

March 15, 2007

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 TECHNICAL TRAINING CENTER
(OIG-07-A-05)

REFERENCE: EXECUTIVE DIRECTOR FOR OPERATIONS
MEMORANDUM DATED FEBRUARY 7, 2007

Attached is the Office of the Inspector General's analysis and status of recommendations as discussed in the agency's response dated February 7, 2007. Based on this response, recommendations 1 through 7 and 9 through 11 are resolved. Recommendation 8 is closed. Please provide an updated status of the resolved recommendations by July 31, 2007.

If you have any questions or concerns, please contact me on 415-5915.

Attachments: As stated

cc: Michael Johnson, OEDO
Melinda Malloy, OEDO
Patricia Tressler, OEDO

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Audit Report
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Status of Recommendations

Recommendation 1: Revise Management Directive (MD) 13.1 to require that property inventories should include independent verification of the property by someone other than the property holder.

EDO Response

Dated

February 7, 2007: Agree. The Office of Administration (ADM) will review and revise Management Directive 13.1 to require that property inventories include independent verification of the property by someone other than the property holder by November 30, 2007.

OIG Analysis: The proposed corrective action addresses the intent of OIG's recommendation. This recommendation will be closed when OIG receives a copy of the final MD 13.1 and determines that it requires that property inventories include independent verification of the property by someone other than the property holder.

Status: Resolved.

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Status of Recommendations

Recommendation 2: Issue interim guidance to accomplish the intent of Recommendation 1, pending revision of MD 13.1.

EDO Response

Dated

February 7, 2007: Agree. Interim written guidance will be provided to all property custodians by March 15, 2007.

OIG Analysis: The proposed corrective action addresses the intent of OIG's recommendation. This recommendation will be closed when OIG receives a copy of the written interim guidance and determines that it accomplishes the intent of Recommendation 1.

Status: Resolved.

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Status of Recommendations

Recommendation 3: Update and finalize the training policies and procedures.

EDO Response

Dated

February 7, 2007: Agree. Human Resources Training and Development (HRTD) has developed and is implementing a plan to review, reformat, and revise, as necessary, the existing TTC Policy Documents. These documents will result in a set of HRTD Operating Procedures by December 31, 2008. The schedule for updating each existing procedure is provided in the enclosure.

OIG Analysis:

The planned corrective action addresses the intent of this recommendation; however, the planned completion date does not conform to the requirements stated in a February 1996 amendment to the IG Act of 1978. The Section titled "Prompt Management Decisions and Implementation of Audit Recommendations" states the following: "the head of a Federal agency shall complete final action on each management decision required with regard to a recommendation in an inspector general's report . . . within 12 months after the date of the inspector general's report."

Based on the referenced requirements of the IG Act, the agency's planned corrective actions should be fully implemented by January 2008.

Of the nine policies listed on the schedule referred to above, one has been completed and four are scheduled for completion by the end of 2007, which is within one year of resolution.

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Status of Recommendations

OIG reviewed the remaining four policies and found the following:

Policy No.	Title	Scheduled Completion Date	No. of Pages
401	Course Scheduling	09/28/08	11
402	Course Registration	09/28/08	*
404	Training Materials Control	06/30/08	4
407	Training Administration	06/28/08	5

* Currently, Course Scheduling and Course Registration are contained in one policy.

If the agency is unable to complete final action within one year on revisions to the four policies listed above, please provide a plan for issuing interim guidance that will address the intent of the recommendation.

Status: Resolved.

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Status of Recommendations

Recommendation 4: Develop and implement a written policy that provides specific expectations for revising course materials, tracking revisions to the course materials, transferring cognizant instructor responsibilities, and organizing and storing course materials.

EDO Response

Dated

February 7, 2007: Agree. HRTD will address this recommendation during the procedures update. HRTD Operating Procedure 404 (Former TTC Policy Document 9), *Training Materials Control*, contains the policy for controlling course materials. HRTD is revising this document as noted in the response above to Recommendation 3, and will address this recommendation during the revision. This revision is scheduled to be completed by June 30, 2008.

