



OFFICE OF THE INSPECTOR GENERAL

U.S. NUCLEAR REGULATORY COMMISSION

DEFENSE NUCLEAR FACILITIES SAFETY BOARD

Audit of NRC's Oversight of Employee Participation in American Society of Mechanical Engineers Code Committees

OIG-17-A-11

April 26, 2017



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

**OFFICE OF THE
INSPECTOR GENERAL**

April 26, 2017

MEMORANDUM TO: Victor M. McCree
Executive Director for Operations

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

SUBJECT: AUDIT OF NRC'S OVERSIGHT OF EMPLOYEE
PARTICIPATION IN AMERICAN SOCIETY OF
MECHANICAL ENGINEERS CODE COMMITTEES
(OIG-17-A-11)

Attached is the Office of the Inspector General's (OIG) audit report titled *Audit of NRC's Oversight of Employee Participation in American Society of Mechanical Engineers Code Committees*.

The report presents the results of the subject audit. Following the March 30, 2017, exit conference, agency staff indicated that they had no formal comments for inclusion in this report.

Please provide information on actions taken or planned on each of the recommendations within 30 days of the date of this memorandum. Actions taken or planned are subject to OIG followup as stated in Management Directive 6.1.

We appreciate the cooperation extended to us by members of your staff during the audit. If you have any questions or comments about our report, please contact me at (301) 415-5915 or Paul Rades, Team Leader, at (301) 415-6228.

Attachment: As stated



Office of the Inspector General

U.S. Nuclear Regulatory Commission
Defense Nuclear Facilities Safety Board

OIG-17-A-11
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Results in Brief

Why We Did This Review

The U. S. Nuclear Regulatory Commission (NRC) participates in American Society of Mechanical Engineers (ASME) code committees as part of NRC's responsibilities under the National Technology Transfer Act of 1995. ASME is a non-profit professional organization that develops technical codes for the public and private sectors and includes a range of public and private sector employees. ASME codes are used in connection with technical standards for design, construction, and maintenance for commercial nuclear power plants.

OIG undertook this work based on awareness of the potential lack of internal controls for managing committee participation in the areas of management oversight, monitoring, coordination, and guidance. OIG auditors also considered OIG Investigations' concerns regarding the potential for conflicts of interest with respect to NRC staff participation in ASME code committee meetings.

Audit of NRC's Oversight of Employee Participation in American Society of Mechanical Engineers Code Committees

What We Found

NRC generally complies with applicable law, regulation, and policy pertaining to participation in ASME code committees. However, management oversight of staff participation could be improved by strengthening recordkeeping practices and internal controls to verify staff compliance with NRC ethics policies.

What We Recommend

OIG made two recommendations to enhance oversight of NRC staff participation in ASME code committee activities. First, OIG recommends that NRC finalize and implement a formal plan for recent changes to guidance that includes elements such as management authority, office coordination, and milestones.

Second, in order to prevent conflicts of interest, NRC should finalize and implement controls to strengthen ASME code committee representatives' adherence to agency ethics policies.

NRC management stated their agreement with the findings and recommendations in this report.

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ABBREVIATIONS AND ACRONYMS

ADAMS	Agencywide Documents Access and Management System
ASME	American Society of Mechanical Engineers
CFR	Code of Federal Regulations
MD	Management Directive
NIST	National Institute of Standards and Technology
NRC	Nuclear Regulatory Commission
NRO	Office of New Reactors
NRR	Office of Nuclear Reactor Regulation
OIG	Office of the Inspector General

I. BACKGROUND

In support of the NRC's mission,¹ NRC designates select employees to represent the agency on ASME code committees. ASME is a non-profit professional organization that develops technical codes for the public and private sectors. ASME members include employees of manufacturing firms, consulting firms, design and construction companies, and U.S. and international government agencies. ASME codes are incorporated into Title 10, *Energy*, Code of Federal Regulations (CFR), Section 50.55a, "Codes and standards," which prescribes technical standards for design, construction, and maintenance for commercial nuclear power plants.

