



# Audit of the U.S. Nuclear Regulatory Commission's Qualification Programs

OIG-NRC-25-A-13  
September 25, 2025



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## **MEMORANDUM**

**DATE:** September 25, 2025

**TO:** Michael F. King  
Acting 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 QUALIFICATION PROGRAMS  
(OIG-NRC-25-A-13)

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

The report presents the results of the subject audit. On September 11, 2025, agency staff waived the exit conference. 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 Avinash Jaigobind, Team Leader, at 301.415.5402.

Attachment:  
As stated

cc: J. Martin, ADO  
D. Lewis, DADO  
E. Deeds, OEDO



# Results in Brief

## Why We Did This Review

The NRC employs staff with a variety of technical backgrounds to conduct operational assignments. Many of these positions require agency-issued qualifications to ensure staff can perform regulatory duties and implement the agency's policies, programs, and activities associated with the regulation of nuclear reactors, materials, and radioactive waste.

Previous OIG audits and an OIG special inquiry highlighted issues pertaining to staff qualifications, including unqualified staff performing work that required specific qualifications and difficulty tracking post-qualification and refresher training.

The audit objective was to determine the adequacy of the NRC's process for managing, tracking, and monitoring its qualification programs.

## ***Audit of the U.S. Nuclear Regulatory Commission's Qualification Programs***

OIG-NRC-25-A-13

September 25, 2025

### What We Found

The U.S. Nuclear Regulatory Commission (NRC) does not have an adequate process for managing, tracking, and monitoring staff qualification records. The OIG found that NRC offices use inconsistent information-gathering methods, driven by changes in management's workforce planning and individual office preferences for using separate information systems. As a result, the NRC may face reduced efficiency in retrieving qualification records and may lack full visibility into staff qualification gaps—factors that could adversely impact the agency's ability to carry out its mission.

Additionally, the OIG found that refresher training is tracked informally, with many staff relying on personal reminders to complete mandatory requirements. This informal approach exists because the NRC lacks a structured, agency-wide system for managing refresher training. The absence of such a system could result in decreased staff productivity, non-compliance with safety and security requirements, and lower employee morale and retention. Refresher training is essential for maintaining up-to-date knowledge, skills, and safety practices, which are critical to ensuring that staff can perform their duties effectively and safely.

### What We Recommend

This report makes three recommendations to improve the NRC's process for managing, tracking, and monitoring its qualification programs.

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## ABBREVIATIONS AND ACRONYMS

ADAMS	Agencywide Documents Access and Management System
IMC	Inspection Manual Chapter
NRC	U.S. Nuclear Regulatory Commission
NRR	Office of Nuclear Reactor Regulation
OCHCO	Office of the Chief Human Capital Officer
OIG	Office of the Inspector General
TMS	Talent Management System

## I. BACKGROUND

To support its mission, the NRC employs staff with background and training in technical disciplines such as nuclear engineering, environmental sciences, health physics, and security. These staff members conduct inspections, license reviews, project management functions, and other operational assignments, including investigations and enforcement actions.

The NRC uses its qualification programs to prepare employees to perform regulatory duties and to implement the agency's policies, programs, and activities associated with the regulation of nuclear reactors, materials, and radioactive waste. The qualification programs help the NRC ensure staff members are well-versed in the regulatory framework, agency processes, best practices, and relevant procedures for their positions.

### **NRC Qualification Programs and Process**

The NRC certifies its staff under several different qualification programs. Specific requirements for the qualification programs are outlined in various Inspection Manual Chapters (IMC) and office instructions.<sup>1</sup> Table 1 describes several qualification programs the agency uses.

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<sup>1</sup> An IMC presents administrative information, policy statements, technical guidance, objectives, and procedures for a given type of inspection. The NRC's [complete IMC collection](#) is available through the [Electronic Reading Room](#). The NRC also provides guidance to its staff through office instructions, which are internal documents developed by staff that define missions or mission support processes.

**Table 1: Qualification Programs Description**

Qualification Programs	Description
Office Instruction ADM-504, <i>Qualification Program</i>	Office Instruction ADM-504 is used to certify reactor technical reviewers, reactor license reviewers, project managers and other technical specialists.
IMC 1245, <i>Qualification Program for Reactor Inspectors</i>	IMC 1245, Appendices A, B, C1–16, and D1–4 are used to certify staff who perform reactor and vendor inspection activities.
IMC 1246, <i>Qualification Programs in Nuclear Material Safety and Safeguards Program Area</i>	IMC 1246, Appendix A, B1–4, C1–5, and D1–2 are used to certify staff performing activities in the Office of Nuclear Material Safety and Safeguards.
IMC 1247, <i>Qualification Program for Fuel Facility Inspectors in the Nuclear Material Safety and Safeguards Programs Area</i>	IMC 1247, Appendix A, B, C1–6, and D1 are used to certify fuel facility inspectors in the Office of Nuclear Material Safety and Safeguards.
IMC 1248, <i>Qualification Programs for Federal and State Materials and Environmental Programs</i>	IMC 1248, Appendices A–I are used to certify staff who work in the Federal and State Materials and Environmental Management Programs.

