatives the agency has underway to address the challenges, and a listing of the reports issued by OIG (audits and investigations) in fiscal year 2000 that relate to the challenge areas. NRC senior management is aware of and has a planned approach through its strategic planning process to address each of the management challenges identified. While the agency has many initiatives planned or underway, agency managers must continue to focus their attention to determine if the agency is adequately meeting the challenges.

NRC's Most Serious Management Challenges as of November 22, 2000	
Challenge 1 Development and implementation of an appropriate risk-informed and performance-based regulatory oversight approach	**Challenge 5** Intra-agency communication (up, down, and across agency organizational lines)
Challenge 2 Identification, acquisition, and implementation of information technologies	**Challenge 6** Regulatory processes that are integrated and continue to meet NRC's safety mission in a changing external environment
Challenge 3 Administration of all aspects of financial management	**Challenge 7** Maintenance of a highly competent staff to carry out NRC's public health and safety mission (i.e., human capital management)
Challenge 4 Clear and balanced communication with external stakeholders	The challenges are not ranked in any order of importance.

CHALLENGE 1
   Development and implementation of an appropriate risk-informed and performance-based regulatory oversight approach

NRC is making its regulatory framework more risk-informed so that areas of highest risk receive the greatest focus. Where appropriate, NRC is also making its regulatory framework more performance-based which is results-oriented and open to allowing licensee flexibility in how to meet NRC's regulatory requirements. The overall goal of this adjustment in regulatory approach is to enhance safety decision making, improve efficiency, and reduce resources devoted to issues with low safety significance. To be successful, NRC's stakeholders (particularly staff members responsible for implementing this approach) must fully understand its dynamics and the agency's goals.

While the agency is aware of what it needs to do to meet its goals, the adjustment in regulatory approach has been and will continue to be a critical area that warrants high-level management attention. In October 1996, OIG issued a special evaluation report[2] that assessed the agency's efforts to move toward a risk-informed and performance-based regulatory system. The report concluded that the agency needed to define what is a performance-based system. To do this, OIG suggested that NRC develop a comprehensive strategy for how its risk-informed and performance-based efforts will be accomplished. The report also suggested that this strategy should include a means for measuring progress towards meeting the objectives of that strategy. In 1998, respondents to the OIG's *NRC Safety Culture and Climate Survey*[3] were concerned about the changes in the agency's regulatory methodology and 67 percent did not know if or did not believe that increased focus on the new methodology was improving NRC's regulatory effectiveness.

In February 1999, during congressional testimony,[4] the General Accounting Office (GAO) noted, among other things, that NRC had not developed a comprehensive strategy that would move its regulation to an approach that focuses on risk. Additionally, GAO said that NRC had not defined such central regulatory concepts as "important to safety" and "risk significant." In March 1999, the Commission issued a "White Paper" on risk-informed and performance-based regulation in an effort to improve the staff's commonality

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2   OIG/96E-18, *Better Definition and Planning Needed to Guide NRC's Transition to a Risk-Informed, Performance-Based Regulatory System*, dated October 4, 1996.

3   OIG/97E-16, *OIG's NRC Safety Culture and Climate Survey*, dated June 1998.

4   GAO Testimony, *Systematic Approach Needed to Regulate Risk-Significant Issues*, before the Subcommittee on Clean Air, Wetlands, Private Property, and Nuclear Safety, Committee on Environment and Public Works, U.S. Senate, on February 4, 1999.

and understanding of the regulatory approach. However, a report[5] issued by the Center for Strategic & International Studies (CSIS) in August 1999 noted that NRC, as a first priority, still needed to define the term "important to safety." Further, the CSIS report concluded that NRC needed clear, concise definitions. In January 2000, GAO issued a report[6] regarding the agency's move to a risk-informed regulatory approach and the status of its efforts to develop a strategy to implement this approach. GAO concluded that NRC's move to a risk-informed regulatory approach is a major change to its culture which will take significant time and effort.

The agency has made progress in this area. For example, NRC is integrating risk-informed approaches into the staff's process used to evaluate the significance of inspection findings at operating reactors as part of its revised Reactor Oversite Process. The agency implemented its revised Reactor Oversight Process in April 2000 for commercial nuclear power plants to make it more risk-informed, objective, understandable, and focused on areas of greatest significance.

Also, in late October 2000, in response to a GAO report recommendation,[7] NRC staff issued an information paper[8] to the Commission on its risk-informed regulation implementation plan. The intent of the plan is to describe the staff's goals to achieve its vision by applying criteria to select regulatory requirements and practices; risk-informing those requirements and practices; and developing the necessary data, methods, guidance, and training to integrate the agency's risk-informing activities. After the NRC staff briefed the Commission on its new implementation plan,[9] the Chairman expressed his view that the implementation plan document falls short of being a plan of the type the Commission had envisioned, and while it is a commendable effort, he stated that the agency still has more to do.

In addition to continued work on its risk-informed regulation implementation plan, the agency is also using a risk-informed approach in developing Yucca Mountain rulemakings to implement the Environmental Protection Agency's standards. Yucca Mountain is being considered as the potential site to serve as the Nation's high-level waste repository. Further, NRC continues to change its enforcement program (including recent revisions to the Enforcement Policy) with the intent to make it better linked to the safety significance of inspection findings and to

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5   *The Regulatory Process for Nuclear Power Reactors, A Review*. A report of the CSIS Nuclear Regulatory Process Review Steering Committee, dated August 1999.

