



# OFFICE OF THE INSPECTOR GENERAL

U.S. NUCLEAR REGULATORY COMMISSION

DEFENSE NUCLEAR FACILITIES SAFETY BOARD

## Audit of DNFSB's Resident Inspector Program

DNFSB-17-A-05

June 5, 2017



All publicly available OIG reports (including this report)  
are accessible through NRC's Web site at

<http://www.nrc.gov/reading-rm/doc-collections/insp-gen>



**DEFENSE NUCLEAR FACILITIES  
SAFETY BOARD**

WASHINGTON, D.C. 20004-2901

OFFICE OF THE  
INSPECTOR GENERAL

June 5, 2017

MEMORANDUM TO: Glenn Sklar  
General Manager

Katherine Herrera  
Deputy General Manager

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

SUBJECT: AUDIT OF DNFSB'S RESIDENT INSPECTOR PROGRAM  
(DNFSB-17-A-05)

Attached is the Office of the Inspector General's (OIG) audit report titled *Audit of DNFSB's Resident Inspector Program*.

The report presents the results of the subject audit. Following the May 25, 2017, exit conference, Board 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.

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 Sherri Miotla, Team Leader, at (301) 415-5914.

Attachment: As stated

cc: R. Howard





# Office of the Inspector General

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

DNFSB-17-A-05

June 5, 2017

## Results in Brief

### Why We Did This Review

Congress created the Defense Nuclear Facilities Safety Board (DNFSB) to identify the nature and consequences of potential threats to public health and safety at the Department of Energy's (DOE) defense nuclear facilities.

DNFSB's enabling legislation authorizes it to assign staff to be stationed at any DOE defense nuclear facility to carry out the functions of the agency. DNFSB has used this authority to implement a Resident Inspector Program that serves a vital function in the agency's safety oversight of DOE's defense nuclear facilities. Employees in the program relocate to a DOE site with defense nuclear facilities and perform direct oversight of the safety of operations.

At this time, there are 10 total resident inspectors, with 2 stationed at 5 DOE sites.

The audit objective was to determine whether the Resident Inspector Program provides for the necessary onsite oversight of DOE defense nuclear facilities to adequately fulfill DNFSB's mission.

### *Audit of DNFSB's Resident Inspector Program*

#### What We Found

DNFSB's Resident Inspector Program does provide the necessary onsite oversight of DOE defense nuclear facilities to adequately fulfill its mission; however, opportunities for improvement exist.

DNFSB is not always able to fill vacant resident inspector positions in a timely manner. Although DNFSB should ensure continuity of needed skills and abilities, the agency does not have a formalized, systematic process for developing a pool of resident inspectors. As a result, DNFSB could face a gap in oversight at a DOE defense nuclear site.

Additionally, OIG found that DNFSB is not transparent in how it determines which defense nuclear sites will have resident inspectors. DNFSB should conduct operations transparently; however, there is no formal process for determining the number and location of resident inspectors. Consequently, a lack of a transparent process may result in a loss of stakeholder confidence.

#### What We Recommend

This report makes recommendations to improve DNFSB's ability to develop and prepare candidates for the resident inspector position and increase agency transparency when determining which defense nuclear sites will have resident inspectors, along with the staffing of those sites. DNFSB stated their general agreement with the recommendations in this report and did not provide formal comments.

## TABLE OF CONTENTS

<a href="#"><u>ABBREVIATIONS AND ACRONYMS</u></a>	i
I. <a href="#"><u>BACKGROUND</u></a>	1
II. <a href="#"><u>OBJECTIVE</u></a>	4
III. <a href="#"><u>FINDINGS</u></a>	4
A. <a href="#"><u>Current Process To Fill Vacant Resident Inspector Positions Is Not Timely</u></a>	4
B. <a href="#"><u>Lack of Board Transparency in Resident Inspector Location and Staffing Decisions</u></a>	11
IV. <a href="#"><u>CONSOLIDATED LIST OF RECOMMENDATIONS</u></a>	16
V. <a href="#"><u>BOARD COMMENTS</u></a>	17
 <b>APPENDIX</b>	
A. <a href="#"><u>OBJECTIVE, SCOPE, AND METHODOLOGY</u></a>	18
 <a href="#"><u>TO REPORT FRAUD, WASTE, OR ABUSE</u></a>	20
<a href="#"><u>COMMENTS AND SUGGESTIONS</u></a>	20

---

## **ABBREVIATIONS AND ACRONYMS**

---

DNFSB	Defense Nuclear Facility Safety Board
DOE	Department of Energy
NNSA	National Nuclear Security Administration
OIG	Office of the Inspector General
USC	United States Code

---

## **I. BACKGROUND**

---

### **DNFSB's Role and Responsibilities**

Established in 1988, the Defense Nuclear Facilities Safety Board (DNFSB) is an independent organization within the executive branch of the United States Government. Congress created DNFSB to identify the nature and consequences of potential threats to public health and safety at the Department of Energy's (DOE) defense nuclear facilities.

