



Audit of the U.S. Nuclear Regulatory Commission's Recruiting and Retention Activities

OIG-NRC-25-A-03
December 18, 2024



All publicly available OIG reports, including this report, are accessible through the OIG's website at:
nrcoig.oversight.gov



MEMORANDUM

DATE: December 18, 2024

TO: Mirela Gavrilas
Executive Director for Operations

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

SUBJECT: AUDIT OF THE U.S. NUCLEAR REGULATORY
COMMISSION'S RECRUITING AND RETENTION
ACTIVITIES (OIG-NRC-25-A-03)

Attached is the Office of the Inspector General's (OIG) audit report titled: *Audit of the U.S. Nuclear Regulatory Commission's Recruiting and Retention Activities*.

The report presents the results of the subject audit. Following the November 18, 2024, exit conference, agency staff indicated that they had no formal comments for inclusion in this report.

Within 30 days of the date of this memorandum, please provide information on actions taken or planned on each of the recommendations.

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 301.415.1982, or Paul Rades, Team Leader, at 301.415.6228.

Attachment:
As stated

cc: J. Martin, ADO
S. Miotla, DADO
J. Jolicoeur, OEDO



Results in Brief

Why We Did This Review

In preparation for the predicted influx of new reactor licensing requests, the NRC aimed to hire 400 new employees in FY 2023. This hiring goal was instituted to meet an anticipated increase in staffing requirements arising out of, in part, many years of limited hiring due to budget restrictions. Recruitment and retention are critical because one-third of the NRC's staff is retirement-eligible.

OCHCO is primarily tasked with recruitment and retention activities.

The audit objective was to assess the NRC's effectiveness in recruiting and retaining staff to address critical skills shortfalls.

Audit of the U.S. Nuclear Regulatory Commission's Recruiting and Retention Activities

OIG-NRC-25-A-03

December 18, 2024

What We Found

The U.S. Nuclear Regulatory Commission (NRC) is effective at retaining staff to address critical skills shortfalls; however, staff recruitment could be improved. The OIG determined the NRC's retention activities were effective through review of Federal Employee Viewpoint Survey results, Resident Inspector surveys, and surveys of employees leaving the NRC who provide input into the Recruitment Activity Tracking System. Additionally, the NRC has maintained attrition rates at or below the federal government rate of 7 to 9 percent. However, the OIG identified problems related to recruitment data and time-to-hire performance.

Specifically, NRC management should use quality information to achieve the agency's goals; however, the OIG determined that information in the agency's Workforce Transformation Tracking System (WTTS) is incomplete and unreliable. This occurred because the Office of the Chief Human Capital Officer (OCHCO) staff lacked appropriate guidance for maintaining WTTS data reliability. As a result, OCHCO management cannot make effective hiring decisions from the incomplete and unreliable data.

In addition, the NRC could improve hiring timeliness to better align with Office of Personnel Management (OPM) standards. The OPM's time-to-hire metric for federal agencies is 80 days. During fiscal year (FY) 2023, the NRC took an average of 148 days to hire. This occurred because human resource (HR) specialists lack sufficient HR support personnel and must navigate a cumbersome hiring process. Longer hiring times mean the NRC has longer vacancies and risks losing applicants to other offers.

What We Recommend

The report makes five recommendations to improve WTTS data and improve the NRC's time-to-hire performance.

TABLE OF CONTENTS

<u>ABBREVIATIONS AND ACRONYMS</u>	iii
I. <u>BACKGROUND</u>	1
II. <u>OBJECTIVE</u>	6
III. <u>FINDINGS</u>	6
1. WTTS Information Is Incomplete and Unreliable	6
2. The NRC's Time-to-Hire Could Be Improved	10
IV. <u>CONSOLIDATED LIST OF RECOMMENDATIONS</u>	14
V. <u>NRC COMMENTS</u>	15
 APPENDIX	
<u>OBJECTIVE, SCOPE, AND METHODOLOGY</u>	16
<u>TO REPORT FRAUD, WASTE, OR ABUSE</u>	18
<u>COMMENTS AND SUGGESTIONS</u>	18
<u>NOTICE TO NON-GOVERNMENTAL ORGANIZATIONS AND BUSINESS ENTITIES SPECIFICALLY MENTIONED IN THIS REPORT</u>	18

ABBREVIATIONS AND ACRONYMS

E2E	End-to-End
FY	Fiscal Year
HR	Human Resources
NRC	U.S. Nuclear Regulatory Commission
OCHCO	Office of the Chief Human Capital Officer
OIG	Office of the Inspector General
OPM	Office of Personnel Management
PD	Position Description
WTTS	Workforce Transformation Tracking System

I. BACKGROUND

The NRC's goal is to maintain a highly qualified workforce through recruitment and retention of staff, with an emphasis on entry- and mid-career level hiring to address projected attrition and to prepare for an anticipated increasing workload in future years. Recruitment and retention are critical because one-third of the NRC's staff is retirement-eligible.

