



# **ENFORCEMENT PROGRAM ANNUAL REPORT**

## **Calendar Year 2025**

**ML26083A245**

**U.S. Nuclear Regulatory Commission  
Office of Enforcement  
Washington, DC 20555**

## Executive Summary

The U.S. Nuclear Regulatory Commission (NRC) continued to effectively carry out the agency's Enforcement Program in calendar year (CY) 2025. NRC regional and headquarters offices maintained their focus on appropriate and consistent enforcement of the agency's regulations.

In CY 2025, the NRC issued 71 escalated enforcement actions under traditional enforcement, the Reactor Oversight Process, and the Construction Reactor Oversight Process. These actions included 12 notices of violation (NOVs) with proposed civil penalties (CPs) totaling \$203,400, as well as 3 confirmatory orders (COs), and 56 escalated NOVs without a proposed CP.

The total number of escalated enforcement actions in CY 2025 across all regulatory oversight programs slightly decreased from the total number (73) reported in CY 2024, however it is slightly higher than the 5-year average (68). Operating reactors and nuclear materials users continue to account for most escalated enforcement actions.

Operating reactors (including those under construction), fuel cycle facilities, and nuclear materials users accounted for most nonescalated enforcement actions—that is, NOVs and noncited violations associated with green significance determination process findings under the Reactor Oversight Process, and Severity Level (SL) IV NOVs and noncited violations under traditional enforcement. In CY 2025, a downward trend was noted in the number of nonescalated enforcement actions for all categories of licensees listed above.

### *Noteworthy Program Accomplishments*

As part of agency activities to support the Accelerating Deployment of Versatile, Advanced Nuclear for Clean Energy Act of 2024 ([ADVANCE Act](#)), the Office of Enforcement implemented a graded approach, including decision-making and resource expenditures, for processing and determining enforcement actions commensurate with the safety significance and complexity of cases. This effort facilitates more streamlined decision making and reduces resource expenditures for issues of lower safety significance and less complexity.

In CY 2025, the agency began using a new modernized and integrated case work database for investigations, allegations, and the Enforcement Program. The new database, Allegations, Resolution, Investigation, and Enforcement System (ARIES), streamlines interoffice communications by reducing repetitive data entry, enhancing search capabilities, achieving greater transparency of data sharing across these program areas, and gaining efficiencies by using an integrated platform. Enhancements to the system will continue in CY 2026 to achieve greater system effectiveness and functionality.

### *Significant Cases*

In CY 2025, the NRC processed four significant cases, summarized here and described further at the following links:

- (1) [Curium US, LLC \(EAF-RIII-2025-0146\)](#)  
St. Louis, MO

On December 17, 2025, the NRC issued an NOV and proposed imposition of a CP in the amount of \$72,000 for an SL II problem associated with six related violations. The violations involved the licensee's failure to: (1) control the occupational dose to the annual limits, as

required by Title 10 of the *Code of Federal Regulations* (10 CFR) 20.1201(a)(1)(i) and 10 CFR 20.1201(a)(2)(ii), (2) use procedures and engineering controls to achieve occupational doses that were as low as reasonably achievable (ALARA), as required by 10 CFR 20.1101(b), (3) conduct its program in accordance with radioactive waste management procedures, as required by License Condition 23.O, (4) make surveys that were reasonable under the circumstances to evaluate the magnitude and extent of radiation levels and potential radiological hazards, as required by 10 CFR 20.1501(a)(2), (5) properly label containers of licensed material, as required by 10 CFR 20.1904(a), and (6) perform audits, as required by License Condition 23.P.

(2) [International Isotopes, Inc. \(EAF-RIV-2025-0022\)](#)

Idaho Falls, ID

On September 30, 2025, the NRC issued a CO to International Isotopes, Inc. (INIS), memorializing commitments reached during an alternative dispute resolution (ADR) mediation session held on August 6, 2025. The ADR session was associated with seven apparent violations involving INIS licensed activities that had a direct impact on a nonlicensee NRC applicant in an adjoining physical space. INIS agreed to complete wide-ranging corrective actions. As a result of the CO, the NRC will not cite the apparent violations and will not issue an associated CP.

