



OFFICE OF THE
INSPECTOR GENERAL

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

August 23, 2019

MEMORANDUM TO: Margaret M. Doane
Executive Director for Operations

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

SUBJECT: STATUS OF RECOMMENDATIONS: THE OFFICE OF
THE INSPECTOR GENERAL'S EVALUATION OF THE U.S.
NUCLEAR REGULATORY COMMISSION'S
HEADQUARTERS OPERATIONS CENTER STAFFING
(OIG-18-A-16)

REFERENCE: DIRECTOR, OFFICE OF NUCLEAR SECURITY AND
INCIDENT RESPONSE, MEMORANDUM DATED JULY 22,
2019

Attached is the Office of the Inspector General's (OIG) analysis and status of recommendations as discussed in the agency's response dated July 22, 2019. Based on this response, all recommendations associated with this report are now closed.

If you have questions or concerns, please call me at (301) 415-5915, or Eric Rivera, Team Leader, at (301) 415-7032.

Attachment: As stated

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Evaluation Report

EVALUATION OF NRC'S HEADQUARTERS OPERATIONS CENTER STAFFING

OIG-18-A-16

Status of Recommendations

Recommendation 1: Develop and document a HOO workforce plan that defines the mission needs, workload, and skills and competencies of the HOO workforce to support achievement of program results.

Agency Response Dated
July 22, 2019:

The Office of Nuclear Security and Incident Response, Division of Preparedness and Response (NSIR/DPR) Procedure OB-1, "Headquarters Operations Officer Staffing and Communications," dated June 28, 2019, was developed and established as the HOO workforce plan. Procedure OB-1 defines the mission needs, workload, and skills and competencies of the HOO workforce to support achievement of program results.

The NSIR/DPR Operations Branch staff reviewed the NRC Incident Response Plan (Management Directive (MD) 8.2), as well as the NRC's Continuity of Operations (COOP) Plan and performed a staffing analysis and workload study with respect to the HOO/Headquarters Emergency Response Officer (HERO) job functions. Based upon these reviews and discussions with the HOOs, Operations Branch staff made several recommendations regarding changes to the position descriptions for HOO/HERO watchstanders. Updated position descriptions incorporating these recommendations were provided to the Office of the Chief Human Capital Officer (OCHCO) for review and approval on June 24, 2019. A summary of the staffing analysis and workload study, including the review of MD 8.2 and the COOP Plan, has been documented in new NSIR/DPR Procedure OB-1.

In addition, Annex B to NSIR Office Procedure TRN-700, "Division of Preparedness and Response, Operations Branch, Headquarters Emergency Response Officer (HERO), Headquarters Operations Officer (HOO) Qualification," dated June 24, 2019, has been issued to clearly define the qualification and proficiency requirements for HOO/HERO watchstanders.

NSIR considers this action to be complete.

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EVALUATION OF NRC'S HEADQUARTERS OPERATIONS CENTER STAFFING

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Status of Recommendations

Recommendation 1 (cont.):

OIG Analysis:

OIG reviewed the NSIR office guidance and determined that it defines the mission needs, workload, and skills and competencies of the HOO workforce to support achievement of program results. OIG determined these items meet the intent of the recommendation. Therefore, this recommendation is closed.

Status:

Closed.

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Status of Recommendations

Recommendation 2:

Develop office guidance to conduct periodic assessment of the HOC (Headquarters Operations Center), to include staffing. Guidance should define

- Periodicity or triggering event for assessment.
- Stakeholders to be involved.
- Areas to be assessed.

Agency Response Dated
July 22, 2019:

NSIR management has recognized the importance of keeping the HOO function adequately staffed. As discussed in the status of Recommendation 3, below, specific measures are being taken to ensure adequate HOO staffing. NSIR management continuously monitors HOO staffing to ensure success in maintaining this staffing.

