2020 U.S. Nuclear Regulatory Commission

Chief FOIA Officer Report

David Nelson

Section 1: Steps Taken to Apply the Presumption of Openness

The guiding principle underlying DOJ's FOIA Guidelines is the presumption of openness.

Please answer the following questions, in order to describe the steps your agency has taken to ensure that the presumption of openness is being applied to all decisions involving the FOIA. You may also include any additional information that illustrates how your agency is working to apply the presumption of openness.

A. FOIA Leadership

1. The FOIA requires each agency to designate a Chief FOIA Officer who is a senior official at the Assistant Secretary or equivalent level. Is your agency's Chief FOIA Officer at this level?

>   Yes.

2. Please provide the name and title of your agency's Chief FOIA Officer.

>   David Nelson, Chief Information Officer.

B. FOIA Training

3. Did your FOIA professionals or the personnel at your agency who have FOIA responsibilities attend any substantive FOIA training or conference during the reporting period such as that provided by the Department of Justice?

>   Yes.

4. If yes, please provide a brief description of the type of training attended or conducted and the topics covered.

>   Multiple NRC FOIA professionals attended the American Society of Access Professionals annual training conference, held in Arlington, VA. In addition, FOIA professionals participated in DOJ offered trainings, such as: Introduction to the Freedom of Information Act, Advanced Freedom of Information Act Seminar, and Continuing Freedom of Information Act Education.

>   The NRC FOIA Officer provided office specific training, which was tailored toward the offices' specific needs, for understanding and processing FOIA requests.

>   Government Information Specialists can explain the FOIA and NRC practices in processing FOIA requests whenever they meet/confer with NRC staff, who are the subject matter experts knowledgeable about the records being requested. On such occasions, the Government Information Specialists provide insight into subjects such as what "reasonable searches" may entail, how we might confer with the requester in an effort to clarify or narrow the scope of requested records, how certain exemptions may apply (or not apply) to NRC records,

whether records are agency or personal records (the latter not being subject to FOIA), the context of exemption (b)(5) deliberative process privilege, and what we look for in a "foreseeable harm" statement to support the exemption claim.

On a few occasions during FY19, we met with NRC staff to reconsider, as appropriate, the approaches taken in the processing of commonly-requested records. Consideration of a change may be due to new case law interpreting the FOIA, or new decision-makers. For example, we met with Office of Inspector General (OIG) staff concerning a change in OIG's practice in the handling of allegers whose identities appear in the records, which the OIG FOIA coordinator provided to the FOIA staff for processing. We also met with OIG staff to revisit the manner in which the Investigation Record (and similar Allegation Record) should be handled under new leadership.

The NRC FOIA and Privacy Officers also provided FOIA and privacy training to the NRC's Information System Security Officers.

5. Provide an estimate of the percentage of your FOIA professionals and staff with FOIA responsibilities who attended substantive FOIA training during this reporting period.

85%.

6. OIP has directed agencies to "take steps to ensure that all of their FOIA professionals attend substantive FOIA training at least once throughout the year." If your response to the previous question is that less than 80% of your FOIA professionals attended training, please explain your agency's plan to ensure that all FOIA professionals receive or attend substantive FOIA training during the next reporting year.

N/A.

C. Outreach

7. Did your FOIA professionals engage in any outreach or dialogue with the requester community or open government groups regarding your administration of the FOIA? Please describe any such outreach or dialogue, and, if applicable, any specific examples of how this dialogue has led to improvements in your agency's FOIA administration.

Yes, the NRC continues to issue a survey to each FOIA requester at the completion of their FOIA request to provide feedback on NRC's administration of the FOIA. The NRC has a distribution list to receive information from the NRC FOIA program. In addition, NRC Government Information Specialists, while communicating with requesters, receive valuable feedback from the requester community regarding areas of improvement for the FOIA program, including updates on the NRC website.

D. Other Initiatives

8. Describe any efforts your agency has undertaken to inform non-FOIA professionals of their obligations under the FOIA.

As referenced in response to question 4, the NRC FOIA Officer provided office specific training which was tailored toward the offices' individual needs for understanding and

processing FOIA requests. Also, the NRC FOIA and Privacy Officers provided FOIA and privacy training, as a component to NRC Information System Security Officer (ISSO) training.