The *National Technology Transfer and Advancement Act of 1995* requires Federal agency participation in the development of technical codes and standards through organizations like ASME. The act stipulates that Federal agencies benefit from private sector expertise, promote Federal participation in standards organizations, support creation of standards that are useable by Federal agencies, and minimize reliance on Government-unique standards where an existing standard would meet the Federal Government's objective.

NRC guidance for staff participation on ASME code committees is contained in NRC Management Directive and Handbook 6.5, *NRC Participation in Development and Use of Consensus Standards* (MD 6.5). This guidance was recently updated October 28, 2016, and implementation of the changes is ongoing.

MD 6.5 designates the Director, Division of Engineering, Office of Nuclear Regulatory Research (RES) as the NRC Standards Executive responsible for administering NRC's participation in standards organizations such as ASME.² The NRC Standards Executive also prepares an annual report on NRC participation in these organizations for the National Institute of

¹ NRC's mission is to license and regulate the civilian use of radioactive materials in the United States to protect public health and safety, promote the common defense and security, and protect the environment.

² NRC guidance refers to these as "Standards Development Organizations."

Standards and Technology (NIST), which then compiles the information into a Government-wide report for the Office of Management and Budget.

NRC division directors and branch chiefs select staff to serve as agency representatives to ASME and other standards organizations based on factors such as technical expertise and NRC functional responsibilities. Staff from the NRC Office of Nuclear Reactor Regulation (NRR), Office of New Reactors (NRO), Office of Nuclear Material Safety and Safeguards (NMSS), and RES represent NRC on three ASME code committees that focus on technical codes for commercial nuclear power reactors:

- The ASME Boiler and Pressure Vessel Committee on Construction of Nuclear Facility Components, Section III, includes 16 NRC-authorized representatives.³
- The ASME Boiler and Pressure Vessel Committee on Nuclear In-service Inspection, Section XI, includes 14 NRC-authorized representatives.
- The ASME Operations and Maintenance Standards Committee includes 6 NRC-authorized representatives.

Nomination Process

The NRC Standards Executive, division directors, and their staff play different roles in nominating agency staff to represent NRC on ASME code committees. Nominees typically prepare nomination letters and forms and division directors approve their staff participation on ASME committees. The NRC Standards Executive authorizes each nomination letter, and Standards Executive staff in RES maintain supporting documentation.⁴ NRC nominees must also submit the following ASME forms:

³ As of January 2017, NRC data indicated that 36 staff are involved in committee meeting preparation, participation, and internal coordination. NRC data also identified 13 additional NRC-authorized representatives who serve as alternates. Furthermore, six NRC-authorized representatives serve on more than one committee. Agency staff subsequently provided revised data indicating that as of March 28, 2017, Section III includes 19, Section XI includes 19, and Operations and Maintenance includes 5, NRC-authorized representatives, including alternates who serve on the 3 ASME code committees.

⁴ All staff nominated for the position of NRC-authorized representative complete NRC Form 652, *Record of Standards Committee Assignment*. NRC Form 652 accompanies the concurrence package for the nomination letter, but is not transmitted with the letter.

- *ASME Codes and Standards Participation Acknowledgement Form*, which contains participant's acknowledgement, by signature, that "As an employee of a government agency, I agree to follow a Code of Ethics and/or Policy on Conflict of Interest administered by the pertinent jurisdiction or governmental agency."
- *ASME Codes and Standards Personnel Form*, which contains participant's professional and academic credentials.

ASME Code Development Process

The ASME code development process begins when ASME committees are presented with proposed changes to ASME codes in 10 CFR 50.55a. The process ends either with a committee decision against making the changes, or a decision to incorporate the changes into ASME's code structure.

Prior to and during ASME code week meetings,⁵ members of ASME code committees, working groups, and subcommittees deliberate over effects of the proposed changes, including safety implications. NRC representatives are required to record and inform other NRC staff of key information that develops during committee deliberations. NRC representatives are expected to remain independent and objective and to communicate a single agency position on a given matter.

