

October 29, 2015

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

FROM: Michael R. Johnson */RA/*  
Deputy Executive Director for Reactor  
and Preparedness Programs  
Office of the Executive Director for Operations

SUBJECT: STAFF RESPONSE TO THE OFFICE OF THE INSPECTOR  
GENERAL'S AUDIT OF THE NRC REGION II'S MANAGEMENT  
OF ITS METROPOLITAN ATLANTA RAPID TRANSIT  
AUTHORITY TRANSIT SUBSIDY PROGRAM (OIG-15-A-21)

The staff has received the Office of the Inspectors General's (OIG's) report for Audit of  
OIG-15-A-21, "Audit of the NRC Region II's Management of its Metropolitan Atlanta Rapid  
Transit Authority (MARTA) Transit Subsidy Program," dated September 30, 2015 (Agencywide  
Document Access and Management System Accession No. ML15273A281). This  
memorandum provides the staff's responses to the enclosed eight OIG recommendations,  
including the actions already taken or planned to be taken with associated target dates for  
completion. We appreciate OIG's audit of our MARTA Transit Subsidy Program and OIG's  
recommendations for enhancement of the program administration.

Enclosure:  
Response to OIG  
Recommendations (OIG 15-A-21)

cc: Chairman Burns  
Commissioner Svinicki  
Commissioner Ostendorff  
Commissioner Baran  
SECY

CONTACT: Glenn G. Trent, RII/DRMA  
404 997-4800

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ADAMS:  Yes      ACCESSION NUMBER: **ML15296A276**

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**RESPONSE TO THE OFFICE OF THE INSPECTOR GENERAL RECOMMENDATIONS  
(OIG 15-A-21)**

Recommendation 1:

Establish guidance for managing the MARTA transit subsidy program, including detailed policies, procedures, and training for both Contracting Officer's Representatives (COR's) and other staff who work on or utilize the transit benefit subsidy program.

Response:

The staff agrees with the recommendation.

Following the Region II internal program review, Region II staff developed revised guidance for the MARTA transit subsidy program in March 2015. The guidance included more detailed procedures for managing the MARTA Transit Subsidy Program. Region II also conducted training with the CORs and other staff on the revised guidance in March 2015.

Planned Action: Region II will review the revised guidance to ensure the Office of the Inspector General's (OIG's) recommendation to include detailed policies, procedures, and training for CORs and other staff who work on the transit benefit subsidy program is fully incorporated. Region II will also conduct training for the COR and other applicable staff on any enhanced guidance.

Region II will conduct annual self-assessments of the Region II Transit Subsidy Program as part of its Internal Control Program to ensure the effectiveness of the program guidance and implementation.

Target date for completion: December 31, 2015

Point of Contact: Clinton McGill, RII/DRMA  
(404) 997-4808

Recommendation 2:

Conduct a cost benefit analysis on the use of alternative contracting mechanisms employed by other Federal agencies, such as the Department of Transportation's Debit Card program.

Response:

The staff agrees with the recommendation.

In September 2015, the Office of Administration (ADM) conducted a preliminary review of the

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Department of Transportation's Debit Card program. The preliminary review revealed that under the Department of Transportation's Debit Card program monthly fare cost is \$125.00 versus the \$92.15 the U.S. Nuclear Regulatory Commission (NRC) pays under the existing MARTA contract.

Planned Action: ADM, Office of Chief Financial Officer (OCFO), and Region II Office will conduct a cost benefit analysis on the use of the Department of Transportation's Debit Card program.

Target date for completion: February 2, 2016

Point of Contact: Clinton McGill, RII/DRMA  
(404) 997-4808

Recommendation 3:

Implement supervisory review of the Form 546, NRC's MARTA Management System's "opt-in" data, the MARTA Partner Pages usage data, and MARTA invoices.

Response:

The staff agrees with the recommendation.

Planned Action: Region II will modify the existing Form 546 to require a supervisory review. In addition, Region II will provide the Director of the Division of Resource Management and Administration (DRMA) and/or his designee the compiled reconciliation data from Recommendation #4 on a quarterly basis.

