

October 26, 2011

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

FROM: Catherine Haney, Director **/RA/**  
Office of Nuclear Material Safety  
and Safeguards

SUBJECT: UPDATE ON STATUS OF IMPLEMENTATION OF  
RECOMMENDATIONS CONTAINED IN AUDIT OF THE U.S.  
NUCLEAR REGULATORY COMMISSION'S OVERSIGHT OF  
INDEPENDENT SPENT FUEL STORAGE INSTALLATIONS  
SAFETY (OIG-11-A-12)

This memorandum is in response to your request, dated June 30, 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 Safety (ISFSIs) (OIG-11-A-12). This audit contained the following recommendations:

1. Develop and implement a formalized agencywide Independent Spent Fuel Storage Installation (ISFSI) safety inspector training program.
2. Modify inspection guidance to include a minimum inspection frequency for conducting routine ISFSI safety inspections.

The status of the implementation of these recommendations is as follows:

Recommendation 1: The NRC staff agreed to develop a qualification card for inspectors by September 30, 2011. After discussions with Headquarters and Regional Branch Chiefs and staff involved in the safety inspections of ISFSIs, the staff developed a qualification journal specific for ISFSI inspectors. This qualification journal will be issued in early Fiscal Year (FY) 2012 as Appendix B3 of Inspection Manual Chapter (IMC) 1246. The staff issued a memorandum on September 30, 2011, to all the regions, which provided the ADAMS accession number of the draft qualification journal to the regions for information. Once issued, staff will be required to use this qualification journal for ISFSI inspector candidates. (Point of Contact: Norma Garcia Santos)

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Recommendation 2: The NRC staff committed to revise inspection guidance (i.e., IMC 2690, appropriate inspection procedures) by September 30, 2011, to establish a minimum frequency for conducting routine ISFSI safety inspections. If guidance could not be issued by September 30, 2011, then a memorandum was to be issued providing interim guidance to inspectors. On September 30, 2011, the staff issued a memorandum to all regions responsible for the ISFSI Inspector Qualification Journal, with the following interim guidance with a minimum frequency for conducting routine ISFSI safety inspections:

<b>INSPECTION ACTIVITY</b>	<b>USE INSPECTION PROCEDURE (IP) NUMBER</b>	<b>EXPECTED FREQUENCY</b>
Routine ISFSI safety inspections at reactor site ISFSIs	60855	Every Two Years, Not to Exceed Three Years <sup>1</sup>
Routine ISFSI safety inspections at away from reactor site ISFSIs	60858	Every Two Years, Not to Exceed Three Years <sup>1</sup>

The revision of IMC 2690 is currently in concurrence. (Point of Contact: Jon Woodfield)

cc: Raymond K. Lorson, RGN-I  
 Joel T. Munday, RGN-II  
 Anne T. Boland, RGN-III  
 Roy J. Caniano, RGN-IV  
 Judith A. Joustra, RGN-I  
 Joel E. Rivera-Ortiz, RGN-II  
 Christine A. Lipa, RGN-III  
 Blair Spitzberg, RGN-IV

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<sup>1</sup> The expected frequency is after the initial loading at new ISFSIs. For operational ISFSIs, where the last Regional inspection was performed more than three years ago, plan an inspection as soon as possible and establish subsequent inspections per the frequency guidance.

Recommendation 2: The NRC staff committed to revise inspection guidance (i.e., IMC 2690, appropriate inspection procedures) by September 30, 2011, to establish a minimum frequency for conducting routine ISFSI safety inspections. If guidance could not be issued by September 30, 2011, then a memorandum was to be issued providing interim guidance to inspectors. On September 30, 2011, the staff issued a memorandum to all regions responsible for the ISFSI Inspector Qualification Journal, with the following interim guidance with a minimum frequency for conducting routine ISFSI safety inspections:

INSPECTION ACTIVITY	USE INSPECTION PROCEDURE (IP) NUMBER	EXPECTED FREQUENCY
Routine ISFSI safety inspections at reactor site ISFSIs	60855	Every Two Years, Not to Exceed Three Years <sup>2</sup>
Routine ISFSI safety inspections at away from reactor site ISFSIs	60858	Every Two Years, Not to Exceed Three Years <sup>1</sup>

The revision of IMC 2690 is currently in concurrence. (Point of Contact: Jon Woodfield)

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<sup>2</sup> The expected frequency is after the initial loading at new ISFSIs. For operational ISFSIs, where the last Regional inspection was performed more than three years ago, plan an inspection as soon as possible and establish subsequent inspections per the frequency guidance.