



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

**OFFICE OF THE
INSPECTOR GENERAL**

August 18, 2015

MEMORANDUM TO: Mark A. Satorius
Executive Director for Operations

FROM: Stephen D. Dingbaum */RA/*
Assistant Inspector General for Audits

SUBJECT: EVALUATION OF INVOLVEMENT OF POLITICAL
APPOINTEES IN NRC'S FOIA PROCESS (OIG-15-A-18)

The Office of the Inspector General (OIG) conducted this evaluation to analyze non-career officials' (political appointees) involvement in the Freedom of Information Act (FOIA) response process at the agency, if any, for the period of January 1, 2007, to the present. OIG initiated the evaluation in response to a request dated June 23, 2015, from Senator Ron Johnson, Chairman, U.S. Senate Committee on Homeland Security and Governmental Affairs. A copy of the letter request is attached to this report.

OIG found no evidence of inappropriate involvement by Nuclear Regulatory Commission (NRC) political appointees in the FOIA responses, nor evidence of involvement that resulted in undue delay or withholding of any document. Therefore, OIG makes no recommendations. I have also attached a certification from the Chief FOIA Officer that there was "no undue delay" by the Commission in responding to a FOIA request. This report presents OIG's evaluation results and methodology.

BACKGROUND

FOIA Inquiry From U.S. Senate

On June 23, 2015, the U.S. Senate Committee on Homeland Security and Governmental Affairs (the Committee) advised the NRC Inspector General that it is conducting oversight of how Executive Branch departments and agencies respond to FOIA requests, in part to ensure that Government officials do not interfere with the FOIA process to inhibit transparency.

Thus, the Committee requested that NRC OIG

- Analyze non-career officials' involvement in NRC's FOIA response process, if any, for the period of January 1, 2007, to the present.
- If non-career officials were involved in the FOIA response, analyze whether their involvement resulted in any undue delay of a response to a FOIA request or the withholding of any document or portion of any document that would have otherwise been released but for the non-career official's involvement in the process.
- Provide further information to the Committee if OIG's analysis shows undue delay or withholding by a non-career official.
- Seek written certification from NRC's chief FOIA officer that (a) no non-career officials were involved in any FOIA request or (b) if such involvement occurred, it has never resulted in undue delay of a response to any FOIA request or the provision of less information than would have been provided but for the involvement of the non-career officials.

The Freedom of Information Act

FOIA¹ is a Federal law that provides any person the right to submit a written request for access to records of information maintained by the Federal Government. In response to such written requests,

¹ [5 U.S.C. § 552, As Amended](#) The Freedom of Information Act.

Federal agencies must disclose the requested records, unless they are protected from release under one of the nine FOIA statutory exemptions.² FOIA mandates that all agencies shall readily promulgate information, agency rules, opinions, orders, records, and proceedings to the public.

In 2009, President Barack Obama and U.S. Attorney General Eric Holder issued memoranda on the FOIA. These statements of FOIA policy emphasize that the FOIA "should be administered with a clear presumption: in the face of doubt, openness prevails."

NRC Implements the FOIA

NRC's FOIA requirements are conveyed in the Code of Federal Regulations under Title 10, Part 9, Subpart A, "Freedom of Information Act Regulations." NRC Management Directive and Handbook 3.1, "Freedom of Information Act," provides guidance on NRC's FOIA policy and implementation of the FOIA process. NRC also maintains an internal and a public Web site with FOIA information.

The FOIA process begins when the agency (1) receives – via mail, facsimile, or Internet – an incoming FOIA request, (2) assigns it a number, and (3) determines which NRC offices need to review their records to identify whether they have information pertinent to the request and sends the request to those offices. FOIA specifies that the response must be issued within 20 business days. However, the law allows additional time for requests that require more extensive document search and consideration.