DNFSB's mission is to provide independent analysis, advice, and recommendations to the Secretary of Energy—in the Secretary's role as operator and regulator of DOE's defense nuclear facilities—to ensure adequate protection of public health and safety at these facilities. DNFSB is the only Government agency that provides independent scientific and technical safety oversight of DOE's defense nuclear facilities. Specifically, DNFSB's oversight of defense nuclear facilities is limited to (1) production or utilization facilities that are under the DOE Secretary's control or jurisdiction and have a function related to national defense, and (2) nuclear waste storage facilities under the DOE Secretary's control or jurisdiction.

Most of DNFSB's work is conducted by its technical office, located at its headquarters in Washington, D.C., and by its resident inspectors located at various DOE defense nuclear facilities.

### **DNFSB Coordination with DOE**

In accordance with United States Code Title 42 (42 U.S.C.) § 2286c(a), the Secretary of Energy and DOE contractors at defense nuclear facilities are required to cooperate with DNFSB and provide DNFSB with ready access to DOE facilities, personnel, and information DNFSB deems necessary to carry out its responsibilities. Both DOE and DNFSB recognize the need for clearly delineated roles and responsibilities in order to maintain the effectiveness of each organization in carrying out its respective mission.

## **DNFSB and the National Nuclear Security Administration (NNSA)**

NNSA was established by Congress in 2000 as a separately organized, semi-autonomous agency within DOE. NNSA is responsible for the management and security of the Nation's nuclear weapons, nuclear nonproliferation, and naval reactor programs. DNFSB provides oversight to NNSA's regulation of the Nation's nuclear weapons.

## **Resident Inspectors**

DNFSB's enabling legislation authorizes it to assign staff to be stationed at any DOE defense nuclear facility to carry out the functions of the agency. DNFSB has used this authority to implement a Resident Inspector Program<sup>1</sup> that serves a vital function in the agency's safety oversight of DOE's defense nuclear facilities. Employees in the program relocate to a DOE site with defense nuclear facilities and perform direct oversight of the safety of operations.

Resident inspectors advise DNFSB on the overall safety conditions at defense nuclear facilities, and they participate in technical reviews by the agency and its technical staff related to the design, construction, operation, and decommissioning of defense nuclear facilities. Resident inspectors are required to write weekly reports that are distributed to all DNFSB staff, including Board members, and are posted to DNFSB's public Web site. The weekly reports' purpose is to summarize the most significant safety issues and events at the site for that week. Resident inspectors also act as DNFSB's liaison with local DOE and contractor management, State and local agencies, elected officials and their staff, the media, and the public.

---

<sup>1</sup> The program was formerly known as the Site Representative Program. On October 17, 2016, the Board voted to change the "site representative" title to "resident inspector" in conformance with its enabling legislation. That change was fully implemented by February 24, 2017.

DOE and NNSA have 10 active defense nuclear facility sites which are subject to DNFSB jurisdiction.<sup>2</sup> Of these 10 sites, 5 have resident inspector stationed onsite. The five sites with resident inspectors are

- Hanford.
- Los Alamos National Laboratory.
- Pantex Plant.
- Savannah River Site.
- Oak Ridge National Laboratory/Y-12 National Security Complex.

At this time, there are 10 total resident inspectors, with 2 stationed at each of the 5 sites identified above. Please see the map below showing the 10 active defense nuclear sites.

Map: Active Defense Nuclear Facility Sites



Source: OIG Generated.

<sup>2</sup> From this point forward in this audit report, OIG will refer to both NNSA and DOE simply as DOE.



---

## II. OBJECTIVE

---

The audit objective was to determine whether the Resident Inspector Program provides for the necessary onsite oversight of DOE defense nuclear facilities to adequately fulfill DNFSB's mission. Appendix A contains information on the audit scope and methodology.