Target date for completion: January 19, 2016

Point of Contact: Clinton McGill, RII/DRMA  
(404) 997-4808

Recommendation 4:

Perform reconciliation of transit data including: (1) persons who park at Region II headquarters to persons receiving a transit subsidy benefit, (2) Form 546 to persons receiving a transit subsidy benefit, (3) monthly count of persons "opting-in" NRC's MARTA Management System to the MARTA usage report from the MARTA Partner Pages for the corresponding month, and (4) monthly count of persons "opting-in" in NRC's MARTA Management System to the number of Breeze Cards billed on the corresponding monthly invoice from MARTA.

Response:

The staff agrees with the recommendation.

Region II implemented a monthly reconciliation of the count of persons "opting-in" NRC's MARTA Management System to the number of Breeze Cards billed on the corresponding monthly invoice from MARTA in May 2015.

Planned Action: Region II will perform the following reconciliations of its transit data on a quarterly basis: (1) persons who park at the Region II Office to persons receiving a transit subsidy benefit, (2) Form 546 to persons receiving a transit subsidy benefit, (3) monthly count of persons "opting-in" NRC's MARTA Management System to the MARTA usage report from the MARTA Partners Page for the corresponding month, and (4) monthly count of persons "opting-in" in NRC's MARTA Management System to the number of Breeze Cards billed on the corresponding monthly invoice from MARTA. The results of the reconciliation and the supporting data will be provided to the Director of DRMA and/or his designee who will perform a review.

Target date for completion: January 19, 2016

Point of Contact: Clinton McGill, RII/DRMA  
(404) 997-4808

Recommendation 5:

Maintain records such as the contract file (contract, delegation letters, invoices, communication with vendor) per records retention requirements in the Federal Acquisition Regulations, and maintain Form 546 for as long as the employee receives a transit subsidy benefit.

Response:

The staff agrees with the recommendation.

The Region II COR currently maintains a contract file (including the contract, delegation letters, invoices, and communication with vendor).

Planned Action: Region II will verify that the COR's contract file includes the contract, delegation letters, invoices, and communication with the vendor on a semi-annual basis. In addition, Region II's COR and Program Administrator will maintain Form 546 for as long as the employee receives a transit benefit.

Target date for completion: January 19, 2016

Point of Contact: Clinton McGill, RII/DRMA  
(404) 997-4808

Recommendation 6:

Periodically audit system access of administrative users in the NRC's MARTA Management System.

Response:

The staff agrees with the recommendation.

The NRC's MARTA Management System web application (now named the Region II Transit Subsidy Program, in response to Recommendation #7) is specifically designed to assist Region II with the Breeze Card reconciliation process. Region II restricted administrative users in that system to the COR, Transit Subsidy Program Coordinator and the Information Technology System Administrator in the June 2015 timeframe.

Planned Action: Region II will include an annual audit of the system access of administrative users as part of the Region II Transit Subsidy Program self-assessments discussed in response to Recommendation #1.

Target date for completion: January 19, 2016

Point of Contact: Thomas Easum, RII/DRMA  
(404) 997-4833

Recommendation 7:

Change the name of the NRC's MARTA Management System to clearly differentiate and indicate that this application belongs to NRC and is not part of MARTA.

Response:

The staff agrees with the recommendation.

Region II changed the name of the NRC's MARTA Management System web application to the Region II Transit Subsidy Program on September 4, 2015.

Target date for completion: Completed: September 4, 2015

Point of Contact: Thomas Easum, RII/DRMA  
(404) 997-4833

Recommendation 8:

Include the issues found in this audit in Region II's review for its fiscal year (FY) 2015 Federal Manager's Financial Integrity Act submission.

Response:

The staff agrees with the recommendation.

Region II submitted the FY 2015 "Reasonable Assurance Justification Template Responsibilities as Partner Offices" (Agencywide Document Access and Management System Accession No. ML15231A487) to the OCFO on September 11, 2015. Region II's Reasonable Assurance Justification template included a statement on the issues found in the audit; documented several proactive corrective actions Region II completed prior to the issuance of the final audit report, and listed several corrective actions planned in FY 2016, including a planned self-assessment of the MARTA program. The statement was developed in consultation with the OCFO's Internal Control and Planning Branch.

Target date for completion: Completed: September 11, 2015

Point of Contact: David Holley, OCFO/DPB  
(301) 415-7325