OCHCO's mission is to provide leadership, guidance, and support to NRC staff and management in attracting, developing, and retaining a high-performing, agile workforce to support the agency's mission. This is especially important because the NRC's FY 2024 budget request included \$105 million for work related to new reactors. The work for new reactors includes the development of a new regulatory licensing framework, numerous pre-application activities, and technical reviews associated with several licensing activities. The increased workload will require staff that the NRC does not currently have.

During FY 2023, the NRC aimed to hire 400¹ new employees to meet anticipated retirements and to increase the agency's staffing after many years of limited hiring due to budget restrictions. Table 1 shows the results of the NRC's efforts for that year.

Table 1: FY 2023 Recruitment and Retention Data

Employees Onboard (start)	External Hires	Separations	Employees Onboard (end)	Budgeted FTE
2,640	281	199	2,722	~2,880

Source: OIG created from the OCHCO Dashboard

NRC Recruitment

The NRC is an excepted service agency. Excepted service positions are federal or civil service positions which are not in the competitive service or the Senior Executive Service. Excepted service agencies set their own qualification requirements and are not subject to the appointment, pay, and classification rules in Title 5, United States Code, *Government Organization and Employees*. In the competitive service, individuals must go through a competitive hiring process before being appointed to a position; once in a

¹ [U.S. Nuclear Regulatory Commission, Transcript - Briefing on Human Capital and Equal Employment Opportunity, June 2023.](#)

competitive-service position, the individuals are subject to the applicable rules in Title 5.

According to the Atomic Energy Act of 1954, as amended, NRC positions are excepted from the competitive service but operate as a competitive merit system based upon the principles of open competition and equitable consideration against uniform standards. Additionally, Management Directive 10.1, *Recruitments, Appointments, and Merit Staffing*, states the NRC operates a competitive merit system that embodies the principles of open competition and equitable consideration against uniform standards even though most NRC positions are excepted from the competitive service.

The Hiring Process

The WTTS² is a workforce management tool for HR specialists to track applicants as they move through the hiring process. The WTTS uses an identification code that connects to a vacancy posting to help track progress and dates.

Hiring is a multifaceted process involving eight distinct steps, from identifying a position to job offer acceptance. The hiring process begins with identifying a position that needs to be filled. Next, the selecting official and HR specialist prepare the position description (PD) (if one does not exist),³ the rating factors, and the crediting plan. Then, the selecting official (with the HR specialist's help) decides on the best options to fill the vacancy, considering factors such as whether the vacancy should be competitive or non-competitive and whether the competitive option will be internal only or internal and external. The selecting official also selects the rating official/panel. Once the selecting official determines the best hiring options, the HR specialist can prepare and post the vacancy announcement.

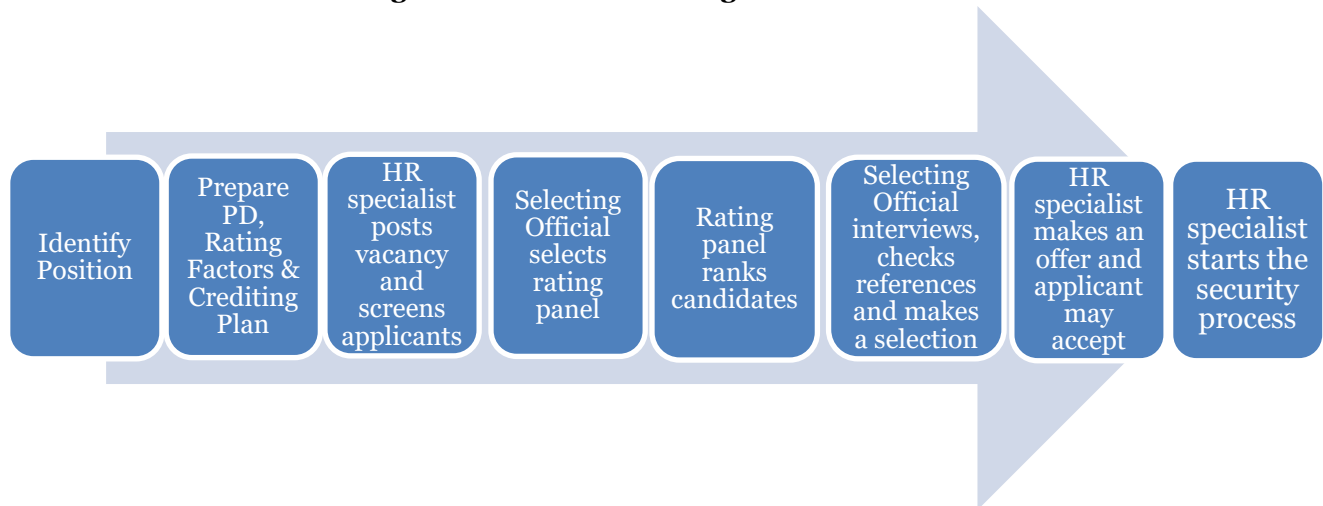
After receiving applications, the HR specialist screens the applicants for eligibility and minimum qualifications. The panel ranks the qualified candidates and sends the selecting official a list of the best-qualified candidates. The selecting official reviews the applications, conducts interviews, checks references, and makes a selection. The HR specialist makes a job offer, and after the applicant accepts the offer, the applicable