---

## III. FINDINGS

---

DNFSB's Resident Inspector Program does provide the necessary onsite oversight of DOE defense nuclear facilities to adequately fulfill its mission; however, opportunities for improvement exist. Specifically, DNFSB should

- Create a formal, systematic process to develop and prepare candidates for the resident inspector position.
- Create a formal, transparent process for annually determining which defense nuclear sites will have resident inspectors, along with the staffing of those sites.

### **A. Current Process To Fill Vacant Resident Inspector Positions Is Not Timely**

DNFSB is not always able to fill vacant resident inspector positions in a timely manner. Although DNFSB should ensure continuity of needed skills and abilities, the agency does not have a formalized, systematic process for developing a pool of resident inspectors. As a result, DNFSB could face a gap in oversight at a DOE defense nuclear site.

## ***What Is Required***

### **Management Should Ensure Continuity of Needed Skills and Abilities**

DNFSB's Internal Control Program Operating Procedures<sup>3</sup> recommend that managers<sup>4</sup> ensure that skill needs are continually assessed and that the organization is able to obtain a workforce that has the required skills that match those necessary to achieve organizational goals. As part of its human capital planning, managers are also encouraged to consider how best to retain valuable employees, plan for their eventual departure, and ensure continuity of needed skills and abilities.

Furthermore, the Government Accountability Office's *Standards for Internal Control in the Federal Government* highlights the need for management to define contingency plans for key roles to help the entity continue achieving its objectives. It states that contingency plans address an entity's need to respond to sudden personnel changes that could compromise the internal control system.

## ***What We Found***

### **DNFSB Is Not Always Able To Fill Vacant Resident Inspector Positions in a Timely Manner**

Under the current Resident Inspector Program, a timely backfill for a vacant resident inspector position is impeded by the formal application process<sup>5</sup> and training requirements, as resident inspectors are expected to begin training 6 months before relocating to their first DOE defense nuclear site.

<sup>3</sup> Operating Procedure 22.1-1, *Internal Control Program Operating Procedures*, April 2016.

<sup>4</sup> When referring to managers, Operating Procedure 22.1-1 lists the Deputy Office Director, Office of the Technical Director Group Leads, and Office of the General Manager Division Directors as examples.

<sup>5</sup> To qualify for the resident inspector position, one must submit a formal application and be a DN level III, IV, or V DNFSB employee. The candidate must also have a minimum of 2 years of direct experience at DNFSB headquarters with an overall performance rating of at least "Fully Successful."

### Resident inspector pre-assignment training includes

- Visits to three resident inspector offices, which should begin at least 5 months before the scheduled date for departing from headquarters.
- Training on core topics such as electrical distribution systems, filtration fundamentals, fire protection systems, etc.<sup>6</sup>
- A defined regimen of self-study.

In addition to completing the applicable pre-assignment training, the resident inspectors are expected to complete additional site-specific training in order to become acquainted with the site and maintain access to the site's facilities. One resident inspector commented that the training process is long and further believes that it takes a year to become effective as a new resident inspector.

The application process, combined with the DNFSB and site-specific training requirements, may result in a lengthy period of time before new resident inspectors can fully and effectively perform their duties at a site.

### Watch Bills

DNFSB's current contingency plan in cases of abrupt resident inspector departures is inefficient. When resident inspectors unexpectedly depart, the agency sets up "watch bills." A watch bill is when DNFSB employees take rotational assignments at the sites, providing coverage for several weeks at a time until the vacant resident inspector position is filled.

---

<sup>6</sup> The Deputy Technical Director may waive the need for one or more courses based on the new resident inspector's prior experience.

A member of the DNFSB technical staff at headquarters confirmed that the agency does not have designated backups for the resident inspectors, nor is there any training for headquarters staff when they act for the resident inspectors who have departed. The staffer added that when resident inspectors go on leave, a site cognizant engineer<sup>7</sup> will temporarily act in their place; however, the ability to contribute is strictly based on his or her knowledge as a site cognizant engineer. The staffer believes that a process that would train headquarters staff on how to serve as resident inspectors would be beneficial and would also help with finding the best suited candidate to fill the resident inspector position when vacancies arise.