The NRC FOIA program recommends that non-FOIA staff take the DOJ Module "FOIA Training for Federal Employees" as well as participate in the above-mentioned training. In addition, the Office of the Chief Information Officer (OCIO) is working with the Office of the Chief Human Capital Officer (OCHCO) to evaluate whether to implement periodic online refresher FOIA training for all agency employees and contractors.

The NRC has employed internal metrics to track the timeliness of a program's regional office's responsiveness to a FOIA request.

The NRC has adopted uniform language in the Government Information Specialist's elements and standards.

9. Optional -- If there are any other initiatives undertaken by your agency to ensure that the presumption of openness is being applied, please describe them here.

N/A.

Section II: Steps Taken to Ensure that Your Agency Has an Effective System in Place for Responding to Requests

DOJ's FOIA Guidelines emphasize that "[a]pplication of the proper disclosure standard is only one part of ensuring transparency. Open government requires not just a presumption of disclosure, but also an effective system for responding to FOIA requests." It is essential that agencies effectively manage their FOIA program.

Please answer the following questions to describe the steps your agency has taken to ensure that the management of your FOIA program is effective and efficient. You should also include any additional information that describes your agency's efforts in this area.

1. For Fiscal Year 2019, what was the average number of days your agency reported for adjudicating requests for expedited processing? Please see Section VIII.A. of your agency's Fiscal Year 2019 Annual FOIA Report.

1.39 days.

2. If your agency's average number of days to adjudicate requests for expedited processing was above ten calendar days, please describe the steps your agency will take to ensure that requests for expedited processing are adjudicated within ten calendar days or less.

N/A.

3. During the reporting period, did your agency conduct a self-assessment of its FOIA program? If so, please describe the methods used, such as reviewing Annual Report data, using active workflows and track management, reviewing and updating processing procedures, etc.

- Note: In September 2017, OIP released a FOIA Self-Assessment Toolkit as a resource for agencies conducting a self-assessment of their FOIA program. The Toolkit is available on OIP's website for all agencies to use.

The NRC is currently undergoing a FOIA assessment with the Office of Government Information Services (OGIS) and anticipates the completion of the assessment in FY 2020. The NRC has drafted an updated management directive on FOIA and is continuously looking for ways to improve our FOIA program.

4. The FOIA Improvement Act of 2016 requires additional notification to requesters about the services provided by the agency's FOIA Public Liaison. Please provide an estimate of the number of times requesters sought assistance from your agency's FOIA Public Liaison during FY 2019 (please provide a total number or an estimate of the number).

0.

5. Optional -- Please describe:

- Best practices used to ensure that your FOIA system operates efficiently and effectively

The NRC is currently using FOIAOnline, which is a shared service hosted by the Environmental Protection Agency (EPA). The NRC FOIA team has worked throughout FY 2019, and years prior, with EPA to share ideas for areas of improvements, through regularly scheduled meetings with EPA and other partnering agencies. EPA has been using the feedback to develop an improved program, which will aid in the processing of FOIA requests.

The NRC is currently using RedactXpress as a stand-alone application. RedactXpress automates the review and redaction of sensitive information from electronic documents.

The NRC tracks program offices' response times against agency goals and provides quarterly metrics to the heads of each program office.

The FOIA Officer meets regularly with staff from the Office of General Counsel (OGC) and, on an as needed basis, with staff of the Office of the Inspector General (OIG) to discuss FOIA activities, new case law, and more efficient ways to process challenging FOIA requests.

- Any challenges your agency faces in this area

FOIAOnline has been experiencing many challenges, however, EPA is committed to improving the system. EPA staff has been holding regular meeting with other partnering agencies to discuss challenges, budget, and improvements.

NRC is facing challenges in the ability to deduplicate records responsive to FOIA. In order to resolve this challenge, NRC is looking into possible tools that could perform the necessary deduplication function to provide efficiency in processing responsive records under FOIA. Deduplication software could significantly reduce a field of responsive records, which will lessen time spent processing FOIA and increase production speed in responding to FOIA requests.

Section III: Steps Taken to Increase Proactive Disclosures

The Department of Justice has long focused on the need for agencies to work proactively to post information online without waiting for individual requests to be received.

Please answer the following questions to describe the steps your agency has taken to increase the amount of material that is available on your agency websites. In addition to the questions below, you should also describe any additional steps taken by your agency to make and improve proactive disclosures of information.

