



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

June 19, 2018

MEMORANDUM TO: Dr. Brett M. Baker
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: STATUS OF RECOMMENDATIONS FOR THE AUDIT OF THE
NUCLEAR REGULATORY COMMISSION SPECIAL AND
INFREQUENTLY PERFORMED INSPECTIONS (OIG-18-A-13)

The purpose of this memorandum is to provide the Office of the Inspector General (OIG) with a status update on the six recommendations in OIG-18-A-13, "Audit of the Nuclear Regulatory Commission's (NRC) Special and Infrequently Performed Inspections."

Recommendation 1 (Planned):

Update Inspection Manual Chapter (IMC) 2515, "Light-Water Reactor Inspection Program – Operations Phase," Appendix C, "Special and Infrequently Performed Inspections," and applicable Office of Nuclear Reactor Regulation (NRR) guidance to reflect the requirement to ensure consistent and periodic reviews of IMC 2515 Appendix C inspection procedures.

Staff Response and Status Update:

The staff plans to update IMC 2515 Appendix C by July 1, 2019. Additionally, the staff will evaluate applicable NRR guidance, and update as necessary, to ensure consistent and periodic reviews of IMC 2515 Appendix C inspection procedures.

Recommendation 2 (Completed):

Implement a means for scheduling and tracking periodic reviews of IMC 2515 Appendix C inspection procedures.

Staff Response and Status Update:

The Division of Inspection and Regional Support (DIRS) in NRR has implemented quarterly reviews of outstanding feedback forms by inspection procedure, and this includes a quarterly review of the feedback forms associated with IMC 2515 Appendix C inspection procedures. This will ensure that Appendix C inspection procedure reviews do not exceed a 5 year period.

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Recommendation 3 (Planned):

Review the inspection procedures listed in IMC 2515 Appendix C to determine if they are still warranted.

Staff Response and Status Update:

The staff plans to review and update the procedures listed in IMC 2515 Appendix C by July 1, 2019.

Recommendation 4 (Planned):

Strengthen application controls in the Replacement Reactor Program System (RRPS) – Inspections Module to ensure NRC staff is correctly coding inspections under IMC 2515 Appendix C.

Staff Response and Status Update:

On May 29, 2018, the NRR/DIRS staff demonstrated the use of the application controls in the RRPS – Inspections Module to the OIG staff. The demonstration of the application controls included the steps a requestor, team leader, or scheduler would take to properly code inspections, as well as the additional review by an approver or branch chief to ensure Appendix C inspections are properly coded.

The OIG staff noted that while specific steps were needed to select an Appendix C inspection, the list of baseline inspection procedures were also presented as options, therefore introducing an opportunity for error. While it is possible that an inspector could select the incorrect inspection in RRPS, it is highly unlikely that an inspector assigned to a special or infrequently performed inspection would incorrectly perform a baseline inspection procedure. However, a change request was submitted to RRPS Resource to restrict the options to only include the appropriate Appendix C inspection procedures when scheduling an Appendix C inspection. RRPS Support Resource issue #: NRC-966 [IN-1237] Completion date, July 1, 2019.

Recommendation 5 (Planned):

Periodically test application controls in the RRPS – Inspections Module to ensure NRC staff is correctly coding inspections under IMC 2515 Appendix C.

Staff Response and Status Update:

The staff will revise IMC 0306, “Planning, Tracking and Reporting of the Reactor Oversight Process (ROP),” to periodically check that the NRC staff is correctly coding inspections under IMC 2515 Appendix C.

Recommendation 6 (Planned):

Train NRC staff on how to properly code IMC 2515 Appendix C inspections in the RRPS – Inspections Module.

Staff Response and Status Update:

Following completion of the change request to modify the RRPS – Inspections Module as mentioned in the above response to Recommendation 4, NRC staff with the responsibility to request or approve Appendix C inspections will be trained on how to properly code IMC 2515 Appendix C inspections in the RRPS – Inspections Module. Completion date, July 1, 2019.

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