

January 19, 2011

MEMORANDUM TO: Stephen D. Dingbaum  
Assistant Inspector General for Audits  
Office of the Inspector General

FROM: Jennifer L. Uhle, Chairman **/RA/ J. L. Uhle**  
Committee to Review Generic Requirements

SUBJECT: STATUS OF RECOMMENDATIONS: AUDIT OF THE  
COMMITTEE TO REVIEW GENERIC REQUIREMENTS  
(OIG-09-A-06) (WITS 200900043 AND WITS 200900044)

This is an update to the memorandum from James E. Lyons to you, issued on February 12, 2010 (Agency Documents Access and Management System [ADAMS] Accession No. ML100250013), that provided the status of the following two recommendations as outlined in your March 25, 2009 (ADAMS Accession No. ML090860869), memorandum to him:

- Recommendation 1

Develop, document, implement, and communicate an agencywide process for reviewing backfit issues to ensure that generic backfits are appropriately justified based on the Nuclear Regulatory Commission's (NRC's) regulations and policy. Due date: February 2011.

- Recommendation 2

Determine what, if any, role the Committee to Review Generic Requirements (CRGR) should perform in NRC's backfit review process including whether the CRGR function is still needed. Due date: Closed.

With regard to Recommendation 1, the date of submission of the CRGR charter to the Commission for review and approval was delayed from December 2010 to February 2011 because of higher priority Commission actions.

According to your March 18, 2010, memorandum to James E. Lyons (ADAMS Accession No. ML100770374), the CRGR has adequately addressed Recommendation 2 and this item has been closed.

In the process of addressing Recommendation 2, the CRGR met with the external stakeholders on November 9, 2009, to discuss and obtain input regarding the future role of the CRGR. Subsequently, the Nuclear Energy Institute (NEI) and Strategic Teaming and Resource Sharing (STARS) provided written comments. These documents are available through ADAMS under Accession Nos. ML100110388 and ML100110402 (NEI memo and enclosure, respectively) and ML100110404 (STARS memo). The stakeholders' views were considered in actions taken to address Recommendation 1. Specifically, the CRGR charter and Management Directive (MD) 8.4, "Management of Facility-specific Backfitting and Information," are being revised to reflect these views.

The CRGR charter is scheduled to be issued to the Office of the Executive Director for Operations during the month of February. The draft MD 8.4 is being revised to incorporate Office of Administration comments in preparation for issuance to the relevant offices for comment by February 2011. However, the MD 8.4 revision schedule is contingent on the direction received from the Commission subsequent to the review of the CRGR charter.

In addition to these activities, the CRGR and Office of the General Counsel, in cooperation with the Office of Human Resources, are working together to establish a centralized agency resource for backfit training. The next step will be to develop a training module on the overall process and then to develop program-specific modules that can be used by the program offices and regions, as appropriate. The planned implementation of this centralized training program is scheduled for the end of calendar year 2011. This is consistent with the planned issuance of the revised MD 8.4 as stated in the July 1, 2010, action plan (ADAMS Accession No. ML101170084).

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