1. Provide examples of any material that your agency has proactively disclosed during the past reporting year, including records that have been requested and released three or more times in accordance with 5 U.S.C. § 552(a)(2)(D). Please include links to these materials as well.

The NRC has a longstanding policy of conducting its regulatory responsibilities in an open and transparent manner and actively makes records publicly available, without waiting for a FOIA request. The NRC has made available to the public at ML072770468, Guidance for Determining the Public Availability of Documents. NRC Management Directive 3.4, "Release of Information to the Public," provides policy guidance on proactive disclosures of agency information of interest to the public, when no request for information has been made under the FOIA. The policy statement found within MD 3.4 reads, "The U.S. Nuclear Regulatory Commission makes as much information as possible available to the public relating to its health and safety mission, in accordance with its legal responsibilities to protect specific types of information. It is the intent of NRC to routinely make information publicly available that is anticipated to be of interest to the public to make it unnecessary for persons to file a request for the information under the Freedom of Information Act (FOIA). This directive requires review of Commission Decision Documents (SECY papers [SECY's], Commission memoranda [COMs], and staff requirements memoranda [SRMs] for mandatory release under the FOIA, 5 U.S.C. 552(a)(1) and (a)(2)."

The records are released in Agencywide Documents Access and Management System (ADAMS) with stringent time constraints to ensure timely release of non-sensitive records to the public in an accessible electronic format. https://adams.nrc.gov/wba/

- NRC regulatory guides: http://www.nrc.gov/reading-rm/doc-collections/reg-guides/
- Office of the Inspector General reports: https://www.nrc.gov/reading-rm/doc-collections/insp-gen/
- Commission documents: https://www.nrc.gov/reading-rm/doc-collections/commission/recent/2017/
- Quarterly generic issues: https://www.nrc.gov/reading-rm/doc-collections/generic-issues/quarterly/index.html
- Congressional testimony: https://www.nrc.gov/reading-rm/doc-collections/congress-docs/congress-testimony/
- Nuclear Reactor Information - https://www.nrc.gov/reactors.html

2. Beyond posting new material, is your agency taking steps to make the posted information more useful to the public, especially to the community of individuals who regularly access your agency's website?

Yes.

3. If yes, please provide examples of such improvements.

In 2018, NRC developed and posted on YouTube 14 "How To" videos on using the Licensing Support Network (LSN). The 14 videos are (1) Introduction, (2) Basic and Advanced Searches, (3) Accessing the LSN Library Search Page, (4) Finding a Record by the LSN Accession number, (5) Performing a Simple Content Search with Search Terms, (6) Advanced Search – Using Search Terms, Dates and Record Properties, (7) Saving Search Criteria for Future Use, (8) Wildcard Searches, (9) Refining a Search, 10) Using the Facet Tree and Facet Chart, (11) Using the Time-Series Chart, (12) Working with the Results, (13) Viewing the Results and Document Properties, and (14) Saving and Printing the Results. A link to the video series can be found on the public LSN Library web site at https://www.nrc.gov/reading-rm/lsn/index.html.

4. Optional -- Please describe:

- Best practices used to improve proactive disclosures

The agency has dedicated some resources to be used for contractor support to review prioritized documents to see if they can be released to the public. The agency has also purchased software, which is being tested for use in electronically searching documents for terms, which may indicate documents that should not be released. This is anticipated to reduce the staff time to review documents for release to the public.

Reduced staffing across the agency has limited the resources for the review of older documents for public release. A significant digitization project is underway, which will significantly increase the number of documents that need to be reviewed for public release.

- Any challenges your agency faces in this area

N/A.

Section IV: Steps Taken to Greater Utilize Technology

A key component of FOIA administration is using technology to make information more accessible. In addition to using the internet to make proactive disclosures, agencies should also be exploring ways to utilize technology in responding to requests.

Please answer the following questions to describe how your agency is utilizing technology to improve its FOIA administration and the public's access to information. You should also include any additional information that describes your agency's efforts in this area.

1. Is your agency leveraging or exploring any new technology to facilitate efficiency in its FOIA administration that you have not previously reported? If so, please describe the type of technology.

Yes, the NRC is leveraging technology to facilitate efficiency in conducting searches. For instance, in FY2018, the NRC moved to Microsoft Office 365 in the cloud. Office 365 offers capabilities to conduct searches of e-mail messages, SharePoint sites, and OneDrive accounts. These capabilities can be used on information created/generated in the Azure cloud as well as information uploaded into the Azure cloud. In addition, the NRC can search its other content repositories, such as ADAMS.