### *Why This Occurred*

#### **DNFSB Does Not Have a Formalized, Systematic Process for Developing a Pool of Resident Inspectors**

Currently, there is no formal process for developing a pool of qualified resident inspector candidates. While the resident inspector training program is robust, the training does not begin until after the resident inspector has completed the application process and is selected for a vacant position. There is no system in place to prepare current headquarters staff for the possibility of permanently filling the resident inspector position in a timely manner.

To develop a qualified pool of individuals that will be able to successfully perform the resident inspector role, DNFSB should have a process in place that will determine whether candidates are not only a good technical fit, but also have the right temperament. Several DOE managers mentioned the importance of personality when discussing the resident inspector position. For example, resident inspectors “cannot just be technically competent,” and the working relationships at the sites depend on the resident inspector’s “attitude, confidence, and personality.” Therefore, a resident inspector should be “someone who knows how to work well with people.”

---

<sup>7</sup> Within the technical staff of the DNFSB, site cognizant engineers play a critical role in providing oversight of DOE defense nuclear facilities and activities. They plan, coordinate, and execute staff safety reviews, and coordinate interactions between DNFSB’s staff and the DOE sites for which they are assigned responsibility.

A DNFSB manager said a process that would allow current headquarters staff to travel to the DOE sites for candidate development purposes would help headquarters staff gain a better understanding of the sites and facilitate their appreciation for the resident inspector role. A resident inspector said that a program where potential resident inspectors could shadow current resident inspectors would help the candidate determine if this is the type of work they want to do and whether that individual is a good fit for the position. Another resident inspector said having the right personality matters, particularly when working with DOE and its contractors.

#### Grant Thornton Assessment

DNFSB hired the advisory firm, Grant Thornton, to perform a diagnostic review of its agencywide internal control program and a risk assessment of its work processes. In July 2016, Grant Thornton issued its *Assessment of the Board's Internal Control Program and Work Processes* report. The report found an internal control deficiency rooted in DNFSB's failure to maintain a succession plan. The report noted there is no formal documented plan to transfer responsibilities to another individual once an employee leaves.

### ***Why This Is Important***

#### **DNFSB Could Face a Gap in Oversight at a DOE Defense Nuclear Site**

DNFSB's ability to effectively oversee DOE sites may be negatively affected as the agency does not have a process in place to consistently backfill resident inspector positions in a timely manner. This could result in a gap in oversight at DOE defense nuclear sites for lengthy periods of time, and consequently, resident inspectors may not be present to oversee major site activities.



## Historical Resident Inspector Staffing Issues

OIG asked DNFSB to provide the resident inspector history for each DOE site within the last 10 years. Based on this data, OIG found that three of the six sites with resident inspectors were short-staffed for an average of nearly 13 months, with Pantex Plant and Lawrence Livermore<sup>8</sup> in particular going through long periods of time of not being fully staffed.

### **Resident Inspector Vacancies from 2007 – 2016**

#### **Pantex Plant\***

- July 2012 – February 2015: 1 resident inspector
- March 2015 – July 2015: No resident inspectors
- August 2015 – March 2016: 1 resident inspector

#### **Lawrence Livermore National Laboratory**

- September 2007 – May 2009: No resident inspectors

#### **Y-12 National Security Complex**

- August 2012 – October 2012: 1 resident inspector

\*DNFSB initiated a watch bill from March 2015 through December 2015.

At Pantex, watch bills were initiated from March 2015 through July 2015 when there were no resident inspectors, and again from August 2015 through December 2015 to assist the new resident inspector. Nonetheless, there was a total period of 3 years and 3 months where there was only one resident inspector at Pantex over the last 10 years.

For approximately 6 years and 6 months, DNFSB decided to station a resident inspector at Lawrence Livermore National Laboratory. During that time however, Lawrence Livermore had a resident inspector vacancy of 1 year and 8 months due to the sudden resignation of a resident inspector and DNFSB's inability to fill the position.

In 2012, Y-12 National Security Complex had only one resident inspector for 3 months. A DNFSB employee who experienced being the single resident inspector at a site said there were challenges relative to being the only resident inspector, and that it was impossible to cover the entire site and write the weekly reports.

<sup>8</sup> DNFSB formerly had 11 total resident inspectors. The eleventh resident inspector was assigned to the Lawrence Livermore National Laboratory site in January 2007. In August 2013, DNFSB closed the Lawrence Livermore National Laboratory site office, which resulted in the current resident inspector configuration of 10 total resident inspectors.