² The WTTS is managed by the U.S. Department of the Interior.

³ In the event there is not an existing position description, the HR specialist determines if the created position description needs to be classified.

information is sent to the Personnel Security Branch to start the security clearance process. Figure 1 illustrates the NRC hiring process.

Figure 1: The NRC's Hiring Process



Source: OIG created from OCHCO flowchart

NRC's Recruitment and Retention Activities

Recruitment Activities

The NRC recruits entry-level and experienced staff from various recruitment events and job postings on USAJobs. For example, the NRC attended over 50 recruitment events in FY 2023, which included universities and college job fairs, industry hiring events, and the NRC's own hiring expo. The NRC's recruitment activities may start while an applicant is still in school. Specifically, the NRC offers students a Temporary Summer Student Program and a Co-Op Education Program. Recent graduates can join the NRC's Nuclear Regulator Apprenticeship Program or its Honor Law Graduate Program.

Retention Activities

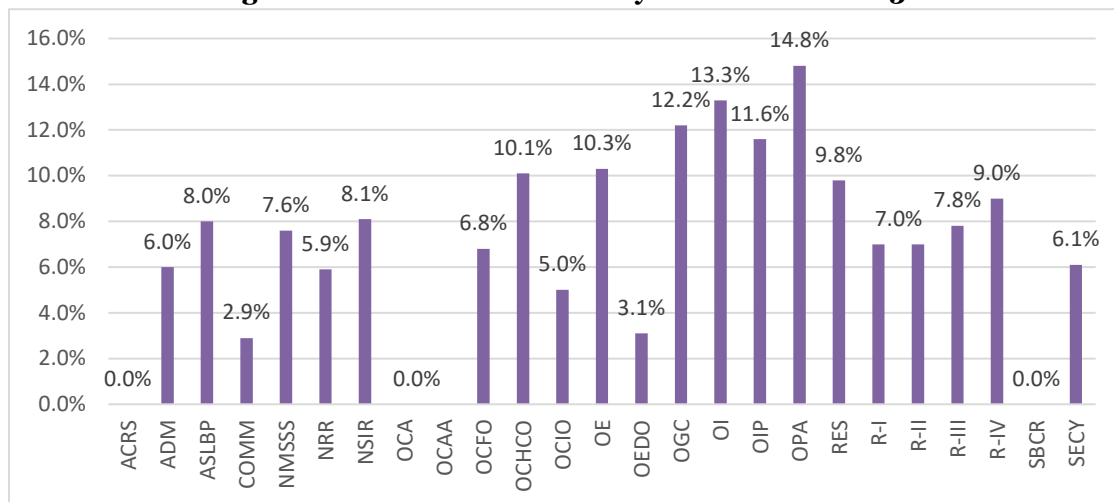
Retention activities aim to keep employees motivated and focused so that they stay with the NRC and remain productive for the benefit of the agency. These activities can reduce turnover and its related costs and help the agency retain employees with specialized competence. Notable retention measures include the NRC's salary advancement process, flexible work schedule, telework, transit and childcare subsidies, insurance, leave and holidays, training and

development opportunities, tuition reimbursement, performance awards, and employee assistance programs.

FY 2023 Data

In FY 2023, the NRC had 199 separations and an attrition rate of 7.4 percent. The attrition rate for the federal government is 7 to 9 percent, and, according to benchmarking, attrition rates under 10 percent are considered manageable; therefore, the NRC attrition rate is reasonable. However, the attrition rates vary by office, with some above the ‘manageable’ 10 percent, while others are well below that mark. Similarly, there is variance in the attrition rates viewed by occupational series. Figure 2 below shows the attrition rates for the various NRC offices in FY 2023.

