



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

**OFFICE OF THE  
INSPECTOR GENERAL**

July 19, 2017

MEMORANDUM TO: Victor M. McCree  
Executive Director for Operations

FROM: Dr. Brett M. Baker */RA/*  
Assistant Inspector General for Audits

SUBJECT: STATUS OF RECOMMENDATIONS: AUDIT OF NRC'S  
REGULATORY ANALYSIS PROCESS (OIG-15-A-15)

REFERENCE: DIRECTOR, OFFICE OF NUCLEAR REACTOR  
REGULATION, MEMORANDUM DATED  
JUNE 23, 2017

Attached is the Office of the Inspector General's (OIG) analysis and status of recommendations as discussed in the agency's response dated June 23, 2017. Based on this response recommendations 1 and 3 remain in resolved status. Please provide an updated status of the resolved recommendations by November 30, 2017.

If you have any questions or concerns, please contact me at (301) 415-5915 or Eric Rivera, Team Leader, at (301) 415-7032.

Attachments: As stated

cc: R. Lewis, OEDO  
H. Rasouli, OEDO  
J. Jolicoeur, OEDO  
J. Bowen, OEDO  
EDO\_ACS Distribution

## **Audit Report**

### **AUDIT OF NRC'S REGULATORY ANALYSIS PROCESS**

**OIG-15-A-15**

#### **Status of Recommendations**

Recommendation 1: Develop and implement a formal training/qualification program for cost estimators. The training/qualification program can be incorporated into the office instructions and procedures of the NRC offices with regulatory analysis responsibilities.

Agency Response Dated  
June 23, 2017:

The Office of Nuclear Reactor Regulation (NRR) issued its regulatory analysis training/qualification program, PRMB-TRNG-02, "Branch-Specific Qualification Plan for Cost Analysts," Rev. 0, on February 18, 2016. The NRR cost analysts have completed or have nearly completed their qualification training and are expected to complete their qualification boards by October 2017. The staff's intent was to incorporate this qualification plan in the next update of NRR office instruction ADM-504, "Qualification Program." However, since issuing this qualification procedure, the Commission has approved a plan to centralize agency specialists in rulemaking and cost analysts into a Rulemaking Center of Expertise (COE) that will be located in the Office of Nuclear Material Safety and Safeguards (NMSS). The Rulemaking COE Implementation Team plans to incorporate this qualification plan into the NMSS office instructions and procedures in accordance with agency processes by October 2017.

Target Completion Date: October 2017

OIG Analysis: The proposed corrective action addresses the intent of OIG's recommendation. This recommendation will be closed when OIG receives and reviews documentation that the training/qualification program for cost estimators has been incorporated into NMSS office instructions and procedures, and that it has been implemented.

**Status:** Resolved.

## **Audit Report**

### **AUDIT OF NRC'S REGULATORY ANALYSIS PROCESS**

**OIG-15-A-15**

#### **Status of Recommendations**

Recommendation 3: Update and implement the cost benefit guidance documents as planned in SECY-14-0002. Incorporate this guidance into office procedures by reference.

Agency Response Dated  
June 23, 2017:

The staff published the updated draft NUREG/BR-0058, Revision 5, "Regulatory Analysis Guidelines of the U.S. NRC," for a 60-day public comment period on April 17, 2017, which ended on June 16, 2017. The staff will resolve the comments received and submit the final NUREG for Commission approval by January 15, 2018. This NUREG is expected to be issued for publication by March 2018. The Rulemaking COE is incorporating NUREG/BR-0058 (current revision) into the Rulemaking COE procedure by reference. NMSS management plans to issue the COE procedure for interim use by October 2017.

Target Completion Date:

October 2017 (Incorporate guidance into office instructions by reference)

March 2018 (Issue revised NUREG)

OIG Analysis:

The proposed corrective action addresses the intent of OIG's recommendation. This recommendation will be closed when OIG receives and reviews the updated cost benefit guidance documents, along with evidence that the guidance documents are implemented and incorporated into office procedures by reference.

**Status:**

Resolved.