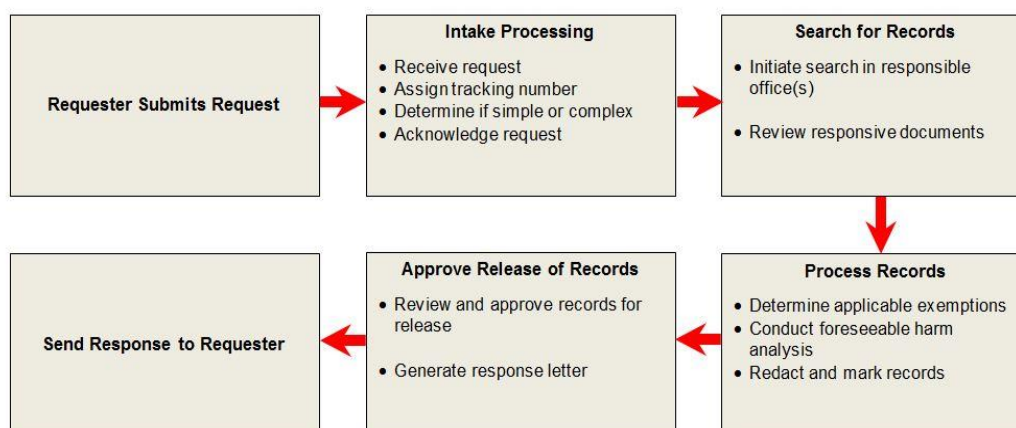
NRC designates FOIA requests as "simple" or "complex." Complexity may result from multiple NRC offices having responsive records, a large volume of records resulting from a search, or from consultation with other Federal agencies that have an interest in the information. Complex requests are more likely to require additional time.

FOIA Response Process

Regardless of the type of request, each follows a similar path through the agency. Figure 1 presents simplified common processing steps.

² See [10 C.F.R. §9.17](#), *Agency records exempt from public disclosure*, for a list of the nine statutory exemptions.

Figure 1: Simplified FOIA Process Flowchart



Source: OIG

The responsive office(s) must identify records and make determinations about release based on the statutory exemption categories. For a complex request, multiple offices with responsive records will follow this process at the same time.

The resulting records have duplicate copies removed. Documents in which multiple offices have an interest are referred to the other offices for their disclosure recommendation. For both simple and complex requests, the FOIA office conducts a final review of the response package to ensure appropriate disclosure or exemption before release to the requester.

Publicly available responses are then placed into NRC's Agencywide Documents Access and Management System³ and are linked through the NRC public Web site. However, the NRC records retention requirement for FOIA request processing records is only 6 years. Summary data on FOIA requests is available from FOIA.gov for complete years beginning in 2008.

Numbers of FOIA Requests at NRC

From 2007 through 2014, NRC received a total of 2,995 FOIA requests, or an average of 333 per year. From 2008 to 2014,⁴ 1,484 were simple requests, and 965 were complex requests. The proportion of complex requests has grown steadily, from 28 out of 360 total requests in 2008, to 306 out of 485 total

³ Responses to Privacy Act requests for the requester's own documents, and investigative materials, are not placed in ADAMS.

⁴ Breakout of simple, complex, and expedited requests is not available for 2007 or 2015.

requests in 2014. The increase in complexity has led to increased time and cost for those responses. The following table presents summary data available on NRC FOIA requests since 2007.

Total NRC FOIA Requests, 2007 to 2015

Fiscal Year	Simple Requests	Complex Requests	Expedited Requests⁵	Total NRC	Total Commission⁶	Total Secretary of the Commission⁵
	# of requests	# of requests	# of requests	# of requests	# of requests	# of requests
2007⁷	---	---	---	341	---	36
2008	332	28	0	360	---	38
2009	265	32	0	297	---	27
2010	273	70	0	343	---	38
2011	237	79	1	317	28	81
2012	115	175	3	293	32	66
2013	94	275	1	370	95	112
2014	168	306	11	485	50	78
2015⁷	---	---	---	189	35	63
Total	>1,484	>965	>16	2,995	>240	539
Avg:	212	138	2	333	48	60