6   RCED-00-29, *Nuclear Regulation: NRC Staff Have Not Fully Accepted Planned Changes*, dated January 19, 2000.

7   GAO/RCED-99-95, *Nuclear Regulation: Strategy Needed to Regulate Safety Using Information on Risk*, dated March 19, 1999.

8   SECY-00-0213, *Risk-Informed Regulation Implementation Plan*, dated October 26, 2000.

9   Public Meeting, *Briefing on Risk-Informed Regulation Implementation Plan*, November 17, 2000.

emphasize the importance of licensees' corrective action programs. According to the Chairman,[10] while the agency has taken the first steps in its efforts to risk-inform its regulatory system, NRC has a "long and difficult road" ahead that will require informed input from the industry and other stakeholders.

NRC has some inherent difficulties to overcome in applying a risk-informed regulatory approach for its nuclear materials licensees. The complexity of developing a risk-informed approach that would adequately cover all types of licensees is increased by the almost 21,000 licensees and the diversity of activities that they conduct (e.g., using radioactive material for industrial, medical, or academic purposes). To help address these issues, the agency formed a Risk Task Group. The Risk Task Group will use case studies to test screening criteria and to determine the feasibility of developing safety goals applicable to nuclear material licensees. The Group will also implement risk training for agency staff.

OIG has several reviews planned in this area for fiscal year 2001, including the second safety culture and climate survey of NRC's workforce. Additionally, the following is a list of OIG reports issued in fiscal year 2000 related to risk-informed and performance-based regulatory oversight:

> *Review of NRC's Operator Licensing Program* - Audit

> *Review of NRC's Spent Fuel Pool Inspection Program at Decommissioning Nuclear Power Plants* - Audit

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CHALLENGE 2
Identification, acquisition, and implementation of information technologies

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Federal agencies' investments in information technology (IT) are critical in providing more effective and cost-efficient government services to the public. However, NRC, like other Federal agencies, continues to struggle in its efforts to obtain a good return on these investments. Congress recognized the need for added diligence in IT investment management in the Clinger-Cohen Act, which was intended to bring accountability, discipline, and structure to agencies' investment practices.

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[10] Remarks by Chairman Richard A. Meserve at the Institute for Nuclear Power Operations Conference, Atlanta, GA, November 2, 2000, *Excellence in Nuclear Safety in Today's Regulatory Environment, A Status Report and a Look Toward the Future at the NRC.*

The necessary link of IT to NRC's mission performance makes it important for the agency to have decision-making processes to assure that funds are invested and managed to achieve high value outcomes at acceptable costs. These investments include telecommunications and networks, new operating systems and software, continued support and operations of existing infrastructure, and data centers. While the agency has made improvements in how it budgets for new systems development efforts, it still needs to improve in the areas of planning and managing projects. Information security also poses an array of potential challenges for the agency.

NRC relies on a wide variety of information systems and networks to help it carry out its responsibilities and support its business functions. The Office of the Chief Information Officer (OCIO) plans, directs, and oversees NRC's information resources (including information technology infrastructure, applications systems, and delivery of information management services) to meet the mission and goals of the agency.

OIG is aware that the agency has experienced extensive problems in the systems development area and it is not evident that the Capital Planning and Investment Control (CPIC) process (for evaluating IT projects) has benefitted these efforts. Presently, NRC is trying to work through many issues with its Agencywide Documents Access and Management System (ADAMS). A later section of this report provides more details on the background and problems associated with ADAMS. ADAMS is but one example of the struggles NRC has had in its attempts to deliver fully functional, well integrated systems within schedule and budget. The Agency Training System, Pay Pers, and STARFIRE are other examples of systems development projects in which the agency experienced extensive problems in its systems development efforts. Systems development is not the only area in which the agency has encountered problems in the IT area, but it exemplifies the need for close management attention, integrated decision-making processes, and more diligent planning in the IT area.

NRC also has had problems with its procurement vehicle for the development, operation, maintenance, and support of the agency's information technology systems and for related operations support. This vehicle has been the subject of multiple OIG audits and is being substantially overhauled.

In addition to the high costs and risk generally associated with IT investments, another global challenge is the protection of information from unauthorized access, tampering, and destruction. Therefore, the information security area poses an array of potential challenges for the international, Federal, and private sectors, including NRC. NRC recently received an "incomplete" in the computer security area in a recent congressional assessment, which was due to the absence of recent independent audit work. OIG plans to audit this area over the next year.

In addition, OIG completed the following reviews related to the IT area in fiscal year 2000:

> *Senior Management Support Needed to Ensure Timely Implementation of the LSN* - Audit

> *Review of NRC's Controls Over Work Performed Under CISSCO* - Audit

> *Review of the Development and Implementation of STARFIRE* - Audit

> *Review of NRC's Audit Follow-Up System* - Audit

> *Special Evaluation of the Status of NRC's Website* - Audit

> *NRC's Efforts to Protect Its Critical Infrastructure: Presidential Decision Directive 63* - Audit

> *Review of the Basis for the Structure of NRC's CISSCO Program* - Audit

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CHALLENGE 3
Administration of all aspects of financial management

NRC must be a prudent steward of its fiscal resources through sound financial management. The Office of the Chief Financial Officer (OCFO) has the lead for the implementation of the Government Performance and Results Act of 1993. This includes developing the agency's strategic plan and implementing the NRC Planning, Budgeting, and Performance Management process. According to the NRC, this process is an integrated method for planning, budgeting, and assessing performance that will enable the agency to better align its programs to outcomes.

