



OFFICE OF THE INSPECTOR GENERAL

U.S. NUCLEAR REGULATORY COMMISSION
DEFENSE NUCLEAR FACILITIES SAFETY BOARD

Audit of the NRC's Grants Pre-Award and Award Processes

OIG-21-A-11
June 8, 2021



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

**OFFICE OF THE
INSPECTOR GENERAL**

June 8, 2021

MEMORANDUM TO: Margaret M. Doane
Executive Director for Operations

FROM: Eric Rivera */RA/*
Acting Assistant Inspector General for Audits

SUBJECT: AUDIT OF THE NRC'S GRANTS PRE-AWARD AND
AWARD PROCESSES (OIG-21-A-11)

Attached is the Office of the Inspector General's (OIG) audit report titled *Audit of the NRC's Grants Pre-Award and Award Processes*.

The report presents the results of the subject audit. Following the April 22, 2021, 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 recommendation(s) within 30 days of the date of this memorandum. Actions taken or planned are subject to OIG followup as stated in Management Directive 6.1.

We appreciate the cooperation extended to us by members of your staff during the audit. If you have any questions or comments about our report, please contact me at (301) 415-5915 or Terri Cooper, Team Leader, at (301) 415-5965.

Attachment: As stated



Office of the Inspector General

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

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Results in Brief

Why We Did This Review

The Omnibus Appropriations Act of 2009 (the Act) established the Integrated University Program (IUP) between the U.S. Nuclear Regulatory Commission (NRC), the Department of Energy, and the National Nuclear Security Administration. The Act authorized the appropriation of \$45 million per year from Fiscal Year (FY) 2009 through FY 2019 with \$15 million for each agency.

Combined, the NRC grants program from FY 2008 through FY 2019 comprised 533 grants and totaled roughly \$185 million. The NRC dedicates approximately three full-time equivalent employees to grant pre-award and award.

The audit objectives were to determine if (1) the NRC's policies and procedures for reviewing grant proposals and making awards comply with applicable federal regulations, and (2) internal controls over the pre-award and award processes are adequate.

Audit of the NRC's Grants Pre-Award and Award Processes

What We Found

The NRC's policies and procedures for reviewing grant proposals and making awards comply with applicable federal regulations. The NRC has made improvements to the program, such as conducting extensive research of potential grantees prior to awarding a grant. In addition, the agency started performing a more robust analysis of grant funding and spending. However, internal controls over the pre-award and award grant processes need improvement. Specifically, the NRC should improve its grant review process and should maintain grant records in accordance with NRC policy.

What We Recommend

The report contains recommendations to revise NRC policy on the grant review process, develop guidance for the use of additional and specific conditions, develop a process to validate the citizenship status of applicants, and develop and implement a process to ensure records are uploaded to the appropriate repository.

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ABBREVIATIONS AND ACRONYMS

ADM	Office of Administration
AMD	Acquisition Management Division
ASAP	Automated Standard Application for Payments
C.F.R.	Code of Federal Regulations
FOA	Funding Opportunity Announcement
FY	Fiscal Year
GAO	Government Accountability Office
IUP	Integrated University Program
MD	Management Directive
NRC	U.S. Nuclear Regulatory Commission
OGC	Office of the General Counsel
OIG	Office of the Inspector General
RES	Office of Nuclear Regulatory Research
SBCR	Office of Small Business and Civil Rights
STAQS	Strategic Acquisition System

I. BACKGROUND

Integrated University Program

The Omnibus Appropriations Act of 2009 (the Act) established the Integrated University Program (IUP) between the U.S. Nuclear Regulatory Commission (NRC), the Department of Energy, and the National Nuclear Security Administration. These three organizations share mutual goals and objectives regarding support of university research and development, nuclear science, and engineering programs.

The Act authorized:

- The appropriation of \$45 million per year from Fiscal Year (FY) 2009 through FY 2019 with \$15 million for each agency.¹
- The use of \$10 million by each organization to support university research and development areas relevant to their respective organization's mission.
- The use of \$5 million by each organization to support a jointly implemented Nuclear Science and Engineering Grant Program that will support multiyear research projects that do not align with programmatic missions but are critical to maintaining the discipline of nuclear science and engineering.