NRC is facing challenges in the ability to deduplicate records responsive to FOIA. In order to resolve this challenge, NRC is looking into possible tools that could perform the necessary deduplication function to provide efficiency in processing responsive records under FOIA. Deduplication software could significantly reduce a field of responsive records, which will lessen time spent processing FOIA and increase production speed in responding to FOIA requests.

2. OIP issued guidance in 2017 encouraging agencies to regularly review their FOIA websites to ensure that they contain essential resources, and are informative and user-friendly. Has your agency reviewed its FOIA website(s) during the reporting period to ensure it addresses the elements noted in the guidance?

Yes.

3. Did your agency successfully post all four quarterly reports for Fiscal Year 2019?

Yes.

4. If your agency did not successfully post all quarterly reports, with information appearing on FOIA.gov, please explain why and provide your agency's plan for ensuring that such reporting is successful in Fiscal Year 2020.

N/A.

5. The FOIA Improvement Act of 2016 requires all agencies to post the raw statistical data used to compile their Annual FOIA Reports. Please provide the link to this posting for your agency's Fiscal Year 2018 Annual FOIA Report and, if available, for your agency's Fiscal Year 2019 Annual FOIA Report.

https://www.nrc.gov/reading-rm/foia/annual-reports/

6. Optional -- Please describe:

- Best practices used in greater utilizing technology

    NRC has made processing more efficient by providing RedactXpress to all Government Information Specialists, OIG FOIA staff, Office of Enforcement FOIA staff, and to OGC attorneys performing the reviews. Providing these licenses to these offices allows them to review and redact information more efficiently. In addition, they can utilize the "Find and Redact" feature within RedactXpress.

- Any challenges your agency faces in this area

    N/A.

Section V: Steps Taken to Improve Timeliness in Responding to Requests and Reducing Backlogs

The Department of Justice has emphasized the importance of improving timeliness in responding to requests. This section of your Chief FOIA Officer Report addresses both time limits and backlog reduction. Backlog reduction is measured both in terms of numbers of

backlogged requests or appeals and by looking at whether agencies closed their ten oldest requests, appeals, and consultations.

For the figures required in this Section, please use the numbers contained in the specified sections of your agency's 2019 Annual FOIA Report and, when applicable, your agency's 2018 Annual FOIA Report.

A. Simple Track

Section VII.A of your agency's Annual FOIA Report, entitled "FOIA Requests – Response Time for All Processed Requests," includes figures that show your agency's average response times for processed requests. For agencies utilizing a multi-track system to process requests, there is a category for "simple" requests, which are those requests that are placed in the agency's fastest (non-expedited) track, based on the low volume and/or simplicity of the records requested.

1. Does your agency utilize a separate track for simple requests?

Yes, the NRC utilizes separate tracks for simple, complex, and expedited requests.

2. If your agency uses a separate track for simple requests, was the agency overall average number of days to process simple requests twenty working days or fewer in Fiscal Year 2019?

No, our average was 38.05 days.

3. Please provide the percentage of requests processed by your agency in Fiscal Year 2019 that were placed in your simple track.

63.33%.

4. If your agency does not track simple requests separately, was the average number of days to process all non-expedited requests twenty working days or fewer?

N/A.

B. Backlogs

Section XII.A of your agency's Annual FOIA Report, entitled "Backlogs of FOIA Requests and Administrative Appeals" shows the numbers of any backlogged requests or appeals from the fiscal year. You should refer to these numbers from your Annual FOIA Reports for both Fiscal Year 2018 and Fiscal Year 2019 when completing this section of your Chief FOIA Officer Report.

BACKLOGGED REQUESTS

5. If your agency had a backlog of requests at the close of Fiscal Year 2019, did that backlog decrease as compared with the backlog reported at the end of Fiscal Year 2018?

Yes, in FY 2018 the NRC backlog was 124, and by the end of FY 2019 the backlog had decreased to 66.

6. If not, did your agency process more requests during Fiscal Year 2019 than it did during Fiscal Year 2018?

    N/A.

