



Audit of the U.S. Nuclear Regulatory Commission's Management and Oversight of Research and Development Grants

OIG-NRC-25-A-08

June 17, 2025



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MEMORANDUM

DATE: June 17, 2025

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 MANAGEMENT AND OVERSIGHT OF
RESEARCH AND DEVELOPMENT GRANTS
(OIG-NRC-25-A-08)

Attached is the Office of the Inspector General's (OIG) audit report titled: *Audit of the U.S. Nuclear Regulatory Commission's Management and Oversight of Research and Development Grants*.

The report presents the results of the subject audit. Following the May 20, 2025, 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.

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
D. Lewis, DADO
E. Deeds, OEDO



Results in Brief

Why We Did This Review

The University Nuclear Leadership Program provides financial assistance for scholarships, fellowships, and research and development projects at institutions of higher education in areas relevant to the programmatic mission of the applicable federal agency. The program places an emphasis on providing financial assistance with respect to research, development, demonstration, and commercial application activities relevant to civilian advanced nuclear reactors.

The NRC Office of Administration supports the awarding, administering, and closing of NRC grants, including those awarded under the University Nuclear Leadership Program. In addition, the Office of Nuclear Regulatory Research staff performs the monitoring of grants.

The audit objective was to determine if the NRC is effectively managing and monitoring selected research and development grants in accordance with applicable federal requirements, agency policies and guidance, and award terms and conditions.

Audit of the U.S. Nuclear Regulatory Commission's Management and Oversight of Research and Development Grants

OIG-NRC-25-A-08

June 17, 2025

What We Found

The OIG determined that the U.S. Nuclear Regulatory Commission (NRC) was not effectively managing or monitoring selected research and development grants. Specifically, the OIG found that staff in the Office of Nuclear Regulatory Research assumed grants officer responsibilities without a grants officer appointment or through a delegation as a grants officer representative. We also found that NRC staff did not request or review source documents to support equipment purchased using grant funds. Additionally, we found that the NRC does not have a public repository for final performance reports or other means to share the results of federally funded research grants.

The OIG further determined that the grants officer had not ensured that all relevant documents were contained in the official grant files; 11 grants were not closed out within the one-year period of performance end date and the NRC had not deobligated over \$321,000 in funds that could have been put to better use; and, grants awarded through the Integrated University Program (the predecessor to the University Nuclear Leadership Program) with periods of performance ending in 2021 and 2022 had more than \$920,000 of funds that were not deobligated and could be put to better use.

What We Recommend

The report makes nine recommendations to improve management and monitoring of research and development grants.

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ABBREVIATIONS AND ACRONYMS

2 C.F.R.	Title 2 of the Code of Federal Regulations
ASAP	Automated Standard Application for Payment
EDO	Executive Director for Operations
NRC	U.S. Nuclear Regulatory Commission
OIG	Office of the Inspector General
SBCR	Office of Small Business and Civil Rights
STAQS	Strategic Acquisition System

I. BACKGROUND

The University Nuclear Leadership Program was established through the Consolidated Appropriations Act, 2021,¹ and the authority for the program resides at 42 U.S. Code Section 16274a. This section states that funds shall be used to provide financial assistance for scholarships, fellowships, and research and development projects at institutions of higher education in areas relevant to the programmatic mission of the applicable federal agency, with an emphasis on providing the financial assistance with respect to research, development, demonstration, and commercial application activities relevant to civilian advanced nuclear reactors. Section 16274a(e) authorizes \$15 million to be appropriated to the NRC for programmatic activities for each of the fiscal years, 2021 through 2025.

NRC Grants

The NRC provides various types of grants through the University Nuclear Leadership Program to facilitate the support of nuclear science and engineering. The NRC awards grants for scholarships, fellowships, faculty development, and trade school and community college scholarships. Additionally, the NRC provides research and development grants to universities. The NRC awarded 73 research and development grants for fiscal years 2020 through 2024, totaling \$35,926,256.

