



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

May 10, 2018

Gregory C. Wilshusen, Director
Information Security Issues
U.S. Government Accountability Office
441 G Street, NW
Washington, DC 20226

Dear Director Wilshusen:

Thank you for the opportunity to review and comment on the Government Accountability Office (GAO) Draft Audit Report: *Cybersecurity Workforce: Agencies Need to Improve Baseline Assessments and Procedures for Coding Positions (GAO-18-466)*, which was provided to the U.S. Nuclear Regulatory Commission (NRC) on April 11, 2018. The NRC staff is in general agreement with the overall content of the draft audit report. However, the NRC staff requests that the evaluation of two factors for the NRC and their associated recommendations be updated in the final report to reflect our current condition. The draft report cited two of the seven factors, in reference to the Cybersecurity Coding Procedures, as incomplete for the NRC. The same two factors were cited as incomplete during the GAO exit conference on October 31, 2017. During this exit conference, we discussed the *Engagement 101198: Statement of Facts and the Preliminary Findings*, which assessed our progress toward completion of Cybersecurity Coding Procedures.

The first factor requires that procedures include language explaining that Information Technology (IT), Cybersecurity, and cyber-related positions will extend beyond the GG-2210 IT occupational series. The second factor requires that the procedures outline the requirement that positions can be assigned up to three different codes and that these codes will be assigned in order of criticality. While these two factors are not required by the Office of Personnel Management, GAO felt strongly that they should be added. Therefore, the NRC Cybersecurity Coding Procedures were revised to incorporate the missing factors in November 2017 (see enclosed with revisions highlighted).

If you have any questions regarding the NRC's response, please contact John R. Jolicoeur by phone at (301) 415-1642 or by email at john.jolicoeur@nrc.gov.

Sincerely,

/RA/

Victor M. McCree
Executive Director for Operations

Enclosure:
NRC Cybersecurity Coding Procedures

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*Email concurrence - NLO from OGC

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