



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

July 27, 2017

MEMORANDUM TO: Dr. Brett M. Baker  
Assistant Inspector General for Audits  
Office of the Inspector General

FROM: Brian E. Holian, Acting Director */RA/*  
Office of Nuclear Reactor Regulation

SUBJECT: STATUS OF RECOMMENDATIONS: OFFICE OF THE INSPECTOR  
GENERAL'S AUDIT OF THE U.S. NUCLEAR REGULATORY  
COMMISSION'S SIGNIFICANCE DETERMINATION PROCESS FOR  
REACTOR SAFETY (OIG-16-A-21)

Enclosed is the U.S. Nuclear Regulatory Commission's (NRC) status of the resolved recommendations 1-4 from the Office of the Inspector General's Audit of NRC's Significance Determination Process for Reactor Safety, dated December 1, 2016.

If you have any questions regarding this document, please contact the individuals identified below.

Enclosure:  
As stated

CONTACT: Molly J. Keefe-Forsyth, NRR/DIRS  
301-415-5717

SUBJECT: STATUS OF RECOMMENDATIONS: OFFICE OF THE INSPECTOR GENERAL'S  
AUDIT OF THE U.S. NUCLEAR REGULATORY COMMISSION'S SIGNIFICANCE  
DETERMINATION PROCESS FOR REACTOR SAFETY (OIG-16-A-21)  
DATE: July 27, 2017

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**STATUS OF RECOMMENDATIONS: OFFICE OF THE INSPECTOR GENERAL'S  
AUDIT OF THE U.S. NUCLEAR REGULATORY COMMISSION'S SIGNIFICANCE  
DETERMINATION PROCESS FOR REACTOR SAFETY  
(OIG-16-A-21)**

**Recommendation 1:** Assess Significance Determination Process (SDP) workflow, and establish, communicate, and document clear and consistent expectations for staff and managers to complete their roles in the SDP.

Update

The Inspection Finding Resolution Management (IFRM) trial period began on November 16, 2016 and is on track to be completed by December 31, 2017. To support the IFRM, several Inspection Manual Chapters (IMC) were issued, including:

- IMC 0609TP, Significance Determination Process
- IMC 0609 Attachment 1TP, Significance and Enforcement Review Panel (SERP)
- IMC 0609 Attachment 5TP, Inspection Finding Review Board

Since the IFRM trial period began every regional office has had the opportunity to use the above IMC's to assess the SDP workflow, and establish, communicate and document clear and consistent expectations for staff and managers to complete their roles in the SDP for inspection findings of potentially greater than very low safety significance.

To assess the effectiveness of the IFRM initiative, a team was established represented by each regional office and the Office of Nuclear Reactor Regulation. The team meets on a quarterly basis to provide feedback on the progress being made and to identify areas for improvement. Once the trial period ends, an effectiveness review will be completed and provided to the Office of the Inspector General.

Target date for completion: August 31, 2018

Contact: Russell A. Gibbs, NRR/DIRS  
301-415-8578

**Recommendation 2:** Clarify IMC 0612 Appendix B issue screening questions, so that they are readily understood and easily applied.

Update

An example has been drafted to illustrate how to apply the more than minor screening questions. Due to other ROP enhancement efforts, IMC 0612, "Power Reactor Inspection Reports" will be split into two documents. The revised IMC 0612 will capture issues screening

and a new IMC (0611) will capture inspection report documentation. The drafted example will be included in the revision of IMC 0612 so that all changes to the IMC can be implemented concurrently. This alignment will ensure a clear picture is provided to the staff to ensure adequate feedback on the holistic changes to IMC 0612 through the inspection manual change review and concurrence process.

Target date for completion: January 1, 2018

Contact: Michael T. Montecalvo, NRR/DIRS  
301-415-1678

**Recommendation 3:** Implement controls to ensure independent audits of greater than Green inspection findings are performed.

**Recommendation 4:** Document independent audits of greater than Green inspection findings.

#### Update

Independent audits of greater-than-Green inspection findings are performed annually in accordance with Metric R-2, "Predictability and Repeatability of Significance Determination Results" of IMC 0307, Appendix A, "Reactor Oversight Process Self-Assessment Metrics." Metric R-2 and the other ROP self-assessment metrics are reported out annually and get referenced in the ROP self-assessment SECY paper. To ensure the audits of greater-than-Green inspection findings are properly documented with supporting information to justify the staff's conclusion, the staff has 1) created and issued a job guide detailing how to perform the annual metric report, and 2) created a revision to IMC 0307, Appendix A that details proper documentation for Metric R-2. The revision to IMC 0307, Appendix A is currently in the comment resolution period which will end on August 7, 2017. Regional resource demands are currently high due to a large number of programmatic changes being proposed to the ROP. The changes proposed to close these recommendations are required to be in place for the 2017 ROP self-assessment, which will begin in January of CY 2018.

Target date for completion: January 1, 2018

Contact: Andrew J. Waugh, NRR/DIRS  
301-415-5601