

March 24, 2016

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

FROM: William M. Dean, Director */RA/*  
Office of Nuclear Reactor Regulation

SUBJECT: UPDATES ON ACTIONS TO ADDRESS THE OFFICE OF THE  
INSPECTOR GENERAL'S AUDIT RECOMMENDATIONS ON  
THE U.S. NUCLEAR REGULATORY COMMISSION'S  
OVERSIGHT OF SPENT FUEL POOLS (OIG-15-A-06)

The staff received the Office of the Inspector General (OIG) report OIG-15-A-06, "Audit of NRC's Oversight of Spent Fuel Pools," dated February 10, 2015. The staff responded in a memorandum dated March 18, 2015, that described specific actions the U.S. Nuclear Regulatory Commission would take to address the four recommendations in OIG-15-A-06. The enclosure to this memorandum provides a status update on the staff's actions.

Enclosure:  
March 2016 Update on Actions to Address  
OIG SFP Audit Recommendations  
(OIG-15-A-06)

cc: Chairman Burns  
Commissioner Svinicki  
Commissioner Ostendorff  
Commissioner Baran  
SECY

CONTACT: Scott T. Krepel, NRR/DSS  
301-302-0399

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## **Recommendation 1**

Planned Action: Upon a satisfactory conclusion to the U.S. Nuclear Regulatory Commission (NRC's) review of NEI 12-16, "Guidance for Performing Criticality Analyses of Fuel Storage at Light Water Reactor Power Plants," incorporate this detailed guidance into NRC internal processes through a regulatory guide and through revisions to NUREG-0800, "Standard Review Plan for the Review of Safety Analysis Reports for Nuclear Power Plants."

March 2016 status update: The staff is currently reviewing Revision 1 of NEI 12-16 (Agencywide Document and Management System (ADAMS) Accession No. ML14112A516), which will form the basis of the regulatory guide. The NRC staff has submitted requests for additional information to the Nuclear Energy Institute and is awaiting a complete set of responses. In addition, the NRC staff has begun the draft regulatory guide process in anticipation of a final revision to NEI 12-16, scheduled for completion this year.

CONTACT: Amrit D. Patel, NRR/DSS  
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## **Recommendation 2**

Planned Action: Develop and implement a discrete inspection procedure or procedures that describe how NRC inspectors should monitor spent fuel pool safety at operating reactors.

March 2016 status update: On October 30, 2015, the staff issued the initial version of Inspection Procedure (IP) 60715, "Spent Fuel Safety at Operating Reactors," (ADAMS Accession No. ML15247A049). Regional inspectors may use this inspection procedure to review infrequent major activities in the spent fuel pool or to evaluate emergent technical issues not related to licensee performance. These inspections are not part of the baseline or supplemental inspection program elements and Regional Administrator authorization is required for their implementation.

This action is complete and Recommendation 2 should be closed.

CONTACT: Juan D. Peralta, NRR/DIRS  
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**ENCLOSURE**

### **Recommendation 3**

Planned Action: Use the generic letter process to collect information and determine what regulatory actions are necessary to ensure compliance with NRC requirements regarding monitoring of neutron-absorbing materials in spent fuel pools, then initiate the regulatory actions.

March 2016 status update: The generic letter requesting information on monitoring of neutron-absorbing materials in spent fuel pools was provided to the Commission as an enclosure to SECY-16-0034, "Issuance of Generic Letter 2016-xx, 'Monitoring of Neutron-Absorbing Materials in Spent Fuel Pools,'" dated March 16, 2016. In addition, the staff has now received an OMB clearance number per the Paperwork Reduction Act for issuing the generic letter. The staff intends to issue the generic letter in April 2016.

CONTACT: Scott T. Krepel, NRR/DSS  
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### **Recommendation 4**

Planned Action: Continue to manage the revision of Inspection Manual Chapter (IMC) 2561, "Decommissioning Power Reactor Inspection Program," and implement inspection procedures (including IP 60801, "Spent Fuel Pool Safety at Permanently Shut Down Reactors") as planned and scheduled. When the revision of IMC 2561 is complete, the agency will begin the approval process.

March 2016 status update: On January 11, 2016, the NRC issued Revision 1 to IP 60801 (ADAMS Accession No. ML16008A819). The revision was coordinated with all regional offices, the Office of Nuclear Security and Incident Response, and the Office of Nuclear Reactor Regulation (NRR) to ensure that the new revision is aligned with IP 60715, which was developed as part of the NRR action for Recommendation 2.

The final revision of IMC 2561 is dependent on the completion of revisions to other core and discretionary inspection procedures. The revision to IMC 2561 pertaining to IP 60801 will be administrative, reflecting the revision to IP 60801 and other IP changes. The staff will complete the revision to IMC 2561 when the agency issues all of the decommissioning core inspection procedures. Therefore, the staff has addressed the recommendation by implementing IP 60801 while continuing to manage the revision of IMC 2561.

This action is complete and Recommendation 4 should be closed.

CONTACT: Bruce A. Watson, CHP, NMSS/DUWP  
301) 415-6221