



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

September 21, 2022

MEMORANDUM TO: Andrea Veil, Director  
Office of Nuclear Reactor Regulation

FROM: Christopher G. Miller, Director  
Division OF Reactor Oversight  
Office of Nuclear Reactor Regulation

A handwritten signature in blue ink, appearing to be "C. Miller", is written over the printed name of Christopher G. Miller.

Signed by Miller, Christopher  
on 09/21/22

SUBJECT: FORWARDING THE FOLLOW-ON REVIEW OF THE LESSONS  
LEARNED, BEST PRACTICES, AND CHALLENGES DURING  
THE COVID-19 PUBLIC HEALTH EMERGENCY WORKING  
GROUP RECOMMENDATIONS AND DRAFT PLAN TO  
EVALUATE RECOMMENDATIONS

This memorandum forwards the recommendations and results of the follow-on review of lessons learned, best practices, and challenges during the COVID-19 public health emergency (PHE) working group. The recommendations were submitted by memorandum (ADAMS Accession No. [ML22172A159](#)) to the Director, Division of Reactor Oversight (DRO), for consideration and implementation. I am appreciative of the significant work by the team, which was supported by all regions and both program offices. I recommend NRR lead the effort to evaluate the recommendations, their prioritization, and any collaborative resources needed to accomplish them in future discussions with NRR, NSIR and Regional Leadership. This memorandum also provides a Draft Plan to Evaluate Recommendations and Their Implementation for consideration. The proposed draft plan delineates potential next steps and prioritizes those key actions and activities for each of the recommendations that are chosen to be moved forward. NRR, NSIR, and the Regions will evaluate the recommendations, their prioritization, and the collaborative resources needed to accomplish them in future discussions with NRR and Regional Leadership.

The recommendations from the working group are summarized in terse fashion below for ease of reference:

- Revise inspection manual chapter 2515, Appendix E, "Inspection Program Modifications During Pandemics, Epidemics, or Other Widespread Illnesses or Diseases," to include direction for the program offices to identify consistent criteria, resources, evaluation methodology, and inspection prioritization for future events.

CONTACT: Jeffrey R. Bream, NRR/DRO  
301-415-0256

- Adopt a standard definition of on-site, remote, and hybrid inspection between NRR, NSIR, and NMSS. Add the standard definition to IMC 2515, "Light Water Reactor Inspection Program - Operations Phase."
- Adopt regular use of hybrid inspection practices during emergency and routine periods by endorsing controls, guidance, and risk mitigation strategies developed to ensure inspections are efficient and effective.
- Enhance guidance to clarify that virtual meetings are acceptable for inspections and should be considered when they may benefit efficiency and effectiveness.
- Submit a project proposal to the NRC's Future Focused Research Program to coordinate with industry stakeholders to explore implementation or development of solutions for licensee information sharing with NRC inspectors for long-term implementation.
- Adopt a voluntary list of standards and expectations for licensee information sharing with NRC inspectors.
- Ensure site-specific Memoranda of Understanding between regions and licensees reflect current information technology (IT) resources available to resident inspectors and any appropriate restrictions.
- Reinforce NRC IT policies that were relaxed during the response to the COVID-19 PHE related to resident inspectors accessing licensee IT systems through virtual private networks from personal devices.
- Encourage resident inspectors to prioritize problem identification and resolution semiannual trend samples with appropriate input from regional inspectors in the near-term to assess for trends attributable to the PHE.

Enclosure:

Draft Plan to Evaluate Recommendations and Their Implementation

SUBJECT: ENDORSEMENT OF THE FOLLOW-ON REVIEW OF THE LESSONS LEARNED, BEST PRACTICES, AND CHALLENGES DURING THE COVID-19 PUBLIC HEALTH EMERGENCY WORKING GROUP RECOMMENDATIONS AND IMPLEMENTATION PLAN **DATED SEPTEMBER XX, 2022**

**DISTRIBUTION:**

MFranke, R2  
THipschman, NRR  
JBream, NRR  
EGutherie, R2  
MFerdas, R1  
SSmith, R2  
AMcCraw, R3  
AAgrawal, R4

**ADAMS Accession Numbers:****Package: ML22224A115****Memo: ML22224A124****\*via email**

OFFICE	NRR/DRO/IRIB	NRR/DRO/IRIB/BC	R1/RA	R2/RA
NAME	JBream	THipschman	DLew	LDudes
DATE	8/ /2022	8/ /2022	9/ /2022	9/ /2022
OFFICE	R3/RA	R4/RA	NSIR/OD	NMSS/OD
NAME	JGiessner	SMorris	MGavrilas	JLubinski
DATE	9/ /2022	9/ /2022	9/ /2022	9/ /2022
OFFICE	NRR/DRO/D			
NAME	CMiller			
DATE	9/ /2022			

**OFFICIAL RECORD COPY**