Source: FOIA.gov, NRC.gov, NRC data

NRC Appointed Officials

The NRC's Commission consists of five members nominated by the President and confirmed by the U.S. Senate for staggered 5-year terms. The President designates one member to serve as Chairman, principal executive officer, and spokesperson of the Commission. The Commission formulates policies, develops regulations governing nuclear reactor and nuclear material safety, issues orders to licensees, and adjudicates legal matters. The Chairman and Commissioners are the only "non-career" officials or

⁵ Under special circumstances, NRC may also designate FOIA requests "expedited."

⁶ The Commission began maintaining a separate electronic log in 2012, containing information beginning in 2011. Prior to 2011, the reports tasked to the Secretary of the Commission include those for the Commissioners' offices.

⁷ Breakout of simple, complex, and expedited requests is not available for 2007 or 2015. The 2015 total is through July, 15, 2015.

political appointees at NRC covered by this evaluation.⁸ The Commissioners and the Secretary of the Commission have been tasked with 539 of the total FOIA requests received at NRC since 2007.

OBJECTIVE

The evaluation objective was to analyze non-career officials' (political appointees) involvement in the FOIA response process at the agency, if any, for the period of January 1, 2007, to the present, and analyze whether any such involvement resulted in any undue delay or the withholding of any document or portion of any document that would have not occurred if they were not involved. The final section of this report discusses the scope and methodology used in the evaluation.

EVALUATION RESULTS

Non-Career Officials Do Not Delay or Withhold NRC FOIA Responses

NRC has processes and procedures in place to respond to FOIA requests in accordance with Federal requirements and to fulfill the agency's own goal of maximizing the amount of information that is disclosable. According to the published processes, non-career officials become involved when their offices have ownership of responsive records. Their involvement remains within published NRC procedures and does not contribute to undue delays or reduced releases of information.

⁸ The Inspector General is also nominated by the President and confirmed by the U.S. Senate. However, the role of the inspector General in FOIA responses, was scoped out of this evaluation to maintain independence. Further, individual Commissioner's staff may include non-career members. Although they are not political appointees, their activities to support Commission responses to FOIA requests are covered by this evaluation.

What Is Required

FOIA Requirements Apply to Non-Career NRC Officials

The FOIA statute includes a range of ways that agencies should provide information to the public. What are known as “FOIA requests” derive from Section 3(A), which states

[E]ach agency, upon any request for records which (i) reasonably describes such records and (ii) is made in accordance with published rules stating the time, place, fees (if any), and procedures to be followed, shall make the records promptly available to any person.

NRC has published its Freedom of Information Act rules in Title 10 of the Code of Federal Regulations, Part 9, Subpart A. Management Directive and Handbook 3.1, “Freedom of Information Act,” provides guidance for the public and NRC staff regarding NRC policy and procedures to implement FOIA. In addition, NRC uses its public Web site to make available specific information about how to submit requests for information and how requests will be processed.

NRC FOIA regulations provide for the Offices of the Commission and the Secretary to the Commission (SECY), as well as the Inspector General, the General Counsel, and Advisory Committees, to make independent determinations on release of their own records. The Commission operates according to published *Internal Commission Procedures*, which address how Commission offices and SECY will respond to FOIA requests. The procedures dovetail with overall agency procedures and relate primarily to Commission-generated documents. In part, the Commission procedures state

- SECY forwards a request for responsive records to the affected Commissioners.
- Commission offices will search for and review responsive documents, and reply to SECY within the 20 business day statutory time frame.
- Individual Commission offices make their own determinations to release or withhold documents.
- SECY also conducts a search for responsive documents and a release or withhold determination. The results are reviewed by the Office of the General Counsel, and the Commissioners are consulted before release is made.

What We Found

Appointee Involvement Falls Within Published Procedures

Interviews with Commission staff and review of Commission FOIA files reveal how FOIA responses occur under Commission procedures.

