



November 9, 2021

MEMORANDUM TO: Catherine Haney
Deputy Executive Director for Materials, Waste, Research,
State, Tribal, Compliance, Administration and Human Capital
Programs

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

SUBJECT: AUDIT OF COVID-19'S IMPACT ON NUCLEAR
MATERIALS AND WASTE OVERSIGHT (OIG-21-A-15)

REFERENCE: DEPUTY EXECUTIVE DIRECTOR FOR MATERIALS,
WASTE, RESEARCH, STATE, TRIBAL, COMPLIANCE,
ADMINISTRATION, AND HUMAN CAPITAL PROGRAMS,
MEMORANDUM DATED OCTOBER 21, 2021

Attached is the Office of the Inspector General's (OIG) analysis and status of recommendations as discussed in the agency's response dated October 21, 2021. Based on this response, recommendations one, two, three, four, and five are open and resolved. Please provide a status update for the open and resolved recommendations by **April 22, 2022**.

If you have questions or concerns, please call me at (301) 415-5915 or Mike Blair, Team Leader, at (301) 415-8399.

Attachment: As stated

cc: J. Jolicoeur, OEDO
S. Miotla, OEDO
RidsEdoMailCenter Resource
OIG Liaison Resource
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Audit Report
AUDIT OF COVID-19'S IMPACT ON NUCLEAR MATERIALS AND
WASTE OVERSIGHT (OIG-21-A-15)
Status of Recommendations

Recommendation 1: Revise the U.S. Nuclear Regulatory Commission (NRC) materials and waste inspection guidance to include instructions on how to respond to prolonged work disruptions, including those that result in required maximum telework or a lack of access to inspection sites.

Agency Response: Agree: As the Office of the Inspector General (OIG) report
Dated October 21, 2021 notes, the Office of Nuclear Material Safety and Safeguards (NMSS) is conducting an assessment to evaluate how the Nuclear Materials and Waste Safety oversight/inspection programs operated during the COVID-19 pandemic. The assessment is examining changes made to the programs and the efficacy of measures put into place to deal with the abnormal conditions cause by the pandemic. As part of the assessment, staff will develop recommendations to:

1. Enhance the implementation of these programs during the current, ongoing COVID-19 pandemic;
2. Ensure inspection programs are adequately prepared for future public health emergencies; and
3. Utilize experiences during the COVID-19 pandemic to enhance any aspects of the current framework for the oversight programs (e.g., inspections planning practices, guidance, communications) to ensure we continue to implement comprehensive, consistent, resilient, and modern oversight programs into the future.

The staff will implement this OIG recommendation, together with the recommendations stemming from the working group evaluating the various practices, processes, and communications implementing the inspection programs during the pandemic, as described above.

The staff will complete this action by **June 30, 2022**.

Point of Contact: María Arribas-Cólón, NMSS

OIG Analysis: The proposed actions meet the intent of this recommendation. The OIG will close this recommendation

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Recommendation 1 (Cont'd):

upon reviewing the proposed changes as documented in the NMSS assessment and updates listed above, including the revised inspection and communications guidance. This recommendation remains open and resolved.

Status:

Open: Resolved.

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Status of Recommendations

Recommendation 2: Formally designate Web-Based Licensing (WBL) as the official system to manage materials and waste inspections data.

Agency Response:
Dated October 21, 2021 Agree: The staff agrees in part, given that the Replacement Reactor Program Systems (RRPS) is already in use as an agency system for some portions of the materials and waste inspection programs led by NMSS—specifically, decommissioning reactors and fuel facilities. The NMSS Office Director will issue a memorandum designating WBL's Inspection module as the official system to manage all inspections under Title 10 of the *Code of Federal Regulations* (10 CFR), Part 30, as well as the 10 CFR Part 40 and 70 inspections that are not tracked under RRPS.

The memo will be issued to:¹

- Region I, Division of Radiological Safety and Security
- Region III, Division of Nuclear Materials Safety
- Region IV, Division of Nuclear Materials Safety

The staff will complete this action by **January 29, 2022**.

Point of Contact: María Arribas-Cólón, NMSS

OIG Analysis: The proposed actions meet the intent of this recommendation. The OIG will close this recommendation upon review of the forthcoming memorandum. This recommendation remains open and resolved.

Status: Open: Resolved.

¹Unlike Regions I, III, and IV, Region II implements inspection programs at nuclear power plants and fuel fabrication facilities. Therefore, Region II staff uses RRPS to track inspections at nuclear power plants and fuel fabrication facilities.

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Recommendation 3: Provide guidance on how to record data consistently in WBL, including specific information on how and when to populate inspection-related information fields.

Agency Response: Agree: NMSS, in conjunction with Regions I, III, and IV, will develop a consistent business process and guidance for recording data within WBL's Inspection module based on the functionality described below in response to
Dated October 21, 2021 Recommendation 4. The WBL User Guide will be updated to incorporate more detail for users about how and when to populate the various fields in the WBL Inspection module.

The staff will complete this action by **August 13, 2022**.

Point of Contact: María Arribas-Cólón, NMSS

OIG Analysis: The proposed actions meet the intent of this recommendation. This recommendation will be closed upon OIG review of the new business process and guidance, as well as the WBL User Guide revisions. This recommendation remains open and resolved.

Status: Open: Resolved.

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Recommendation 4: Review and reconfigure WBL to include mechanisms for recording complete inspections data.

Agency Response: Agree: NMSS staff in conjunction with the Regions I, III, and
Dated October 21, 2021 IV inspection staff in Fiscal Year 2022 will begin enhancing the functionality of WBL's Inspection module for improved data capture and management of materials and waste inspections not already tracked under RRPS for decommissioning reactors and fuel facilities. This effort will include revising WBL's Inspection module to:

- Better track the status and components of an inspection (e.g., status steps such as started, completion of exit interview, inspection report preparation).
- Integrate the other modules for reciprocity, fuel facilities licensing, and casework in the NMSS Division of Decommissioning, Uranium, Recovery and Waste Programs with the Inspection module to allow regional inspectors better planning and tracking of all inspections not already tracked under RRPS for decommissioning reactors and fuel facilities.

The staff will complete this action by August 13, 2022.
Point of Contact: Timothy Mossman, NMSS

OIG Analysis: The proposed actions meet the intent of this recommendation. The OIG will close this recommendation upon demonstration of updated tracking modules in WBL as described above, in addition to any updated guidance associated with this process. This recommendation remains open and resolved.

Status: Open: Resolved.

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<u>Recommendation 5:</u>	Update and implement training for NRC staff to consistently employ the mechanisms developed by the NRC to record the inspections data in WBL.
<u>Agency Response:</u> <u>Dated October 21, 2021</u>	<p>Agree: Once the staff completes activities associated with Items 3 and 4, NMSS staff will develop and implement training for inspection staff on how to record inspection data in WBL. This training will consist of in-person training with the WBL team and the development of step-by-step training guides as a reference for users.</p> <p>The staff will complete this action by September 17, 2022. Point of Contact: Timothy Mossman, NMSS</p>
<u>OIG Analysis:</u>	The proposed actions meet the intent of this recommendation. This recommendation will be closed when the OIG reviews the proposed training program and guidance. This recommendation remains open and resolved.
<u>Status:</u>	Open: Resolved.