Source: OIG generated

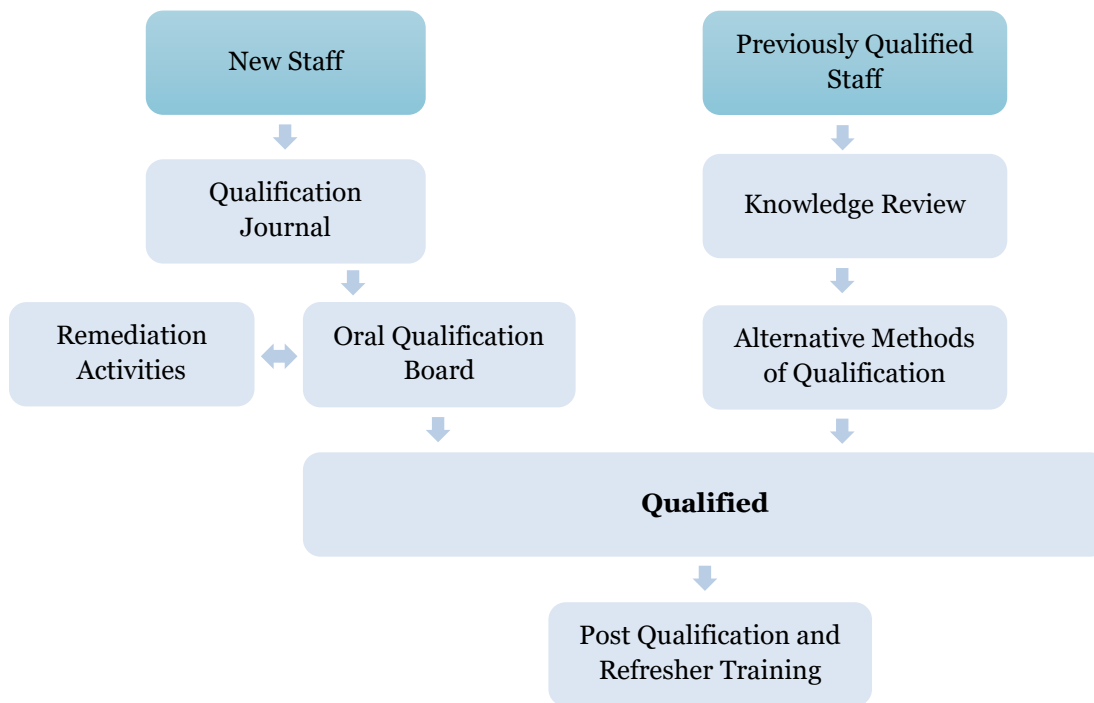
The employee qualification process consists of three general steps. The first step is initial training, including self-study activities, classroom instruction, and on-the-job training. The second step is qualification activity to receive the full qualification, which usually involves an oral qualification board examination. The oral examination confirms that the individual can integrate and apply agency, office, and position-specific competencies to actual situations. The third step is post-qualification training to maintain and enhance qualification knowledge. Post-qualification training ensures staff have the skills needed to continue fulfilling their positions.

#### *Alternative Methods of Qualification*

The Office of Nuclear Reactor Regulation (NRR) Office Instruction titled ADM-504, “Qualification Program,” outlines alternative qualification methods, which state that employees may be “qualified without any further activity for a position based on previous experience.” To meet the criteria for an alternative method of qualification, the branch chief must ensure that the staff member possesses sufficient expertise through a knowledge review. These activities generally result in a memo

recommending qualification once tailored requirements are met.<sup>2</sup> These memos are written by the branch chief and sent to the division director for approval. Figure 1 illustrates the qualification programs process for both new and previously qualified staff.

**Figure 1: NRC's Qualification Programs Process**



Source: OIG generated

## NRC Qualification Records Management Systems

NRC qualification records are tracked through a number of methods:

- Talent Management System (TMS) is a software system that provides the NRC with an online learning platform and tools for the automation of performance management tasks and strategic workforce planning.
- Agencywide Documents Access and Management System (ADAMS) is the official recordkeeping system through which the NRC provides access to “libraries” or collections of documents.