After deliberations, committees use ballots to record members' votes on code changes. Each member has one vote. While there is no specific schedule associated with balloting, members typically vote by electronic ballot over a 30-day period following the code week meetings.

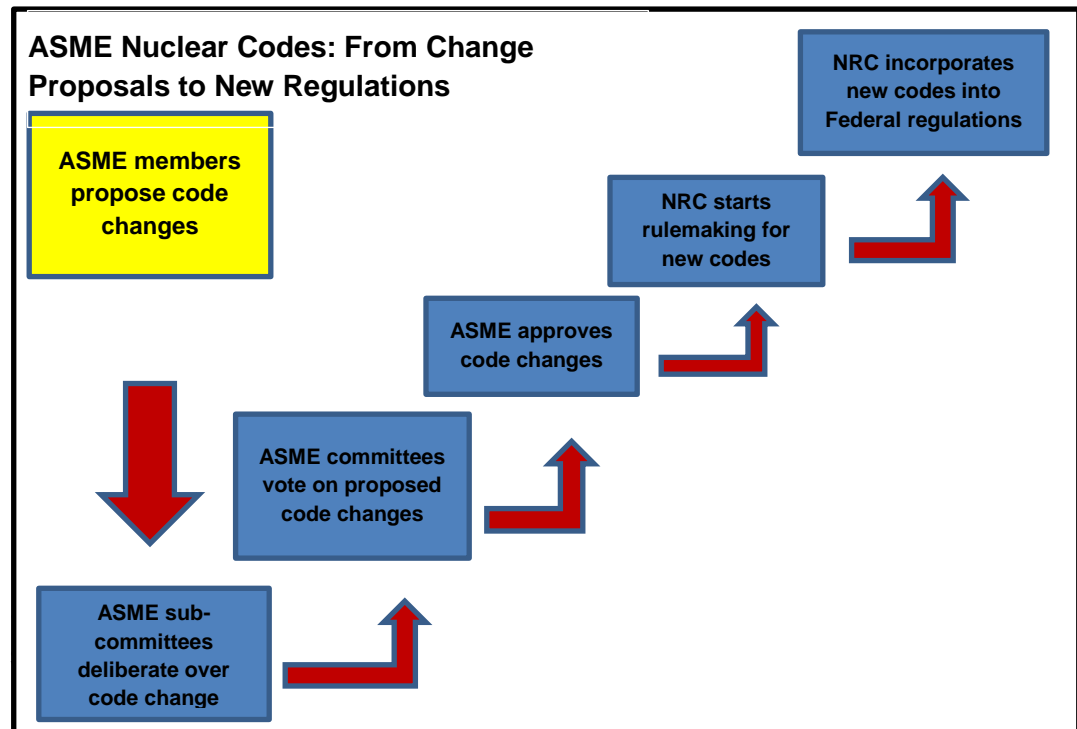
If approved for publication by ASME,⁶ NRC may consider code changes for incorporation into the CFR through NRC's rulemaking process. ASME maintains official records of the ASME code development process in an online proprietary data system, which is accessible to the organization's members.

⁵ Boiler Pressure Vessel Section III and Section XI committees hold three to four ASME code week meetings each year. The Operations and Maintenance committee holds ASME code week meetings twice a year.

⁶ASME has additional measures to validate code changes, including approval through ASME's Boiler and Pressure Vessel Certification Program.

Figure 1 illustrates the general process by which ASME codes are developed and incorporated into the CFR.

Figure 1: ASME Code Development and Rulemaking Process



Source: OIG analysis of ASME documentation and interviews with NRC staff.