Roles and Responsibilities

NRC Offices

The Office of Administration (ADM), specifically, the Acquisition Management Division, supports the awarding, administering, and closing of NRC grants. These actions are performed by the grants officer. The Office of Nuclear Regulatory Research staff performs the monitoring of grants. The Office of Small Business and Civil Rights (SBCR) leads the agency's compliance efforts to ensure equitable treatment in federal financially assisted programs and activities. SBCR also ensures potential grantees comply with federal civil rights requirements.

¹ Public Law 116-260 (Dec. 27, 2020).

NRC Grant Oversight Positions

The grants officer is the NRC official responsible for the business management aspects of the grant, including review, negotiation, award, and administration. The grant officer representative is delegated the grants officer's authority to monitor the technical effort being performed under research and development grants. The grant officer representative does not have the authority to obligate the NRC to the expenditure of funds and permit changes to approved projects on behalf of the NRC.

The program manager is the NRC official responsible for the programmatic, scientific, and/or technical aspects of a grant. The projects officer is the NRC staff member who is assigned the management of a portfolio of grants. These management activities include, but are not limited to, evaluating grant applications for administrative content and compliance with statutes, regulations, and guidelines; providing consultation and technical assistance to grantees; and, administering grants after award.

Systems Used in the Grants Process

The Strategic Acquisition System (STAQS) is the NRC's automated acquisition system that maintains the electronic files for grants. The official grant file is the repository for program office documentation in support of applicant selections/non-selections and all fiscal, budgetary, and performance documents pertaining to each grant. STAQS interfaces with FedConnect.

FedConnect is an auditable two-way web portal used to communicate with recipients. It provides bi-directional communication between the recipient and the NRC throughout the grant's pre-award, award, and post-award phases. The NRC requires grantees' semi-annual federal financial reports and research performance progress reports to be submitted through FedConnect.

The Automated Standard Application for Payments (ASAP) is a U.S. Department of the Treasury payment and information system that provides a single point of contact for the request and delivery of federal funds. Grantee organizations receiving federal funds can draw from ASAP accounts pre-authorized by the NRC.

Applicable Regulations and Directives

Title 2 of the Code of Federal Regulations (2 C.F.R), *Grants and Agreements*, Part 200, “Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards,” establishes requirements for receipt and use of federal grant awards.

Management Directive 11.6, *Financial Assistance Program*, provides the framework for the NRC financial assistance process. The Management Directive states that NRC staff with financial assistance-related responsibilities shall ensure that management and internal controls permit effective monitoring of programs and processes; knowledge gained from the grant or cooperative agreement is used to further the objectives of the financial assistance programs and the NRC in general; and, the closeouts of grants and cooperative agreements are timely, and in accordance with applicable regulations.

II. OBJECTIVE

The audit objective was to determine if the NRC is effectively managing and monitoring selected research and development grants in accordance with applicable federal requirements, agency policies and guidance, and award terms and conditions.

III. FINDINGS

The OIG determined that the NRC did not effectively manage or monitor selected research and development grants. Specifically, staff without delegated authority were performing grants officer responsibilities. Additionally, official grant files were incomplete, and final report reviews were not completed, preventing the timely closeout of grant files and the deobligation of grant funds. Finally, the NRC had not maximized public access to the results of federally funded research.

1. Staff without Delegated Authority Assumed Grants Officer Responsibilities

The NRC should ensure that the delegation of grant responsibilities is communicated in writing. The OIG found that the Office of Nuclear Regulatory Research staff assumed grants officer responsibilities without a grants officer appointment or through a delegation as a grant officer representative. The OIG determined this occurred because roles and responsibilities were not clearly defined. Ensuring that programmatic roles and responsibilities are clearly defined is essential to the University Nuclear Leadership Program's integrity and effective execution.

