



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

August 28, 2019

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

FROM: Ho K. Nieh, Director */RA by Eric Benner for/*
Office of Nuclear Reactor Regulation

SUBJECT: STATUS OF RECOMMENDATIONS: AUDIT OF THE U.S. NUCLEAR
REGULATORY COMMISSION'S LICENSE AMENDMENT REQUEST
ACCEPTANCE REVIEW PROCESS (OIG-19-A-05)

As requested in your June 25, 2019, memorandum, "Status of Recommendations: Audit of the NRC License Amendment Request Acceptance Review Process (OIG-19-A-05)," enclosed please find an update on the status of the recommendations in "Audit of NRC's License Amendment Request Acceptance Review Process (OIG-19-A-05)," dated December 13, 2018, including actual dates of completion for Recommendations 1 and 2.

Enclosure:
Status of Recommendations (OIG-19-A-05)

CONTACT: Sujata Goetz, NRR/DORL
(301) 415-8004

SUBJECT: STATUS OF RECOMMENDATIONS: AUDIT OF THE U.S. NUCLEAR
REGULATORY COMMISSION'S LICENSE AMENDMENT REQUEST
ACCEPTANCE REVIEW PROCESS (OIG-19-A-05)
DATED AUGUST 28, 2019

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SGoetz, NRR

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

Recommendation 1:

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

Agency Response Dated
January 31, 2019

The staff agrees with the recommendation.

The NRC [U.S. Nuclear Regulatory Commission] 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:
August 31, 2019

Enclosure

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

Status of Recommendations

Current Agency Response NRR staff has documented the manual review and validation process for NRR monthly acceptance review performance reports in a DORL desktop guide issued August 2019 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML19136A300). In addition, DORL staff documented in a DORL memorandum dated August 21, 2019 (ADAMS Accession No. ML19065A181), the actions taken to identify the scope and cause of acceptance review data integrity issues in the RRPS-Licensing module that require manual review and validation, and the additional actions taken and planned to correct and prevent the data integrity issues. The guidance and memorandum have been posted to the internal DORL workload management SharePoint site.

Actual Completion Date: August 21, 2019

Contact: Sujata Goetz, (301) 415-8004

Recommendation 2: Identify a single, consistent process for calculating the number of workdays for the acceptance review metric and communicate it to DORL staff.

Agency Response Dated The staff agrees with the recommendation.
January 31, 2019

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 [license amendment request] 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: August 31, 2019

Current Agency Response Enclosure 2 to the DORL memorandum described in the status update for Recommendation 1 (ADAMS Accession No. ML19136A300) provided reminder guidance for all DORL staff

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Status of Recommendations

on the timeliness goals in LIC-109, how performance against these goals is calculated and assessed in performance reports, and the requirements for entry of acceptance review data in the RRPS-Licensing Module to ensure performance reporting is accurate. The DORL staff assessment described in the status update for Recommendation 1 also identified the need for additional guidance in two areas regarding how to calculate working days for acceptance reviews. The additional guidance is included in Enclosure 2 to the DORL memorandum and will be incorporated in the next update to LIC-109. The guidance was provided to all applicable DORL staff and will be reinforced in a refresher training session that will address RRPS-Licensing data entry requirements for acceptance reviews.

Actual Completion Date: August 21, 2019

Contact: Sujata Goetz, (301) 415-8004

Recommendation 3:

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

Agency Response Dated
January 31, 2019

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

Current Agency Response

Work to implement RRPS improvements continues.

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Status of Recommendations

Target date for completion: February 28, 2020

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