(3) [Saint Francis Medical Center \(EA-24-114/EAF-RIII-2024-0018\)](#)

Cape Girardeau, MO

On March 20, 2025, the NRC issued an NOV and proposed imposition of a CP in the amount of \$14,400 to Saint Francis Medical Center (licensee) for an SL II problem associated with four related violations. The violations involved the licensee's failure to: (1) have a written directive that was dated and signed by an authorized user before the administration of a therapeutic dosage of unsealed byproduct material, as required by 10 CFR 35.40(a), (2) provide high confidence that the patient's identity was verified before each administration and that each administration was in accordance with the written directive, as required by 10 CFR 35.41(a), (3) train all individuals involved in yttrium-90 microsphere use, commensurate with the individual's duties, as required by the licensee's License Condition 14.C, and (4) ensure that radiation safety activities were being performed in accordance with licensee-approved procedures and regulatory requirements, as required by 10 CFR 35.24(b).

(4) [Quad Cities Nuclear Power Station \(EAF-RIII-2025-0074\)](#)

Warrenville, IL

On July 16, 2025, the NRC issued a CO to Quad Cities Nuclear Power Station (Quad Cities) memorializing commitments reached during an ADR mediation session held June 17–18, 2025. The ADR session was associated with six apparent violations involving an event related to mispositioning of a reactor pressure vessel valve. Quad Cities agreed to complete wide-ranging corrective actions. As a result of the CO, the NRC will not cite the apparent violations and will not issue an associated CP.

**Contents**

Executive Summary ..... ii

I. Program Overview ..... 1

    A. Mission and Authority ..... 1

    B. Escalated Enforcement Actions ..... 3

        1. Escalated Enforcement Trends ..... 5

        2. Civil Penalty Actions ..... 6

        3. Notices of Violation without Civil Penalties ..... 6

        4. Enforcement Program Timeliness ..... 7

        5. Alternative Dispute Resolution ..... 9

    C. Nonescalated Enforcement ..... 10

II. Enforcement Case Work ..... 12

    A. Significant Enforcement Actions ..... 12

    B. Hearing Activities ..... 13

    C. Enforcement Orders ..... 13

    D. Enforcement Actions Supported by the Office of Investigations ..... 13

    E. Actions Involving Individuals and Nonlicensee Organizations ..... 13

    F. Enforcement Actions Involving Discrimination ..... 13

    G. Use of Judgment and Discretion in Determining Appropriate Enforcement Sanctions ..... 13

    H. Withdrawn Actions ..... 14

III. Ongoing Activities ..... 15

    A. Enforcement Policy and Guidance ..... 15

        1. Enforcement Policy Revisions ..... 15

        2. Enforcement Manual Guidance ..... 15

    B. Enforcement Program Initiatives ..... 15

        1. Program Enhancements ..... 15

        2. Knowledge Management ..... 16

    C. Regional Accomplishments ..... 16

    D. Calendar Year 2026 Focus Areas ..... 17

**Tables**

Table 1 Escalated Enforcement Actions by Region and Program Office (CY 2025) ..... 5

**Figures**

Figure 1 How the NRC regulates ..... 1

Figure 2 Escalated enforcement by type of action (CY 2025) ..... 3

Figure 3 Escalated enforcement by business line (CY 2025) ..... 4

Figure 4 Escalated enforcement by business line (CY 2015–CY 2025) ..... 5

Figure 5 Proposed CPs by business line (CY 2021–CY 2025) ..... 6

Figure 6 Non-OI-related case timeliness (CY 2021–CY 2025) ..... 8

Figure 7 OI-related case timeliness (CY 2021–CY 2025) ..... 9

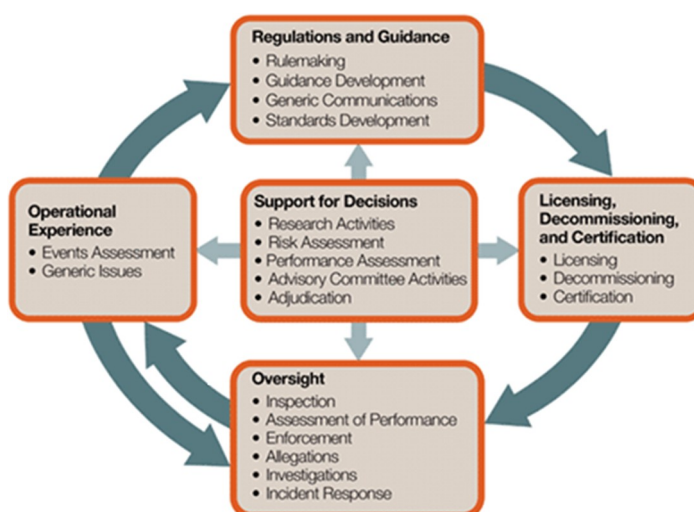
Figure 8 Nonescalated enforcement actions per operating reactor, by region  
(CY 2021–CY 2025)..... 10