The financial reporting process, an important aspect of financial management, is an agency method for tracking and reporting on its resources. For the past six consecutive years (1994 through 1999), NRC has received an unqualified opinion on its financial statements. The agency has also taken actions to implement a system to capture labor-cost data by strategic arenas. However, OIG has found instances where the agency relied on the OIG annual financial statement audit process to identify problems and outline solutions instead of initiating its own actions to assess financial reporting requirements and develop solutions. Furthermore, reportable conditions regarding the financial statements have increased over the last three years.

As a specific example, the Federal Accounting Standards Advisory Board established requirements whereby Federal agencies were to develop and implement, by fiscal year 1998, cost accounting practices and techniques. The implementation of cost accounting techniques and practices is essential to

agency managers' ability to comply with the Government Performance and Results Act. NRC has developed a remediation plan for achieving compliance and projects implementation of cost management by mid-fiscal year 2001. Detailed information regarding an open audit recommendation related to cost accounting is provided at Section B - *Open Audit Recommendation*.

NRC allocates a significant portion of its budget to procurement matters to ensure the safety of the public and to enable efficient operation. In times of reduced financial resources, it is important that NRC strives for economy in meeting the agency's mission through effective and efficient procurement. Without effective oversight, the government procurement process is even more susceptible to fraud, waste, and abuse.

As part of its procurement process, the agency relies on its Comprehensive Information Systems Support Consolidation (CISSCO) program as the primary vehicle for the development, operation, maintenance, and support of the agency's information technology systems and for related operations support. Currently, CISSCO consists of a single contractor, using several subcontractors, to provide a wide-range of information technology services. Since 1996, when the contract was signed with Computer Sciences Corporation as the prime contractor for meeting the needs of NRC's CISSCO program, OIG has conducted three audits[11] specifically reporting on potential improvements that the agency should make to lessen the risks and weaknesses associated with the program. OIG's audit report on the agency's financial statements for the year ended September 30, 1998, also contained specific recommendations for addressing funds control weaknesses associated with the CISSCO program. The agency is currently in the process of addressing OIG's concerns through the implementation of CISSCO II, the agency's successor program to CISSCO.

OIG will continue to monitor the agency's procurement program and will conduct audits of specific contracts. Likewise, as required by the Chief Financial Officers Act of 1990, OIG will continue to conduct financial statement audits of the agency.

In addition, OIG issued the following reports in relation to various aspects of financial management in fiscal year 2000:

> *Review of NRC's Controls Over Work Performed Under CISSCO* - Audit
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> *Review of the Development and Implementation of STARFIRE* - Audit
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> *Review of the Basis for the Structure of NRC's CISSCO Program* - Audit
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> *Independent Auditors' Report and Principal Statements for the Year*

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[11] OIG/98A-18, *Controls Over Funding for CISSCO Need Improvement*, dated May 11, 1999; OIG/99A-13, *Review of NRC's Controls Over Work Performed Under CISSCO*, dated March 14, 2000; and OIG/00A-03, *Review of the Basis for the Structure of NRC's CISSCO Program*, dated June 8, 2000.

Ended September 30, 1999 - Audit

Review of NRC's Implementation of the Federal Managers' Financial Integrity Act for Fiscal Year 1999 - Audit

Best Practices in Implementing Managerial Cost Accounting - Audit

Time Charge Abuse by NRC Contractor - Investigation

Possible Fraud by ICF Inc. Involving NRC Contracts - Investigation

False Claim: Pal Consultants Inc. - Investigation

Misadministration of NRC Contract NRC-10-99-151 - Investigation

37 U.S. Defense Contract Audit Agency Contract Audits

CHALLENGE 4

Clear and balanced communication with external stakeholders

To maintain public trust and confidence, NRC must be viewed as an independent, open, efficient, clear, and reliable regulator.[12] The agency states that it will accomplish this by providing its diverse group of external stakeholders (e.g., the Congress, general public, other Federal agencies, industry, citizen groups) with clear and accurate information about, and a meaningful role in, its regulatory process. This is a difficult task because of the highly technical nature of NRC's operations and the balance the agency must maintain to remain independent.

NRC recognized the need to improve the quality, clarity, and credibility of communications with all stakeholders and developed a plan to accomplish this initiative. NRC focused on improvements in the broad areas of (1) more effective written and oral communications with the public, (2) early identification of concerns, (3) early involvement of the public in NRC regulatory decisions of substantial interest or concern, and (4) more effective outreach to the general public on NRC's roles and responsibilities.

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[12]   See Appendix III, NRC's Principles of Good Regulation, which details the characteristics noted above.