What Is Required

Grants Officer Ensures Necessary Actions

The U.S. Government Accountability Office, *Standards for Internal Control in the Federal Government*² states that management should establish an

² [U.S. Government Accountability Office, *Standards for Internal Control in the Federal Government*, GAO-25-107721G, May 2025](#)

organizational structure, assign responsibility, and delegate authority to achieve the entity's objectives. Additionally, 2 C.F.R. Section 200.211 states that the federal agency must include contact information for the awarding official in each federal award.

What We Found

NRC Staff Lacked Delegated Authority

The OIG found that the Office of Nuclear Regulatory Research staff performed grants officer responsibilities without a grants officer appointment or through a delegation as a grants officer representative. Specifically, the OIG found that grant specialists within the Office of Nuclear Regulatory Research were communicating directly with grantees to address issues with the semi-annual performance reports submitted by the grantees. Communications included requests for additional information and requests to update report budget tables or to submit new reports. Although these communications were necessary for proper grant monitoring, an authorized representative should have sent these communications.

Why This Occurred

Roles and Responsibilities are not Clearly Defined

The OIG determined this occurred because roles and responsibilities are not clearly defined. During the audit, one NRC staff member stated that there was confusion regarding grants-related roles and responsibilities. Additionally, the OIG noted that duties associated with the project officer role were not performed consistently in accordance with Management Directive 11.6, and grant specialists performing these duties were not designated in writing. An NRC staff member noted that they had not reviewed the grants officer's performance to ensure they were adequately fulfilling their roles and responsibilities.

Why This Is Important

Prevent Violations

Ensuring that programmatic roles and responsibilities are clearly defined is essential to the program's integrity and effective execution. Specifically, violations of 2 C.F.R. Part 200 could occur due to grantee confusion regarding which NRC staff are authorized to approve grant actions.

Recommendations

The OIG recommends that the Executive Director for Operations (EDO):

- 1.1. Update Management Directive 11.6 to ensure roles and responsibilities are clearly defined; and,
- 1.2. Develop procedures to ensure all current NRC staff performing grant-related functions have appropriate authority or delegation letters that fully cover their grant roles and responsibilities.

2. Grants were not Closed Out Timely and Funds were not Deobligated

Federal regulations state that federal agencies must make every effort to complete all closeout actions no later than one year after the end of the period of performance. The OIG determined that 11 grants were not closed out within the one-year period of performance end date, and the remaining \$321,000 for those grants was not deobligated. This occurred because NRC staff had not completed the necessary reviews of final performance reports; therefore, project officers could not submit the required requisitions to deobligate funds. Failure to deobligate funds prevents the NRC from awarding funds for other research projects that could enhance the understanding of scientific and technical issues that impact the agency's mission.

What Is Required

Grant Closeout and Deobligation

Federal regulations provide specific timelines for grant closeout. Under 2 C.F.R. Section 200.328, the final financial report submitted by the recipient must be due no later than 120 calendar days after the conclusion of the period of performance. In addition, 2 C.F.R. Section 200.344 states that the federal agency must make every effort to complete all closeout actions no later than one year after the end of the period of performance. Finally, 2 C.F.R. Section 200.334 states that the recipient must retain all federal award records for three years from the date of submission of their final financial report.

Management Directive 11.6 states that closeout is the process by which the grants officer determines that all administrative actions and work have been completed by the recipient. The closeout process begins when the grantee submits the final reports to the NRC for review by the grants officer and the project officer. It is imperative that the grants officer ensures the timely closeout of financial assistance awards and prompt disposition of any outstanding ASAP accounts. If there are no remaining funds, the grant is closed out. However, if there are remaining funds, the project officer submits a requisition in STAQS to the grants officer initiating the deobligation of funds. The grants officer then issues an amendment to deobligate the funds, and the grant is closed out.

What We Found

Grants were not Closed Out and Funds were not Deobligated

The OIG reviewed the 73 research and development grants awarded from fiscal years 2020 through 2024. The OIG determined that 11 grants were not closed out within the one-year period of performance end date. In addition, the NRC did not deobligate the remaining funds associated with those grants. As such, the OIG questions whether approximately \$321,000 in funds could have been put to better use.