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<sup>2</sup> Grandfathering: Office Instruction ADM-504 states that “employees may be qualified without any further activity for a position based on previous experience” (i.e., grandfathered) if they meet certain criteria.



- SharePoint sites or spreadsheets tracked by individual divisions or branches.
- Hard copies or electronic copies retained by individual staff.

## Qualifications Survey and Sampling

### *OIG Qualifications Survey*

The OIG surveyed NRC staff and managers to learn how the agency manages, tracks, and monitors its qualification programs and then collated and evaluated the data received. The OIG's Survey of Staff Qualifications was a voluntary survey that the OIG sent to 1,973 staff members (roughly two-thirds of the NRC). To obtain the broadest input possible, the OIG sent the survey to both staff who hold qualifications and staff who do not hold qualifications. The OIG received 519 responses (a 26 percent response rate). Of the 519 staff members who completed the survey, 389 (75 percent) held qualifications. For additional information relating to the survey, see Appendix B of this report.

### *Selected Sample of Staff Qualifications*

The OIG reviewed records, management practices, and the tracking of refresher training across NRC Headquarters and Regional Offices. However, based on patterns identified in the free written survey comments, the OIG narrowed the focus to staff who should hold Office Instruction ADM-504, *Qualification Program*, and IMC 1245 Appendix C11, *Security Risk Analyst Technical Proficiency Training and Qualification Journal* qualifications based on their position.

To further narrow the scope, the OIG determined that based on risk significance, we would use a judgmental sample that included staff in three NRR divisions<sup>3</sup> and Security Risk Analysts<sup>4</sup> in Regions I through IV. In total, the OIG identified 148 staff members to verify their qualifications.

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<sup>3</sup> The Division of Advanced Reactors and Non-Power Production and Utilization Facilities, the Division of New and Renewed Licenses, and the Division of Safety Systems.

<sup>4</sup> Security risk analysts generally work in the Region's Division of Radiological Safety and Security. This division conducts physical security inspections at operating reactors.

## Prior OIG Reports

Since 2021, the OIG has issued three reports where multiple staff qualifications-related issues were found. In March 2021, the OIG issued the *Audit of the NRC's Material Control and Accounting Inspection Program for Special Nuclear Material*.<sup>5</sup> The OIG found that while existing material control and accounting inspectors were qualified, the low number of qualified staff was concerning. This problem was compounded by the lengthy qualification process, which can take more than two years to complete. Additionally, the NRC did not have an alternative plan to qualify material control and accounting inspectors quickly, should the need arise, and the agency's qualification program guidance had not been updated since 2014.

The second report the OIG issued, in February 2023, was the Special Inquiry into the U.S. Nuclear Regulatory Commission Region II's Inspections of Independent Spent Fuel Storage Installations at Operating Reactors. The OIG found resident inspectors in Region II were conducting Independent Spent Fuel Storage Installation inspections without proper qualifications.<sup>6</sup> During this special inquiry, the OIG found potential gaps in managing, tracking, and monitoring the NRC's qualification programs.

Finally, in April 2024, the OIG issued the *Audit of the U.S. Nuclear Regulatory Commission's Safety Inspections of Class II Research and Test Reactors*.<sup>7</sup> The OIG found that the NRC does not consistently track post-qualification and refresher training for research and test reactor inspectors.

Based on the reports above, the OIG initiated an audit to explore systemic qualifications-related issues.

## II. OBJECTIVE

The audit objective was to determine the adequacy of the NRC's process for managing, tracking, and monitoring its qualification programs.

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<sup>5</sup> [OIG-21-A-04](#), March 9, 2021.

<sup>6</sup> [OIG Case No. 20-012](#), February 21, 2023.

<sup>7</sup> [OIG-24-A-07](#), April 11, 2024.

### III. FINDINGS

The NRC does not have an adequate process for managing, tracking, and monitoring staff qualification records. The NRC also lacks an adequate process for ensuring that staff complete qualifications and refresher requirements.

#### 1. Lack of Formal Policies and a Centralized Information System Hinders Effective Management of Staff Qualification Records

The NRC should have a centralized information-gathering approach to manage, track, and monitor staff qualification records. However, the NRC does not have an adequate method to manage staff qualification records, which was highlighted by the NRC's inability to provide proof of employee certifications upon the OIG's request. This occurred because of changes in NRC management's workforce planning, and also because NRC offices prefer to use their own information systems. Consequently, the NRC could have difficulty retrieving staff qualification records and overlook gaps in staff qualifications, which could potentially hinder the agency's ability to fulfill its mission.

