

September 26, 2011

MEMORANDUM TO: Stephen D. Dingbaum
Assistant Inspector General for Audits

FROM: James T. Wiggins, Director */RA/*
Office of Nuclear Security and Incident Response

SUBJECT: THE OFFICE OF NUCLEAR SECURITY AND INCIDENT
RESPONSE STATUS UPDATES ON THE
RECOMMENDATIONS FROM THE OFFICE OF THE
INSPECTOR GENERAL AUDIT OF THE NUCLEAR
REGULATORY COMMISSION'S OVERSIGHT OF
INDEPENDENT SPENT FUEL STORAGE INSTALLATIONS
SECURITY (OIG-11-A-10)

This memorandum is in response to your request, dated June 23, 2011, to provide a status update addressing all open recommendations from the Office of the Inspector General (OIG) audit of the U. S. Nuclear Regulatory Commission's (NRC's) Oversight of Independent Spent Fuel Storage Installations (ISFSIs) (OIG-11-A-10). This audit identified the following recommendations:

1. Develop and implement an overarching process document that defines and clearly documents the roles and responsibilities of all offices involved with ISFSI security.
2. Develop and implement a comprehensive ISFSI security inspection procedure which includes a defined frequency for inspections to occur.
3. Develop and implement a formal ISFSI security qualification program.
4. Develop and implement a centralized repository of relevant ISFSI security information.

Specifically, your June 23, 2011, memorandum noted that Recommendations 2 and 4 were closed, and that Recommendations 1 and 3 were resolved, but remained open. Based on the staff's review, the following information is provided on the current status of Recommendations 1 and 3 respectively:

Recommendation 1: In our June 5, 2011, response to the OIG Recommendations, the Office of Nuclear Security and Incident Response (NSIR) indicated the roles and responsibilities relative to ISFSI security would be addressed in documents and activities, currently in development. Specifically, the activities were NSIR's development and implementation of Inspection Procedure 81311 (OIG Recommendation 2); a specific ISFSI security inspector qualification program (OIG Recommendation 3); and a centralized repository for ISFSI security information (OIG Recommendation 4). As noted in your memorandum, Recommendations 2 and 4 are

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already completed and the Recommendations are closed. The status of Recommendation 3 is discussed in detail below. (NSIR POC: Susan Bagley)

Recommendation 3: NSIR is working with Region I and the NRC Technical Training Center (TTC) to develop a specific ISFSI inspector qualification program. NSIR is developing the ISFSI security inspector training and qualification standard which will be added to TRN-700, "NSIR Training, Development and Qualification Programs." The target date for the completion of the training and qualification standard is December 30, 2011. The ISFSI inspector qualification program will be incorporated as subpart of the agency training and qualification guidance in Inspection Manual Chapters (IMC) 1245 and 1246 under revision by Region I and the NRC TTC. The formal changes will be recommended to the IMC working groups by June 12, 2012. (NSIR POC: Susan Bagley)

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