Similarly, the OIG's review of ASAP found grants awarded through the Integrated University Program (the predecessor to the University Nuclear Leadership Program) that started in fiscal years 2018 and 2019, with periods of performance ending between June 2020 and August 2023, which still had

funds obligated to them. As such, the OIG also questions whether more than \$920,000 of additional funds could have been put to better use.

Why This Occurred

Grant Closeouts were not Prioritized

NRC staff stated that they are aware of the timeliness issue related to closeouts; however, resolving this issue was not prioritized. NRC staff reportedly placed a greater emphasis on ensuring required semi-annual reports were reviewed timely and had not completed the necessary reviews of final performance reports; therefore, project officers could not submit the required requisitions to deobligate funds. Additionally, the OIG determined that the project officer was not fully aware of all of their roles and responsibilities regarding grant closeouts.

Why This Is Important

Decreased Benefit and Increased Risk

Failure to deobligate funds prevents the NRC from awarding other research projects that could enhance the understanding of scientific and technical issues that impact the agency's mission. In addition, once the three-year retention period for grant-related documents passes, there is an increased risk that grantees will no longer have records to support costs associated with grant-related activities, which limits the NRC's ability to detect waste and abuse in the program.

Recommendations

The OIG recommends that the EDO:

- 2.1. Develop relevant training and a plan to ensure grant staff know their roles and responsibilities;
- 2.2. Develop a process to ensure the timely deobligation of funds for grants past their period of performance;
- 2.3. Validate the completeness of grant files past their period of performance and deobligate the more than \$321,000 in funds

specified in this report, or provide documentation to the OIG to justify not deobligating these funds; and,

- 2.4. Validate the completeness of grant files past their period of performance and deobligate the more than \$920,000 in funds specified in this report, or provide documentation to the OIG to justify not deobligating these funds.

3. Grant Staff did not Review Supporting Documents for Expenditures

Federal regulations state that costs must be adequately documented to be allowable under federal awards. Further, awarding agencies must manage and administer the awards in a manner that ensures federal funding is expended in full accordance with requirements. The OIG found that NRC staff did not request or review source documents to support direct grant costs, such as equipment. This occurred because the current NRC process does not include a requirement for the grantees to submit supporting documents for equipment expenses. Therefore, the NRC is potentially paying more for grantee equipment than is allowed.

What Is Required

Ensuring Allowability

Under 2 C.F.R. Section 200.300, the federal awarding agency must manage and administer federal awards in a manner that ensures federal funding is expended and associated programs are implemented in full accordance with the U.S. Constitution, federal law, and public policy requirements. To ensure expenditures can be supported, 2 C.F.R. Section 200.302 states that the financial management system of each non-federal entity must provide records that identify adequately the source and application of funds for federally funded activities. The records must contain information pertaining to federal awards, authorizations, financial obligations, unobligated balances, assets, expenditures, and income and interest, and be supported by source documentation. Additionally, 2 C.F.R. Section 200.403 states that in order for costs to be allowable under federal awards, they must be adequately documented.

What We Found

Supporting Documents not Reviewed

The OIG found that NRC staff did not request or review source documents to support direct costs on grants; therefore, equipment purchased by grantees may not be supported. NRC staff stated that the current method used to review expenses compares the preapproved budget to the spending rate in the semi-annual performance report. However, budget approval occurs during the award process, and preapprovals are based on estimates.

Why This Occurred

Insufficient Staff Reviews

The OIG determined that NRC staff did not request grantees submit supporting documents for equipment expenses. Although the current method of review would note variations from the budget, it is not sufficient to determine if reported equipment costs are accurate at the time of purchase. The OIG noted that ASAP does not include the ability to upload supporting documentation during the drawdown process. Furthermore, NRC staff had not directed grantees to submit supporting documentation for expenses through FedConnect.

Why This Is Important

Potentially Paying more than Allowed

The NRC is potentially paying more for grantees' equipment than is allowed. Further, the lack of supporting documentation for review increases the risk of fraud, waste, and abuse of grant funds.

