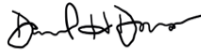




UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

September 3, 2021

MEMORANDUM TO: Eric Rivera
Acting Assistant Inspector General for Audits
Office of the Inspector General

FROM: Daniel H. Dorman  Signed by Dorman, Dan
Deputy Executive Director for Reactor on 09/03/21
and Preparedness Programs
Office of the Executive Director for Operations

SUBJECT: STAFF RESPONSE TO THE OFFICE OF INSPECTOR
GENERAL'S AUDIT OF THE NRC'S PANDEMIC OVERSIGHT
OF NUCLEAR POWER PLANTS (OIG-21-A-13)

The purpose of this memorandum is to provide the Office of the Inspector General (OIG) with the agency's response to the subject audit report, including the agency's intended or completed actions to address the recommendation in OIG-21-A-13, "Audit of the NRC's Pandemic Oversight of Nuclear Power Plants" (Agencywide Documents Access and Management System Accession Number ML21214A042).

The Reactor Oversight Process (ROP) is the Nuclear Regulatory Commission's (NRC's) program to inspect, measure, and assess the safety and security performance of operating commercial nuclear power plants, and to respond to any decline in their performance. The ROP, which includes the inspection program for operating commercial nuclear power plants, is an effective program that continues to evolve and improve to ensure that it continues to meet the program goals of being risk-informed, performance-based, objective, predictable, and understandable. The NRC staff, working with internal and external stakeholders, is continuously seeking and receiving feedback about the ROP.

Recommendation 1:

Conduct an assessment that presents agency management with options for modifying inspection program documents and procedures to give staff flexibility for conducting inspections under irregular conditions.

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NRC Staff Response:

The NRC staff agrees with the recommendation. In March 2021, the staff created a working group composed of senior inspectors from the Office of Nuclear Reactor Regulation, the Office of Nuclear Security and Incident Response, and all four NRC Regions to review all ROP baseline inspection procedures (IPs) to determine which elements of each IP could be accomplished remotely, and which elements must be accomplished onsite for the IP to be considered complete; to identify potential compensatory or alternate inspection activities, if any, in lieu of the required elements if circumstances preclude an inspector from being onsite to complete specific required elements of IPs; and to interview inspectors to identify best practices for accomplishing inspections, both in person and remotely. The objective of the working group is to recommend to management revisions to inspection program guidance based on lessons learned from the pandemic to standardize implementation of the inspection program and facilitate completing the baseline inspection program if travel and site access for inspectors are restricted in the future.

Following that effort, the staff plans to conduct a comprehensive review of lessons learned and best practices that will consider the additional experience gained from conducting inspections during the pandemic. This review will include engagement with external stakeholders and explore the impacts of the increased flexibilities utilized during COVID-19 on the effectiveness and efficiency of the inspection program overall in order to identify potential enhancements to the program for both emergency and non-emergency use.

Target date for completion: July 2022

SUBJECT: STATUS OF RECOMMENDATIONS FOR THE AUDIT OF THE NRC'S
 PANDEMIC OVERSIGHT OF NUCLEAR POWER PLANTS (OIG-21-A-13)
 DATED: September 3, 2021

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ADAMS ACCESSION Number: ML 21231A258

***via-e-mail**

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