Figure 2: NRC Attrition Rate by Office for FY 2023

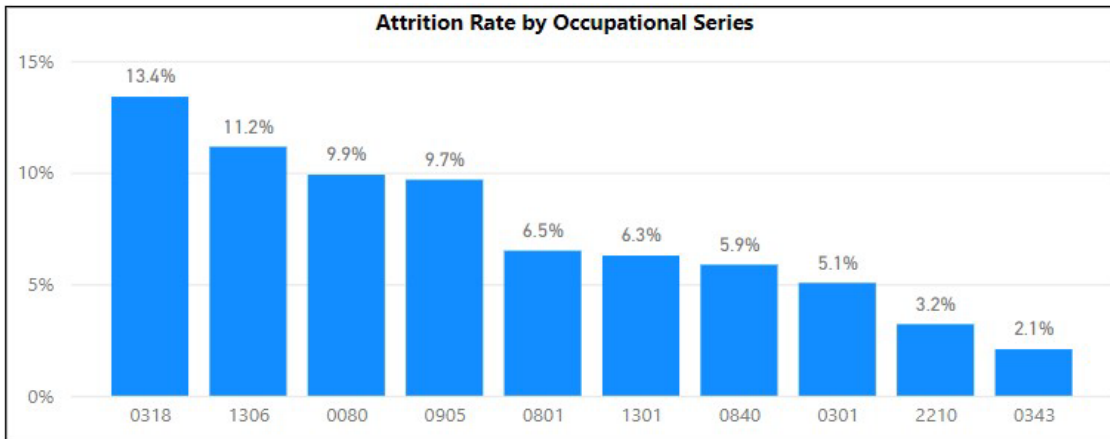


Source: OIG analysis of the OCHCO Dashboard

Additionally, Figure 3 below shows the 10 job-series with the highest external attrition rates during FY 2023.⁴ Notice that only the administrative assistant and health physics series had attrition rates of over 10 percent.

⁴ In figure 3, the job series codes are: 0318 - Secretary; 1306 - Health Physics; 0080 - Security Administration; 0905 - General Attorney; 0801 - General Engineering; 1301 - General Physical Science; 0840 - Nuclear Engineering; 0301 - Miscellaneous Administration and Program; 2210 - Information Technology Management; and, 0343 - Management and Program Analysis.

Figure 3: NRC Occupational Series with Highest Attrition Rates in FY 2023



Source: OCHCO Dashboard

II. OBJECTIVE

The audit objective was to assess the NRC's effectiveness in recruiting and retaining staff to address critical skills shortfalls.

III. FINDINGS

The NRC is effective at retaining staff to address critical skills shortfalls; however, staff recruitment could be improved. The OIG determined the NRC's retention activities were effective through review of Federal Employee Viewpoint Survey results, Resident Inspector surveys, and surveys of employees leaving the NRC who provided input into the Recruitment Activity Tracking System. Additionally, the NRC has maintained attrition rates at or below the federal government rate of 7 to 9 percent. However, the OIG identified problems related to recruitment data and time-to-hire performance.

1. WTTS Information Is Incomplete and Unreliable

Management should use quality information to achieve the agency's goals; however, the OIG determined that the information in the WTTS is incomplete and unreliable. This occurred because OCHCO staff lacked appropriate guidance for maintaining WTTS data reliability. As a result, OCHCO management cannot make effective hiring decisions from the incomplete and unreliable data.

What Is Required

Management Should Use Quality Information to Achieve the Agency's Objectives

According to the Government Accountability Office's *Standards for Internal Control in the Federal Government*,⁵ management must use quality information to make informed decisions and evaluate the entity's performance in achieving key objectives and addressing risks. Quality

⁵ [U. S. Government Accountability Office, *Standards for Internal Control in the Federal Government*, GAO-14-704G, September 2014.](#)

information is defined as information that is appropriate, current, complete, accurate, accessible, and provided on a timely basis.

In addition, management should design control activities over the information technology infrastructure to support the completeness, accuracy and validity of information processing by the information technology. Completeness means that transactions that occur are recorded and not understated.

What We Found

Key WTTS Data Is Incomplete and Unreliable

The OIG reviewed WTTS data from FY 2023 and found problems with data completeness that could render the data unreliable for management decision-making purposes. The OIG reviewed two reports for FY 2023, that use the WTTS information, the “End-to-End (E2E) Report” and the “Declinations Report.”