Without a formalized process to prepare and develop potential resident inspector candidates, DNFSB is not prepared to effectively handle an unforeseen resident inspector departure. As the Grant Thornton report stated, the lack of a formal plan to transfer responsibilities to another individual once an employee leaves poses a strategic risk to DNFSB and could cause confusion and inefficiencies within the organization. Having a pool of headquarters employees with the requisite skills and abilities to successfully perform the resident inspector position is highly important as the resident inspectors are the “eyes and ears” of DNFSB headquarters at the DOE sites, and they play an integral role in the oversight of DOE defense nuclear facilities.

### **Recommendations**

OIG Recommends that DNFSB

1. Design and implement a formalized, systematic process to develop and prepare candidates for the resident inspector position.

## **B. Lack of Board Transparency in Resident Inspector Location and Staffing Decisions**

DNFSB is not transparent in how it determines which defense nuclear sites will have resident inspectors. DNFSB should conduct operations transparently; however, there is no formal process for determining the number and location of resident inspectors. Consequently, a lack of a transparent process may result in a loss of stakeholder<sup>9</sup> confidence.

### ***What Is Required***

#### **DNFSB Should Conduct Operations Transparently**

DNFSB should conduct operations in a manner that is accountable and transparent. Through leadership and operational processes, the Board should engender an organizational culture that strives for the highest standards of integrity, efficiency, effectiveness, and transparency.

### ***What We Found***

#### **DNFSB Is Not Transparent in How it Determines Which Defense Nuclear Sites Will Have Resident Inspectors**

DNFSB's resource planning process involves technical staff submitting an agency staffing plan to the Board members. The staffing plan must include, among other things, the number and location of resident inspectors stationed at DOE sites. The Board members then vote to approve or disapprove the recommended plan, thereby weighing in on maintaining the status quo or making changes to the number and location of resident inspectors. However, the Board members typically do not make the basis for their decisions to approve or disapprove the staffing plan transparent.

Several DNFSB staff (including resident inspectors) and DOE personnel do not know how DNFSB determines which DOE sites are assigned

<sup>9</sup> For the purposes of this audit, stakeholders refers to the general public, DNFSB staff, DOE personnel, and congressional members and their staff.

resident inspectors and the number of resident inspectors each site is assigned. DNFSB and DOE personnel speculated that it is based on tradition, the site's hazard level, and the amount of operational activity within the facilities at the various DOE sites. However, the Board usually does not make its decision making process or the rationale behind the current resident inspector configuration transparent to stakeholders.

### *Why This Occurred*

#### **There Is No Formal Process for Determining the Number and Location of Resident Inspectors**

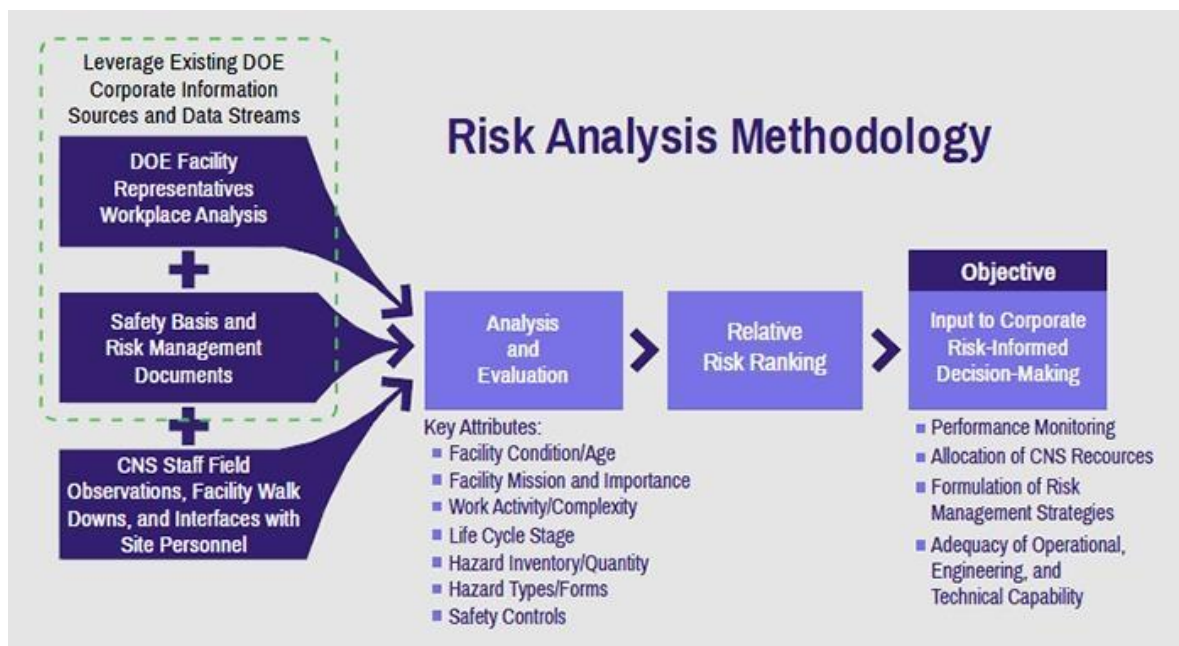
A resident inspector guidance document assigns the Deputy Technical Director with the responsibility of assessing the deployment of resident inspectors on an annual basis and recommending changes to the Technical Director as warranted. While DNFSB does perform a review of resident inspector staffing and locations, that review is not conducted by means of a formal methodology or risk analysis. Thus, DNFSB is not able to be transparent with its resident inspector staffing decisions because it does not have a formal resident inspector staffing process. Additionally, in cases where the Board members review the staffing plan and vote against staff's recommendations, there is no formal requirement that the Board members explain their reasoning for issuing a dissenting vote.

