

**ACTION PLAN FOR RESOLUTION OF RECOMMENDATIONS  
IN THE OFFICE OF THE INSPECTOR GENERAL AUDIT  
ON THE COMMITTEE TO REVIEW GENERIC REQUIREMENTS**

Lead: Office of Nuclear Regulatory Research

Support: Office of Nuclear Reactor Regulation  
Office of Nuclear Material Safety and Safeguards  
Office of New Reactors  
Office of Nuclear Security and Incident Response  
Office of Federal and State Materials and Environmental  
Management Programs  
Office of Administration  
Office of Human Resources  
Office of the General Counsel  
Regional Offices

Milestone	Date (T: Target) (C: Complete)	Lead	Support
<b>1. Review and determine what, if any, role the CRGR should perform in NRC's backfit review process.</b>			
a. Hold public discussions with external stakeholders to obtain input on the future role, if any, of the CRGR.	Fall 09 (T) November 9, 2009(C)	CRGR	
b. Provide recommendations to the EDO regarding CRGR.	2 months after stakeholder meeting (T) Provided on January, 28, 2010 (C) Approved on March 8, 2010	CRGR	
c. Review procedures from the program offices and from regions to evaluate existing documentation and to ascertain revisions necessary to develop and document an overarching agencywide backfit program that is comprehensive in ensuring Commission backfit policies and backfit rules for nuclear and special nuclear materials are provided for and ensuring information regarding the basis for decisions on backfit is documented and preserved in a manner that can be easily retrieved by the staff at a later time.	3 months after recommendation is approved (6/2010) (T)	CRGR	NRR NRO FSME NSIR NMSS Regions
<b>2. Revise CRGR charter to reflect its modified role in the NRC backfit process.</b>			
a. Revise CRGR Charter as needed.	1.c + 1 month (7/30/2010) T	CRGR	NRR NRO FSME NSIR NMSS OGC Regions
b. Obtain comments from program offices and regions.	2.a + 1 month (8/30/2010) T	NRR NRO FSME NSIR NMSS OGC Regions	CRGR

Milestone	Date (T: Target) (C: Complete)	Lead	Support
c. Revise Charter per comments.	2.a + 2 months (9/30/2010) T	CRGR	
d. Submit Charter for EDO/Commission Approval.	2.a + 3 months (10/30/2010)	CRGR	
<b>3. Revise Management Directive (MD) 8.4, "NRC Program for Management of Plant-Specific Backfitting of Nuclear Power Plants" to reflect process changes due to the new role of CRGR.</b>			
a. Obtain office-level agreement on the office and regional responsibilities.	(7/2010) T	RES	NRR NRO FSME NSIR NMSS Regions
b. Develop Draft Revised MD 8.4 addressing OIG recommendations and organizational/procedural controls.	(09/30/2010) T	RES	NRR NRO FSME NSIR NMSS ADM Regions
c. Relevant offices and Regions begins 20 day Review of Draft Revised MD 8.4.	(Begin: 12/07/2010) T (End: 1/10/2011) T	RES	NRR NRO FSME NSIR NMSS OGC Regions
d. Comment Resolution on Draft Revised MD 8.4.	(1/25/2011) T	RES	NRR NRO FSME NSIR NMSS ADM Regions
e. Management Directive team in ADM makes any necessary revisions to MD, Handbook and	(03/15/2011) T	ADM	RES

Milestone	Date (T: Target) (C: Complete)	Lead	Support
comment resolution document.			
f. Request ADM review and acceptance publication of MD 8.4. (MD 5-year plan due date is June 2011.)	(Request: 05/27/2011) T	RES	ADM
g. Issue Final MD 8.4.	TBD [target date estimated to 8+ weeks once MD is accepted for publications; see MD at; <a href="http://www.internal.nrc.gov/ADM/DAS/cag/mandirs/mdtime.html">http://www.internal.nrc.gov/ADM/DAS/cag/mandirs/mdtime.html</a> ]	ADM	RES (Minimal)
<b>4. Implement backfit controls that are consistent with CRGR Charter and MD 8.4.</b>			
a. Update template for regional backfit procedures consistent with the revised MD 8.4 and CRGR Charter Rev 8.	TBD	Region IV	Regions
b. Update draft office and regional backfit procedures that are consistent with the revised MD 8.4 and CRGR Charter Rev 8.	TBD	NRR NRO FSME NSIR NMSS Regions	-
c. Interoffice review of office and regional backfit procedures.	TBD	NRR NRO FSME NSIR NMSS OGC Regions	RES
d. Resolution of comments on RES office procedure to integrate role of the regulatory analysis guidelines.	TBD	RES	-
e. Approval of RES office procedure to integrate role of the regulatory analysis guidelines	TBD	RES	

Milestone	Date (T: Target) (C: Complete)	Lead	Support
f. Approval of office and regional backfit procedures.	TBD	NRR NRO FSME NSIR NMSS OGC Regions	CRGR
<b>5. Backfit training.</b>			
Develop an overarching Web-based backfit training program for the staff by providing access to varying levels of information in the beginner, advanced, and refresher training.	Begin with the approval of the Charter and complete in time to implement approved office and regional procedures.	HR/ ADTD	RES NRR NMSS NSIR Regions NRO FSME
<b>6. Launch agencywide backfit training program.</b>			
Communication and implementation of the agencywide backfit program	TBD	RES	NRR NRO FSME NSIR NMSS ADM Regions