First, the OIG pulled the E2E Report, which shows data on the time-to-hire for all NRC hires. The OIG was able to filter this report to show only the data for external hires for FY 2023. The E2E Report recorded time-to-hire data for approximately 65 percent of external hires. Consequently, the report showed no time-to-hire for nearly 35 percent of the other external hires in FY 2023.

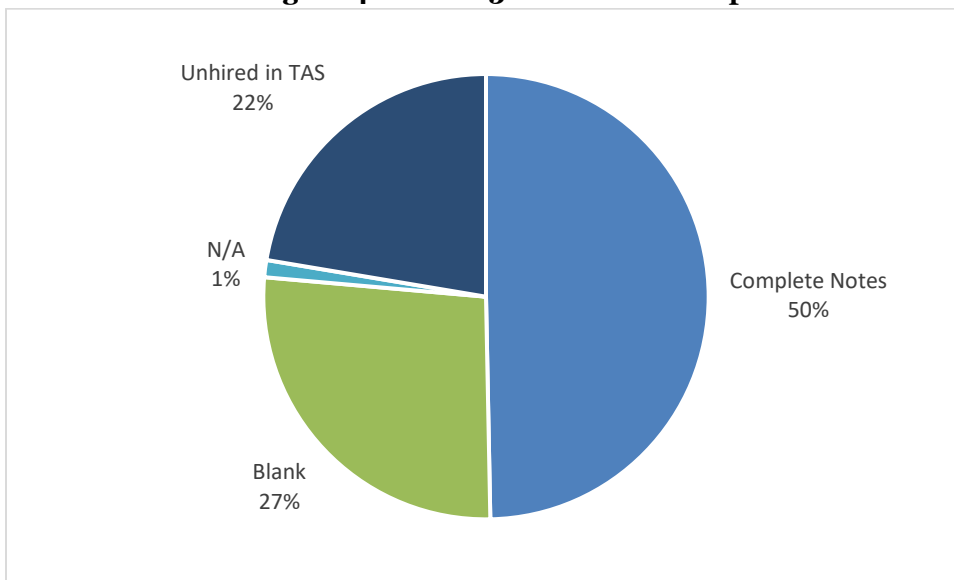
Furthermore, the time-to-hire data only indicates whether there is a date at the start (identification of a need) and the end of the process (at entrance on duty). As part of the hiring process, however, additional data, such as dates for the various intermediate hiring steps, should be documented more fully. These data could prove valuable in evaluating the NRC’s performance throughout the various stages of the hiring process. One area of incomplete documentation involved variability in the completeness of these different data fields. For example, the “date that a tentative offer was made” was documented 87 percent of the time, while the “date the package was sent to security” was complete only 52 percent of the time.

The OIG also reviewed the “Declinations Report” and found missing information. The Declinations Report differs from the E2E Report and uses the data the NRC’s HR specialists manually enter into the WTTS. The Declinations Report documents the reasons for applicants declining offers,

while the E2E Report tracks the hiring process with dates when steps are started and completed. The WTTS allows an HR specialist to select the declination type from a preset list and provides a notes section to document additional information. The preset list provides the reasons why potential hires declined an NRC offer, including finding the position unsuitable, salary, location, or other reasons.

For FY 2023, the Declinations Report listed 161 candidates. In the notes section, 43 (27 percent) of the entries were blank; 36 (22 percent) noted “unhired in TAS”;⁶ and 2 (1 percent) noted “n/a.” The NRC thus lacked vital information for 81 (50 percent) of the 161 declinations. An NRC official explained that the information in the report can only be as good as the information provided by the applicant who declined the NRC offer. However, the FY 2023 Declinations Report did not have any entries noting that an applicant declined to provide a reason for a declination. Figure 4 shows the types of data available in the FY 2023 Declinations Report.

Figure 4: FY 2023 Declinations Report Data



Source: OIG analysis of WTTS data

⁶ “Unhired in TAS” means the selectee was unhired in Monster (the online website). Once a selectee declines the NRC’s offer, the HR specialist “unhires” them in Monster, and the information is relayed into the WTTS.

Why This Occurred

OCHCO Guidance Lacks Current and Consistent Instructions for WTTS Data Collection

The HR specialists the OIG contacted during our audit stated that the Annual Hiring Guidance (guidance) had not been updated and there were frequent changes regarding WTTS data collection. The HR specialists explained that the guidance should be updated frequently enough to reflect the current data collection requirements.