Figure 9 Nonescalated enforcement actions for nuclear materials users (CY 2021–CY 2025)..... 11

# I. Program Overview

## A. Mission and Authority

The U.S. Nuclear Regulatory Commission (NRC) protects public health and safety and advances the Nation’s common defense and security by enabling the safe and secure use and deployment of civilian nuclear energy technologies and radioactive materials through efficient and reliable licensing, oversight, and regulation for the benefit of society and the environment. The NRC accomplishes its mission through the licensing of nuclear facilities and the possession, use, and disposal of nuclear materials; the development and implementation of requirements governing licensed activities; and inspection and enforcement activities to ensure compliance with these requirements (figure 1).



**Figure 1 How the NRC regulates**

The NRC conducts various types of inspections and investigations designed to ensure that the activities it licenses are conducted in strict compliance with the Commission’s regulations, the terms of the licenses, and other requirements.

The sources of the NRC’s enforcement authority are the Atomic Energy Act of 1954, as amended; the Energy Reorganization Act of 1974, as amended; and the Energy Policy Act of 2005. These statutes give the NRC broad authority with respect to its Enforcement Program. The Energy Policy Act of 2005 also expanded the definition of byproduct material, placing additional byproduct material under the NRC’s jurisdiction, including both naturally occurring and accelerator-produced radioactive materials. The NRC carries out its broad enforcement authority through Title 10 of the *Code of Federal Regulations* Part 2, “Agency Rules of Practice and Procedure,” Subpart B, “Procedure for Imposing Requirements by Order, or for Modification, Suspension, or Revocation of a License, or for Imposing Civil Penalties.” Congress also provides the statutory framework for the Federal Government to use alternative dispute resolution (ADR) in conjunction with enforcement authority through the Administrative Dispute Resolution Act of 1996.

The NRC Office of Enforcement (OE) develops policies and programs for the enforcement of NRC requirements. In addition, OE oversees the agency’s enforcement activities, giving programmatic

## Enforcement Program Annual Report

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and implementation guidance to NRC regional and headquarters offices that conduct or participate in enforcement activities, to ensure consistent implementation of the NRC's Enforcement Program.

The Enforcement Policy establishes the general principles governing the NRC's Enforcement Program and specifies a process for implementing its enforcement authority in response to violations of agency requirements. This statement of policy is based on the NRC's view that compliance with its requirements plays a critical role in ensuring safety, maintaining security, and protecting the environment. The policy applies to all NRC licensees, to various categories of nonlicensees (vendors and contractors), and to individual employees of licensed and nonlicensed firms involved in NRC-regulated activities.

The NRC enforces compliance as necessary. Enforcement actions serve as a deterrent, emphasize the importance of compliance with regulatory requirements, and encourage the prompt identification and comprehensive correction of violations. In addition, because violations occur in a variety of activities and vary in significance, the policy contains graduated sanctions informed by risk and regulatory significance.

Enforcement authority includes using notices of violation (NOVs); civil penalties (CPs); demands for information; and orders to modify, suspend, or revoke a license. The NRC staff may exercise discretion in determining appropriate enforcement sanctions. Most violations are identified through inspections and investigations. In traditional enforcement, violations are normally assigned severity levels (SLs), which range from SL IV for violations of more than minor concern to SL I for the most significant violations.

The Reactor Oversight Process (ROP) supplements the enforcement process for operating nuclear reactors. The NRC has implemented a similar process to assess findings at new reactor construction sites. Under the ROP, the NRC staff does not normally assign SLs to violations but instead assigns them a "significance" by assessing their associated inspection findings. The NRC determines the risk significance of inspection findings using the significance determination process (SDP), which designates findings as green, white, yellow, or red (in order of increasing risk significance). Findings under the ROP may also include licensee failures to meet self-imposed standards; such findings may or may not involve violations of regulatory requirements. Violations and findings assessed as white, yellow, or red are considered escalated enforcement actions.

