



MEMORANDUM

DATE: January 09, 2024

TO: Daniel H. Dorman
Executive Director for Operations

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

FROM: Hruta Virkar, CPA /RA/
Assistant Inspector General for Audits

SUBJECT: STATUS OF RECOMMENDATIONS: AUDIT OF THE U.S. NUCLEAR REGULATORY COMMISSION'S OVERSIGHT OF IRRETRIEVABLE WELL LOGGING SOURCE ABANDONMENTS (OIG-23-A-04)

REFERENCE: DIRECTOR, OFFICE OF NUCLEAR MATERIAL SAFETY AND SAFEGUARDS MEMORANDUM DATED DECEMBER 27, 2023

Attached is the Office of the Inspector General's (OIG) analysis and status of recommendations as discussed in the agency's response dated December 27, 2023. Based on this response, recommendation 1.3 is now closed, and recommendations 1.1, 1.2, 1.4, and 2.1 remain open and resolved. Please provide an updated status of the open, resolved recommendations by September 10, 2024.

If you have any questions or concerns, please call me at 301.415.1982 or Mike Blair, Team Leader, at 301.415.8399.

Attachment:
As stated

cc: M. Bailey, ADO
T. Govan, Acting DADO
J. Jolicoeur, OEDO
OIG Liaison Resource
EDO ACS Distribution

Audit Report
AUDIT OF THE U.S. NUCLEAR REGULATORY
COMMISSION'S OVERSIGHT OF IRRETRIEVABLE WELL
LOGGING SOURCE ABANDONMENTS
Status of Recommendations
(OIG-23-A-04)

Recommendation 1.1: Collaborate with the regions and the Office of Nuclear Material Safety and Safeguards (NMSS) to establish policy and agencywide positions related to well logging source abandonments.

Agency Response Dated
December 27, 2023:

Ongoing. The staff collaborated with the Regions, reviewed the existing policy and agencywide positions related to well logging source abandonments and determined that they were sufficient.

The staff evaluated updating NMSS Office Procedure 70-09, "NMSS Processing of Technical Assistance Requests (non-public ML17080A506)," and determined that it is more appropriate to include these references in the proposed new NMSS office procedure, titled "Procedures for Processing and Handling of Irretrievable Well Logging Source Abandonments."

Target date for completion: May 1, 2024

OIG Analysis:

The proposed actions meet the intent of this recommendation. The OIG will close this recommendation when it verifies completion of the establishment of policy and agencywide positions related to well logging source abandonments. This recommendation remains open and resolved.

Status:

Open: Resolved.

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Recommendation 1.2: Review and standardize processes and guidance related to the handling and processing of irretrievable well logging source abandonments.

Agency Response Dated
December 27, 2023:

Ongoing. The NMSS staff is collaborating with the regions to establish guidance to be included in a proposed new NMSS office procedure, titled "Procedures for Processing and Handling of Irretrievable Well Logging Source Abandonments."

Target date for completion: May 1, 2024

OIG Analysis:

The proposed actions meet the intent of this recommendation. The OIG will close this recommendation when it verifies completion of standardized processes and guidance related to the handling and processing of irretrievable well logging source abandonments. This recommendation remains open and resolved.

Status:

Open: Resolved.

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Recommendation 1.3: Develop an environmental assessment to be used in support of exemptions related to the approval of temporary storage locations for abandoned well logging sources.

Agency Response Dated December 27, 2023: Completed. Staff developed an example environmental assessment to be used as a template by NRC environmental reviewers to support evaluations for license exemption requests regarding the temporary storage for irretrievable well logging sources. The Environmental Assessment Template for Alternate Abandonment of an Irretrievable Sealed Source (non-public ML23320A310) was entered into ADAMS on November 16, 2023.

OIG Analysis: The actions described in the staff response meet the intent of this recommendation. Based on supporting information in the staff response, this recommendation is now closed.

Status: Closed.

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Status of Recommendations
(OIG-23-A-04)

Recommendation 1.4: Develop guidance to support analysis of exemption requests.

Agency Response Dated
December 27, 2023:

Ongoing. The staff is developing a new NMSS office procedure, "Procedures for Processing and Handling of Irretrievable Well Logging Source Abandonments."

Target date for completion: May 1, 2024

OIG Analysis:

The proposed actions meet the intent of this recommendation. The OIG will close this recommendation when it verifies the completion of the development of guidance to support analysis of exemption requests. This recommendation remains open and resolved.

Status:

Open: Resolved.

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Recommendation 2.1: Develop consistent guidance across all regions to clarify the processes and procedures for documenting abandonment notifications and licensee reports, and to ensure consistency and completeness for abandonment event documentation in ADAMS.

Agency Response Dated
December 27, 2023:

Ongoing. The staff is developing a new NMSS office procedure, “Procedures for Processing and Handling of Irretrievable Well Logging Source Abandonments.”

The staff will also update SA-300, “Handbook on Nuclear Material Event Reporting for the Agreement States” is being updated to formalize the guidance for Agreement States to submit written reports received from Agreement State licensees to the Nuclear Materials Events Database (NMED).

Target date for completion: May 1, 2024

OIG Analysis:

The proposed actions meet the intent of this recommendation. The OIG will close this recommendation upon the completion of the development of consistent guidance across all regions to clarify the processes and procedures for documenting abandonment notifications and licensee reports, and to ensure consistency and completeness for abandonment event documentation in ADAMS. This recommendation remains open and resolved.

Status:

Open: Resolved.