Furthermore, OCHCO's quality control process involved HR specialists reviewing the work of other HR specialists and sometimes their own work. To improve the overall hiring process and perform more comprehensive reviews of the HR specialists' work, OCHCO created a quality control team in April 2024. However, this new quality control team will require training and guidance on OCHCO's quality control process to efficiently perform its duties.

Why This Is Important

WTTS Data Lack Information to Support Management Decisions

Incomplete and unreliable WTTS information impedes the ability of OCHCO management to make informed decisions. The WTTS data contained missing data fields and other anomalies, thereby compromising its reliability for use in assessing the effectiveness of the NRC's hiring process. Incomplete and unreliable data in the E2E report limits OCHCO management's ability to assess the hiring process by part or job series. When complete, the data in the E2E report could explain which parts of the hiring process are problematic or whether a particular job series takes longer to hire than others. In addition, OCHCO management lacks all the data needed to help them understand factors that negatively affect recruitment.

Recommendations

The OIG recommends that the Executive Director for Operations:

- 1.1 Develop data quality controls for the WTTS, create/update detailed guidance for implementing these controls, and train staff to perform these controls properly, especially with regard to the dates and

information expected in key WTTS data fields.

- 1.2 Update the format of WTTS reports to ensure they clearly capture the information required for internal reviews and external reporting.

2. The NRC's Time-to-Hire Could Be Improved

The OPM's time-to-hire metric⁷ for federal agencies is 80 days. On average, the NRC's time-to-hire metric was 148 days in FY 2023. This occurred because HR specialists lack sufficient HR support personnel and must navigate a cumbersome process. Longer hiring times mean the NRC has longer vacancies and risks losing applicants to other offers.

What Is Required

The OPM Time-to-Hire Metric Is 80 Days

The OPM hiring metric is 80 days. The metric starts when a need is identified and ends at the entrance on duty date. The metric is a goal, not a formal requirement for agencies. It is not expected that all agencies will immediately meet the 80-day timeline established by the OPM; however, agencies are expected to set aggressive improvement targets, work towards the timeline over the program year, and evaluate their progress to continue moving toward the standards established by the OPM.

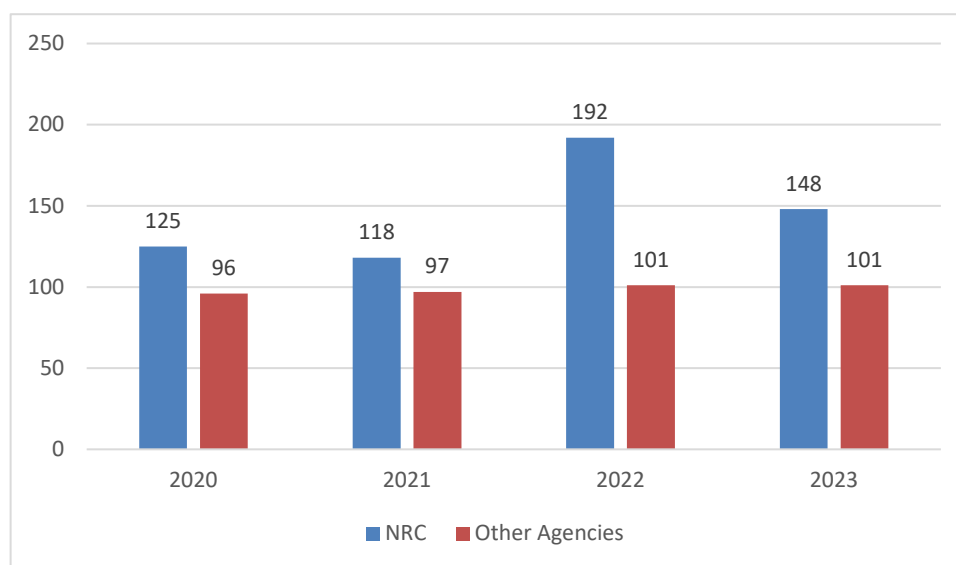
What We Found

The NRC's Time-to-Hire Metric Performance Could Be Improved

The NRC's time-to-hire metric in FY 2023 was 148 days, while the rest of the federal government averaged 101 days. The NRC ranked 23 out of 24 across mid-sized agencies for this metric. Figure 5 shows the average time-to-hire for the NRC compared to other mid-sized federal agencies for FYs 2020 through 2023.

⁷ The OPM's *End-to-End Hiring Initiative* sets a goal of 80 days for hiring in the federal government. This metric begins with the identification of a position that needs to be filled and ends on the selectee's entry on duty date. The time from identification to entrance on duty is called the time-to-hire.