Ethics Policy Compliance

NRC's ASME code committee representatives interact with nuclear industry personnel during committee business, and must comply with Federal ethics laws and regulations, as well as NRC and ASME ethics policies. These include conflict-of-interest criminal statutes under 18 U.S.C. 201-209; 5 CFR Part 2635, *Standards of Ethical Conduct for Employees of the Executive Branch*; and NRC guidance contained in MD 7.3, *Participation in Professional Organizations*. Additionally, the ASME "balance of interest" policy aims to minimize conflicts of interest in technical or membership matters by preventing situations in which a single interest group could control action on a particular issue.

II. OBJECTIVE

The audit objective was to assess NRC's oversight and compliance with applicable law, regulation, and policy relating to NRC employee participation in ASME code committees. Appendix A describes the audit's scope and methodology.

III. FINDINGS

NRC generally complies with applicable law, regulation, and policy pertaining to participation in ASME code committees. However, management oversight of staff participation could be improved by strengthening recordkeeping practices and internal controls for staff adherence to NRC ethics policies.

A. Recordkeeping Could Be Improved for More Reliable Information, Communication, and Monitoring

Federal agencies are required to implement internal controls for effective information, communication, and monitoring. However, ASME code committee participation information is incomplete and staff use inconsistent methods for recording, communicating, and monitoring committee information. This has occurred because NRC has not yet finalized a plan for implementing recently revised guidance on NRC participation in standards organizations. Strengthened recordkeeping would support external reporting requirements, and enhance NRC's program management.

What Is Required

Federal Information, Communication, and Monitoring Internal Control Requirements

Federal internal control standards require NRC management to implement effective information, communication, and monitoring of internal controls. Specifically, the Government Accountability Office's *Standards for Internal Control in the Federal Government* (September 2014) requires agency management to implement a control framework that includes information, communication, and monitoring. In support of this control framework, NRC management should

- Use quality information to achieve program objectives.
- Communicate the necessary quality information⁷ internally and externally to achieve program objectives.
- Monitor program activities and evaluate results.

What We Found

Code Committee Information Is Incomplete; Practices for Managing and Documenting Activities Are Inconsistent

NRC staff responsible for ASME code committee participation maintain incomplete records and use inconsistent practices for managing and documenting committee activities.

⁷ *Standards for Internal Control in the Federal Government*, (GAO-14-704G), September 10, 2014, states that quality information is "relevant data that have a logical connection with, or bearing upon, the identified information requirements. Reliable internal and external sources provide data that are reasonably free from error and bias and faithfully represent what they purport to represent."

Incomplete Appointment, Replacement, and Termination Information

The NRC Standards Executive and agency program offices have not maintained complete documentation of all appointments, replacements, and terminations for NRC-authorized representatives to ASME committees. The NRC Standards Executive provided OIG with committee appointment documentation for approximately 31 percent (11 of 36) staff members reportedly representing NRC on ASME's 3 nuclear power plant code committees.

NRC Standards Executive staff explained that they did not have the NRC-representatives' documentation, in part, because they had only recently undertaken a comprehensive effort to determine staff participation in standards organization committees. In March 2016, the NRC Standards Executive requested that each office director reaffirm his or her decision to support continued participation. Office director responses identified some participation terminations, proposed appointments, and reassignments. During the summer of 2016, follow up efforts were performed to have new appointees submit their completed application forms, which were being used as the basis to write standards organization appointment letters. Staff explained that issuance of new NRC nomination letters was only partially completed, and additional nominations of NRC staff to ASME code committees had been deferred, based on project prioritization and available resources.⁸

Another example of incomplete ASME code committee information appears on an NRC public Web page that provides information about agency participation in standards organizations. Specifically, approximately 16 percent (9 of 55) of ASME code committee positions⁹ identified on the Web page were not included in records provided to OIG. Furthermore, approximately 22 percent (12 of 55) of ASME code committee positions identified in agency records were not on the Web site.

⁸ Project Aim actions reduced ASME-related travel and staffing resources.

⁹ The 55 ASME code committee positions are comprised of 36 individuals involved in committee meeting preparation, participation, and internal coordination, 13 individuals who serve as alternates, and 6 individuals who serve on more than one committee.