Commissioners become involved in two types of requests – those for Commission-generated documents, and referral packages from other offices whose searches produce documents related to the Commission.

Commission-generated documents may come from the office of an individual Commissioner or from the Commission as a whole. Individual Commissioners have authority to make determinations about their own records, typically concurring on recommendations from their legal assistants.⁹ However, Commissioner staff noted that responsive records belonging wholly to a single Commissioner are rare. More common are documents in which the entire Commission has ownership, and Commissioners are polled to reach a consensus. Staff members could recall no case where Commissioners could not agree, resulting in a delay in responding to the request.

Commission staff also discussed the Commissioners' role in reviewing response packages referred from NRC program offices. In these cases, the searching office has identified the records, reviewed for material that should be withheld, and marked it with appropriate exemptions. Guidance for NRC staff states that NRC offices should make release recommendations prior to referring any responsive documents to the Commission. Before the package is sent to the FOIA office for eventual release, the Commissioners have an opportunity to review staff recommended determinations and ask questions. Staff members for all Commissioners observed that when Commissioners question a staff-recommended exemption in a document originating in a program office, it is normally in favor of a discretionary release. In other words, Commissioners do not review referrals to apply additional exemptions; rather, they review to confirm appropriateness of staff recommendations.

Commissioner FOIA logs and response files record the steps in these processes, from when the request is received and assigned, through concurrence on the responsive documents found, if any, and the return of the package to NRC's FOIA office. Because not all responsive documents originating in NRC program offices are referred to the

⁹ The Commissioners and the Office of the Secretary may also consult with the Office of the General Counsel.

Commission, Commission review is an additional step for some packages. However, review of files shows that Commission review does not appear to add unduly to the time required for responses. Such referral packages are more likely to come from complex requests, whose response generally takes longer.

Conclusion

No Interference in FOIA Responses From Non-Career Officials

As a result of this evaluation, OIG concludes that involvement of NRC's non-career, politically-appointed officials in FOIA responses is appropriate. While OIG's 2014 audit of NRC FOIA processes identified areas in which effectiveness and efficiency could be improved, the issues identified exist outside of any role of the Commissioners in the response process.

AGENCY COMMENTS

An exit conference was held with the agency on August 14, 2015. Prior to this meeting, after reviewing a discussion draft, agency management provided comments that have been incorporated into this report, as appropriate. As a result, agency management stated their general agreement with the conclusions in this report and opted not to provide formal comments for inclusion in this report.

SCOPE AND METHODOLOGY

Scope

NRC currently has five political appointees confirmed by the U.S. Senate: the Chairman, the Commissioners, and the Inspector General.¹⁰ The Inspector General's

¹⁰ NRC currently has a vacant Commissioner position – when that is filled, NRC will have six political appointees.

role in responding to FOIA requests relates only to OIG, and this role was excluded from this evaluation to maintain independence.

The inquiry of the Senate Committee on Homeland Security and Governmental Affairs requested a review of FOIA responses beginning in 2007. However, NRC records retention requirements entail only 6 years for the maintenance of records regarding withheld information. Therefore, prior to 2008, only publicly released closed responses are available as a record, and the scope of this review had to be narrowed to Fiscal Year 2008 to the present.¹¹

Methodology

To respond to the Committee's request within the required timeframe, OIG reviewed two prior NRC OIG reports related to FOIA processes:

- OIG-10-A-19, "Memorandum Report: Evaluation of NRC's FOIA Process."
- OIG-14-A-17, "Audit of NRC's Freedom of Information Act Process."

To determine what is required for processing FOIA requests at NRC, OIG reviewed the following criteria and guidance documents:

- The Freedom of Information Act, 5.U.S.C. § 552 and any amendments, including E-FOIA.
- NRC's regulations at Title 10, Code of Federal Regulations, Section 9.25.
- January 21, 2009, Memorandum from the President for the Heads of Executive Departments and Agencies on FOIA.
- March 19, 2009, Memorandum for Executive Departments and Agencies from the Attorney General on FOIA.
- NRC's FOIA Guide.