Figure 5: NRC Time-to-Hire Compared to Other Agencies



Source: OIG analysis of OPM HR Insights Dashboard data

Why This Occurred

HR Specialists Are Overburdened, and the Hiring Process Could Be Improved

Both HR specialists and hiring managers stated that the HR specialists' workload is high due to turnover, increased hiring and movements⁸ at the NRC, the time required to bring HR specialists trained and up to speed, and the work split between the HR specialists and the selecting official.

The OIG determined that, in recent years, OCHCO has experienced high turnover and HR specialists have become overburdened as a result. The issue was exacerbated when the NRC decided to increase its hiring efforts, thereby further overburdening HR specialists. While OCHCO's increase in hiring has lessened this problem, new hires require time to become fully proficient. The NRC's hiring process differs from other agencies' processes because the NRC's positions are excepted service positions, not subject to the same appointment, pay, and classification rules as competitive service positions codified under Title 5 of the United States Code. This difference often requires HR specialists to spend extra time to learn the process. One HR specialist noted that it can take two years to get accustomed to "the NRC way" of doing business. HR specialists noted that updating guidance and providing

⁸ Movements, in this case, refers to NRC staff moving within the agency to fill positions instead of hiring externally. This would include reassignments, rotations, and responses to solicitations of interest.

appropriate training could help new HR specialists more quickly become proficient at their job functions.

The OIG found that the assignment of roles and responsibilities to HR specialists and hiring managers may unnecessarily burden the HR specialists. HR specialists have many responsibilities, and only some of those responsibilities relate to hiring. Within the hiring space, the HR specialists also have many ancillary duties, such as keeping the hiring managers up-to-date on the status of hiring actions. These additional liaising duties can be burdensome for HR specialists, depending on the number of hiring actions currently ongoing in the HR specialist's assigned office or offices. HR specialists must assume these duties because hiring managers do not have access to the WTTS and must contact their HR specialists each time they want an update on their hiring action.

The OIG learned about another issue from a former HR specialist. This person noted that it took 35 minutes just to update the hiring information for one action in all the systems (Monster, the WTTS, and the Federal Personnel & Payroll System). While updating these systems is a part of the HR specialist's role, it may not be evident to other parties how burdensome this process can be, especially for new HR specialists or those assigned to large offices with many hiring actions and movements.

The OIG contacted the OPM regarding the NRC's time-to-hire metric and requested feedback on how it could be improved. The OPM suggested that the NRC should expand its use of excepted-service capabilities, which could improve the agency's time-to-hire performance by eliminating or reducing some competitive hiring requirements from its hiring process.

Why This Is Important

Longer Hiring Times Can Adversely Impact Agency Performance and Recruiting

Longer hiring times result in job vacancies remaining unfilled for longer periods. This can be particularly problematic for offices that are already overburdened or short-staffed, causing adverse impacts on productivity, institutional knowledge, and morale. Additionally, performance gaps may emerge as new employees lack necessary skills to execute the agency's mission without extensive guidance and support from more experienced staff.

Additionally, longer hiring times allow more time for other organizations to make competing offers to NRC job applicants, who may then choose more timely or lucrative offers from other organizations.

Recommendations

The OIG recommends that the Executive Director for Operations:

- 2.1. Update guidance and ensure that all OCHCO staff take appropriate training regarding the hiring process. This training should include refresher training.
- 2.2. Develop procedures and adjust the functions/tasks between the HR specialists and hiring managers to better balance the workload among the staff.
- 2.3. Develop plans to expand the use of the NRC's excepted service authority.

IV. CONSOLIDATED LIST OF RECOMMENDATIONS

The OIG recommends that the Executive Director for Operations:

- 1.1. Develop data quality controls for the WTTS, create/update detailed guidance for implementing these controls, and train staff to perform these controls properly, especially with regard to the dates and information expected in key WTTS data fields;
- 1.2. Update the format of WTTS reports to ensure they clearly capture the information required for internal reviews and external reporting;
- 2.1. Update guidance and ensure that all OCHCO staff take appropriate training regarding the hiring process. This training should include refresher training;
- 2.2. Develop procedures and adjust the functions/tasks between the HR specialists and hiring managers to better balance the workload among the staff; and,
- 2.3. Develop plans to expand the use of the NRC's excepted service authority.

V. NRC COMMENTS

The OIG held an exit conference with the agency on November 18, 2024. Before the exit conference, agency management reviewed and provided comments on the discussion draft version of this report, and the OIG discussed these comments with the agency during the conference. Following the conference, agency management stated their general agreement with the findings and recommendations in this report and opted not to provide additional comments. The OIG has incorporated the agency's comments into this report, as appropriate.