OIG Analysis: See OIG Analysis of the agency's response to Recommendation 3.

Status: Resolved.

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Status of Recommendations

Recommendation 5: Develop and implement a written policy that provides specific expectations for the aggregate of pending changes for all course materials on an ongoing basis. The policy should address prioritizing individual changes, identifying available resources, and scheduling the changes.

EDO Response

Dated

February 7, 2007: Agree. HRTD will address this recommendation during the procedures update. HRTD Operating Procedure 404 (Former TTC Policy Document 9), *Training Materials Control*, contains the policy for the items listed in this recommendation. HRTD is revising this document as noted in the response above to Recommendation 3, and will address this recommendation during the revision. This revision is scheduled to be completed by June 30, 2008.

OIG Analysis: See OIG Analysis of the agency's response to Recommendation 3.

Status: Resolved.

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Status of Recommendations

Recommendation 6: Develop and implement a written policy requiring TTC instructors to maintain technical currency.

EDO Response

Dated

February 7, 2007: Agree. TTC instructors complete technical training and participate in other agency activities to maintain their technical currency. HRTD Operating Procedure 501 (Former TTC Policy Document 7), *Staff Qualification*, contains the policy for continuing training for instructors and other training staff. HRTD is revising this document as noted in the response above to Recommendation 3, and will address this recommendation during the revision. This revision is scheduled to be completed by June 29, 2007.

OIG Analysis: The proposed corrective action addresses the intent of OIG's recommendation. This recommendation will be closed when OIG receives a copy of HRTD Operating Procedure 501, *Staff Qualification*, and determines that it requires TTC instructors to maintain technical currency.

Status: Resolved.

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Status of Recommendations

Recommendation 7: Periodically provide instructional methodology training for all TTC instructors.

EDO Response

Dated

February 7, 2007: Agree. TTC instructors are periodically provided instructional methodology training. HRTD Operating Procedure 501 (Former TTC Policy Document 7), *Staff Qualification*, contains the policy for continuing training for instructors and other training staff. HRTD is revising this document as noted in the response above to Recommendation 3, and will address this recommendation during the revision. This revision is scheduled to be completed by June 29, 2007.

OIG Analysis: The proposed corrective action addresses the intent of OIG's recommendation. This recommendation will be closed when OIG receives a copy of HRTD Operating Procedure 501, *Staff Qualification*, and determines that it requires all TTC instructors to receive periodic instructional methodology training.

Status: Resolved.

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Status of Recommendations

Recommendation 8: Develop and implement a pilot program for rotational instructor positions at TTC.

EDO Response

Dated

February 7, 2007: Disagree. As discussed in my November 22, 2006, comments to you on the draft report, HR has found that it is effective and efficient to send TTC staff out on assignments to offices and regions to bring back information and ideas to TTC for use in programs and processes. Instructors' participation in other agency activities (e.g., accompanying/supporting inspections, interacting with NRC technical personnel at periodic regional inspector meetings, supporting technical projects led by other agency offices) has been effective in maintaining their currency. These activities, combined with other instructor qualification and post-qualification activities, have been sufficient to produce the favorable ratings from former students that were identified in your audit ("Instructor Knowledgeable and Current," mode of 9 on a ten point scale, page 19). Additionally, office and region subject matter experts participate as instructors for selected courses as well as participate in development of course objectives and course materials, as necessary, to provide up-to-the-minute program perspectives in the training curricula.

While we agree that continued success depends, in no small part, on maintaining and updating instructors' technical knowledge and taking advantage of selected new approaches, we conclude that undertaking a pilot program for rotational instructor positions would unnecessarily compete for staff and financial resources as well as management attention. Consequently, while we will consider your recommendation among other strategies aimed at ensuring instructor and program currency, we do not consider the development of a pilot program for rotational instructor positions necessary for programmatic success at this time.

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OIG Analysis: OIG accepts the agency's reasons for not developing and implementing a pilot program for rotational instructor positions at TTC at this time. Implementation of Recommendation 9 requiring periodic rotation of cognizant instructor responsibilities would have the benefit of providing fresh perspectives and new ideas that would enhance the effectiveness of the training program.