It is not uncommon for NRC OIG investigative staff to hear complaints concerning the public's perceived lack of adequate access to NRC's regulatory process. Some citizens perceive that the NRC staff (1) miss opportunities to dialogue with the public and (2) engage in much more frequent and open discussion with the industry than with the public. OIG recognizes that "balanced" communication does not mean an "equal" frequency in contacts with the public and the regulated industry. The challenge is that NRC must maintain constant contact with the industry to meet its safety mission and, at the same time, afford all other stakeholders appropriate access to its regulatory process in a manner that fosters confidence in the agency.

NRC employees often have difficulties communicating with the public through both highly technical documents and statements made at public meetings. Jargon and technical language work reasonably well with NRC's licensees; however, such language is not very effective in dealing with other stakeholders, particularly the general public. NRC realizes this and has several initiatives underway through its strategic plan to enhance public confidence by communicating more clearly and adding focus, clarity, and consistency to its message. For example, the agency is offering communication training courses for its managers and staff, and it has embarked on a redesign effort of the NRC public website. NRC has also developed communication plans to effectively communicate with and involve diverse stakeholders early in regulatory activities. Further, the agency recently issued a revised "plain language" booklet describing its new Reactor Oversight Process.

According to the NRC Chairman,[13] public confidence is a challenge for the agency because continuing efforts are required. He also believes that a renewed interest in nuclear energy is emerging and will not be sustained without public confidence. The Chairman said that the NRC will continue to engage the public and search for new means to facilitate that engagement.

OIG currently has a review underway regarding the agency's quality assurance process for official documents that are available to external stakeholders. Also, in fiscal year 2000, OIG issued the following reports related to external communication:

> *NRC's License Fee Development Process Needs Improvement* - Audit

> *Senior Management Support Needed to Ensure Timely Implementation of the LSN* - Audit

> *Special Evaluation of the Role and Structure of the NRC's Commission* - Audit

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[13] Remarks by Chairman Richard A. Meserve at the Institute for Nuclear Power Operations Conference, Atlanta, GA, November 2, 2000, *Excellence in Nuclear Safety in Today's Regulatory Environment, A Status Report and a Look Toward the Future at the NRC*.

Review of NRC's Decommissioning Fund Program - Audit

Special Evaluation of the Status of NRC's Website - Audit

Misleading NRC Response to Congressional Request for Information - Investigation

NRC's Response to the February 15, 2000, Steam Generator Tube Rupture at Indian Point Unit 2 Power Plant - Investigation

Improper Actions by a Region III Inspector Toward Licensee Employees - Investigation

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CHALLENGE 5

Intra-agency communication (up, down, and across agency organizational lines)

Internal communication is a fundamental and necessary aspect of conducting agency business. NRC needs effective internal communication channels and methods to support its critical health and safety mission. Information is the key resource that links managers to the staff, the organization, and other stakeholders--enabling them to do their jobs. However, unless the information is organized, it is just data and is not meaningful.

As evidenced by OIG's *NRC Safety Culture and Climate Survey* results in 1998, improvements are needed in various aspects of the NRC's internal communications. For example, over a third of the employees responded that they did not feel sufficiently informed about NRC's performance. Also, a third of the employees believed that communication at the NRC would remain generally poor over the next year or so. NRC managers recognize the need to improve internal communications and have a number of ongoing initiatives to address this issue. For example, the current Senior Executive Service (SES) Candidate Development Program members are reviewing and assessing the agency's internal communications. This project includes activities such as identifying good communication practices that can assist NRC in improving the effectiveness and efficiency of its internal communications. Additionally, the Office of Nuclear Reactor Regulation (NRR) is working with a contractor on staff outreach and change management issues, particularly in the areas of training and communication. Similarly, the Office of Nuclear Material Safety and Safeguards is developing a communications website, including discussion groups and links to important documents to enhance communications within the office.

Breakdowns in internal communication channels and methods have the potential to undermine the agency's accomplishment of its mission. For example, through an Event Inquiry[14] on the Indian Point Unit 2 Power Plant, OIG noted that staff members in NRR contacted the Office of Nuclear Regulatory Research (RES) after a steam generator tube ruptured at Indian Point Unit 2 Power Plant. Once contacted, RES was able to quickly provide NRR with relevant information and feedback on this incident. Additionally, the agency conducted a lessons-learned review. As a result, NRR has initiated efforts to further improve its communication with other offices, placing special emphasis on RES.

At a recent Advisory Committee on Reactor Safeguards (ACRS) meeting,[15] a representative from a public interest group stated his belief that reports put out by RES "go up on a shelf" without the rest of the NRC staff relying on them. The representative related a specific instance when he talked about numbers in a report and regional NRC staff members had never heard of the information. An ACRS official agreed with these statements and added that ACRS has previously expressed its disappointment on many occasions. Moreover, during a recent Water Reactor Safety Information Meeting,[16] an NRC Commissioner stated that some of NRC's internal and external stakeholders still do not have an appreciation of the value provided by the agency's research initiatives.

NRC has organized its strategic goals, performance goals, and strategies for achieving its mission into the following four strategic arenas: Nuclear Reactor Safety, Nuclear Materials Safety, Nuclear Waste Safety, and International Nuclear Safety Support. Through its strategic plan, the agency has identified increased efforts in each of these arenas to improve the coordination and communication between its program offices.

