



OFFICE OF THE
INSPECTOR GENERAL

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

May 20, 2021

MEMORANDUM TO: Margaret M. Doane
Office of the Executive Director for Operations

FROM: Eric Rivera */RA/*
Acting Assistant Inspector General for Audit
Office of the Inspector General

SUBJECT: STATUS OF RECOMMENDATIONS: AUDIT OF THE U.S.
NUCLEAR REGULATORY COMMISSION'S USE OF
REQUESTS FOR ADDITIONAL INFORMATION IN
LICENSING PROCESSES FOR SPENT NUCLEAR FUEL
(OIG-21-A-08)

REFERENCE: DEPUTY EXECUTIVE DIRECTOR FOR MATERIALS,
WASTE, RESEARCH, STATE, TRIBAL, COMPLIANCE,
ADMINISTRATION, AND HUMAN CAPITAL PROGRAMS,
MEMORANDUM DATED MAY 7, 2021

Attached is the Office of the Inspector General's (OIG) analysis and status of recommendations as discussed in the agency's response dated May 7, 2021. Based on this response, recommendations one, two, and three remain open and resolved. Please provide a status update for the open and resolved recommendations by January 28, 2022.

If you have questions or concerns, please call me at (301) 415-7032 or Mike Blair, Team Leader, at (301) 415-8399.

Attachment: As stated

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Audit Report

AUDIT OF THE NRC'S USE OF REQUESTS FOR ADDITIONAL INFORMATION IN LICENSING PROCESSES FOR SPENT NUCLEAR FUEL

(OIG-21-A-08)

Status of Recommendations

Recommendation 1: Update guidance to document strategies or tools to be used for risk-informing requests for additional information.

Agency Response Dated
May 7, 2021:

The NRC staff agrees with the recommendation. The newly developed Division of Fuel Management Instruction on performing an acceptance review includes additional aspects of being risk-informed, such as identifying the significance of each request during the draft request for information stage, clarification calls, and part of division management engagement of any subsequent rounds of requests. The staff has issued guidance for the pilot use of the risk tool and will begin finalizing the guidance. Division management has also issued an "expectations memo" that reinforces risk-informed decision-making in all licensing processes. Additionally, NRC staff plans to hold early assignment and alignment meetings that use risk insights to help inform the scope, focus, and level of detail of each of the technical review areas involved in a review to support the review of licensing actions.

Target date for completion: Complete action by first quarter FY2022.

Point of contact: John B. McKirgan, NMSS/DFM/STLB, 301-415-5722

OIG Analysis: The proposed actions meet the intent of this recommendation. The OIG will close this recommendation upon reviewing the guidance documents on performing an acceptance review and using the risk tool to ensure that the documents contain strategies or tools for risk-informing requests for additional information. This recommendation remains open and resolved.

Status: Open: Resolved.

Audit Report

AUDIT OF THE NRC'S USE OF REQUESTS FOR ADDITIONAL INFORMATION IN LICENSING PROCESSES FOR SPENT NUCLEAR FUEL

(OIG-21-A-08)

Status of Recommendations

Recommendation 2:

Conduct training across the division on how to risk-inform relative to the request for additional information process, and conduct refresher training on an as needed, periodic basis.

**Agency Response Dated
May 7, 2021:**

The NRC staff agrees with the recommendation and plans to continue and complete training (including a "Popup" seminar, "Be RiskSMART," in June, and other informal workshops and knowledge management sessions) on the division instruction for requests for additional information, applying the risk tool, and clarify what it means to be risk-informed in the context of the request for additional information process, and applying risk insights to the request for additional information process and other licensing processes.

Target date for completion: Complete action by first quarter FY2022.

Point of contact: John B. McKirgan, NMSS/DFM/STLB, 301-415-5722

OIG Analysis:

The proposed actions meet the intent of this recommendation. The OIG will close this recommendation upon reviewing documentation related to the training programs on risk-informing relative to the request for additional information process. This recommendation remains open and resolved.

Status:

Open: Resolved.

Audit Report

AUDIT OF THE NRC'S USE OF REQUESTS FOR ADDITIONAL INFORMATION IN LICENSING PROCESSES FOR SPENT NUCLEAR FUEL

(OIG-21-A-08)

Status of Recommendations

Recommendation 3: Create and implement a formalized process to facilitate effective management transitions in the Division of Fuel Management.

Agency Response Dated
May 7, 2021:

The NRC staff agrees with the recommendation and plans to develop and implement a turnover checklist to be used when making management changes. The checklist will be included in a division-wide expectations memorandum. In addition, staff will continue to expand the use of Nuclepedia as a knowledge management tool to capture important technical positions and recurrent request for information issues. Review of the branches' Nuclepedia inputs will be added to the turnover checklist.

Target date for completion: Complete action by second quarter FY2022.

Point of contact: John B. McKirgan, NMSS/DFM/STLB,
301-415-5722

OIG Analysis:

The proposed actions meet the intent of this recommendation. The OIG will close this recommendation upon reviewing the turnover checklist and expectations memorandum. This recommendation remains open and resolved.

Status:

Open: Resolved.