Inconsistent Practices and Documentation

OIG's comparison of NRC staff activities on ASME's three nuclear power plant code committees found inconsistent practices for managing and documenting participation in code committee meetings. For example, NRC representatives on one ASME code committee reportedly resolve disagreements over particular ballot proposals through expert consensus. In contrast, NRC representatives to a second committee reportedly vote "no" on a ballot proposal if they cannot reach consensus. NRC representatives on a third committee were unaware of any policy or process for reaching consensus on ballot proposals. Two of the three committee groups do not maintain any records of their deliberations and differing staff positions.

Furthermore, NRC representatives do not consistently document issues raised during ASME code committee meetings in their trip reports. Representatives on one committee do not prepare a written trip report. Representatives on a second committee write a quarterly report that is shared with other NRC staff, but is not officially tracked in NRC's official recordkeeping system, the Agencywide Documents Access and Management System (ADAMS). In contrast, representatives on a third committee write official trip reports and store these in ADAMS.

Why This Occurred

ASME Participation Guidance Implementation Plan Has Not Been Finalized

Recordkeeping weaknesses exist because NRC has not yet finalized the agency's plan for implementing the revised guidance on NRC participation in standards organizations. NRC has updated the primary internal guidance for ASME committee participation —MD 6.5—but does not have a formal plan, with milestones, for implementing MD 6.5 changes. The NRC Standards Executive has written a draft communications plan, a draft rollout plan, and a draft desktop guide to implement MD 6.5 changes. In addition, the NRC Standards Executive's staff cited challenges inherent in functioning as a coordinating office with no authority to enforce guidance over other program offices.

Comprehensive recordkeeping requirements were not present in the previous revision of MD 6.5. NRC recognized the benefit of having records, included recordkeeping requirements in the October 2016 revision, and has begun the process of implementing revised MD 6.5 guidance that includes mechanisms such to better facilitate information sharing and retention.

Why This Is Important

Reliable Information Needed for External Reporting Requirements and Program Management

Improved recordkeeping would better support external reporting requirements. NIST subsequently changed the format for reporting fiscal year 2016 data to include the NRC public Web page that provides information about agency participation in standards organizations but the number of NRC representatives is no longer submitted. Nevertheless, NRC's fiscal year 2015 report to NIST stated 204 NRC representatives participated in 460 activities on 14 standards organizations, including ASME. However, NRC's fiscal year 2015 data reported to NIST is unreliable due, in part, to discrepancies in ASME code committee participation data.¹⁰

Complete information would also help NRC better address management needs. Retirements, staff reassignments, and resource reductions present challenges for knowledge management, succession planning, and training new committee representatives. Senior NRC managers need complete, accurate information to ensure proper oversight of staff activities and adequate resource allocation in accordance with the agency's safety mission. Additionally, complete recordkeeping is important so that NRC has the necessary information to present a single agency position on a given matter.

¹⁰ Analyzing staff participation data for other standards organizations besides ASME is beyond the scope of this audit. However, OIG cannot rule out the possibility of discrepancies in participation data for other standards organizations, given the condition and causal factors identified in this report.

Recommendations

OIG recommends that the Executive Director for Operations

1. Finalize and implement a formal MD 6.5 implementation plan that includes elements such as management authority, office coordination, and milestones.

B. Conflict of Interest Controls Need to Be Strengthened

NRC ethics policy reflects Federal requirements for conflict of interest controls, such as training and financial disclosure reporting. However, most NRC staff representing the agency on ASME code committees do not file financial disclosure reports. This occurs because NRC policy governing ASME code committee participation does not include controls to verify staff compliance with conflict of interest policy. Financial disclosure reporting by ASME code committee representatives can help NRC better manage conflict of interest risk, and strengthen public confidence in the agency as a fair and impartial regulator.

What Is Required

NRC Ethics Policy Reflects Federal Requirements

According to NRC Management Directive and Handbook 7.6, *Public and Confidential Financial Disclosure Reports* (MD 7.6), NRC policy is to inform employees of laws and regulations governing financial disclosure requirements, prevent potential conflicts of interest, and resolve actual conflicts of interest.