OIG is preparing to again measure NRC's organizational safety culture and climate and compare the results against the baseline survey it conducted in 1998. Additionally, OIG issued the following reports in fiscal year 2000 that address some of the challenges the agency is facing regarding its intra-agency communications:

> *Special Evaluation of the Role and Structure of the NRC's Commission* - Audit

> *Review of NRC's Differing Professional View/Differing Professional Opinion Program* - Audit

> *NRC's Response to the February 15, 2000, Steam Generator Tube Rupture at Indian Point Unit 2 Power Plant* - Investigation

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[14]   Case No. 00-03S, *NRC's Response to the February 15, 2000, Steam Generator Tube Rupture at Indian Point Unit 2 Power Plant*, dated August 29, 2000.

[15]   Advisory Committee on Reactor Safeguards, 476th Meeting, October 5, 2000.

[16]   Water Reactor Safety Information Meeting, 28th Annual Meeting, October 25, 2000.

CHALLENGE 6
> **Regulatory processes that are integrated and continue to meet NRC's safety mission in a changing external environment**

According to the Chairman,[17] NRC is currently in a period of transition in several dimensions and he believes that the change is more rapid than in any other period in the history of civilian nuclear power, certainly since the event at Three Mile Island. Several of the factors driving this period of transition are economic deregulation of electric utilities, license transfers, and license renewals. NRC's organizational structure can also affect the way its regulatory processes are integrated. All of these conditions pose a challenge for the agency.

As a direct result of deregulation, NRC has experienced a significant increase in the number of requests for approval of license transfers. Historically, the agency has seen an average of about two or three license transfers per year. In 1998 and 1999 that average jumped to 15 license transfers per year. Another related issue that the NRC is dealing with is license renewals due to an increase in the interest in nuclear power plant life extension beyond the original 40-year term. As these diverse licensing activities continue to increase, the agency must ensure that its procedures are focused and well integrated so as to not create unmanageable demands on staff resources.

Additionally, NRC has faced an increase in the number of decommissioning commercial nuclear power plants. Part of the decommissioning process is when the fuel is removed from the reactor of a retired commercial nuclear power plant. The fuel, known as spent fuel, is stored in spent fuel pools which are steel-lined, concrete vaults filled with water. The spent fuel has an elevated temperature and contains some highly radioactive gases. Recently, OIG completed an audit[18] on spent fuel pools at decommissioning nuclear power reactors. During the audit, OIG observed that transitioning decommissioning responsibilities between NRC offices can be improved. For example, under the current process, a plant may have three project managers from different NRC offices assigned at the same time. Communication among project managers can create challenges during decommissioning. The agency is reviewing its procedures for transitioning responsibility between NRC offices during the decommissioning process.

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[17]   Remarks by Chairman Richard A. Meserve at the Institute for Nuclear Power Operations Conference, Atlanta, GA, November 2, 2000, *Excellence in Nuclear Safety in Today's Regulatory Environment, A Status Report and a Look Toward the Future at the NRC*.

[18]   OIG/00A-01, *Review of NRC's Spent Fuel Pool Inspection Program at Decommissioning Nuclear Power Plants*, dated August 16, 2000.

OIG learned during its special evaluation[19] of the Executive Council (EC)[20] that the existing EC structure did not foster an environment in which EC members routinely focused on a common picture of success across the agency. For example, since the EC members were each responsible for their own functional areas, they seemed to promote their individual responsibilities without careful coordination regarding the impact on staffing constraints of other offices. Furthermore, due to their alignment within NRC and their equal voting status on the EC, no one EC member could direct the actions of another. One EC member said that because there was no accountability among the members to each other, he could not always secure the information or assistance he needed from the others for effective resource planning. Conversely, his staff often spent unplanned resources to execute programs implemented by the other EC members. The lack of close coordination and integration of program and resource planning and implementation can be costly. In response to OIG's special evaluation, the NRC Chairman announced on January 17, 2001, that the EC was abolished effective immediately. The agency is now transitioning to its new arrangement.

NRC must be cognizant of its processes to make sure that they are well integrated. In addition, agency managers need to be fully aware of what each organizational component is doing in an effort to reduce regulatory burden without compromising the public's health and safety. OIG will continue to monitor this area. OIG issued the following reports relating to the integration of NRC's regulatory processes in fiscal year 2000:

> *Review of NRC's Operator Licensing Program* - Audit
>
> *Review of NRC's Spent Fuel Pool Inspection Program at Decommissioning Nuclear Power Plants* - Audit
>
> *Special Evaluation of the Role and Structure of NRC's Executive Council* - Audit
>
> *NRC's Response to the February 15, 2000, Steam Generator Tube Rupture at Indian Point Unit 2 Power Plant* - Investigation

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[19] OIG/00E-09, *Special Evaluation of the Role and Structure of NRC's Executive Council*, dated August 31, 2000.

[20] The EC was an executive body composed of three equal members: the Executive Director for Operations, the Chief Financial Officer, and the Chief Information Officer.