OBJECTIVE, SCOPE, AND METHODOLOGY

Objective

The audit objective was to assess the NRC's effectiveness in recruiting and retaining staff to address critical skills shortfalls.

Scope

This audit focused on determining whether the NRC's recruitment and retention practices effectively support its ability to accomplish its mission. We conducted this performance audit at NRC headquarters in Rockville, Maryland, from November 2023 to June 2024.

Internal controls related to the audit objective were reviewed and analyzed. Specifically, the OIG reviewed the components of the control environment, risk assessments, control activities, information and communication, and monitoring. Within those components, the OIG reviewed the principles of establishing structure, assigning responsibility and delegating authority to achieve the entity's objectives; demonstrating a commitment to recruit, develop, and retain competent individuals; evaluating performance and holding individuals accountable for their internal control responsibilities; identifying, analyzing, and responding to risk and changes that impact the internal control process; designing control activities, including policies for achieving management objectives and responding to risks; using quality information; communicating internally and externally; performing monitoring activities; and, evaluating issues and remediating deficiencies.

Methodology

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

- The Government Accountability Office *Standards for Internal Control in the Federal Government*;
- OPM's *End to End Hiring Initiative*;
- Management Directive 10.1, *Recruitment, Appointments, and Merit Staffing*;
- Management Directive 10.13, *Special Employment Programs*; and,

- Pacific Research & Evaluation, LLC's *Evaluation of the Nuclear Regulatory Commission's Strategic Workforce Planning (SWP) Process: Final Report*.

The OIG interviewed OCHCO staff including HR specialists at Headquarters and in the regions, the Human Capital Analysis Branch, the Workforce Management and Benefits Branch, and OCHCO Management. The OIG also interviewed hiring managers from various offices and regions at the NRC and two National Treasury Employees Union representatives. In addition, the OIG reviewed data from the WTTS (including the time-to-hire and declinations reports), surveys from the Recruitment Activity Tracking System, Federal Employee Viewpoint Survey results, and Resident Inspector surveys. The OIG also reviewed three contracts related to HR support services, recruitment and retention marketing services, and personnel security services.

The OIG assessed the reliability of data used to address this audit's objectives by direct observation. The OIG observed that the data in the WTTS is incomplete and unreliable, as stated in Finding 1. As a result, this report makes five recommendations to improve data quality and reliability. The OIG also reviewed time-to-hire metrics for various mid-sized agencies through the OPM. However, the OIG did not confirm the reliability of other agencies' data submitted to the OPM.

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 the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

Throughout the audit, auditors considered the possibility of fraud, waste, and abuse in the program.

The audit was conducted by Paul Rades, Team Leader; George Gusack, Audit Manager; Connor McCune, Senior Auditor; Ruth Clark, Auditor; and Jocelyn Rivera, Management Analyst.

TO REPORT FRAUD, WASTE, OR ABUSE

Please Contact:

Online: [Hotline 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 O12-A12
11555 Rockville Pike
Rockville, Maryland 20852

COMMENTS AND SUGGESTIONS

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

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

NOTICE TO NON-GOVERNMENTAL ORGANIZATIONS AND BUSINESS ENTITIES SPECIFICALLY MENTIONED IN THIS REPORT

Section 5274 of the James M. Inhofe National Defense Authorization Act for Fiscal Year 2023, Pub. L. No. 117-263, amended the Inspector General Act of 1978 to require OIGs to notify certain entities of OIG reports. In particular, section 5274 requires that, if an OIG specifically identifies any non-governmental organization (NGO) or business entity (BE) in an audit or other non-investigative report, the OIG must notify the NGO or BE that it has 30 days from the date of the report's publication to review the report and, if it chooses, submit a written response that clarifies or provides additional context for each instance within the report in which the NGO or BE is specifically identified.

If you are an NGO or BE that has been specifically identified in this report and you believe you have not been otherwise notified of the report's availability, please be aware that under section 5274 such an NGO or BE may provide a written response to this report no later than 30 days from the report's publication date. Any response you provide will be appended to the published report as it appears on our public website, assuming your response is within the scope of section 5274. Please note, however, that the OIG may decline to append to the report any response, or portion of a response, that goes beyond the scope of the response provided for by section 5274. Additionally, the OIG will review each response to determine whether it should be redacted in accordance with applicable laws, rules, and policies before we post the response to our public website.

Please send any response via email using this [link](#). Questions regarding the opportunity to respond should also be directed to this same address.