#### What Is Required

##### **The NRC Should Establish Policies, Procedures, and a Centralized Information System to Manage, Track, and Monitor Staff Qualifications Records**

According to the U.S. Government Accountability Office, *Standards for Internal Control in the Federal Government*,<sup>8</sup> management should "design the information system and related control activities to achieve objectives and respond to risks."

Control activities are the actions management establishes through policies and

##### **What is internal control?**

Internal control is a process used by management to help an entity achieve its objectives.

##### **How does internal control work?**

Internal control helps an entity:

- Run its operations efficiently and effectively;
- Report reliable information about its operations; and,
- Comply with applicable laws and regulations.

<sup>8</sup> Government Accountability Office, *Standards for Internal Control in the Federal Government*, [GAO-14-704G](#), September 2014.

procedures to achieve objectives and respond to risks in the internal control system, which includes the entity's information system.

Additionally, the public webpage for the NRC's Records Management Program<sup>9</sup> states that NRC decision-makers should have the right information in support of mission accomplishments. Having the right information includes understanding the types of qualifications staff possess, which is easier for decision-makers to obtain through a centralized information system.

## What We Found

### **The NRC does not have an Adequate Method to Manage Staff Qualification Records**

The NRC does not have an adequate method to manage staff qualification records. According to NRC staff and managers, various methods are used by different offices, divisions, and branches to manage, track, and monitor staff qualifications. The OIG determined that to locate staff qualification records, NRC managers must search electronic files, local spreadsheets, hard copies, and different information systems such as TMS, ADAMS, shared drives, or a combination of these systems.

#### *OIG Survey Efforts*

The OIG surveyed NRC staff and managers to learn how the agency manages, tracks, and monitors its qualification programs and then collated and evaluated the data received. Based on the OIG's Qualifications Survey results, TMS is the most common method to track staff qualifications, followed by a hard copy and ADAMS. Figure 2 illustrates the variety of methods used to track employee qualifications.<sup>10</sup>

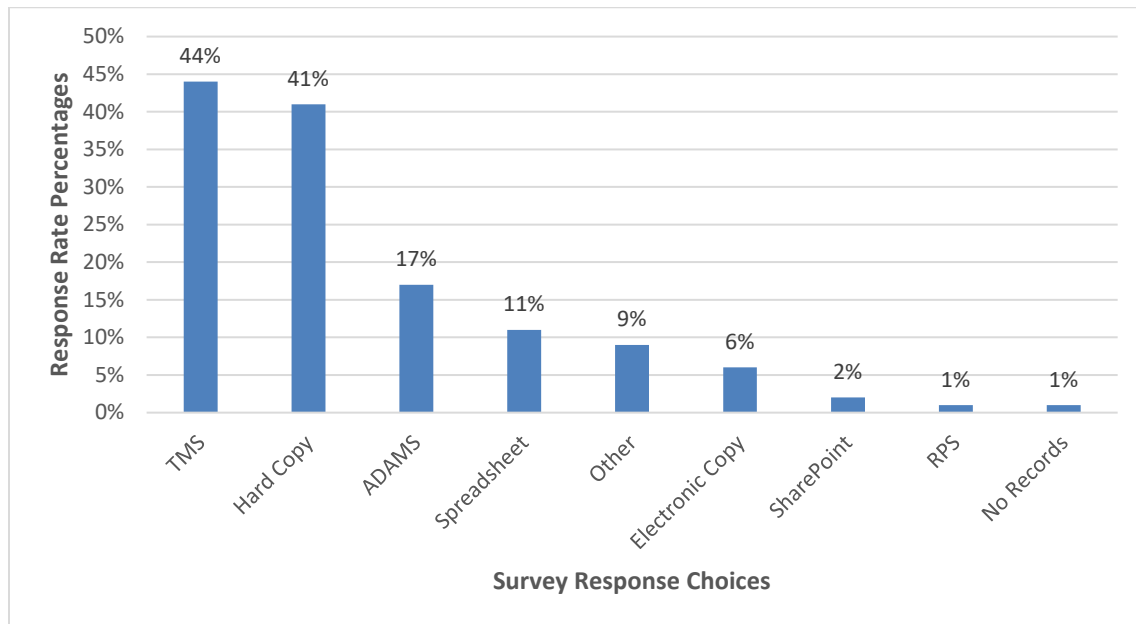
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<sup>9</sup> The NRC Records Management Program is responsible for the development of policies and procedures for the creation and maintenance of records and information regardless of physical form or technology.

<sup>10</sup> The Reactor Program System (RPS) is an information technology tool used to support the NRC's oversight of the operating reactor fleet.