CHALLENGE 7
   Maintenance of a highly competent staff to carry out NRC's public health and safety mission (i.e., human capital management)

NRC needs a dynamic, results-oriented, diverse workforce with the appropriate knowledge, skills, abilities, and competencies to achieve its public health and safety mission. Although the agency's expertise appears to be sufficient today, it is likely that the future expertise and technical capability of NRC will decline without intervention. Indicators such as declining university enrollment in nuclear studies, dilution of university courses in nuclear studies, and the high number of staff eligible to retire further exacerbate NRC's ability to maintain a technically qualified staff. NRC has identified that about 40 percent of its SES members will be eligible for optional retirement within the next three years. In 1998, OIG's *NRC Safety Culture and Climate Survey* results showed that over half of the staff did not think that the agency was doing a good job of developing its people to their fullest potential or retaining the most talented people. A senior agency official noted that the survey was conducted during a period of downsizing of NRC's budgetary and human resources. Without resources which support the use of a full range of incentives to recruit and retain highly qualified employees, NRC runs the risk of not being adequately staffed to meet its public health and safety mission. While the NRC has the need for some unique skills, it is important to note that human capital management is a challenge facing all of the Federal government.

NRC is addressing human capital management issues in the context of its Planning, Budgeting, and Performance Management process. For example, the agency is working to develop and maintain a pool of high-potential management candidates through its SES Candidate Development Program. Recently, the Chairman also directed the staff to perform an assessment of the scientific, engineering, and technical core competencies that NRC needs and propose specific strategies for ensuring that they are maintained.

OIG plans to review NRC's efforts in human capital management to determine the effectiveness of the agency's workforce plan. In fiscal year 2000, OIG issued the following report related to human capital management:

> *Review of NRC's Differing Professional View/Differing Professional Opinion Program* - Audit

B.   Open Audit Recommendation

Congress requested the IGs to identify and briefly describe any significant open audit recommendations that address the management challenges they identified. Relating to Challenge 3, as previously stated, the IG identified a significant audit recommendation, *NRC Compliance with the Federal Financial Management Improvement Act of 1996*, that has not yet been closed. The Federal Financial Management Improvement Act of 1996 (FFMIA) requires that agencies establish a remediation plan when their financial systems do not comply with the provisions of the Act. The remediation plan is to include resources, remedies, and intermediate target dates to bring the agency's systems into compliance. An agency then has three years to implement the plan. Section 804(b) of the FFMIA requires that Inspectors General, who prepare Semiannual Reports to Congress, report instances and reasons when any agency has not met the intermediate target dates established in the remediation plan.

On March 1, 1999, the OIG reported a substantial noncompliance with FFMIA because NRC had not implemented a cost accounting process as required by Statement of Federal Financial Accounting Standards Number 4. NRC's OCFO submitted a remediation plan dated July 19, 1999, and a revised plan dated November 17, 1999. Full implementation of cost accounting was scheduled for May 2001. However, as of November 30, 2000, NRC has not met key intermediate target dates designed to achieve full implementation by May 2001. The delay is primarily due to problems in implementing NRC's time and labor system, which is integral to achieving the agency's cost accounting objectives.

On December 27, 2000, the agency transmitted its revised remediation plan for managerial cost accounting to OIG. NRC anticipates that its integrated human resources, payroll, and labor cost distribution system, as well as its managerial cost accounting software will be implemented in mid-fiscal year 2001. The OIG will continue to monitor the agency's progress and report, as needed, in future Semiannual Reports to Congress.

C. NRC's Efforts in Addressing the IG's 1999 List of Most Serious Management Challenges

Congress expects each agency to match its management challenges with the appropriate steps in its strategic plan and performance plan. In essence, Congress is looking for a crosswalk to clearly show the connection. The Department of Transportation (DOT) has successfully completed this task and congressional staff members hold the crosswalk to the management challenges in DOT's strategic plan as a good example. Essentially, the crosswalk is a tool for an agency to verify that it has addressed its management challenges. This approach also shows Congress that the agency is taking its management challenges seriously.

A GAO report[21] found that NRC's 1999 Performance Report and Fiscal Year 2001 Performance Plan had not established performance goals or measures that specifically addressed GAO's or the IG's management challenges. Furthermore, the Chairman of the Senate Governmental Affairs Committee advised NRC that, without specific and measurable goals for many of the major management challenges, it will be difficult to assess progress in addressing many of the areas. In August 2000, OIG informed agency officials of the need and importance for NRC to do a crosswalk between its strategic plan and performance plan and the IG's management challenges. In response, NRC included an appendix dedicated to the management challenges in its Strategic Plan for Fiscal Year 2000 - Fiscal Year 2005 that was distributed on October 4, 2000. For each challenge, NRC identified the goals, their associated strategies, and/or the corporate management strategies that relate to them in the strategic plan.

Section A of this report provided some specific examples of initiatives the agency has underway to address its management challenges. In addition, the agency plans to address the newly revised management challenges in greater detail in its Annual Performance Plan.

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21   GAO/RCED-00-200R, *NRC's FY 1999 Performance Report and FY 2001 Performance Plan*, dated June 30, 2000.

D.   Comparison of the Lists

The IG has developed and revised his list of most serious management challenges three times in response to congressional requests. And, his lists have evolved over the years. For example, when the IG revised his initial list, several of the challenges that revolved around NRC's possible regulatory oversight of Department of Energy (DOE) facilities were removed because interest in that issue had subsided. However, the IG is aware that former House Commerce Committee Chairman Tom Bliley[22] introduced a bill on March 14, 2000, that would give NRC oversight of all nuclear safety matters across the DOE. The IG will continue to monitor this issue.