The NRC, the Department of Energy, and the National Nuclear Security Administration independently manage their own portions of the IUP but communicate frequently with each other to coordinate and avoid duplication.

NRC Grants

The NRC provides various types of grants to support educational institutions and research to facilitate the support of nuclear science and engineering. The NRC's IUP encompasses the following types of grants:

- Scholarships
- Fellowships
- Faculty Development

¹ In 2020, the NRC did not award any grants related to the IUP.

- Trade School and Community College Scholarships

The NRC also provides research financial assistance program grants which fund organizations that propose to conduct independent experiments and analyses, develop technical bases for supporting realistic safety decisions, and evaluate safety issues involving current and new designs and technologies.

Combined, the NRC grants program from FY 2008 through FY 2019 comprised 533 grants and totaled roughly \$185 million.² The NRC dedicates approximately three full-time equivalent employees to grant pre-award and award.

Involved NRC Offices and Systems Used for Grants

Four NRC offices have roles and responsibilities for grants. The Office of Administration (ADM), specifically the Acquisition Management Division (AMD), supports awarding, administering, and closing NRC grants. Grant officers are responsible for (1) negotiating with prospective grantees before awarding the grant, (2) performing a detailed financial and business analysis of application packages and making determinations of high risk applicants, (3) ensuring the maintenance of the official grant record file, and, (4) suspending or terminating individual awards.³

The Office of Nuclear Regulatory Research (RES) grant specialists perform the day-to-day administration of grants. During pre-award, they (1) coordinate with the ADM to create a Funding Opportunity Announcement (FOA), (2) create an independent panel to evaluate the applications, and, (3) provide funding recommendations to the grants officer.

The Office of Small Business and Civil Rights (SBCR) manages existing minority serving institution grants.⁴ SBCR staff also lead the agency's compliance efforts to ensure fair and equitable treatment in federal

² The NRC did not award any IUP grants in FY 2020.

³ The grant officer provides proper notice to recipients in advance of suspending payments, including information on how to remedy the suspension and ensure the resumption of payments once the recipient meets the requirements.

⁴ These types of grants are no longer being newly awarded by the NRC because of Project Aim, an effort within the NRC to fulfill its safety and security mission while improving its efficiency, effectiveness and agility.

financially assisted programs and activities and ensure that potential grantees comply with federal civil rights requirements.

The Office of the General Counsel (OGC) reviews grant applications to determine compliance with the Funding Opportunity Announcement terms, and to ensure awards to grantees do not give rise to conflicts of interest.

The Strategic Acquisition System (STAQS) is the system used to track all contracts and grants. The STAQS is the official repository for grant documentation.

The Automated Standard Application for Payments (ASAP) system is an all-electronic payment and information system developed by the U.S. Department of the Treasury's Financial Management Service. Grantee organizations receiving federal funds can draw from ASAP accounts pre-authorized by the NRC.

Pre-Award and Award Processes

The ADM and the RES have responsibilities during the pre-award and award processes. For a visual representation of this process, see Figure 1 below.

ADM:

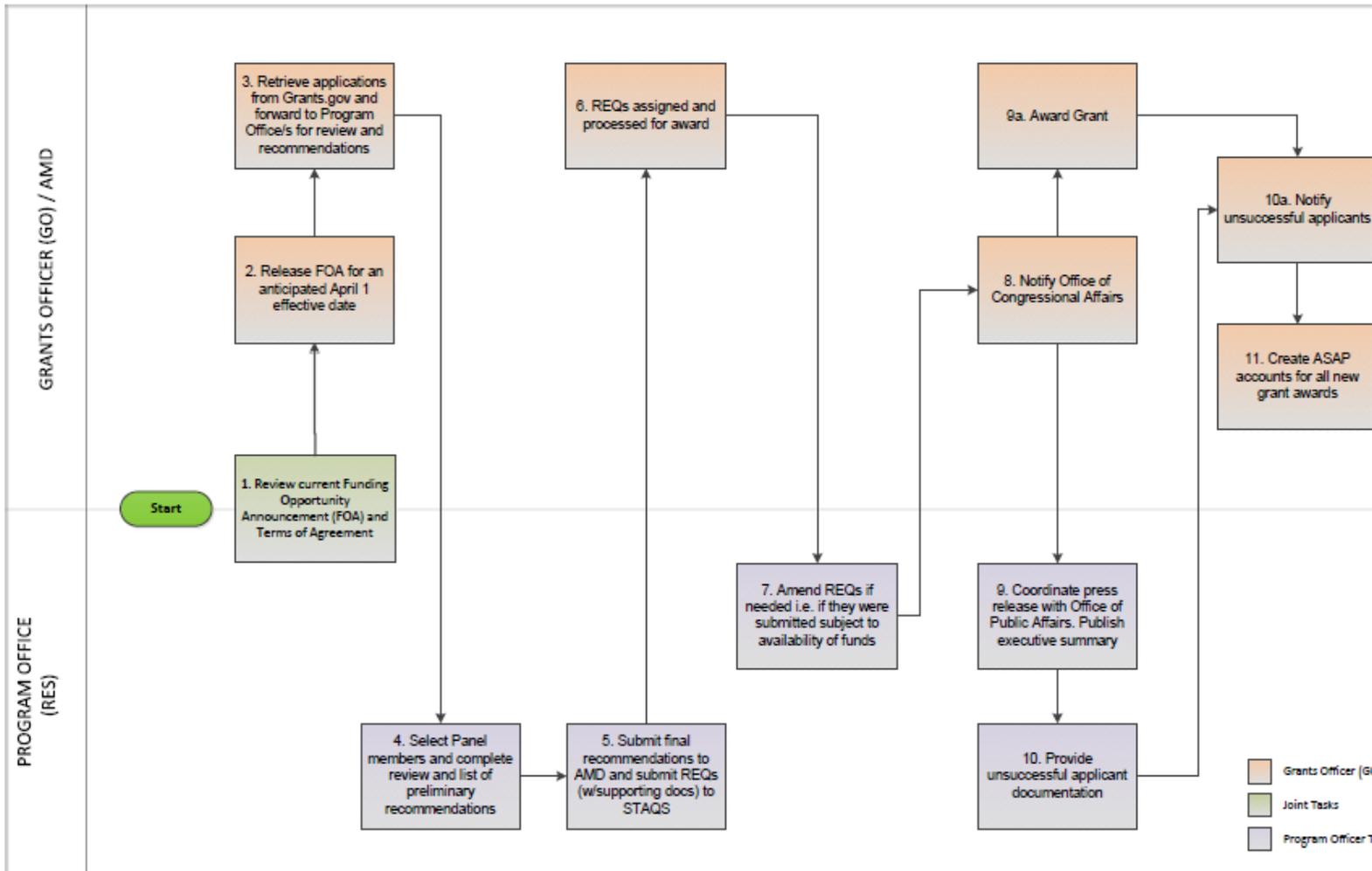
- Retrieves applications from Grants.gov and forwards the information to the program office;
- Processes the requisitions for an award;
- Notifies the Office of Congressional Affairs of the grants to be awarded;
- Notifies the unsuccessful applicants; and,
- Awards the successful grant applicants and creates accounts for the new grants in the ASAP.

RES:

- Selects an independent panel to complete a review of the applications and creates a list of preliminary grant funding recommendations;
- Submits final recommendations to the ADM through requisitions in the STAQS;
- Amends the requisitions as necessary;

- Coordinates a press release with the Office of Public Affairs; and
- Provides unsuccessful applicant documentation to the ADM.

Figure 1: Grants Pre-Award/Award Process



Source: NRC generated.

II. OBJECTIVE

The audit objectives were to determine if (1) the NRC's policies and procedures for reviewing grant proposals and making awards comply with applicable federal regulations, and (2) internal controls over the pre-award and award processes are adequate. The report appendix contains information on the audit scope and methodology.