¹¹ The review of FOIA records from 2008 – present included those reviewed by the current Chairman and Commissioners, as well as former Chairmen Klein, Jaczko, and Macfarlane, and former Commissioners Apostolakis and Magwood.

- NRC's Management Directive and Handbook 3.1 "Freedom of Information Act."
- Office of Government Ethics regulations (Title 5, Code of Federal Regulations, Section 2636.03) on the definition of a "covered non-career employee."

To analyze the involvement of non-career, politically appointed officials at NRC in FOIA processes OIG

- Reviewed a list compiled by NRC's Office of the Chief Human Capital Officer of NRC non-career individuals since January 1, 2007.
- Interviewed staff members of the current NRC Chairman and Commissioners.
- Reviewed a sample of Commission FOIA responses representing the lengthiest response times for the 6 years for which records are available.
- Analyzed statistics reported to the Department of Justice regarding NRC's FOIA program since 2008, including types of requests and timeliness of agency responses.

This evaluation was conducted in accordance with the "Quality Standards for Inspection and Evaluation."

The evaluation was performed by Beth Serepca, Team Leader; Kristen Lipuma, Audit Manager; Amy Hardin, Senior Auditor; and Andrew Pham, Student Analyst.

ATTACHMENT 1

RON JOHNSON, WISCONSIN, CHAIRMAN

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United States Senate

COMMITTEE ON
HOMELAND SECURITY AND GOVERNMENTAL AFFAIRS
WASHINGTON, DC 20510-6250

June 23, 2015

The Honorable Hubert T. Bell
Inspector General
Nuclear Regulatory Commission
11555 Rockville Pike
Rockville, MD 20852

Dear Mr. Bell:

The Committee on Homeland Security and Governmental Affairs is conducting oversight of how Executive Branch departments and agencies respond to Freedom of Information Act (FOIA) requests. The Committee recognizes the important role that FOIA plays in holding the government accountable to American taxpayers and seeks to ensure that government officials do not interfere with the FOIA process to inhibit transparency. Accordingly, as the Committee examines how departments and agencies comply with FOIA, the Committee is interested in learning about any involvement by non-career officials with the FOIA process at the Nuclear Regulatory Commission.

Enacted in 1966, FOIA bestows a right upon the American public to request records created by Executive Branch departments and agencies.¹ FOIA does not require requestors to articulate a reason for the request and creates a presumption of access so long as the request does not encompass any of the nine categories of information exempted from the statute.² This right of openness and transparency guaranteed by FOIA allows the American public to understand how their government is operating—a concept essential to perpetuate a flourishing democracy. FOIA, therefore, is a critical tool available to the American public to learn and understand how their government is acting on their behalf, as well as to hold the government accountable for its actions.

¹ 5 U.S.C. § 552.

² *Id.* at § 552(b). FOIA states that agencies may withhold the following nine categories: (1) information that is classified to protect national security; (2) information related solely to the internal personnel rules and practices of an agency; (3) information that is prohibited from disclosure by another federal law; (4) trade secrets or commercial or financial information that is confidential or privileged; (5) privileged communications within or between agencies; (6) information that, if disclosed, would invade another individual's personal privacy; (7) certain information compiled for law enforcement purposes; (8) information that concerns the supervision of financial institutions; and (9) geological information on wells. *Id.*

The Honorable Hubert T. Bell
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Just one day after taking office, President Obama issued a memorandum to all heads of Executive Branch departments and agencies emphasizing that openness and transparency are fundamental aspects of FOIA.³ President Obama stated:

The Freedom of Information Act should be administered with a clear presumption: In the face of doubt, openness prevails. The Government should not keep information confidential merely because public officials might be embarrassed by disclosure, because errors and failures might be revealed, or because of speculative or abstract fears. Nondisclosure should never be based on an effort to protect the personal interests of Government officials at the expense of those they are supposed to serve. In responding to requests under the FOIA, executive branch agencies should act promptly and in a spirit of cooperation, recognizing that such agencies are servants of the public.⁴

As described in the President's directive, FOIA is an essential tool vital to furthering transparency within government programs and operations. Department and agency personnel play an important role in ensuring FOIA requests are handled in a timely manner. In addition, Offices of Inspectors General (OIGs) across Executive Branch perform a critical role in providing oversight of agency operations and investigating allegations of misconduct related to the processing of FOIA requests.