Status: Closed.

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Status of Recommendations

Recommendation 9: Periodically rotate cognizant instructor responsibilities.

EDO Response

Dated

February 7, 2007: Agree. HRTD management assigns individuals as cognizant instructors to utilize resources most efficiently and to best serve the balanced needs of the training programs, the individuals, and the HRTD mission. We will weigh the potential benefits of rotating cognizant instructor duties, as well as the associated costs and other impacts, and make our assignments based on these factors. HRTD Operating Procedure 404 (Former TTC Policy Document 9), *Training Materials Control*, contains the policy for cognizant instructor responsibilities. HRTD is revising this document as noted in the response above to Recommendation 3, and will address this recommendation during the revision. This revision is scheduled to be completed by June 30, 2008.

OIG Analysis: The agency's plan to "weigh the potential benefits of rotating cognizant instructor duties, as well as the associated costs and other impacts," does not fully address the intent of the recommendation since there is no commitment to take specific corrective action. OIG will close this recommendation once the agency develops and implements a policy requiring periodic rotation of cognizant instructor responsibilities.

With respect to the schedule for completion of HRTD Operating Procedure 404, *Training Materials Control*, see OIG Analysis of the agency's response to Recommendation 3.

Status: Resolved

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Status of Recommendations

Recommendation 10: Establish a more formal method to track and trend TTC course evaluations and periodically analyze trends for appropriate action.

EDO Response

Dated

February 7, 2007: Agree. One of the strategic goals outlined in the Training and Development Strategic Plan is to ensure that training resources are optimized and the agency is realizing the intended benefits of training. The recommended action is consistent with the supporting Training and Development Strategic Plan strategy of implementing meaningful evaluation tools and performance measures to assess progress toward achieving results aligned with agency mission and goals. Over the next several years, HRTD plans to assess our current methods of training evaluation and enhance these appropriately. In parallel, as required by the President's e-gov initiatives, we are in the process of purchasing a Learning Management System (LMS). A LMS is a Web-based software product that provides desktop capability for planning training, registering students, providing access to on-line training opportunities, as well as recording, tracking, and reporting data related to training. The LMS is also expected to provide the capability to electronically record, track, trend and report training evaluation data. Once the LMS is implemented, we will be in a position to consider this recommendation in conjunction with assessing evaluation-related capabilities of the LMS that will be useful to the NRC. HRTD Operating Procedure 403 (Former TTC Policy Document 4), *Course Administration*, contains the course evaluation policy. HRTD will address this recommendation either as a revision to HRTD Operating Procedure 403 or by establishing a new procedure for training evaluation. This revision is projected to be completed by December 20, 2008.

In the near term, HRTD is revising HRTD Operating Procedure 403 (Former TTC Policy Document 4), *Course Administration*, to better describe our current evaluation processes. This revision is scheduled to be completed by December 21, 2007.

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Status of Recommendations

OIG Analysis: OIG will close this recommendation once the agency establishes a more formal method to track and trend TTC course evaluations and periodically analyze trends for appropriate action.

With respect to the schedule for completion of HRTD Operating Procedure 403, *Course Administration*, see OIG Analysis of the agency's response to Recommendation 3.

Status: Resolved.

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Status of Recommendations

Recommendation 11: Include questions specific to instructor performance on all course evaluations.

EDO Response

Dated

February 7, 2007: Agree. As part of the training evaluation review discussed above for Recommendation 10, HRTD will consult with other training organizations with in-house bargaining unit instructors to identify and appropriately enhance instructor evaluation. HRTD will address this recommendation either as a revision to HRTD Operating Procedure 403 or by establishing a new procedure for training evaluation. This revision is projected to be completed by December 20, 2008.

OIG Analysis: OIG will close this recommendation once the agency includes questions specific to instructor performance on all course evaluations.

With respect to the schedule for completion of HRTD Operating Procedure 403, *Course Administration*, see OIG Analysis of the agency's response to Recommendation 3.

Status: Resolved.