7. If your agency's request backlog increased during Fiscal Year 2019, please explain why and describe the causes that contributed to your agency not being able to reduce its backlog. When doing so, please also indicate if any of the following were contributing factors:

- An increase in the number of incoming requests. N/A.
- A loss of staff. N/A.
- An increase in the complexity of the requests received. If possible, please provide examples or briefly describe the types of complex requests contributing to your backlog increase. N/A.
- Any other reasons – please briefly describe or provide examples when possible. N/A.

8. If you had a request backlog please report the percentage of requests that make up the backlog out of the total number of requests received by your agency in Fiscal Year 2019. If your agency has no request backlog, please answer with "N/A."

    18%.

BACKLOGGED APPEALS

9. If your agency had a backlog of appeals at the close of Fiscal Year 2019, did that backlog decrease as compared with the backlog reported at the end of Fiscal Year 2018?

    Yes, in FY 2018 the NRC appeals backlog was 20, and the end of FY 2019 the appeals backlog had decreased to 3.

10. If not, did your agency process more appeals during Fiscal Year 2019 than it did during Fiscal Year 2018?

    N/A.

11. If your agency's appeal backlog increased during Fiscal Year 2019, please explain why and describe the causes that contributed to your agency not being able to reduce its backlog. When doing so, please also indicate if any of the following were contributing factors:

- An increase in the number of incoming appeals. N/A.
- A loss of staff. N/A.
- An increase in the complexity of the requests received. If possible, please provide examples or briefly describe the types of complex requests contributing to your backlog increase. N/A.
- Any other reasons – please briefly describe or provide examples when possible. N/A.

12. If you had an appeal backlog please report the percentage of appeals that make up the backlog out of the total number of appeals received by your agency in Fiscal Year 2019. If your agency did not receive any appeals in Fiscal Year 2019 and/or has no appeal backlog, please answer with "N/A."

5.35%.

C. Backlog Reduction Plans

13. In the 2019 guidelines for Chief FOIA Officer Reports, any agency with a backlog of over 1000 requests in Fiscal Year 2018 was asked to provide a plan for achieving backlog reduction in the year ahead. Did your agency implement a backlog reduction plan last year? If so, describe your agency's efforts in implementing this plan and note if your agency was able to achieve backlog reduction in Fiscal Year 2019?

      N/A.

14. If your agency had a backlog of more than 1,000 requests in Fiscal Year 2019, what is your agency's plan to reduce this backlog during Fiscal Year 2020?

      N/A.

D. Status of Oldest Requests, Appeals, and Consultations

Section VII.E, entitled "Pending Requests – Ten Oldest Pending Requests," Section VI.C.(5), entitled "Ten Oldest Pending Administrative Appeals," and Section XII.C., entitled "Consultations on FOIA Requests – Ten Oldest Consultations Received from Other Agencies and Pending at Your Agency," show the ten oldest pending requests, appeals, and consultations. You should refer to these numbers from your Annual FOIA Reports for both Fiscal Year 2018 and Fiscal Year 2019 when completing this section of your Chief FOIA Officer Report.

OLDEST REQUESTS

15. In Fiscal Year 2019, did your agency close the ten oldest requests that were reported pending in your Fiscal Year 2018 Annual FOIA Report?

      No.

16. If no, please provide the number of these requests your agency was able to close by the end of the fiscal year, as listed in Section VII.E of your Fiscal Year 2018 Annual FOIA Report. If you had fewer than ten total oldest requests to close, please indicate that.

      3 out of 10.

17. Beyond work on the ten oldest requests, please describe any steps your agency took to reduce the overall age of your pending requests.

      The NRC continues to take steps to reduce the overall age of our pending requests through communication internally, with other agencies, and with FOIA requesters. This communication can be internal to the NRC with the record owners, with other agencies, and with public submitters. Through communication we stress the importance of timeliness in searching, reviewing, redacting (if needed) and providing the requested information to the FOIA requester. The NRC provides the requester with status updates regarding their FOIA request, as well as always offering the opportunity for narrowing the scope to receive their request more expeditiously.

TEN OLDEST APPEALS

18. In Fiscal Year 2019, did your agency close the ten oldest appeals that were reported pending in your Fiscal Year 2018 Annual FOIA Report?

     No.

19. If no, please provide the number of these appeals your agency was able to close by the end of the fiscal year, as listed in Section VII.C.(5) of your Fiscal Year 2018 Annual FOIA Report. If you had fewer than ten total oldest appeals to close, please indicate that.