Recommendation

The OIG recommends that the EDO:

- 3.1 Implement a policy that requires periodic reviews to ensure compliance with 2 C.F.R. Part 200 requirements related to the allowability of costs.

4. The NRC has not Maximized Public Access to the Results of Federally Funded Research

Federal regulations state that federal agencies should work with recipients to maximize public access to federally funded research results and data. The OIG determined that the NRC does not have a public repository for final performance reports or other means to share the results of federally funded research grants. The OIG concluded that this occurred because NRC staff believed that the ability to provide information from reports, if requested, was sufficient and no further posting was needed. However, the inability of researchers to review the results of federally funded research reduces the effectiveness of the University Nuclear Leadership Program's grant funding.

What Is Required

Maximize Access to Federally Funded Research

Under 2 C.F.R. Section 200.315, "Intangible property," federal agencies should work with recipients to maximize public access to federally funded research results and data in a manner that protects data providers' confidentiality, privacy, and security. The regulation also states that the Freedom of Information Act may not be the most appropriate mechanism for providing access to intangible property, including federally funded research results and data.

What We Found

The NRC does not have a Public Repository

The OIG determined that the NRC does not have a public repository for final performance reports or other means to share the results of federally funded research grants. An NRC staff member stated that the NRC has an internal repository for the information, STAQS, and can provide information when requested. The OIG noted that although the NRC has the information, it is neither publicly available nor internally available without requesting access to STAQS.

Why This Occurred

Research Results Available if Requested

Based on an interview with NRC staff, the OIG concluded that staff believed the ability to provide research-related information from reports, if requested, was sufficient and no further posting was needed. One NRC staff member stated that the NRC was considering what information could be made public, but the staff member was concerned that final performance reports are high-level and contain proprietary information. The NRC staff member further stated that grantees share information with the public through articles in publications. Another NRC staff member also stated that it would be duplicative to post the articles in the NRC's public document system if published articles are already publicly available elsewhere.

Why This Is Important

Reduced Effectiveness of Grant Funding

Researchers' inability to review the results of federally funded research reduces the effectiveness of the University Nuclear Leadership Program. Further, many publications require a fee to read peer-reviewed articles, which limits public access to information produced by federally funded research.

Recommendation

The OIG recommends that the EDO:

- 4.1. Develop a method within existing agency resources to optimize public access, in compliance with all relevant laws and policies, to the results of research funded by NRC grants.

5. Official Grant Files are Incomplete

Management Directive 11.6 states that the grants officer ensures that all materials are properly placed and maintained in the official files (STAQS). The OIG determined that the grants officer had not ensured that all relevant documents were contained in the official grant files. Specifically, follow-up reviews of grantees that were placed in periodic review status by SBCR were not maintained in the official file. The OIG determined this occurred due to

communication problems between SBCR and the grants officer. Therefore, civil rights issues may not be properly documented in a manner that ensures other NRC staff can access the information to make determinations about awarding future grants.

What Is Required

Maintenance of the Official File

Management Directive 11.6 states that the grants officer ensures the maintenance of the official record file relative to all actions required to fund the grant or cooperative agreement and that all materials are properly placed and maintained in that file. The official files for NRC grants are maintained in STAQS.

What We Found

Office of Small Business and Civil Rights Review

The OIG reviewed the grant files and determined that the grants officer had not ensured all relevant documents were contained in the official grant files. Specifically, follow-up reviews of grantees that were placed in periodic review status by SBCR were not maintained in the official file. During the pre-award process, SBCR reviews the potential grantee to ensure they are in compliance with federal civil rights requirements.

Although SBCR determined that sufficient information existed to allow the execution of the proposed grants, SBCR placed certain grantees in periodic status to further monitor the progress of open equal opportunity cases and lawsuits or to obtain additional information. SBCR staff stated that the follow-up review documentation is maintained in an SBCR internal network drive, which is not accessible by the grants officer.

