

UNITED STATES OFFICE OF  
GOVERNMENT ETHICS



November 6, 2015

Margaret Doane  
General Counsel and  
Designated Agency Ethics Official  
Nuclear Regulatory Commission  
11555 Rockville Pike  
Rockville, MD 20852

Dear Ms. Doane:

As a result of its review of the Nuclear Regulatory Commission (NRC) ethics program, the United States Office of Government Ethics (OGE) issued 13 recommendations in its November 2014 program review report. During August and September 2015, OGE conducted a follow-up review to assess the implementation of the recommendations. The table below summarizes the results of OGE's follow-up review.

	Recommendation	Agency Action	Status
1	Improve the filing timeliness of new entrant public financial disclosure reports.	<p>NRC improved its process for notifying new entrant public financial disclosure report filers of the filing requirement.</p> <p>Current NRC employees who are promoted into a filing position receive an email that links to NRC's electronic filing system and provides filing instructions. Employees hired from outside of NRC receive a blank public financial disclosure report with their offer letter. This blank report is collected on the new employee's entry date as part of the onboarding process.</p> <p>OGE reviewed a sample of new entrant public financial disclosure reports filed since the November 2014 program review. Filing timeliness improved to 88%.</p>	Closed

2	Improve the certification timeliness of all public financial disclosure reports.	NRC developed and documented new procedures to assign and track reviews of public reports. OGE verified that 100% of public financial disclosure reports filed since the November 2014 program review were certified in a timely manner.	Closed
3	Purge any existing public financial disclosure reports that have been kept beyond the retention period.	<p>NRC destroyed all paper public financial disclosure reports that exceeded the retention period, but still has electronic public financial disclosure reports that exceed the retention period.</p> <p>In late September 2015, NRC began testing a new software script capable of deleting the electronic reports. This recommendation remains open pending the implementation of the new software and the deletion of the remaining electronic reports.</p>	Open
4	Establish a regular destruction schedule for public financial disclosure reports.	NRC established an annual destruction schedule and updated its written procedures for destroying public financial disclosure reports that have reached the end of their retention period.	Closed
5	Improve the filing timeliness of new entrant confidential financial disclosure reports.	Since March 2015, when NRC implemented an improved system to identify and collect new entrant confidential financial disclosure reports, filing timeliness improved to 82%.	Closed
6	Implement a permanent system to timely identify new entrant confidential financial disclosure filers and collect their reports.	<p>In March 2015, NRC assigned responsibilities for the new entrant confidential financial disclosure identification and collection process.</p> <p>Under this process, the human resources office is in charge of identifying new entrant filers and notifying the filers via email of the filing requirement within 30 days of the new filer's entrance date. The email contains a link to an internal site where the filer can complete their new entrant confidential financial disclosure report. The ethics office, which is responsible for collecting, reviewing and certifying the reports, is also notified once new entrant filers are identified.</p>	Closed

7	Purge any existing confidential financial disclosure reports that have been kept beyond the retention period.	<p>NRC destroyed all paper confidential financial disclosure reports that exceeded the retention period, but still has electronic confidential financial disclosure reports that exceed the retention period.</p> <p>In late September 2015, NRC began testing a new software script capable of deleting the electronic reports. This recommendation remains open pending the implementation of the new software and the deletion of the remaining electronic reports.</p>	Open
8	Establish a regular destruction schedule for confidential financial disclosure reports.	NRC established an annual destruction schedule and updated its written procedures for destroying confidential financial disclosure reports that have reached the end of their retention period.	Closed
9	Ensure that the 31 covered employees who did not receive annual ethics training for 2013 complete the required training.	NRC provided documentation to OGE confirming that all 31 covered employees received the required annual ethics training.	Closed
10	Improve the filing timeliness of special Government employee (SGE) financial disclosure reports.	<p>NRC identified and documented all SGEs who are required to file financial disclosure reports. Ethics officials then notified these SGEs of the filing requirement.</p> <p>OGE reviewed a sample of SGE financial disclosure reports filed since the November 2014 program review. Filing timeliness improved to 85%.</p>	Closed
11	Improve SGE financial disclosure handling to ensure SGE financial disclosure reports are properly stored and accessible.	<p>NRC provided OGE with documentation of their improved process for ensuring SGE financial disclosure reports are properly stored and accessible.</p> <p>Under this process, NRC's human resources office receives the financial disclosure reports from the SGEs and securely provides them to the ethics office for review and then storage in locked cabinets.</p>	Closed
12	Recover the missing SGE financial disclosure reports.	NRC provided OGE with reviewed and certified copies of the missing SGE financial disclosure reports.	Closed
13	Ensure that the SGE who did not receive annual ethics training for 2013 completes the required training.	NRC provided OGE with signed documentation confirming that the SGE in question completed the required training.	Closed

Ms. Margaret Doane  
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Thank you for your assistance during the follow-up review. OGE will perform a second follow-up during 2016 to assess the status of the two outstanding recommendations. We encourage you to contact your OGE Desk Officer for ethics program support.

Sincerely,

A handwritten signature in black ink, appearing to read 'Dale Christopher', written over the printed name.

Dale Christopher  
Deputy Director for Compliance