



OFFICE OF THE
INSPECTOR GENERAL

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

July 25, 2018

MEMORANDUM TO: Margaret M. Doane
Executive Director for Operations

FROM: Dr. Brett M. Baker */RA/*
Assistant Inspector General for Audits

SUBJECT: STATUS OF RECOMMENDATIONS: AUDIT OF THE
NUCLEAR REGULATORY COMMISSION'S SPECIAL AND
INFREQUENTLY PERFORMED INSPECTIONS
(OIG-18-A-13)

REFERENCE: ACTING DIRECTOR, OFFICE OF NUCLEAR REACTOR
REGULATION, MEMORANDUM DATED JUNE 19, 2018

Attached is the Office of the Inspector General's (OIG) analysis and status of recommendations as discussed in the agency's response dated June 19, 2018. Based on this response, recommendation 2 is closed, while recommendations 1, 3, 4, 5, and 6 are resolved. Please provide a status update for these recommendations by July 15, 2019.

If you have questions or concerns, please call me at (301) 415-5915, or Paul Rades, Team Leader at (301) 415-6228.

Attachment: As stated

cc: R. Lewis, OEDO
H. Rasouli, OEDO
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Audit Report

AUDIT OF THE NUCLEAR REGULATORY COMMISSION'S SPECIAL AND INFREQUENTLY PERFORMED INSPECTIONS OIG-18-A-13

Status of Recommendations

Recommendation 1: 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.

Agency Response Dated
June 19, 2018:

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.

CONTACT: Thomas R. Hipschman, NRR/DIRS
(301) 415-1169

OIG Analysis: The proposed actions meet the intent of this recommendation. OIG will close this recommendation upon reviewing the updated IMC 2515 Appendix C, as well as any other applicable guidance, to verify requirements ensuring consistent and periodic reviews of IMC 2515 Appendix C inspection procedures.

Status: Resolved.

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Status of Recommendations

Recommendation 2: Implement a means for scheduling and tracking periodic reviews of IMC 2515 Appendix C inspection procedures.

Agency Response Dated
June 19, 2018:

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.

CONTACT: Thomas R. Hipschman, NRR/DIRS
(301) 415-1169

OIG Analysis: OIG has reviewed documentation of the actions described in the staff response, and verified that staff have implemented means for scheduling and tracking periodic reviews of IMC 2515 Appendix C inspection procedures. Therefore, this recommendation is considered closed.

Status: Closed.

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Status of Recommendations

Recommendation 3: Review the inspection procedures listed in IMC 2515 Appendix C to determine if they are still warranted.

Agency Response Dated
June 19, 2018: The staff plans to review and update the procedures listed in IMC 2515 Appendix C by July 1, 2019.

CONTACT: Thomas R. Hipschman, NRR/DIRS
(301) 415-1169

OIG Analysis: The proposed actions meet the intent of this recommendation. OIG will close this recommendation after verifying results of the IMC 2515 Appendix C inspection procedure review.

Status: Resolved.

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Status of Recommendations

Recommendation 4: 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.

Agency Response Dated
June 19, 2018:

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.
Completion date: July 1, 2019.

CONTACT: Thomas R. Hipschman, NRR/DIRS
(301) 415-1169

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Status of Recommendations

Recommendation 4 (cont.):

OIG Analysis: The proposed actions meet the intent of this recommendation. OIG will close this recommendation after verifying that the RRPS change request has been implemented.

Status: Resolved.

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Status of Recommendations

Recommendation 5: Periodically test application controls in the RRPS – Inspections Module to ensure NRC staff is correctly coding inspections under IMC 2515 Appendix C.

Agency Response Dated
June 19, 2018:

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.

CONTACT: Thomas R. Hipschman, NRR/DIRS
(301) 415-1169

OIG Analysis: The proposed actions meet the intent of this recommendation. OIG will close this recommendation after verifying applicable procedural changes resulting from the revision of IMC 0306.

Status: Resolved.

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Status of Recommendations

Recommendation 6: Train NRC staff on how to properly code IMC 2515 Appendix C inspections in the RRPS – Inspections Module.

Agency Response Dated
June 19, 2018:

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.

CONTACT: Thomas R. Hipschman, NRR/DIRS
(301) 415-1169

OIG Analysis:

The proposed actions meet the intent of this recommendation. OIG will close this recommendation after verifying that appropriate training has been provided for staff with the responsibility to request or approve RRPS – Inspection Module codes for IMC 2515 Appendix C inspection work.

Status:

Resolved.