III. FINDINGS

The NRC's policies and procedures for reviewing grant proposals and making awards comply with applicable federal regulations. The NRC has made improvements to the program, such as conducting extensive research of potential grantees prior to awarding a grant. In addition, the agency started performing a more robust analysis of grant funding and spending. However, internal controls over the pre-award and award grant processes need improvement. Specifically, the NRC should improve its grant review process and should maintain grant records in accordance with NRC policy.

A. Grant Review Process Needs Improvement

Federal regulations state the review process for grant applications may consider such things as the recipient's history of performance. The NRC's FOA would generally recommend a recipient for funding unless they had demonstrated prior award performance issues, multiple prior NRC grant awards, or their current awards have high unexpended funds. It also requires U.S. citizenship or permanent residence for students and faculty. However, the NRC does not always apply this guidance consistently. This inconsistent application of the guidance occurs because the policies and procedures that outline that review are inadequate. As a result, the NRC could put grant funds to better use and decrease the risk that the grant funds will not be used for their intended purpose.

What Is Required

The NRC Should Review Prior Grant Awards for Current Applicants

Title 2 Code of Federal Regulations (C.F.R.) 200.205 states that in evaluating risks posed by applicants, the federal awarding agency may use a risk-based approach and may consider any items such as the following:

- Financial stability;
- Quality of management systems and ability to meet the management standards;
- History of performance including the applicant's record in managing federal awards, if it is a prior recipient of federal awards. This may include timeliness of compliance with applicable reporting requirements, conformance to the terms and conditions of previous federal awards, and if applicable, the extent to which applicants have expended any previously awarded amounts before future awards;
- Audit reports and findings; and,
- Ability to implement statutory, regulatory, and other requirements.

Management Directive (MD) 11.6, *Financial Assistance Program*, the NRC's governing policy document for grants, states that the ADM is responsible for reviewing business aspects of the application. MD 11.6 further states that this review is to determine the applicant's ability to manage the award's financial aspects. If there is doubt of the applicant's ability to administer funds, the ADM should solicit further information or take other steps to ensure federal funds are safeguarded.

The NRC's FY 2019 FOA states: "the selecting official generally recommends funding in rank order unless a particular recipient/selectee's application:

- Supports geographic diversity;
- Assures diversity in technical disciplines;
- Demonstrated prior award performance issues;
- The recipient received multiple prior NRC grant awards; or,
- Current awards have high unexpended grant funds."

Additionally, the FOA provides that “all scholarship, fellowship, faculty development, and trade school and community college students and supported faculty must be United States citizens or a noncitizen national of the United States or have been lawfully admitted to the United States for permanent residence.”

The U.S. Government Accountability Office (GAO), *Standards for Internal Control in the Federal Government*,⁵ states that management should use quality information to achieve the entity's objectives. Agencies use such information to make informed decisions regarding the use and prioritization of resources, as well as evaluating agency performance and potential risk areas that could affect efficiency and effectiveness.

What We Found

The NRC's Pre-Award Grant Review Needs Improvement

The NRC's pre-award grant review needs improvement because the agency does not fully apply criteria to rank grant applications for award. In addition, the NRC awards grants in subsequent years on suspended accounts. Lastly, the NRC could improve its review of citizenship/residence status for students and faculty on agency grants.

The NRC Does Not Fully Apply Criteria

The NRC's FY 2019 FOA provides criteria that the NRC will use to rank grant applications for award. However, the criteria are not fully applied when ranking applications.

In FY 2019, the NRC received 30 applications for faculty development grants. Four of these applications did not comply with the FOA and the NRC did not consider them. A review panel rated the remaining 26 applications moving on for consideration of award those who received a combined rating above 75 percent. Twelve such applications received scores above 75 percent. However, the NRC removed two from consideration for having high unexpended funds or having a current no cost extension on previous awards. Then, the agency considered the next

⁵ GAO, *Standards for Internal Control in the Federal Government*, GAO-14-704G, September 2014.

two applications in rank order. The NRC removed one of these applications from consideration for having a no cost extension on a previous grant and awarded the other application.

