



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

January 31, 2019

MEMORANDUM TO: Dr. Brett M. Baker
Assistant Inspector General for Audits
Office of the Inspector General

FROM: Daniel H. Dorman **/RA/**
Deputy Executive Director for Reactor
and Preparedness Programs
Office of the Executive Director for Operations

SUBJECT: STAFF RESPONSE TO THE OFFICE OF THE INSPECTOR
GENERAL'S AUDIT OF THE U.S. NUCLEAR REGULATORY
COMMISSION'S LICENSE AMENDMENT REQUEST
ACCEPTANCE REVIEW PROCESS (OIG-19-A-05)

This memorandum responds to your memorandum dated December 13, 2018, transmitting audit report OIG-19-A-05, "Audit of NRC's License Amendment Request Acceptance Review Process." We appreciate the Office of the Inspector General's (OIG) audit and recommendations for the agency's license amendment request acceptance review process. The OIG audit report makes three recommendations for improving the acceptance review process. Enclosed please find the U.S. Nuclear Regulatory Commission staff's responses to these three recommendations, including planned actions and target dates for completion.

Enclosure:
Response to OIG's Audit of the NRC's License
Amendment Request Acceptance Review Process

cc: Chairman Svinicki
Commissioner Baran
Commissioner Burns
Commissioner Wright
Commissioner Caputo
SECY

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SUBJECT: STAFF RESPONSE TO THE OFFICE OF THE INSPECTOR GENERAL'S
AUDIT OF THE U.S. NUCLEAR REGULATORY COMMISSION'S 10 LICENSE
AMENDMENT REQUEST ACCEPTANCE REVIEW PROCESS (OIG-19-A-05)
DATED JANUARY 31, 2019

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ADAMS Accession Nos.

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Incoming ML18347A838

Response ML18360A527

via email*

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RESPONSE TO THE OFFICE OF THE INSPECTOR GENERAL'S
AUDIT OF THE U.S. NUCLEAR REGULATORY COMMISSION'S LICENSE AMENDMENT
REQUEST ACCEPTANCE REVIEW PROCESS (OIG-19-A-05)

In OIG-19-A-05, "Audit of NRC's License Amendment Request Acceptance Review Process," dated December 13, 2018, the Office of the Inspector General (OIG) made three recommendations to the U.S. Nuclear Regulatory Commission (NRC) staff for improving the agency's license amendment request (LAR) acceptance review process. Below are the OIG's recommendations followed by the NRC staff's responses, including target completion dates.

Recommendation 1:

Strengthen data verification and validation measures to ensure completed acceptance review reports and data are processed accurately.

Response:

The staff agrees with the recommendation.

The NRC deployed the Replacement Reactor Program System (RRPS) on October 21, 2016. The Office of Nuclear Reactor Regulation (NRR) has introduced several RRPS software updates to remedy programming problems as they are discovered by the users (staff), to make improvements based on staff feedback, and to better attune the software to evolving office needs. These updates have improved the RRPS acceptance review status reporting capability and, as with any software, the staff will continue to introduce updates periodically to address office needs.

NRR staff reviews RRPS acceptance review reports to identify the need to edit data (e.g., due to data input errors) to provide the most accurate accounting of milestones. NRR management review of the metrics reports is performed on a monthly basis. NRR expects this combination of software updates, staff validation, and management review to continue indefinitely.

Planned Action: NRR staff will continue to update the RRPS, including improving the automated reporting capability. NRR staff and management will continue to review and edit automated RRPS reports manually, as needed to ensure the most accurate information is reported, until RRPS updates described in Recommendation 3 of this audit response resolve RRPS reporting issues. NRR staff will document the manual review and validation process for RRPS reports in a NRR Division of Operating Reactor Licensing (DORL) memorandum that will be posted to the internal DORL workload management SharePoint site.

Target date for documenting the manual process: February 28, 2019

Enclosure

Recommendation 2:

Identify a single, consistent process for calculating the number of workdays for the acceptance review metric and communicate it to DORL staff.

Response:

The staff agrees with the recommendation.

Appendix E, "Generic Acceptance Review Milestones," to LIC-109, Revision 2, "Acceptance Review Procedures," effective January 16, 2017, pages E-1 and E-2, gives the review milestones for each of the four possible outcomes of an acceptance review. The 25 and 53-day timeframes in these tables form the basis for the acceptance review metrics for each of the outcomes. Through project manager qualification and participation in LAR reviews, all project managers are expected to be familiar with the LIC-109 review milestones and metrics.

Planned Action: DORL will provide a reminder of the guidance in LIC-109 regarding acceptance review milestones to its staff to help ensure consistent understanding. This information will be included in the DORL memorandum described in Recommendation 1 of this audit response and provided to all applicable DORL staff.

Target date for completion: February 28, 2019

Recommendation 3:

Complete the Replacement Reactor Program System—Licensing Module upgrade efforts to generate automated reports.

Response:

The staff agrees with the recommendation.

The validation of RRPS reports revealed inaccuracies in calculating various metrics, including those for acceptance reviews. In addition, interfaces between the RRPS and other NRC systems have presented significant challenges to metric calculations and reports. Since deployment, the RRPS has received numerous updates, and the NRC continues to work with the RRPS contractor to resolve the multiple issues related to reporting.

Planned Action: The NRC is working to improve all aspects of the RRPS with updates. Funding for a task order was implemented in January 2019 to support dedicated resources for improvements to RRPS automated reporting and advanced search capabilities that are, in part, intended to support workload planning and metrics reporting. NRR staff will continue to work with RRPS contractors to implement these improvements.

Target date for completion: February 28, 2020