



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

September 19, 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 TRANSITION PROCESS FOR  
DECOMMISSIONING POWER REACTORS (OIG-19-A-16)

This memorandum responds to the two recommendations in the Office of the Inspector General (OIG) audit report OIG-19-A-16, "Audit of NRC's Transition Process for Decommissioning Power Reactors," dated August 23, 2019. We appreciate the opportunity to comment on OIG's audit and recommendations for the agency's transition process for decommissioning power reactors. The OIG audit report makes two recommendations for improving the decommissioning process. Enclosed please find the U.S. Nuclear Regulatory Commission staff's responses to these two recommendations, including planned actions and target dates for completion.

Enclosure:  
Response to OIG's Audit of the  
NRC's Transition Process for  
Decommissioning Power Reactors

cc: Chairman Svinicki  
Commissioner Baran  
Commissioner Caputo  
Commissioner Wright  
SECY

CONTACT: Michael D. Orenak, NRR/DORL  
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SUBJECT: STAFF RESPONSE TO THE OFFICE OF THE INSPECTOR GENERAL'S  
 AUDIT OF THE U.S. NUCLEAR REGULATORY COMMISSION'S TRANSITION  
 PROCESS FOR DECOMMISSIONING POWER REACTORS (OIG-19-A-16)  
 DATED SEPTEMBER 19, 2019

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**via email\***

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**RESPONSE TO THE OFFICE OF THE INSPECTOR GENERAL'S  
AUDIT OF THE U.S. NUCLEAR REGULATORY COMMISSION'S TRANSITION PROCESS  
FOR DECOMMISSIONING POWER REACTORS (OIG-19-A-16)**

In OIG-19-A-16, "Audit of NRC's Transition Process for Decommissioning Power Reactors," dated August 23, 2019 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML19235A246), the Office of the Inspector General (OIG) made two recommendations to the U.S. Nuclear Regulatory Commission (NRC) staff for improving the agency's transition process for decommissioning power reactors. Below are OIG's recommendations followed by the NRC staff's responses, including target completion dates.

**Recommendation 1:**

Update NRR [Office of Nuclear Reactor Regulation] and NMSS [Office of Nuclear Material Safety and Safeguards] decommissioning guidance to include the license transfer business model, the applicable items/recommendations of the Lessons Learned Report, and to further clarify the operating to decommissioning transition process.

**Response:**

The NRC staff agrees with the recommendation.

The NRC staff acknowledges that the agency needs to update its decommissioning guidance documents.

The staff plans to create an interim guidance document to include additions to address the license transfer business model, applicable items and recommendations from the "Power Reactor Transition from Operations to Decommissioning Lessons Learned Report," issued October 2016 (ADAMS Accession No. ML16085A029), and clarifications on the transition process from operating to decommissioning. Ultimately, this interim guidance will be incorporated into NRR Office Instruction (OI) COM-101, "NRR Interfaces with NMSS," issued November 19, 2002 (ADAMS Accession No. ML022110316); NMSS Policy & Procedure (P&P) 5-1, "Reactor Decommissioning Program Procedures for Interfacing with NRR," issued March 31, 2016 (ADAMS Accession No. ML16081A259); and Regulatory Guide 1.184, Revision 1, "Decommissioning of Nuclear Power Reactors," issued October 2013 (ADAMS Accession No. ML13144A840).

Planned Action: NRR and NMSS will jointly develop a stand-alone interim guidance document that will address the license transfer business model, the applicable items/recommendations of the Lessons Learned Report, and further clarification regarding the operating to decommissioning transition process.

Target Date for Completion: March 31, 2020.

**Recommendation 2:**

Create and implement a formal project manager (PM) knowledge transfer process on decommissioning power reactors.

**Response:**

The NRC staff agrees with the recommendation.

NRR and NMSS will jointly develop a formal PM knowledge transfer process on decommissioning for power reactors that will be reflected in the stand-alone interim guidance document described above in Recommendation 1. This will also include revisions to PM qualification programs to enhance knowledge transfer. As mentioned in the OIG report, NRR is developing a transition to decommissioning qualification card for NRR PM qualification programs detailed in NRR OI ADM-504, Revision 3, "Qualification Program," issued February 16, 2015 (ADAMS Accession No. ML14321A881). When complete, this will be a required part of NRR PM qualification programs. Additionally, the NMSS decommissioning qualification program for decommissioning PMs and technical reviewers in Inspection Manual Chapter 1248, "Qualifications Program for Federal and State Materials and Environmental Management Programs," dated April 19, 2013 (ADAMS Accession No. ML12240A129), includes NMSS P&P 5-1 as a required knowledge factor, which will be referenced in the stand-alone interim guidance document. The final component of the knowledge transfer program is development of a process for the transfer of site-specific knowledge from the NRR PM to the NMSS PM. This process will also be incorporated into the stand-alone interim guidance document.

Planned Actions: NRR and NMSS will jointly develop a formal PM knowledge transfer process on decommissioning for power reactors that will be incorporated into the stand-alone interim guidance document described in the response to Recommendation 1 above.

Target Date for Completion: March 31, 2020.