In addition, a university which received a grant in the FY 2019 faculty development pool also received a faculty development grant from the NRC in FY 2018. When awarding the FY 2019 faculty development grant, the university had not spent any of the FY 2018 grant money, failed to meet the reporting requirements, and had its ASAP account for the FY 2018 grant suspended.

The NRC Awards Grants in Subsequent Years on Suspended Grant Accounts

The NRC awards grants to previous institutions with suspended accounts. In FY 2019, the NRC awarded four grants to schools that had an ASAP account suspended by the NRC. This award meant that the NRC deemed the school non-compliant enough to be suspended on a previous grant, but still responsible enough to receive a new grant. According to 2 C.F.R. 200.207, agencies can impose additional specific conditions as needed to applicants that pose a risk. However, the NRC does not have agency guidance for when to use additional and specific conditions to grants agreements for awardees that have prior inconsistent application of grant requirements. See Figure 2 below for examples of universities with a suspended ASAP account that received a new grant in the subsequent fiscal year.

Figure 2: Universities with Suspended ASAP Accounts that Received a New Grant

School	Date Suspended	New Grant Date
Pennsylvania State University	12/18/18	7/11/19
Rensselaer Polytechnic Institute	2/13/19	7/11/19
Virginia Polytechnic Institute and State University	2/14/19	8/6/19 8/31/19
University of Texas at Austin	7/8/19	8/30/19

Source: OIG Generated

The NRC's Review of Citizenship and Residence Status Could be Improved

The NRC could improve its review of citizenship/residence status for students and faculty on NRC grants. An agency official stated that grant staff are not consistently reviewing applicant citizenship. Additionally, grant staff are not verifying the citizenship of applicants from embargoed countries. For example, principal investigators on visas expiring before the grant end date are riskier than other applicants.

Why This Occurred

Policies and Procedures Need Improvement

The NRC's review of grant applications needs improvement. The policies and procedures that outline that review are inadequate. MD 11.6 and the FY 2019 FOA should include more detail for completing the review and minimizing the risk of wasting federal funds.

Although MD 11.6 calls for a review to "determine the recipient's ability to manage the financial aspects," it does not provide detail on how to accomplish such a review. The NRC's FY 2019 FOA states the RES will recommend funding in rank order unless the applicant has received multiple prior NRC grants, demonstrated prior performance issues, or has high unexpended funds. The FOA provides some areas to review but is an external document, not the governing guidance for the NRC's process. Moreover, the reviews mentioned in the MD and the FOA appear similar, but they assign the reviews to different NRC offices.

Furthermore, the NRC has awarded grants to schools with suspended accounts because the MD does not require a prior review of the suspended account list. The NRC can find schools that have suspended accounts on previous grants by reviewing the ASAP account list. Once the NRC identifies these schools, the agency should take steps to ensure the safeguarding of federal funds, as MD 11.6 states. One option would be to impose additional and specific conditions allowed under 2 C.F.R. 200.207.

The NRC does not consistently review citizenship requirements, and the validation process needs to be improved. The NRC added language in its FY 2021 FOA for applicants to certify compliance with citizenship requirements of the FOA. The NRC is relying on the applicants' self-certification for assurance that the application complies with the citizenship requirements in the FOA.

Why This Is Important

Grant Funds Could Be Put to Better Use

Grants awarded to recipients that had high unexpended funds or suspended accounts could have been awarded to other applicants that potentially would have found better use for the funds. Grants awarded to recipients that had high unexpended funds or suspended accounts increases the risk that grant funds will not be used for their intended purpose.

Recommendations

The OIG recommends that the Executive Director for Operations:

1. Revise agency policies to require:
 - A. A review of applicants' geographic diversity, diversity in technical disciplines, prior award performance issues, number of prior NRC awards, and current unexpended grant funds, including the NRC staff responsible for the review, and
 - B. A review of the NRC's suspended Automated Standard Application for Payments account list to determine applicants' performance histories, including the NRC staff responsible for the review;
2. Develop agency guidance for when to use additional and specific conditions in grant agreements for awardees that have prior inconsistent application of grant requirements; and,

3. Implement a requirement whereby the grant application shall require the validation of citizenship status or lawful admittance to the United States as a permanent resident, for individuals proposed in the grant application.