**Figure 2: Survey Question #8 Results: What system does the above staff member use to track your qualifications? Select all that apply.**



Source: OIG generated. Percentages rounded to nearest whole number.

### *Verification of Staff Qualifications*

The OIG selected qualification records for 148 NRC staff members who hold positions for which they need to have specific qualifications. The OIG found 85 (57 percent) of the 148 qualification records in TMS or ADAMS.

For the remaining 63 staff members, the OIG requested qualification records from their division directors. The division directors provided proof of qualifications for 15 staff members. The division directors also stated that 41 staff members were then attending training to receive their qualifications. They could not provide qualification records for 7 staff members.

Because the 7 staff members with missing qualification records have multiple years of technical experience, the OIG will not provide an opinion on their qualifications. However, the OIG is concerned that a lack of definitive proof of qualifications could hamper the agency's ability to ensure that only qualified staff conduct work where qualifications are needed.

## *The NRC relies on an Informal System of Verifying Qualifications for Temporary Duty Staff*

The NRC often augments regional inspections with headquarters personnel when additional staff is needed. The NRC uses informal methods (e.g., emails, phone calls, or word of mouth) to confirm that headquarters staff members are qualified to perform inspections. However, regional officials cannot independently verify a headquarters staff member's qualifications by searching a centralized database. They must rely on one of the informal methods for verification.

### **Why This Occurred**

#### **Changes in Workforce Planning and Office Preferences to Use Individual Systems**

According to NRC managers, changes in workforce planning and office preferences to use their own information systems have resulted in a lack of policies, procedures, and a centralized information system to manage, track, and monitor staff qualification records. A senior official from the Office of the Chief Human Capital Officer (OCHCO) stated that various NRC offices wanted to use their own methods to manage, track, and monitor their staff's qualification records. This official stated there was pushback during discussions about implementing a centralized information system.

Changes in workforce planning also contributed to the lack of a centralized information system. Division directors stated that qualification tracking is prioritized during periods of mass hiring and when new staff must receive qualifications to fully engage in their positions. For example, in fiscal year 2023, the #HIRENRC! initiative sought to hire 400 new staff members to manage the anticipated increased workload due to the demand for new reactors.<sup>11</sup> However, according to division directors, the priority of tracking qualification completion is lessened during hiring lulls because staff are not brought on board at the same rate.

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<sup>11</sup> #HIRENRC! is a cross-organizational collaborative effort that engages a broad array of NRC internal stakeholders to expand the NRC's hiring capabilities.

Furthermore, many training coordinator positions were eliminated due to Project AIM 2020,<sup>12</sup> which affected the qualification tracking process. These training coordinators oversaw the monitoring of the qualifications program completion for new staff, but this responsibility has shifted mainly to the first-line supervisors, resulting in a more decentralized approach.

Currently, the NRC is in the process of centralizing staff qualification records and developing guidance to ensure a more consistent approach to managing, tracking, and monitoring qualification records.

### Why This Is Important

#### **The NRC Could Experience Reduced Efficiency and Lack Awareness of Gaps in Staff Qualifications**

The absence of formal policies, procedures, and a centralized information system may cause the NRC to continue having difficulty retrieving staff qualification records, potentially impacting the agency's ability to fulfill its mission. For example, in November 2024, a Commissioner requested from OCHCO information concerning the number of qualified licensed and environmental reviewers the agency employed. OCHCO fulfilled the request, but many steps were required before responding. For example, responding to the request required OCHCO to converse with points of contact across the entire agency and transmit smaller lists of qualified staff to assemble a file. Following its response to the Commissioner, OCHCO determined it needed to establish a centralized system to ensure it could respond to future requests efficiently.

To ensure the NRC meets its mission-related goals, staff qualifications tracking must be a priority so the agency can confirm that enough qualified staff are available for licensing and oversight-related work. Without a centralized system, the NRC could struggle to identify qualification shortfalls in key positions.

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<sup>12</sup> Project AIM 2020 was an initiative launched by the NRC in 2015 to “right size the agency” due to an expected future decline in the interest of nuclear technologies. Project AIM 2020, eventually renamed “Project AIM,” sought to decrease the NRC’s staffing level by 10 percent over the next 5 years.

## **Recommendation**

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

- 1.1 Establish policies, procedures, and a centralized information system to consistently manage, track, and monitor staff qualification records.

## **2. The NRC Tracks Required Refresher Training in an Informal Manner**

The NRC should use a centralized automated system to track and notify staff of required refresher training. However, refresher training is tracked informally, with many staff relying on personal reminders to complete mandatory requirements. This informal approach exists because the NRC lacks a structured, agency-wide system for managing refresher training. The absence of such a system and detailed guidance could result in decreased staff productivity, non-compliance with safety and security requirements, and lower employee morale and retention. Refresher training is essential for maintaining up-to-date knowledge, skills, and safety practices, which are critical to ensuring that staff can perform their duties effectively and safely.

