



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

January 31, 2019

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

FROM: Daniel H. Dorman */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 U.S. NUCLEAR REGULATORY  
COMMISSION'S LICENSE AMENDMENT REQUEST  
ACCEPTANCE REVIEW PROCESS (OIG-19-A-05)

This memorandum responds to your memorandum dated December 13, 2018, transmitting audit report OIG-19-A-05, "Audit of NRC's License Amendment Request Acceptance Review Process." We appreciate the Office of the Inspector General's (OIG) audit and recommendations for the agency's license amendment request acceptance review process. The OIG audit report makes three recommendations for improving the acceptance review process. Enclosed please find the U.S. Nuclear Regulatory Commission staff's responses to these three recommendations, including planned actions and target dates for completion.

Enclosure:  
Response to OIG's Audit of the NRC's License  
Amendment Request Acceptance Review Process

cc: Chairman Svinicki  
Commissioner Baran  
Commissioner Burns  
Commissioner Wright  
Commissioner Caputo  
SECY

CONTACT: Perry H. Buckberg, NRR/DORL  
(301) 415-1383

SUBJECT: STAFF RESPONSE TO THE OFFICE OF THE INSPECTOR GENERAL'S  
AUDIT OF THE U.S. NUCLEAR REGULATORY COMMISSION'S 10 LICENSE  
AMENDMENT REQUEST ACCEPTANCE REVIEW PROCESS (OIG-19-A-05)  
DATED JANUARY 31, 2019

**DISTRIBUTION:** OEDO-18-00642

RidsEdoMailCenter Resource  
RidsNrrDorl Resource  
RidsNrrDorlLspb Resource  
RidsNrrMailCenter Resource  
RidsOgcMailCenter Resource  
RidsOigMailCenter Resource  
RidsOpaMail Resource  
RidsRgn1MailCenter Resource  
RidsRgn2MailCenter Resource  
RidsRgn3MailCenter Resource  
RidsRgn4MailCenter Resource  
RidsSecyMailCenter Resource

**ADAMS Accession Nos.**  
**Package ML18347B040**  
**Incoming ML18347A838**  
**Response ML18360A527**

**via email\***

OFFICE	NRR/DORL/LSPB/PM	NRR/DORL/LSPB/LA*	NRR/DORL/LSPB/BC	Tech Editor*
NAME	PBuckberg	JBurkhardt	DBroaddus	JDaugherty
DATE	1/9/19	1/7/19	1/16/19	1/16/19
OFFICE	OGC*	NRR/DORL/D	NRR/D	DEDR
NAME	DRoth (NLO)	CErlanger (GSuber for)	HNieh (MEvans for)	DDorman
DATE	1/23/19	1/23/19	1/25/19	1/31/19

**OFFICIAL RECORD COPY**

**RESPONSE TO THE OFFICE OF THE INSPECTOR GENERAL'S**  
**AUDIT OF THE U.S. NUCLEAR REGULATORY COMMISSION'S LICENSE AMENDMENT**  
**REQUEST ACCEPTANCE REVIEW PROCESS (OIG-19-A-05)**

In OIG-19-A-05, "Audit of NRC's License Amendment Request Acceptance Review Process," dated December 13, 2018, the Office of the Inspector General (OIG) made three recommendations to the U.S. Nuclear Regulatory Commission (NRC) staff for improving the agency's license amendment request (LAR) acceptance review process. Below are the OIG's recommendations followed by the NRC staff's responses, including target completion dates.

**Recommendation 1:**

Strengthen data verification and validation measures to ensure completed acceptance review reports and data are processed accurately.

**Response:**

The staff agrees with the recommendation.

The NRC deployed the Replacement Reactor Program System (RRPS) on October 21, 2016. The Office of Nuclear Reactor Regulation (NRR) has introduced several RRPS software updates to remedy programming problems as they are discovered by the users (staff), to make improvements based on staff feedback, and to better attune the software to evolving office needs. These updates have improved the RRPS acceptance review status reporting capability and, as with any software, the staff will continue to introduce updates periodically to address office needs.

NRR staff reviews RRPS acceptance review reports to identify the need to edit data (e.g., due to data input errors) to provide the most accurate accounting of milestones. NRR management review of the metrics reports is performed on a monthly basis. NRR expects this combination of software updates, staff validation, and management review to continue indefinitely.

Planned Action: NRR staff will continue to update the RRPS, including improving the automated reporting capability. NRR staff and management will continue to review and edit automated RRPS reports manually, as needed to ensure the most accurate information is reported, until RRPS updates described in Recommendation 3 of this audit response resolve RRPS reporting issues. NRR staff will document the manual review and validation process for RRPS reports in a NRR Division of Operating Reactor Licensing (DORL) memorandum that will be posted to the internal DORL workload management SharePoint site.

Target date for documenting the manual process: February 28, 2019

**Recommendation 2:**

Identify a single, consistent process for calculating the number of workdays for the acceptance review metric and communicate it to DORL staff.

**Response:**

The staff agrees with the recommendation.

Appendix E, “Generic Acceptance Review Milestones,” to LIC-109, Revision 2, “Acceptance Review Procedures,” effective January 16, 2017, pages E-1 and E-2, gives the review milestones for each of the four possible outcomes of an acceptance review. The 25 and 53-day timeframes in these tables form the basis for the acceptance review metrics for each of the outcomes. Through project manager qualification and participation in LAR reviews, all project managers are expected to be familiar with the LIC-109 review milestones and metrics.

Planned Action: DORL will provide a reminder of the guidance in LIC-109 regarding acceptance review milestones to its staff to help ensure consistent understanding. This information will be included in the DORL memorandum described in Recommendation 1 of this audit response and provided to all applicable DORL staff.

Target date for completion: February 28, 2019

**Recommendation 3:**

Complete the Replacement Reactor Program System—Licensing Module upgrade efforts to generate automated reports.

**Response:**

The staff agrees with the recommendation.

The validation of RRPS reports revealed inaccuracies in calculating various metrics, including those for acceptance reviews. In addition, interfaces between the RRPS and other NRC systems have presented significant challenges to metric calculations and reports. Since deployment, the RRPS has received numerous updates, and the NRC continues to work with the RRPS contractor to resolve the multiple issues related to reporting.

Planned Action: The NRC is working to improve all aspects of the RRPS with updates. Funding for a task order was implemented in January 2019 to support dedicated resources for improvements to RRPS automated reporting and advanced search capabilities that are, in part, intended to support workload planning and metrics reporting. NRR staff will continue to work with RRPS contractors to implement these improvements.

Target date for completion: February 28, 2020