B. Maintenance of Grant Records Needs Improvement

NRC policy states that documents in hard copy are also electronically captured in the current electronic system used by the AMD. However, the NRC is not consistently maintaining grant documents in the electronic repository. This occurs because the NRC needs to improve controls to ensure that all grant documents are electronically available. As a result, NRC employees may not have access to grant documents required to make informed decisions.

What Is Required

Federal and Agency Records Management Guidance Require the Agency to Retain Documentation in the Current Electronic System

Federal and agency records management guidance require the agency to retain documentation in the current electronic system. Title 2 C.F.R. 200.333 states that records pertinent to a federal award must be retained for three years from the date of submission of the final expenditure report. MD 11.6 states the AMD maintains the official grant or cooperative agreement file. The grant officer ensures that all materials are properly placed and maintained in that file. Documents contained in the hard file are also electronically captured in the current electronic system being used by the AMD. The GAO's *Standards for Internal Control in the Federal Government* states that management should clearly document internal control and all transactions and other significant events in a manner that allows the documentation, paper or electronic, to be readily available for examination.

What We Found

Grant Documents Retained in the NRC's Electronic Repository Are Inconsistent

Grant documents retained in the NRC's electronic repository are inconsistent. The OIG reviewed and analyzed FY 2018 and 2019 grants and completed a series of judgmental samples.

The OIG reviewed and analyzed the Federal Financial Reports (Standard Form 425s) for 40 grants across FY 2018 and 2019 and found that 16 out of 124 required semiannual Standard Form 425 reports were missing from the STAQS.

Furthermore, the OIG reviewed and analyzed the electronic files contained in the STAQS for 10 grants awarded in FY 2018 and 10 grants awarded in FY 2019 to ensure that electronic documentation exists for each grant in the pre-award and award grant process. In the sample, three grant files did not include the grant application, and six files did not include evidence that AMD staff notified the Office of Congressional Affairs of the award.

Although some electronic files were missing from the STAQS electronic repository at the time of the OIG's review, the agency provided some of those missing electronic files via email. The missing electronic files demonstrate the inconsistent retention of grant documents in the NRC's electronic repository.

Why This Occurred

Control Improvements are Needed to Ensure Grant Documents are Electronically Available

Grant documents in the NRC's electronic repository are inconsistent because existing controls designed to ensure that grant documents are electronically available need improvement. Although NRC policies and

procedures require grant documents to be uploaded electronically, they lack a process detailing how and when to accomplish this.

Why This Is Important

Improving Controls Will Increase Review Efficiency

Improving controls to ensure grant documents are electronically available will increase the NRC's efficiency in the grant review process. The NRC will be able to access grant documents more efficiently, which will improve review times and allow staff to make informed decisions.

Recommendations

OIG recommends that the Executive Director for Operations:

4. Develop and implement a process to ensure all grant documents and records are uploaded to the appropriate electronic repository.

IV. CONSOLIDATED LIST OF RECOMMENDATIONS

The OIG recommends that the Executive Director for Operations:

1. Revise agency policies to require:
 - A. A review of applicants' geographic diversity, diversity in technical disciplines, prior award performance issues, number of prior NRC awards, and current unexpended grant funds, including the NRC staff responsible for the review, and
 - B. A review of the NRC's suspended Automated Standard Application for Payments account list to determine applicants' performance histories, including the NRC staff responsible for the review;
2. Develop agency guidance for when to use additional and specific conditions into grant agreements for awardees that have prior inconsistent application of grant requirements; and,
3. Implement a requirement whereby the grant application shall require the validation of citizenship status or lawful admittance to the United States as a permanent resident, for individuals proposed in the grant application; and,
4. Develop and implement a process to ensure all grant documents and records are uploaded to the appropriate electronic repository.