### **What Is Required**

#### **The NRC Should Establish an Automated System to Notify Staff about Qualification Refresher Training**

According to the U.S. Government Accountability Office's *Standards for Internal Control in the Federal Government*, management should use control activities established through policies and procedures. Control activities are used to achieve objectives and respond to risks in the internal control system and information system. Management should incorporate control activities as they design the entity's information system to respond to the entity's objectives and risks, such as the need to notify staff when qualification refresher training is upcoming.

Additionally, the Office of Personnel Management's *Guide for Collection and Management of Training Information* (Aug. 2008) states that agencies should "track training completed by individual employees, particularly related to any mandatory training curricula or requirements." Mandatory training includes refresher requirements for staff qualifications.



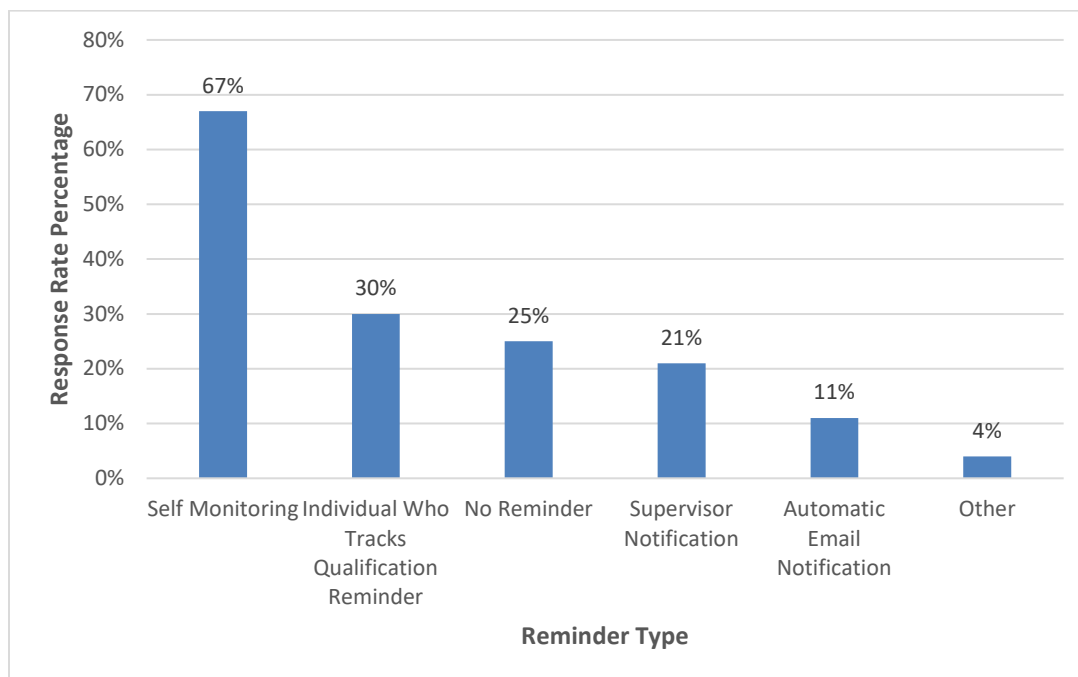
## What We Found

### Many Staff Must Remind Themselves when Required Post-Qualification Refresher Training is Due

The OIG determined that the NRC does not have a systematic method to ensure that staff complete qualification refresher training requirements. In the responses to the OIG Qualification Survey, 67 percent of respondents stated that they use self-monitoring to remind themselves to complete required refresher training. Only 11 percent of respondents stated that they receive automatic email notifications when refresher training is due, and 25 percent of respondents stated that they receive no reminders at all (email or otherwise). Managers interviewed by the OIG said branch chiefs are primarily responsible for reminding staff to complete required refresher training, but they acknowledged the branch chiefs may not always issue such reminders.

Figure 3 illustrates staff responses when asked how they were reminded about refresher training.

**Figure 3: Survey Question #12: How are you reminded that your qualifications need to be refreshed? Select all that apply.**



Source: OIG generated. Percentages rounded to nearest whole number.

## *Industry Approach to Qualification Tracking*

The agency's approach to monitoring refresher training contrasts with that of industry. Many NRC licensees use a Learning Management System, which is commercially available software that has an automated mechanism to track qualification status, along with a module to monitor training due dates. This module uses color coding based on importance (yellow and red) to identify the level of urgency for training as well as automatic emails reminding staff of upcoming training. Licensees stated that such a system is needed based on the potential safety repercussions if staff have a lapse in required refresher training.