Why This Occurred

Lack of Communication between SBCR and the Grants Officer

The OIG determined this occurred due to communication problems between SBCR and the grants officer. An SBCR staff member stated that SBCR's

intention was not for the Office of Administration's Acquisition Management Division to formally document the periodic review status in the grant documents but was provided for informational purposes only. The OIG concluded that placing grantees in SBCR's periodic review status is part of compliance requirements agreed to during negotiations between the NRC and the potential grantee. In addition, where a university is a grantee, all requirements related to the university's "grantee" status must be in the grant terms and conditions to ensure compliance with those requirements. The OIG found that, for the official grant files the OIG reviewed, a lack of communication between SBCR and the grants officer regarding these processes resulted in insufficient documentation in the files.

Why This Is Important

Future Knowledge

Civil rights issues may not be properly documented in a manner that ensures other NRC staff can access the information to make determinations about awarding future grants. In addition, information and knowledge about grantees may be lost when staff leave employment at the NRC.

Recommendation

The OIG recommends that the EDO:

- 5.1. Train SBCR staff to ensure they are aware of the communication and documentation requirements related to grant periodic reviews.

IV. CONSOLIDATED LIST OF RECOMMENDATIONS

The OIG recommends that the Executive Director for Operations:

- 1.1. Update Management Directive 11.6 to ensure roles and responsibilities are clearly defined;
- 1.2. Develop procedures to ensure all current NRC staff performing grant-related functions have appropriate authority or delegation letters that fully cover their grant roles and responsibilities;
- 2.1. Develop relevant training and a plan to ensure grant staff know their roles and responsibilities;
- 2.2. Develop a process to ensure the timely deobligation of funds for grants past their period of performance;
- 2.3. Validate the completeness of grant files past their period of performance and deobligate the more than \$321,000 in funds specified in this report, or provide documentation to the OIG to justify not deobligating the funds;
- 2.4. Validate the completeness of grant files past their period of performance and deobligate the more than \$920,000 specified in this report, or provide documentation to the OIG to justify not deobligating the funds;
- 3.1 Implement a policy that requires periodic reviews to ensure compliance with 2 C.F.R. Part 200 requirements related to the allowability of costs;
- 4.1 Develop a method within existing agency resources to optimize public access, in compliance with all relevant laws and policies, to the results of research funded by NRC grants; and,
- 5.1 Train SBCR staff to ensure they are aware of the communication and documentation requirements related to grant periodic reviews.

V. NRC COMMENTS

The OIG held an exit conference with the agency on May 20, 2025. 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 determine if the NRC is effectively managing and monitoring selected research and development grants in accordance with applicable federal requirements, agency policies and guidance, and award terms and conditions.

Scope

This audit focused on determining if the NRC is effectively managing and monitoring selected research and development grants from fiscal years 2020 to 2025. We conducted this performance audit at NRC headquarters in Rockville, Maryland, from November 2024 to March 2025.

Internal controls related to the audit objective were reviewed and analyzed. Specifically, the OIG reviewed the components of the control environment, control activities, information and communication, and monitoring. Within those components, the OIG reviewed the principles of assigning responsibility and delegating authority to achieve the entity's objectives; and, designing control activities, including policies for achieving management objectives.

Methodology

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

- *42 United States Code 16274a, University Nuclear Leadership Program;*
- *Title 2 Code of Federal Regulations, Part 200, Uniform Administrative Requirements, Cost Principles, And Audit Requirements for Federal Awards;* and,
- *Management Directive 11.6 Financial Assistance Program.*

The OIG interviewed staff from the Office of Administration, the Office of Nuclear Regulatory Research, and the Office of Small Business and Civil Rights. In addition, the OIG reviewed the data from STAQS grant files and ASAP drawdowns.

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 STAQS was incomplete, as stated in Findings 3 and 5. As a result, this report makes three recommendations to improve data completeness.

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.

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

The audit was conducted by Paul Rades, Team Leader; Diane Parker, Audit Manager; Connor McCune, Senior Auditor; and, Ruth Clark, Auditor.

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.