



**UNITED STATES**  
**NUCLEAR REGULATORY COMMISSION**  
WASHINGTON, D.C. 20555-0001

**OFFICE OF THE  
INSPECTOR GENERAL**

April 15, 2014

**MEMORANDUM TO:** Mark A. Satorius  
Executive Director for Operations

**FROM:** Stephen D. Dingbaum */RA/*  
Assistant Inspector General for Audits

**SUBJECT:** STATUS OF RECOMMENDATIONS: AUDIT OF NRC'S  
INSPECTIONS, TESTS, ANALYSES, AND ACCEPTANCE  
CRITERIA (ITAAC) PROCESS (OIG-12-A-16)

**REFERENCE:** DIRECTOR, OFFICE OF NEW REACTORS, MEMORANDUM  
DATED MARCH 5, 2014

Attached is the Office of the Inspector General's (OIG) analysis and status of recommendations as discussed in the agency's response dated March 5, 2014. Based on this response, recommendations 4 and 10 are resolved and Recommendation 7 is closed. Recommendations 1, 2, 3, 5, 6, 8, and 9 were previously closed. Please provide an updated status of these recommendations by August 29, 2014.

If you have questions or concerns, please call me at 415-5915 or R.K. Wild, Team Leader, at 415-5948.

Attachment: As stated

cc: M. Galloway, OEDO  
K. Brock, OEDO  
J. Arildsen, OEDO  
C. Jaegers, OEDO  
RidsEdoMailCenter  
G.Tracy, NRO

## Audit Report

### AUDIT OF NRC'S INSPECTIONS, TESTS, ANALYSES, AND ACCEPTANCE CRITERIA (ITAAC) PROCESS

#### OIG-12-A-16

#### Status of Recommendations

Recommendation 4: Develop and deliver training for the ITAAC process based on the results of needs assessments.

#### Agency Response

Dated March 5, 2014:

Based on work load prioritization and limited in-house experience at designing and developing self-paced learning modules, OCHCO has identified funding for professional development of this important training. A statement of work (SOW) has been issued for design, development and delivery through an existing task order contract with an experienced eLearning development contractor. The SOW was submitted on January 27, 2014. The contractor's proposal, which is expected shortly, will include costs and a timeline for completion. The SOW included a required completion date of September 30, 2014, which should be readily achievable for this experienced design and development contractor. The contractor has dedicated staff and resources and a proven track record for training projects similar to this one. Once the contract task order is established, an update will be provided including milestones for the actual completion of the training which will be made available in iLearn.

#### OIG Analysis:

The proposed actions continue to meet the intent of OIG's recommendation. OIG acknowledges the scheduled completion date of September 30, 2014, following submission of an SOW in January 2014. OIG will close this recommendation upon completion, issuance, and OIG review of the new training needs assessment guidance. This guidance will include a three-stage training needs evaluation process that includes organizational, occupational, and individual assessments as outlined in existing NRC and Office of Personnel Management guidance, as well as development and delivery of training.

#### Status:

Resolved.

## Audit Report

### AUDIT OF NRC'S INSPECTIONS, TESTS, ANALYSES, AND ACCEPTANCE CRITERIA (ITAAC) PROCESS

OIG-12-A-16

#### Status of Recommendations

Recommendation 7: Determine what systems, structures and components assembled or manufactured off-site need to be inspected prior to arrival at the construction site in support of the ITAAC closure process.

**Agency Response**

Dated March 5, 2014:

The NRC staff reviewed IMC 2503, "Construction Inspection Program: Inspections of Inspections, Tests, Analyses and Acceptance Criteria (ITAAC) Related Work," and IMC 2506, "Construction Reactor Oversight Process General Guidance and Basis Document," in detail and determined that they are adequate and that no updates are necessary because the changes made in September 2013 to the Vendor Inspection Program (VIP) Plan and IMC 2507, "Construction Inspection Program Vendor Inspection," will adequately capture the guidance involving Recommendation 7.

**OIG Analysis:**

The agency's actions have met the intent of OIG's recommendation to determine what systems, structures, and components, assembled or manufactured off-site, need to be inspected prior to arrival at the construction site in support of the ITAAC closure process. This recommendation is closed based on discussion with NRO staff in October 2013 and OIG review of updates to the relevant IMCs, including 2507.

**Status:**

Closed.

## Audit Report

### AUDIT OF NRC'S INSPECTIONS, TESTS, ANALYSES, AND ACCEPTANCE CRITERIA (ITAAC) PROCESS

OIG-12-A-16

#### Status of Recommendations

Recommendation 10: Develop and implement a change management process to address future change in the ITAAC process that can create barriers to effective communication and coordination.

Agency Response

Dated March 5, 2014:

The staff's August 1, 2013, response to this recommendation stated that agency senior management are evaluating implementation of an agency-level management system, which is expected to include a change management process to address future changes in NRC processes. While this agency-level management system is being developed, NRO's Division of Construction Inspection and Operational Programs (DCIP) will develop a formal change-management process that can be used to address future changes in the ITAAC process. This NRO/DCIP process will be developed following the approach outlined in the Office of Information Services (OIS) change-management guidance (OIS-0203, Revision 1).

OIG Analysis:

The agency's actions partially meet the intent of OIG's recommendation. OIG notes that although this recommendation was issued in July 2012, the agency has yet to establish dates for completion and implementation of a change management program. OIG further notes that the proposed model OIS guidance does not contain all of the elements of a complete change management process. OIG will close this recommendation upon agency completion and OIG review of the change management process guidance to ensure it contains all of the elements of a complete change management process, and subsequent implementation of the process.

**Status:**

Resolved.