### **Why This Occurred**

#### **Existing Qualifications Guidance Lacks Details on How Staff should be Reminded about Refresher Training**

The OIG determined that this occurred because the NRC does not have a centralized information system to remind staff of required refresher training related to qualifications. NRC management confirmed there is no centralized formal information system or guidance addressing refresher notifications. Additionally, the NRC's existing IMCs and office instructions do not contain details on how staff should be reminded of mandatory refresher training.

The OIG noted that Office Instruction ADM-504, *Qualification Program*, discusses the need for continued refresher training, stating that "staff is expected to maintain and build upon the knowledge gained during the qualification process," and that completion of office-level continued training is expected every 6 years. However, ADM-504 does not provide details about how staff will be notified that their refresher training due date is approaching. Similarly, IMC 1245 Appendix D1, *Maintaining Qualifications*, does not address the process for reminding staff of their required qualification-specific refresher training, which occurs every 3 years, nor does it designate a records system to store related documentation.

## Why This Is Important

### **Unrefreshed Qualifications Could Weaken the Knowledge Base of the Workforce**

Staff who have not completed their qualification refresher training requirements, might miss pertinent information related to their position, increasing the possibility of a less-informed workforce. Many of the NRC's qualification programs address specific aspects of nuclear oversight. In a dynamic regulatory environment, it is essential that staff remain regularly informed and updated on agency processes, policies, and procedures.

Additionally, the responsibility for reminding staff to complete required refresher training often falls to the individual branch chiefs. Given the frequent rotation of branch chiefs, this decentralized approach poses a risk of lapses in the continuity of refresher training and oversight of that training. Implementing a centralized, automated notification information system would help mitigate this risk and ensure consistent compliance.

### **Recommendations**

The OIG recommends that the EDO:

- 2.1. Update inspection manual chapters and office instruction(s) addressing qualification programs to include guidance about reminding staff of required refresher training; and,
- 2.2. Implement a centralized, automated information system to ensure compliance with mandatory refresher training requirements.

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

The OIG recommends that the Executive Director for Operations:

- 1.1. Establish policies, procedures, and a centralized information system to consistently manage, track, and monitor staff qualifications records;
- 2.1. Update inspection manual chapters and office instruction(s) addressing qualification programs to include guidance about reminding staff of required refresher training; and,
- 2.2. Implement a centralized, automated information system to ensure compliance with mandatory refresher training requirements.



## V. NRC COMMENTS

Agency Management reviewed the discussion draft version of this report and had minor comments, which have been incorporated into the report. The NRC waived the exit conference with the OIG on September 11, 2025.

## OBJECTIVE, SCOPE, AND METHODOLOGY

### Objective

The audit objective was to determine the adequacy of the NRC's process for managing, tracking, and monitoring its qualification programs.

### Scope

This audit focused on the NRC's process for managing, tracking, and monitoring its qualification programs. The OIG conducted this performance audit at the NRC's headquarters in Rockville, Maryland, from June 2024 to April 2025 and reviewed the NRC's Headquarters and Regional Offices that issue qualifications.

The OIG reviewed and analyzed internal controls related to the audit objective. Specifically, the OIG reviewed the components of information systems and quality information. Within those components, the OIG reviewed the principles of design of the entity's information system, design of appropriate types of control activities, identification of information requirements, relevant data from reliable sources, and data processed into quality information.

### Methodology

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

- U.S. Government Accountability Office, *Standards for Internal Control in the Federal Government*, GAO-14-704G, dated September 2014;
- U.S. Office of Personnel Management, *Guide for Collection and Management of Training Information*, dated August 2008;
- Nuclear Regulatory Commission, *Records Management Program*, dated January 2023;
- Nuclear Regulatory Commission, *Principles of Good Regulation*, dated February 2025;

- Office of Administration 504, Revision 4, *Qualification Program*, dated April 2023;
- Inspection Manual Chapter 1245, *Qualification Program for Reactor Inspectors*, dated May 2024;
- Inspection Manual Chapter 1246, *Formal Qualification Programs in the Nuclear Material Safety and Safeguards Program Area*, dated October, 2011;
- Inspection Manual Chapter 1247, *Qualification Program for Fuel Facility Inspectors in the Nuclear Material Safety and Safeguards Program Area*, dated October 2014; and,
- Inspection Manual Chapter 1248, *Qualification Programs for Federal and State Materials and Environmental Management Programs*, dated April 2013.

