



## **MEMORANDUM**

**DATE:** October 31, 2022

**TO:** Daniel H. Dorman  
Executive Director for Operations

**FROM:** Hruta Virkar, CPA /*RA*/  
Assistant Inspector General for Audits

**SUBJECT:** STATUS OF RECOMMENDATIONS: RESULTS OF THE  
AUDIT OF COVID-19'S IMPACT ON NUCLEAR  
MATERIALS AND WASTE OVERSIGHT (OIG-21-A-15)

**REFERENCE:** DEPUTY EXECUTIVE DIRECTOR FOR MATERIALS,  
WASTE, RESEARCH, STATE, TRIBAL, COMPLIANCE,  
ADMINISTRATION, AND HUMAN CAPITAL PROGRAMS,  
MEMORANDUM DATED SEPTEMBER 9, 2022

Attached is the Office of the Inspector General's (OIG) analysis and status of recommendations as discussed in the agency's response dated September 9, 2022. Based on this response, recommendation one remains open and resolved. Recommendations three, four and five are now closed. Recommendation two was previously closed. Please provide a status update for the open and resolved recommendations by January 14, 2023.

If you have questions or concerns, please call me at 301.415.1982 or Mike Blair, Team Leader, at 301.415.8399.

Attachment:  
As stated

cc: M. Bailey, OEDO  
E. Stahl, OEDO  
J. Jolicoeur, OEDO  
RidsEdoMailCenter Resource  
OIG Liaison Resource  
EDO\_ACS Distribution

**Audit Report**  
**AUDIT OF COVID-19'S IMPACT ON NUCLEAR MATERIALS AND**  
**WASTE OVERSIGHT**  
**(OIG-21-A-15)**  
**Status of Recommendations**

<u>Recommendation 1:</u>	Revise the U.S. Nuclear Regulatory Commission (NRC) materials and waste inspection guidance to include instructions on how to respond to prolonged work disruptions, including those that result in required maximum telework or a lack of access to inspection sites.
<u>Agency Response Dated September 9, 2022:</u>	<p>Ongoing. The Office of Nuclear Material Safety and Safeguards (NMSS) completed an assessment to evaluate the Nuclear Materials and Waste Safety oversight/inspection programs during the Coronavirus Disease (COVID-19) pandemic and provided a series of recommendations. The final report for this assessment can be found in the Agencywide Documents Access and Management System (ADAMS) with Accession No. <a href="#">ML21294A342</a>.</p> <p>NMSS management agreed with the working group's recommendation to prepare pandemic-related guidance and aligned among on this path forward together with its regional counterparts. The staff is developing inspection guidance for inspection activities during pandemics including periods of prolonged work disruptions or lack of access to inspection sites.</p> <p>Consistent with the agency's Continuity of Operations pandemic guidance, NMSS is responsible for developing pandemic related guidance in the Inspection Manual Chapters for each of its business lines. The Spent Fuel and Transportation and the Fuel Facilities Business Lines incorporated guidance specific to inspection activities during pandemics in Fiscal Year 2021. The Decommissioning and Low-Level Waste and the Nuclear Material Users Business Lines are developing consistent guidance for their inspection programs that is currently scheduled to be completed by the end of the 2022. The inspection guidance are program elements that are a matter of compatibility for the Agreement States.</p>

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**(OIG-21-A-15)**  
**Status of Recommendations**

Therefore, the guidance will be provided to the Agreement States for comment. The target completion date may be affected by the feedback received on the draft guidance. NMSS has a business process in place for the routine revisions of inspection procedures. The guidance associated with pandemics or periods of prolonged work disruptions will be reviewed on a routine basis after their initial issuance and updated as needed.

Target Completion Date: December 31, 2022.

Point of Contact: Leira Cuadrado, NMSS

**OIG Analysis:**

The proposed actions meet the intent of this recommendation. The OIG will close this recommendation upon reviewing the final approved guidance. This recommendation remains open and resolved.

**Status:**

Open: Resolved.

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**(OIG-21-A-15)**  
**Status of Recommendations**

Recommendation 3: Provide guidance on how to record data consistently in WBL, including specific information on how and when to populate inspection-related information fields.

Agency Response Dated September 9, 2022: Completed. Staff developed a consistent business process and guidance for recording data within WBL's inspection module based on the functionality described below in response to Recommendation 4. This guidance was provided to the regions via e-mail on July 20, 2022, and the first training was conducted with the regions on July 21, 2022. The guidance was formally sent to the regions via memo on September 7, 2022 (ADAMS Accession No. ML22244A059). The guidance is available in the WBL User Portal.

Completion Date: July 20, 2022

Point of Contact: Leira Cuadrado, NMSS

OIG Analysis: OIG has reviewed the *Memorandum* and *Users' Guide* published by NMSS and also reviewed the dashboards and WBL portal updates. In addition, OIG has reviewed the training materials associated with the above training. This recommendation is now closed.

**Status:** Closed.

**Audit Report**  
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**(OIG-21-A-15)**  
**Status of Recommendations**

Recommendation 4: Review and reconfigure WBL to include mechanisms for recording complete inspections data.

Agency Response Dated September 9, 2022: Completed. The staff enhanced the functionality of WBL's inspection module for improved data capture and management of materials and waste inspections not already tracked under Replacement Reactor Program System. The new functionalities of the WBL inspection module will allow for better tracking the status and components of an inspection, as well as integrate with other modules to better plan and track inspections.

Completion Date: June 30, 2022

Point of Contact: Adelaide Giantelli, NMSS

OIG Analysis: The OIG has reviewed the updated dashboards, the updated WBL module, and the guidance referenced in Recommendation 3 above. This recommendation is therefore closed.

**Status:** Closed.

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**Status of Recommendations**

Recommendation 5: Update and implement training for NRC staff to consistently employ the mechanisms developed by the NRC to record the inspections data in WBL.

Agency Response Dated September 9, 2022: Completed. Upon deployment of the enhancements to the inspection module in June 2022, NMSS staff provided virtual training on July 21, 2022, for inspection staff in each region on how to record inspection data in WBL.

Completion Date: July 21, 2022

Point of Contact: Adelaide Giantelli, NMSS

OIG Analysis: OIG has reviewed the training materials and noted the training sessions held on July 21, September 13, and September 21, 2022. This recommendation is now closed.

**Status:** Closed.