



OLG Commitment Audit Findings and Corrective Actions

John Hughey
Division of Operating Reactor Licensing



Areas For Improvement

- Staff understanding of the definition and use of regulatory commitments
- Consistent implementation of commitment management audits
- NRC tracking of regulatory commitments



Definition/Use of Commitments

- **Obligation – Legal Requirement**
- **Commitment – Voluntary Action**
- **Misapplied Commitments**
 - regulatory decisions
 - findings of public health and safety in safety evaluations
 - Beware of past precedence
- **Training for NRR / OGC / Region**



Commitment **Obligation**

- License Amendments
 - license condition
 - implementation requirement
- Exemption
 - limitation / condition
- Relief Request
 - imposed condition of relief
 - supplement to revise alternative



Consistent Audits

- **Enhanced Audit Sample Selection**
- **Robust Implementation Verification**
- **Revised Office Instruction (LIC-105)**



Commitment Tracking Database

- **Resource Prohibitive**
- **Counter Proposal to Evaluate Extent of Misapplied Commitments via Audits**
- **Compile Results and Make Recommendation**



OIG Commitment Audit

- **Track/Trend Results Through 2012**
- **Consider Additional Actions**
- **Questions?**
- **DORL Contact: John Hughey
(301) 415-3204**