The OIG interviewed NRC staff and management across the agency to understand qualification policies and processes. This includes the Office of Nuclear Reactor Regulation, the Office of Nuclear Security and Incident Response, the Office of Nuclear Material Safety and Safeguards, the OCHCO, and Regions I through IV. The OIG interviewed staff at the Technical Training Center to learn about the new qualification program for resident inspectors in training and also interviewed representatives from three licensees to understand industry standards for systems, processes, procedures, and guidelines on tracking staff qualifications.

The audit team obtained source documents from TMS and ADAMS to include qualification memos (held in ADAMS) and training qualification completion notifications (from TMS). The ADAMS documentation was pulled by an ADAMS manager for OIG use. Entries were verified by comparing information entered into the various databases to confirm its accuracy.

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 Avinash Jaigobind, Team Leader; Tim Wilson, Audit Manager; Roxana Hartsock, Audit Manager; Lawrence Heller, Senior Management Analyst; and Christopher Tan, Management Analyst.

## OIG QUALIFICATIONS SURVEY

### Survey Methodology

The OIG conducted a voluntary, anonymous survey of the agency's staff to obtain their perspective and recommendations for improving qualification records management. The survey was distributed through office emails to 1,973 NRC staff members. We received 519 responses, a 26percent response rate. Of the 519 responses, 389 respondents (75 percent) indicated that they hold at least one qualification.

The survey included 17 questions and contained single, multiple choice (select all that apply) and free written response questions. Many of the questions contained a response of "other" as an option and allowed the respondent to enter information specific to their qualification. See the survey below.

Question 1: How many years have you worked for the NRC? (Single choice response)

- Less than 1
- 1-5
- 6-9
- 10-14
- 15+

Question 2: What is your supervisory status? (Single choice response)

- Supervisor
- Non-supervisor

Question 3: Which office do you work for? (Single choice response)

- NRR
- NMSS
- NSIR
- Region I
- Region II
- Region III
- Region IV

Question 4: What is your primary position function? (Single choice response)

- Conducting Inspections
- Reactor Licensing
- Materials Licensing
- Technical Reviewer
- Examiner
- Emergency Response
- Administrative
- Management
- Other (please explain)

Question 5: How many NRC qualifications do you hold? (Single choice response)

- None
- One
- Two
- More than Two

Question 6: List your current qualifications in the space below. If you do not have qualifications, write "N/A." (Free written response)

Question 7: Who tracks your qualifications? Select all that apply. (Multiple response)

- Office Director
- Division Director
- Branch Chief
- Not Tracked
- Self-Tracked
- N/A
- Other: \_\_\_\_\_

Question 8: What system does the above staff member use to track your qualifications? Select all that apply. (Multiple response)

- TMS
- ADAMS
- RPS
- Hard Copy
- N/A
- Other: \_\_\_\_\_

Question 9: Are you aware of any guidance or policies/procedures related to refreshing your qualification(s)? If your qualifications(s) do not require refreshing, select N/A. (Free written response)

Question 10: If you have a qualification(s) that require refreshing, have they been refreshed? (Single choice response)

- Yes
- No
- N/A

Question 11: If your qualification(s) require a refresher, what is the grace period for completing the training? If refresher is not required, select “N/A.” If you have multiple qualifications with different refresher periods, please list those in order. (Multiple response)

- 1 year
- 2 years
- 3 years
- 4 years
- 5 years
- N/A

Question 12: How are you reminded that your qualification(s) need to be refreshed? Select all that apply. (Multiple response)

- Automatic Email Notification
- Supervisor Notification
- Individual who tracks qualification reminder
- No reminder
- Self-Monitoring
- N/A
- Other: \_\_\_\_\_

Question 13: What are the repercussions for not refreshing your qualifications? (Single choice response)

- No Repercussion
- Management Intervention
- Suspension of duties pending refresher completion
- Losing qualifications
- N/A
- Other: \_\_\_\_\_



Question 14: To your knowledge, are any NRC staff members performing duties requiring qualifications without the proper training or qualification? If yes, write “yes,” and you may provide details in the space. If no, write “no.” (Free written response)

Question 15: To your knowledge, are any NRC staff members performing duties with qualifications that have not been refreshed? If yes, write “yes,” and you may provide details in the space provided below. If no, write “no.” (Free written response)

Question 16: Are the classes needed to refresh your qualification(s) readily available, such as through TMS or the Technical Training Center? If yes, write “yes” in the space below. If no, write “no” and explain how you receive the needed training. (Free written response)

Question 17: How would you improve the NRC’s process to manage, track, and monitor the qualifications program? Is there anything else you would like to share related to this topic? (Free written response)

## 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.

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