



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

April 18, 2022

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

FROM: John W. Lubinski, Director
Office of Nuclear Material Safety
and Safeguards

SUBJECT: STATUS OF RECOMMENDATIONS: AUDIT OF
CORONAVIRUS DISEASE'S IMPACT ON NUCLEAR
MATERIALS AND WASTE OVERSIGHT
(OIG-21-A-15)

A handwritten signature in black ink, appearing to read "RLewis", written over the printed name of Robert Lewis.

Lewis, Robert signing on behalf
of Lubinski, John
on 04/18/22

Enclosed is the U.S. Nuclear Regulatory Commission's (NRC's) status of Recommendations 1 – 5 from the Office of the Inspector General (OIG) Audit of Coronavirus Disease's (COVID-19) Impact on Nuclear Materials and Waste Oversight (OIG-21-A-15), dated September 23, 2021. If you have any questions regarding this document, please contact the individual identified below.

Enclosure:
As stated

CONTACT: Leira Cuadrado, NMSS/MSST
301-415-0324

SUBJECT: STATUS OF RECOMMENDATIONS: AUDIT OF CORONAVIRUS DISEASE'S IMPACT ON NUCLEAR MATERIALS AND WASTE OVERSIGHT (OIG-21-15)

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DATE	04/06/2022	04/06/2022	04/07/2022	04/08/2022	04/18/2022

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**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.

Status: Ongoing. The Office of Nuclear Material Safety and Safeguards (NMSS) completed an assessment to evaluate the Nuclear Materials and Waste Safety oversight/inspection programs during the Coronavirus Disease (COVID-19) pandemic and provided a series of recommendations. The final report for this assessment can be found in the Agencywide Documents Access and Management System (ADAMS) with Accession No. ML21294A342.

NMSS management agreed with the working group's recommendation to prepare pandemic-related guidance and aligned among on this path forward together with its regional counterparts. The staff is developing inspection guidance for inspection activities during pandemics including periods of prolonged work disruptions or lack of access to inspection sites.

Consistent with the agency's Continuity of Operations pandemic guidance, NMSS is responsible for developing pandemic related guidance in the Inspection Manual Chapters for each of its business lines. The Spent Fuel and Transportation and the Fuel Facilities Business Lines incorporated guidance specific to inspection activities during pandemics in Fiscal Year 2021. The Decommissioning and Low-Level Waste and the Nuclear Material Users Business Lines are developing consistent guidance for their inspection programs that is currently scheduled to be completed by the end of the 2022. The target date has shifted from June, because of additional time to provide for regional and Agreement State comments on inspection procedures, since inspection guidance are program elements that are a matter of compatibility for the Agreement States, as well as to ensure consistency of language and formatting across business lines. The target completion date may be affected by the feedback received on the draft guidance.

NMSS already has a business process in place for the routine revisions of inspection procedures. The guidance associated with pandemics or periods of prolonged work disruptions will

be reviewed on a routine basis after their initial issuance and updated as needed.

Target Completion Date: December 31, 2022.

Point of Contact: María Arribas-Colón, NMSS

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

Status: Completed. NMSS designated WBL as the official system to manage materials and waste inspections in a memorandum dated January 27, 2022 (ADAMS Accession No. ML22011A057).

Completion Date: January 27, 2022

Point of Contact: María Arribas-Colón, NMSS

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.

Status: Ongoing. Staff 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 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.

Target Completion Date: August 13, 2022

Point of Contact: María Arribas-Colón, NMSS

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

Status: Ongoing. The staff is enhancing the functionality of WBL's Inspection module for improved data capture and management of materials and waste inspections not already tracked under Replacement Reactor Program System. As previously described, the WBL inspection module will better track the status and components of an inspection, as well as

integrate with other modules to better plan and track inspections.

Target Completion Date: August 13, 2022

Point of Contact: Adelaide Giantelli, NMSS

Recommendation 5 Update and implement training for NRC staff to consistently employ the mechanisms developed by the NRC to record the inspections data in WBL.

Status: Ongoing. 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.

Target Completion Date: September 17, 2022

Point of Contact: Adelaide Giantelli, NMSS