NRC's ASME code committee representatives must comply with Federal ethics laws and regulations, as well as agency-specific ethics guidance. For example, 18 USC 201-209 defines criminal activities associated with bribery and conflict of interest as they apply to Federal employees, along with the associated penalties. 5 CFR 2635 addresses the applicability of ethics policies to public officials and how agencies provide supplemental regulations to further explain the requirements of the CFR. NRC implements these laws and regulations through MD 7.3, *Participation in Professional Organizations* (MD 7.3). Specifically, MD 7.3 encourages staff participation in professional organizations while reinforcing adherence to Government conflict of interest requirements. Additionally, NRC's measures to prevent conflicts of interest include staff training and financial disclosure reporting.

What We Found

Most ASME Code Committee Representatives Do Not File Financial Disclosure Reports

In accordance with MD 7.6, agency staff must file forms based on criteria associated with rank and position within the agency. For example, non-senior executive supervisors in NRR and RES are required to file confidential financial disclosure reports per NRC guidance. However, OIG determined that approximately 12 percent (6 of 49) of authorized ASME code committee representatives¹¹ file annual financial disclosure reports.

Despite these relatively low financial disclosure reporting rates, similarities exist between ASME code committee representatives and other NRC technical staff who are subject to the reporting requirements by virtue of their licensing duties. For example, participation in ASME code committees requires NRC staff to engage licensee personnel and review licensee-proposed changes to existing regulations. Code committee members must maintain current knowledge of the latest ASME code developments, as they may be called upon to use it in their day to day duties. In one example, an NRC representative reportedly applied his knowledge of the most current ASME code developments to successfully challenge plant modifications proposed by a licensee.

NRC managers and staff were not aware of any conflict of interest situations associated with ASME work. However, agency managers and staff were familiar with conflict of interest principles and potential risks. Additionally, OIG reviewed licensing documents that listed ASME code committee members as reviewers. OIG analysis resulted in no evidence of conflicts of interest that could result if NRC staff reviewed and unilaterally dispositioned ASME code-related relief requests while also representing the agency on ASME code committees.¹²

¹¹ The 49 authorized ASME code committee representatives include 36 individuals involved in committee meeting preparation, participation, and internal coordination and 13 individuals who serve as alternates, and excludes 6 individuals who serve on more than 1 committee.

¹² OIG reviewed 40 documents associated with code relief requests covering the period 2011-2016. Licensees submitted the requests to NRC for the purposes of gaining exemptions from existing ASME code requirements. Licensees must submit the request and supporting technical justification, which are then reviewed and approved or disapproved by NRC after review by NRC technical staff.

Why This Occurred

NRC Policy Lacks Controls to Verify Staff Compliance

NRC policy for ASME code committee participation does not include controls to verify staff compliance with NRC conflict of interest policy. Rather, office directors determine, for their respective staff, who would be subject to financial disclosure reporting requirements. RES, NRR, and NRO require financial disclosure reporting based primarily on seniority rather than regulatory roles and engagement with licensees. NRR also requires reporting by some contracting and financial management staff.

In contrast, NMSS requires reporting by staff in technical positions with signature authority for licensing actions. The NRC Ethics Counselor and NRC Deputy Ethics Counselor indicated no opposition with NRR, NRO, and RES adding technical positions who participate on ASME code committees to the list of NRC positions that meet filing criteria.

Why This Is Important

Financial Disclosure Can Help NRC Manage Conflict of Interest Risk

Financial disclosure reporting by ASME code committee representatives can help NRC better manage conflict of interest risk, and minimize the likelihood of apparent conflicts of interest among its staff. Further, financial disclosure vetting may benefit staff who participate in ASME code committees and perform other regulatory duties by protecting them against unfounded conflict of interest allegations. Lastly, the increased transparency afforded by financial disclosure reporting could promote public confidence in NRC as a fair, impartial regulator staffed by personnel with uncompromised commitment to their agency's safety mission.