Additionally, Congress' use for the management challenges lists has also evolved. Initially, Congress asked for the lists as an aid in developing agendas for a congressional session. Later, Congress focused on linking the management challenges lists to the Government Performance and Results Act.

In developing the newly revised management challenges list, the IG was able to eliminate some challenges by merging them with other challenges because the agency has made positive progress in certain areas. For example, *Refocusing NRC's research program to reflect a mature industry*, from the previous management challenge list,[23] has been merged with other challenges to create Challenge 6, *Regulatory processes that are integrated and continue to meet NRC's safety mission in a changing external environment*. NRC's research program is also a consideration in Challenge 5, *Intra-agency communication (up, down, and across agency organizational lines)*. Because NRC's research program has shown some positive progress, through a major reorganization (including the reduction of management positions) and an Arthur Andersen-assisted self-assessment, it no longer singularly rises to the threshold of a serious management challenge. Nevertheless, the research program is still a challenge for and vital to the agency.

Another example, relating to a challenge from the previous list (*Ensuring that NRC's enforcement program has an appropriate safety focus and reflects improved licensee performance*), is part of the new reactor oversight program which includes assessment, inspection, and enforcement. The reactor oversight program is addressed through Challenge 1. While the agency's enforcement program is an ongoing effort, it appears to be making positive progress through significant changes as evidenced by its new Enforcement Manual. Therefore, this program no longer singularly rises to the threshold of a most serious management challenge.

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[22]   Congressman Bliley's term ended on January 3, 2001.

[23]   See Appendix II for a copy of the IG's management challenges list from 1999 which was based on his December 1, 1998 listing.

E.   Agency Program with Questionable Results

Congress requested the IG to identify, based on his work and knowledge of agency operations, any programs that, in his judgment, have had questionable success in achieving the intended results. This includes, among other things, programs providing ineffective subsidies; programs that suffer from poor targeting or design; or programs that simply are not managed in a way that best promotes accomplishing their intended results. ADAMS is a program that has experienced questionable success in achieving results.

ADAMS is an electronic information system for maintaining NRC's unclassified official program and administrative records in a centralized electronic document repository. ADAMS became a strategic NRC initiative in November 1993 giving it top agency support regarding information technology. The approval to fund the system came by March 1994 and the ADAMS development project was awarded to its first contractor in mid 1996. By October 1996, the contract ended and the $1.3 million obligated for the work had been essentially spent. In February 1997, OIG initiated a survey to gather information on the current status and planned approach of the ADAMS contract. Because the ADAMS project was still unfolding, OIG terminated the survey in March 1997 with a briefing to the EC on its concerns regarding the development of the system.

As a result of interviews with ADAMS project staff and other agency officials and the analysis of documentation pertaining to the project, OIG identified a need in January 1999 to take a more in-depth look at the project. The review focused on three aspects of ADAMS -- schedule, performance, and cost. Based on the information learned in this review, OIG did not see any significant impediments to the delivery of ADAMS. However, the analysis only reflected a "snapshot in time" and it was clear that a number of critical elements remained to be achieved before ADAMS could be fully implemented. For example, none of the major components of ADAMS would be delivered in full with the deployment of *Release 1* of the system and that ADAMS had limited staff resources dedicated to the management of the project.

In May 2000, after the deployment of *Release 1*, the NRC Chairman tasked the Acting Chief Information Officer (CIO) with developing an action plan to address areas of concern that had been reported by agency office directors and regional administrators. In addition, NRC received complaints from external stakeholders claiming that the system does not work. The Acting CIO was also tasked to work with the public to address the issues affecting the public's ability to use ADAMS. During an NRC all employees meeting in June 2000, the Chairman said that the Commission is fully conscious of the concerns that people have with ADAMS and they are committed to addressing those concerns. He added that the Commission does not want to have the ADAMS system serve as a barrier to staff being able to complete their work effectively.

In fiscal year 2001, OIG is planning to again initiate a review of ADAMS to assess the extent to which the Acting CIO has successfully implemented the requests from the Chairman and to assess what went wrong during the ADAMS project and why it occurred.

CONCLUSION

One of the OIG's strategic goals is to identify opportunities to improve NRC's programs and operations. The IG's identification of the most serious management challenges facing the agency and the work of the OIG staff helps achieve this goal. As evidenced by this review, the agency has already taken some steps to address the management challenges. This report does not acknowledge all of the initiatives that NRC has underway. Also, it does not highlight all of the areas where the agency still needs to focus management attention. Furthermore, this report makes no recommendations.

While the IG identified seven distinctive challenges, the challenges are also interdependent of each other. By continuing its important activities in addressing these challenges, NRC can align itself to enhance agency efforts in successfully meeting its public health and safety mission.

AGENCY COMMENTS

OIG also provided this report in draft form to the EC members and discussed its content with senior agency officials at an exit conference on January 22, 2001. As appropriate, OIG incorporated the senior managers' views in the final version of this report.