#### **DOE Facility Risk Ranking**

Unlike DNFSB, DOE uses a formula to develop a facility risk ranking used to determine its resource allocation and how much DOE coverage is required at the various DOE facilities. The facility ranking process addresses important nuclear facility attributes identified for operational safety and for establishing the facility safety basis. The operational safety attributes include type and magnitude of facility hazards, material conditions, operation complexity, programmatic importance, and operational rigor. The facility ranking process also addresses hazards and safety controls identified in the facility safety basis documents. The safety basis review process engages DOE headquarters personnel with nuclear safety personnel from the site and provides a forum for increased understanding of the facilities and their current state of condition and

operation as well as their safety basis information. All of this information is developed into a facility ranking methodology to prioritize DOE nuclear facilities.

The graphic below shows a simplified flowchart of DOE's risk ranking process.



Source: DOE Strategic Planning Meeting PowerPoint



## *Why This Is Important*

### **A Lack of a Transparent Process May Result in a Loss of Stakeholder Confidence**

Without a transparent process for determining the number and location of resident inspectors, DNFSB may lose stakeholder confidence. For example, a DOE manager questioned why the Nevada National Security Site<sup>10</sup> does not have any resident inspectors when it has

over 2 tons of nuclear material located there. Another DOE manager opined that the accident at the Waste Isolation Pilot Plant<sup>11</sup> would not have occurred if DNFSB had a resident inspector stationed there. The manager questioned how DNFSB determines where to place its resident inspectors. The recent incident at the Hanford Site<sup>12</sup> could also raise questions from stakeholders concerning resident inspector staffing decisions. A congressional staffer told OIG that having more transparency into the Board's decision making process regarding resident inspector locations and staffing would be helpful.

Photo of Waste Isolation Pilot Plant Operations



Source: DOE Flickr Web site

---

<sup>10</sup> The Nevada National Security Site is an NNSA site located outside of Las Vegas, NV. It is an extensive outdoor laboratory and national experiment center. Activities at the site include preparations for the disposition of damaged nuclear weapons, subcritical experiments, criticality experiments, emergency response training, and waste management.

<sup>11</sup> The Waste Isolation Pilot Plant is a DOE site located in Carlsbad, NM. It is an underground repository licensed to safely and permanently dispose of transuranic radioactive waste left from the research and production of nuclear weapons. In February 2014, a drum of nuclear waste burst open causing a release of radioactive material into the environment. This explosion contaminated 21 people with low-level radioactivity.

<sup>12</sup> On May 9, 2017, the DOE Richland Operations Office declared an emergency at the Hanford site after a cave-in of a 20-foot section of an underground tunnel that is used to store contaminated material. The resident inspectors at Hanford worked closely with DNFSB headquarters and DOE site personnel to provide real-time evaluation of DOE's response to the accident. No contamination was detected following the cave-in.