     8 out of 10.

20. Beyond work on the ten oldest appeals, please describe any steps your agency took to reduce the overall age of your pending appeals.

     The NRC continues to take steps to reduce the overall age of our pending appeals through communication internally and with requesters. This communication is often internal with our program offices to make sure they are timely in performing reasonable searches and clarifying how they searched so that we can inform the requester.

TEN OLDEST CONSULTATIONS

21. In Fiscal Year 2019, did your agency close the ten oldest consultations that were reported pending in your Fiscal Year 2018 Annual FOIA Report?

     Yes.

22. If no, please provide the number of these consultations your agency was able to close by the end of the fiscal year, as listed in Section XII.C. of your Fiscal Year 2018 Annual FOIA Report. If you had fewer than ten total oldest consultations to close, please indicate that.

     NRC closed 1 of 1 pending consult FY18.

E. Additional Information on Ten Oldest Requests, Appeals, and Consultations & Plans

23. Briefly explain any obstacles your agency faced in closing its ten oldest requests, appeals, and consultations from Fiscal Year 2019.

     The main obstacle the NRC faced in closing its ten oldest requests, appeals, and consultations from FY2019, was due to the voluminous nature of the requests. In addition, one obstacle is that the NRC lacked equipment to view/listen to older records stored on out-of-date technology format and technology to convey the content is no longer routinely available. The NRC has taken steps to obtain the proper equipment and anticipates that it will be successful in closing this request during FY2020.

     Another obstacle the NRC faced in closing its older requests, appeals, and consultations received, was during consultations with other federal agencies. Some agencies lack the resources necessary to conduct the disclosure reviews in a timely manner, which cause an increase in backlogs and raises the risk for potential law suits.

24. If your agency was unable to close any of its ten oldest requests because you were waiting to hear back from other agencies on consultations you sent, please provide the date the request was initially received by your agency, the date when your agency sent the consultation, and the date when you last contacted the agency where the consultation was pending.

       None of the ten oldest requests were unable to be closed because of waiting to hear back from other agencies. However, the NRC does have a FY 2017 request, even though not one of the ten oldest, that is held up because we are waiting to hear back from another agency. The initial request was received by the NRC on June 30, 2017, consultation was sent to the agency on November 17, 2017, and the most recent follow up communication with the agency was December 12, 2019. This is an example of an agency, which has informed us they have limited resources to conduct reviews, preventing a timely response to the consultation.

25. If your agency did not close its ten oldest pending requests, appeals, or consultations, please provide a plan describing how your agency intends to close those "ten oldest" requests, appeals, and consultations during Fiscal Year 2020.

       The NRC will continue to work aggressively and focus necessary resources to successfully reach our goal of completing the ten oldest requests during FY2020.

F. Success Stories

Out of all the activities undertaken by your agency since March 2019 to increase transparency and improve FOIA administration, please briefly describe here at least one success story that you would like to highlight as emblematic of your agency's efforts. The success story can come from any one of the five key areas. As noted above, OIP will highlight these agency success stories during Sunshine Week. To facilitate this process, all agencies should use bullets to describe their success story and limit their text to a half page. The success story is designed to be a quick summary of key achievements. A complete description of all your efforts will be contained in the body of your Chief FOIA Officer Report.

- The NRC was able to successfully reduce the backlog by approximately 47% during FY 2019. This success was due to continued collaboration within the NRC, as well as other agencies, and legal counsel on strategies for addressing similar situations. The NRC reevaluated how we were processing large volumes of pending requests from frequent requesters and placed them in their own track. The NRC established a separate track, so that a single requester's frequent requests would not unduly delay the staff's processing of other requests. The NRC also reevaluated how we were interpreting reasonable descriptions, as a FOIA request must allow an agency to reasonably ascertain exactly which records are being requested and to locate them. Applying this principle, the staff was able to close numerous requests that, without further explanation, sought records on topics with no obvious connection to the NRC or were on broad topics where the NRC might have had records, but did not have sufficient information in the request in order to know how or where to search. Lastly, the NRC was able to aggregate FOIA requests, consistent with the Office of Management and Budget's (OMB) longstanding fee guidance and was able to aggregate closely related requests.

- The NRC is currently undergoing an assessment of the FOIA program through OGIS. The NRC is looking forward to any recommendations, which will help develop an even better FOIA program.