SCOPE AND METHODOLOGY

The scope of this special evaluation focused on the Inspector General's (IG) revised list of most serious management challenges facing the Nuclear Regulatory Commission (NRC). Furthermore, the review explored, in depth, the agency's efforts to address the management challenges, the similarities and differences between the IG's previous managements challenges lists and the most current list, and a related agency program that has had questionable success in achieving its intended result.

The Office of the Inspector General (OIG) special evaluation team interviewed NRC's Chairman, Commissioners, office directors, and regional administrators to obtain their views on what challenges the agency is facing and what efforts the agency has taken to address previously identified management challenges. OIG also reviewed Office of the Inspector General (OIG) reports, General Accounting Office reports, and other NRC-sponsored reports.

To assist OIG in identifying possible future challenges, OIG interviewed several futurists and used Peter F. Drucker's book, *Management Challenges for the 21st Century*, as a resource. Furthermore, the special evaluation team talked with IG staff members from 12 other Federal agencies to learn what challenges their agencies are facing. And, to get a better understanding of Congress' intent for the management challenges list, OIG talked with the congressional staff members responsible for reviewing the lists. This special evaluation was conducted from July 2000 to October 2000. Major contributors to this report were Corenthis B. Kelley, Beth H. Serepca, and Cheryl A. Miotla.

1999 Management Challenges List[24]
(**Based on December 1, 1998 Listing)**

Challenge 1 - Developing and Implementing a risk-informed, performance-based approach to regulatory oversight.

Challenge 2 - Developing information management systems and being able to anticipate and measure the benefits to be gained.

Challenge 3 - Responding to the impact of industry de-regulation and license transfers.

Challenge 4 - Administering and overseeing agency procurement under government contracting rules.

Challenge 5 - Effectively communicating with the public and industry.

Challenge 6 - Maintaining an unqualified financial statement opinion in light of new and existing CFO requirements.

Challenge 7 - Ensuring that NRC's processes, such as spent fuel cask certification and license renewal, are responsive to industry needs.

Challenge 8 - Ensuring that NRC's enforcement program has an appropriate safety focus and reflects improved licensee performance.

Challenge 9 - Refocusing NRC's research program to reflect a mature industry.

Challenge 10 - Responding to external influences for changing NRC's operations. For example, the ability to meet NRC's mission and requirements of the Government Performance and Results Act, as the result of a proposed agency reorganization, poses a significant challenge to NRC.

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[24] The challenges are not ranked in any order of importance.

U.S. NUCLEAR REGULATORY COMMISSION'S (NRC)
PRINCIPLES OF GOOD REGULATION[25]

INDEPENDENT. Nothing but the highest possible standards of ethical performance and professionalism should influence regulation. However, independence does not imply isolation. The NRC will seek all available facts and opinions openly from licensees and other interested members of the public and consider the many and possibly conflicting public interests involved. The NRC will strive to base final decisions on objective, unbiased assessments of all information and explicitly state its reasons for the decisions.

OPEN. Nuclear regulation is the public's business, and it must be transacted publicly and candidly. The public must be informed about and have the opportunity to participate in the regulatory processes as required by law. Open channels of communication must be maintained with Congress, other government agencies, licensees, and the public, as well as with the international nuclear community.

EFFICIENT. The American taxpayer, the rate-paying consumer, and licensees are all entitled to the best possible management and administration of regulatory activities. The highest technical and managerial competence is required and must be a constant agency goal. The NRC must establish means to evaluate and continually upgrade its regulatory capabilities. Regulatory activities should be consistent with the degree of risk reduction they achieve. Where several effective alternatives are available, the option that minimizes the use of resources should be adopted. Regulatory decisions should be made without undue delay.

CLEAR. Regulations should be coherent, logical, and practical. There should be a clear nexus between regulations and agency goals and objectives whether explicitly stated. Agency positions should be readily understood and easily applied.

RELIABLE. Regulations should be based on the best available knowledge from research and operational experience. The agency should take into account systems interactions, technological uncertainties, and the diversity of licensees and regulatory activities so that risks are maintained at an acceptably low level. Once established, regulation should be perceived by all stakeholders to be reliable and not unjustifiably in a state of transition. The NRC's regulatory actions should always be fully consistent with written regulations and should be promptly, fairly, and decisively administered so as to lend stability to the nuclear operational and planning processes.

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[25]   NRC's Strategic Plan, NUREG-1614, Vol. 2, Part 1, page ii.

ABBREVIATIONS AND ACRONYMS

ACRS	-	Advisory Committee on Reactor Safeguards
ADAMS	-	Agencywide Documents Access and Management System
CIO	-	Chief Information Officer
CISSCO	-	Comprehensive Information Systems Support Consolidation
CPIC	-	Capital Planning and Investment Control
CSIS	-	Center for Strategic & International Studies
DOE	-	Department of Energy
DOT	-	Department of Transportation
EC	-	Executive Council
FFMIA	-	The Federal Financial Management Improvement Act of 1996
GAO	-	General Accounting Office
IG	-	Inspector General
IT	-	information technology
NRC	-	Nuclear Regulatory Commission
NRR	-	Office of Nuclear Reactor Regulation
OCFO	-	Office of the Chief Financial Officer
OCIO	-	Office of the Chief Information Officer
OIG	-	Office of the Inspector General
RES	-	Office of Nuclear Regulatory Research
SES	-	Senior Executive Service