Recent media reports indicate prior cases where non-career officials have been substantially involved in the FOIA response process. For example, during Hillary Clinton's tenure as Secretary of State, her staff carefully reviewed and scrutinized politically sensitive documents requested under FOIA—directly affecting what documents or portions of documents were ultimately released to requestors.⁵ Her staff's involvement in the response process led to delays, despite the Department's FOIA officer already having prepared and finalized responses for release.⁶ Additionally, in 2010, former Department of Homeland Security Secretary Janet Napolitano's non-career staff was substantially involved in the Department's FOIA response process by implementing an intricate review and approval process for FOIA responses, including redacting potentially embarrassing information, which compromised transparency and accountability to American taxpayers.⁷ These troubling examples raise particular concerns as the Committee seeks to ensure Executive Branch departments and agencies are following public

³ Memorandum from Pres. Obama to Heads of Executive Departments and Agencies, *Freedom of Information Act* (Jan. 21, 2009), available at https://www.whitehouse.gov/the_press_office/Freedom_of_Information_Act/ (last visited Jun. 23, 2015).

⁴ *Id.*

⁵ Laura Meckler, *Hillary Clinton's State Dep't Staff Kept Tight Rein on Records*, WALL ST. J., May 19, 2015, available at <http://www.wsj.com/articles/hillary-clintons-state-department-staff-kept-tight-rein-on-records-1432081701> (last visited Jun. 23, 2015).

⁶ *Id.*

⁷ *Id.*; see also H. Comm. on Oversight & Gov't Reform, *Staff Report: A New Era of Openness? How and Why Political Staff at DHS Interfered with the FOIA Process*, 112th Cong. (Mar. 30, 2011), available at http://oversight.house.gov/wp-content/uploads/2012/02/DHS_REPORT_FINAL_FINAL_4_01_11.pdf (last visited Jun. 23, 2015).

The Honorable Hubert T. Bell
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records law and that non-career personnel are not adversely affecting the quantity, quality, and timeliness of information provided to the American public through the FOIA process.

In light of previous cases of involvement by non-career officials in the FOIA response process and the critical role that OIGs play in providing oversight of internal agency operations, the Committee wants to ensure that agencies are taking the appropriate steps to fully respond to FOIA requests without unnecessary delay, and that the involvement of non-career officials in the FOIA process does not result in less information being provided to the requestors than otherwise would have been provided. Further, the Committee wants to be sure that honest efforts by departments and agencies to respond to FOIA requests are not frustrated or compromised by the involvement of non-career officials in the FOIA response process.

In order to assist the Committee's oversight obligations, I ask that your office please analyze the involvement of non-career officials' involvement in the FOIA response process at the department or agency, if any, for the period of January 1, 2007, to the present. If non-career officials were involved in the FOIA response process, please analyze whether their involvement resulted in any undue delay of a response to any FOIA request or the withholding of any document or portion of any document that would have otherwise been released but for the non-career official's involvement in the process. If your analysis shows such a result, please provide the following information about each FOIA request:

- a. Contents of the FOIA request;
- b. Recommendation by the department or agency's FOIA officer as to what information should be disclosed in response to the request;
- c. Name(s) and position(s) of non-career personnel who were involved with the response process;
- d. Details and supporting documents related to the processing of the response to the FOIA request;
- e. Documents that were ultimately disclosed in response to the request; and
- f. Documents or information that would have been disclosed in response to the FOIA request absent the involvement of non-career department or agency personnel.