The Operations Branch staff will perform an evaluation each quarter of HOO full time equivalent (FTE) utilization. During our review of the OIG recommendations, staff determined that the use of excessive amounts of overtime hours is indicative of insufficient staffing. As a result, a preliminary trigger point based on total projected overtime hours logged by the HOO/HEROs has been set at 700 hours annually to determine when additional actions should be taken to address HOO staffing. This trigger point may be adjusted, and/or additional trigger points created through quarterly review of these evaluations. The requirement to perform a quarterly review of FTE utilization has been documented in NSIR/DPR Procedure OB-1.

A questionnaire was sent to internal NRC stakeholders on June 28, 2019, soliciting feedback on their experiences and opinions regarding HOO performance. Results of this survey will be used to inform training requirements for the HOO/HERO watchstanders or other changes to HOO operations. A survey is conducted biennially, and the stakeholders to be involved have been documented in NSIR/DPR Procedure OB-1.

NSIR considers this action to be complete.

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Status of Recommendations

Recommendation 2 (cont.):

OIG Analysis:

OIG reviewed the NSIR procedure and determined that it provides criteria to conduct periodic assessments of the HOC. OIG determined these items meet the intent of the recommendation. Therefore, this recommendation is closed.

Status:

Closed.

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Status of Recommendations

Recommendation 3:

Develop and implement a set of procedures to support human capital management and succession in the HOC, including

- Completed documentation of resource sharing with regions.
- Expedited hiring process for HOO positions.
- Backup pool of qualified HEROs and/or former HOOs.
- Formalize current communications initiatives and methods.

Agency Response Dated
July 22, 2019:

By memorandum dated June 25, 2018, NSIR and Region IV management documented mutual expectations on resource sharing between headquarters and ROOs. The agreement, which is intended to minimize impacts on staff and to ensure a common understanding of expectations regarding regional support of the HOO function, is referenced in NSIR/DPR Procedure OB-1.

By memorandum dated February 26, 2019, NSIR and OCHCO management documented actions to be taken to implement a proactive staffing process for filling HOO/HERO vacancies. This proactive staffing strategy has subsequently been used to quickly and efficiently fill two recent HOO/HERO vacancies.

The Operations Branch staff developed a pool of backup HOO/HERO watchstanders who can be used to supplement the full-time watchstanders. Qualifications and proficiency requirements are documented into NSIR TRN-700 Annex B, "Division of Preparedness and Response, Operations Branch, Headquarters Emergency Response Officer (HERO), Headquarters Operations Officer (HOO) Qualification." Instructions for filling vacant shifts with backup pool personnel have been added to HOO Procedure G.4, "Operations Center Scheduling Guidance" (HOO procedures are maintained on the Operations Branch SharePoint site). In addition, the chief of the Operations Branch will periodically solicit (formally and/or informally) individuals to perform rotations in the Operations Branch as

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Status of Recommendations

Recommendation 3 (cont.):

a HOO/HERO. Upon satisfactory completion of HOO and/or HERO qualification, the individual will be invited to volunteer to be a member of the backup pool with approval of the individual's supervisor. The requirement to maintain a backup pool of HOO/HERO watchstanders, and a target pool size, have been documented in NSIR/DPR Procedure OB-1.

Management has implemented several measures to enhance communication among the HOOs, ROOs, and management. A quarterly management forum has been developed to discuss key focus areas, such as staffing and the work environment, for the HOOs and ROOs. A 'Plan of the Day' meeting is held daily between the HOOs, ROOs, and the Operations Branch support staff to discuss the day's activities, issues occurring during the previous shifts, and general information. An expectation has been established for at least one member of NSIR management to visit Region IV every 6 months to meet with Region IV management and the ROOs. In addition, each HOO is expected to visit Region IV and observe operations of the Region IV Incident Response Center at least once every 3 years. These ongoing actions to enhance communications have been formalized and documented in NSIR/DPR Procedure OB-1.

NSIR considers this action to be complete.

OIG Analysis:

OIG reviewed, and verified implementation of, guidance and procedures to support human capital management and succession in the HOC. OIG determined the actions taken by the agency meet the intent of the recommendation. Therefore, this recommendation is closed.

Status:

Closed.