Recommendations

OIG recommends that the Executive Director for Operations

2. Finalize and implement controls in the MD 6.5 implementation plan to strengthen ASME code committee representatives' adherence to ethics policies, such as but not limited to, financial disclosure reporting.

IV. CONSOLIDATED LIST OF RECOMMENDATIONS

OIG recommends that the Executive Director for Operations

1. Finalize and implement a formal MD 6.5 implementation plan that includes elements such as management authority, office coordination, and milestones.
2. Finalize and implement controls in the MD 6.5 implementation plan to strengthen ASME code committee representatives' adherence to ethics policies, such as but not limited to, financial disclosure reporting.

V. AGENCY COMMENTS

An exit conference was held with the agency on March 30, 2017, and a follow-up meeting was held on April 3, 2017. After reviewing a discussion draft, agency management provided comments that have been incorporated into this report, as appropriate. As a result, agency management stated their general agreement with the findings and recommendations in this report and opted not to provide formal comments for inclusion in this report.

OBJECTIVE, SCOPE, AND METHODOLOGY

Objective

The objective of this audit was to assess NRC's oversight and compliance with applicable law, regulation, and policy relating to NRC employee participation in ASME code committees.

Scope

The audit focused on NRC's oversight of employee participation in ASME code committees. We reviewed ASME code committee participation by NRC staff during August 2016 through January 2017, primarily at NRC headquarters in Rockville, Maryland. OIG also observed NRC staff participation in one ASME code week meeting held in Clearwater, Florida. Internal controls related to the audit objective were reviewed and analyzed. NRC is generally compliant with relevant laws and regulations. Throughout the audit, auditors were aware of the possibility of fraud, waste, and abuse in the program.

Methodology

OIG reviewed relevant criteria for this audit, including

- *National Technology Transfer and Advancement Act of 1995* (Public Law 104-113).
- 10 Code of Federal Regulations 50.55a, "Codes and standards."
- Office of Management and Budget Circular A-119, *Federal Participation in the Development and Use of Voluntary Consensus Standards and in Conformity Assessment Activities*.
- Office of Management and Budget Circular A-123, *Management Responsibility for Enterprise Risk Management and Internal Control*.

- Government Accountability Office, *Standards for Internal Control in the Federal Government*, GAO-14-704G.
- NRC's *Principles of Good Regulation*.
- SECY-08-140, *Development and Regulatory Application of Consensus Standards by US Nuclear Regulatory Commission Staff*.
- Management Directive 6.5, *NRC Participation in Development and Use of Consensus Standards*.
- Management Directive 7.3, *Participation in Professional Organizations*.
- Inspection Manual 1201, *Conduct of Employees*.

To understand how NRC staff and managers oversee participation in ASME code committees, OIG analyzed agency guidance and compared it with staff practices among the three ASME nuclear power plant code committees. OIG also analyzed the NRC public Web site to compare the ASME committee members noted on the site with the members noted on the ASME organizational charts to identify discrepancies. OIG also analyzed code relief request documentation for evidence of conflicts of interest that could result if NRC staff review and unilaterally disposition ASME code-related relief requests while also representing the agency on ASME code committees.

To obtain the perspectives on NRC staff participation on ASME code committees, OIG interviewed NRC management and staff, as well as ASME staff. OIG interviewed NRC management and staff from the RES, NRR, NRO and the Office of the General Counsel. OIG also interviewed NRC representatives to the three ASME nuclear power plant code committees. Additionally, OIG interviewed ASME staff responsible for coordinating the committees' activities.

We conducted this performance audit in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a

reasonable basis for our findings and conclusions based on our audit objectives.

The audit was conducted by Paul Rades, Team Leader; Vicki Foster, Audit Manager; Tim Wilson, Senior Management Analyst; Curtis Browne, Auditor; and John Thorp, Senior Technical Advisor.

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COMMENTS AND SUGGESTIONS

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