While it is uncertain if having resident inspectors stationed at the Nevada National Security Site is necessary, or if having resident inspectors stationed at the Waste Isolation Pilot Plant would have prevented the accident, establishing a transparent process for resident inspector staffing decisions would provide an explanation to stakeholders as to how DNFSB determines where to station its resident inspectors, as well as the justification behind those determinations. As one of DNFSB's visions from its Strategic Plan is to conduct operations "in a manner that is accountable and transparent," the agency should adhere to this commitment when determining resident inspector site and staffing decisions. Operating in such a manner would also serve to enhance stakeholder confidence in DNFSB's ability to effectively oversee DOE's defense nuclear facilities.

### **Recommendations**

OIG recommends that DNFSB

2. Develop and implement a formal, transparent process for annually determining which defense nuclear sites will have resident inspectors, along with the staffing of those sites.

---

## **IV. CONSOLIDATED LIST OF RECOMMENDATIONS**

---

OIG recommends that DNFSB

1. Design and implement a formalized, systematic process to develop and prepare candidates for the resident inspector position.
2. Develop and implement a formal, transparent process for annually determining which defense nuclear sites will have resident inspectors, along with the staffing of those sites.

---

## **V. BOARD COMMENTS**

---

An exit briefing was held with the agency on May 25, 2017. Prior to this meeting, DNFSB management reviewed a discussion draft and later provided comments that have been incorporated into this report as appropriate. As a result, DNFSB management stated their general agreement with the findings and recommendations of this report and chose not to provide formal comments for inclusion in this report.

---

## OBJECTIVE, SCOPE, AND METHODOLOGY

---

### Objective

The audit objective was to determine whether the Resident Inspector Program provides for the necessary onsite oversight of DOE defense nuclear facilities to adequately fulfill DNFSB's mission.

### Scope

This audit focused on evaluating whether DNFSB's Resident Inspector Program provides for the necessary onsite oversight of DOE defense nuclear facilities to adequately fulfill DNFSB's mission. We conducted this performance audit at DNFSB headquarters (Washington, D.C.) and various DOE sites from October 2016 to April 2017. Internal controls related to the audit objective were reviewed and analyzed. Throughout the audit, auditors considered the possibility of fraud, waste, or abuse in the program.

### Methodology

OIG reviewed relevant criteria for this audit, including, but not limited to:

- "Enabling Statute of the Defense Nuclear Safety Board (DNFSB)," 42 U.S.C. § 2286 et seq.
- NUREG-0980, Volume 1, Number 10, "Nuclear Regulatory Legislation 112th Congress; 2nd Session."
- Government Accountability Office *Standards for Internal Control in the Federal Government*.
- DOE Manual 140.1-1B, "Interface with the Defense Nuclear Facilities Safety Board."
- The Defense Nuclear Facilities Safety Board Strategic Plan for Fiscal Years 2014-2018.



OIG also identified and reviewed DNFSB's internal controls such as its instructions, work practices, operating procedures, directives, as well as DOE orders and a standard to identify available guidance relating to oversight of the Resident Inspector Program. In addition, OIG reviewed past audit and evaluation work pertaining to DNFSB's internal control program conducted by the Government Accountability Office and Grant Thornton. OIG found that DNFSB is compliant with relevant laws and regulations.

Audit work was conducted by performing fieldwork and interviews with individuals located in the Washington D.C. metro area. For example, the audit team interviewed staff and management at DNFSB headquarters to gain an understanding of the Resident Inspector Program. The audit team also interviewed pertinent congressional staff as well as staff from DOE.

Additionally, audit team members traveled to Hanford, Los Alamos National Laboratory, Pantex Plant, Savannah River Site, and Y-12 National Security Complex/Oak Ridge National Laboratory to shadow and interview the resident inspectors, as well DOE and NNSA management onsite.

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 Sherri Miotla, Team Leader; Michael Blair, Audit Manager; John Thorp, Senior Technical Advisor; Regina Revinzon, Auditor; and Meredith Johnson, Management Analyst.

---

## TO REPORT FRAUD, WASTE, OR ABUSE

---

### Please Contact:

Email: [Online Form](#)

Telephone: 1-800-233-3497

TTY/TDD: 7-1-1, or 1-800-201-7165

Address: U.S. Nuclear Regulatory Commission  
Office of the Inspector General  
Hotline Program  
Mail Stop O5-E13  
11555 Rockville Pike  
Rockville, MD 20852

---

## COMMENTS AND SUGGESTIONS

---

If you wish to provide comments on this report, please email OIG using this [link](#).

In addition, if you have suggestions for future OIG audits, please provide them using this [link](#).