V. AGENCY COMMENTS

An exit conference was held with the agency on April 22, 2021. After reviewing a discussion draft, agency management provided comments that have been incorporated into this report, as appropriate. As a result, agency management opted not to provide formal comments for inclusion in this report.

OBJECTIVE, SCOPE, AND METHODOLOGY

Objective

The audit objectives were to determine if (1) the NRC's policies and procedures for reviewing grant proposals and making awards comply with applicable federal regulations, and (2) internal controls over the pre-award and award processes are adequate.

Scope

The audit focused on the agency's pre-award and award grant process for NRC IUP grants awarded in FYs 2018 and 2019. We conducted this performance audit at NRC headquarters (Rockville, Maryland) from February 2018 through February 2021.⁶ The OIG previously visited four grantees located in Maryland, Pennsylvania, Louisiana, and Florida.

Internal controls related to the audit objective were reviewed and analyzed. Specifically, the OIG reviewed the components of risk assessment, control activities, and information and communication. Within those components, the OIG reviewed the principles of defining objectives and risk tolerances; identifying, analyzing, and responding to risk; assessing fraud risk; designing control activities; designing activities for the information system; implementing control activities through policies; using quality information; and, communicating internally.

Methodology

The OIG reviewed relevant criteria and guidance documents for this audit including

- The *Atomic Energy Act of 1954*, as amended.
- The *Energy Policy Act of 2005*.
- 42 United States Code § 16274a. *Integrated University Program*.

⁶ The OIG conducted the audit intermittently in Fiscal Years 2018 and 2019 and conducted the remainder of the audit from July 2020 through February 2021.

- Title 31 United States Code §7502(a), *Audit Requirements, Exemptions*.
- The *Federal Grant and Cooperative Agreement Act of 1977*.
- 2 C.F.R. 200 *Uniform Administrative Requirements, Cost Principles and Audit Requirements for Federal Awards, Title 2 Grants and Agreements*.
- MD 11.6, *Financial Assistance Program*.
- The GAO's *Standards for Internal Control in the Federal Government*.
- *Threats to the U.S. Research Enterprise: China's Talent Recruitment Plans*, Staff Report, Permanent Subcommittee on Investigations, United States Senate.

The OIG interviewed staff that perform pre-award and award grant duties throughout the NRC. These interviews included key NRC staff from the ADM, the RES, the OGC, and the SBCR involved in the pre-award and award process. The OIG also received walkthroughs of Grants Acquisition Navigator and the STAQS as it relates to the NRC's pre-award and award grant process. OIG staff received training on the ASAP to learn to run and understand ASAP reports and queries.

The OIG also previously conducted four site visits to interview staff from organizations outside of the NRC, including the College of Southern Maryland, Pennsylvania State University, the University of Florida, and Louisiana State University. The OIG also conducted interviews and follow-up question sessions with Principal Investigators and other staff involved with the management of NRC grants.

The OIG conducted various data analytic reviews, judgmental sampling, and transactional testing of FY 2018 and 2019 grants. The OIG also examined and analyzed FY 2018 and 2019 grants data through the Standard Form 425s, in the STAQS, and in the ASAP. Furthermore, the OIG conducted a compliance review of the NRC's pre-award and award process through a judgmental sample of the NRC's grants.

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 Eric Rivera, Acting Assistant Inspector General for Audit; Terri Cooper, Team Leader; Vicki Foster, Team Leader; Gail F.P. Butler, Quality Assurance Manager; Jenny Cheung, Audit Manager; Felicia Silver, Audit Manager; Timothy Nelson, Audit Manager; Tincy Thomas, Audit Manager; Curtis Browne, Senior Auditor; George Gusack, Senior Auditor; Muhammad Arefin, Senior Auditor; William Chung, Senior Auditor; Michael Steinberg, Senior Auditor; Phillipe Mathis, Intern; and George Auel, Intern.

TO REPORT FRAUD, WASTE, OR ABUSE

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

COMMENTS AND SUGGESTIONS

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

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