As part of your analysis, I request that you seek a written certification from the department or agency's chief FOIA officer that 1) no non-career officials were involved in the department or agency's response to any FOIA request or 2) if such involvement occurred, the involvement of non-career officials has never resulted in the undue delay of a response to a FOIA request or the provision of less information than would have been provided but for the involvement of the non-career officials. Please provide this certification to the Committee in conjunction with your analysis.

I respectfully request that your office perform this analysis and report back to the Committee within 60 days. If you have any questions about this request, please have your staff contact Caroline Ingram of the Committee staff at (202) 224-4751. Thank you for your attention to this matter.

The Honorable Hubert T. Bell
June 23, 2015
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Sincerely,

A handwritten signature in blue ink that reads "Ron Johnson". The signature is stylized with a large, looping "R" and a long, sweeping underline.

Ron Johnson
Chairman

cc: The Honorable Thomas R. Carper
Ranking Member

ATTACHMENT 2



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

July 28, 2015

MEMORANDUM TO:

Hubert T. Bell
Hubert T. Bell
Inspector General

FROM:

Darren B. Ash
Darren B. Ash
Deputy Executive Director for
Corporate Management and Chief FOIA Officer
Office of the Executive Director for Operations

SUBJECT:

INVOLVEMENT OF NON-CAREER OFFICIALS IN FOIA RESPONSE
PROCESS

On behalf of the U.S. Nuclear Regulatory Commission (NRC) staff, I am responding to the letter of June 23, 2015, from Senator Ron Johnson, the Chairman of the Senate Committee on Homeland Security and Government Affairs. This constitutes my written certification regarding the involvement of non-career officials in the Freedom of Information Act (FOIA) response process at the U.S. Nuclear Regulatory Commission (NRC) and that we have no indication that such involvement has resulted in the undue delay of a response to a FOIA request or unwarranted withholding of information in response to such a request.

Pursuant to NRC regulations found in 10 C.F.R. Part 9, Management Directive 3.1, and Chapter II and Appendix 2 of the Internal Commission Procedures, non-career officials are involved in responding to some initial responses to FOIA requests and a small number of appeals. Those non-career officials are the Commissioners, and in some cases, a small number of non-career officials employed in a Commissioner's office. Under these procedures, these non-career officials search and identify any material within their office that falls within the scope of a FOIA request. Each Commissioner is responsible for determining whether any documents generated by his or her office should be released. In addition, the Commission, as a collegial body, is responsible for making initial release determinations on documents that have been referred to the Commission by the NRC staff or by a Commission-level office, and for any appeals of denials of such documents. As such, when a FOIA request seeks agency records, non-career officials may be involved at multiple stages of the FOIA response process.

While the NRC has exceeded the statutory deadline for responding to some FOIA requests that encompass documents that the Commission must review, I do not conclude that such a delay constitutes an "undue delay." Further, in keeping with President Obama's January 2009 FOIA memorandum, the NRC strives to disclose the maximum amount of information permissible under the law. Consistent with this policy, the Commission carefully reviews proposed withholdings before it to determine whether additional material may be released.

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The Commission (advised by the Office of the General Counsel) has the final word on release of such documents, in conformity with legal requirements under FOIA and the Privacy Act.

I appreciate the opportunity to work with you on this matter.

TO REPORT FRAUD, WASTE, OR ABUSE

Please Contact:

Email: [Online Form](#)

Telephone: 1-800-233-3497

TDD 1-800-270-2787

Address: U.S. Nuclear Regulatory Commission
Office of the Inspector General
Hotline Program
Mail Stop O5-E13
11555 Rockville Pike
Rockville, MD 20852

COMMENTS AND SUGGESTIONS

If you wish to provide comments on this report, please email OIG using this [link](#).

In addition, if you have suggestions for future OIG audits, please provide them using this [link](#).