Although the ROP applies to most violations, some aspects of violations (e.g., willfulness and individual actions) cannot be addressed solely through the SDP; such violations require the NRC to follow the traditional enforcement process. The NRC uses traditional enforcement for violations that have actual safety or security consequences, affect the agency's ability to perform its regulatory oversight function, or involve willfulness.

In addition, although ROP findings are not normally subject to CPs, the NRC does consider CPs for any violations that have actual consequences. SL IV violations and violations associated with green ROP findings are normally dispositioned as noncited violations (NCVs) if certain criteria are met. Inspection reports or records document NCVs and briefly describe the corrective actions that the licensee has taken or plans to take, if these actions are known at the time the NCV is documented. Additional information about the ROP is available at <https://www.nrc.gov/reactors/operating/oversight.html>.

The NRC's enforcement website (<http://www.nrc.gov/about-nrc/regulatory/enforcement.html>), presents a variety of information, including the Enforcement Policy and the Enforcement Manual. It also contains information on escalated enforcement actions that the NRC has issued to reactors and

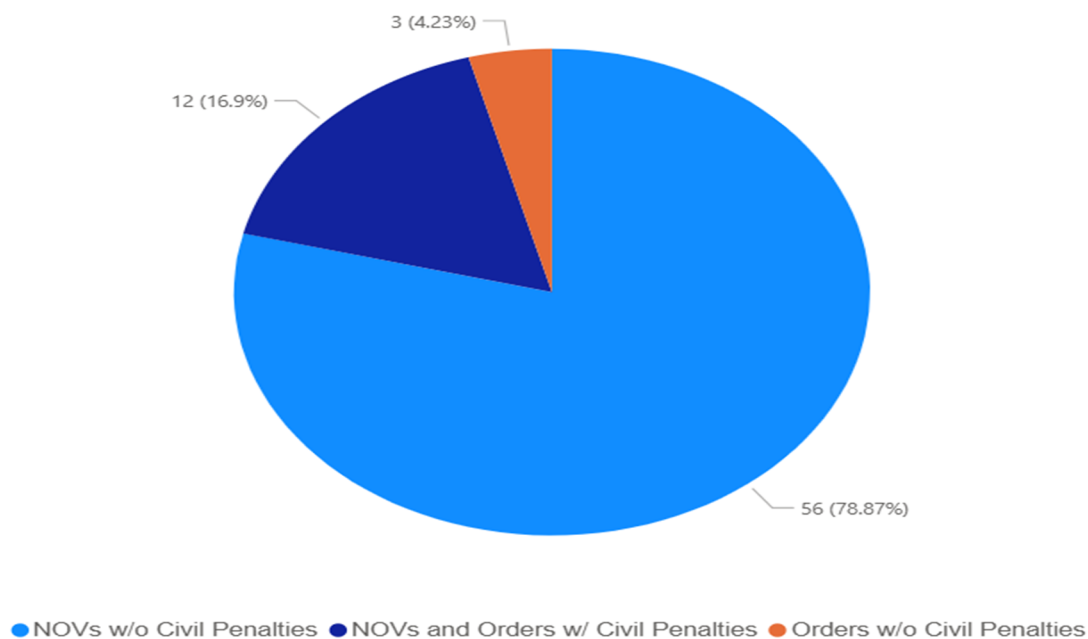
materials licensees, nonlicensees, and individuals. In keeping with agency practices and policies, the NRC's public website does not provide details on most security-related actions and activities.

### B. Escalated Enforcement Actions

Escalated enforcement actions include the following:

- NOVs, including SL I, II, or III violations
- NOVs associated with a problem (closely related violations may be grouped together as a problem to appropriately characterize the significance of the event or incident)
- SL IV violations to individuals
- NOVs associated with red, yellow, or white SDP findings
- CP actions
- enforcement orders (including confirmatory orders that result from the ADR process) and orders to suspend, revoke, or modify an NRC license

During calendar year (CY) 2025, the NRC issued 71 escalated enforcement actions to licensees, nonlicensees, and individuals. These enforcement actions are described on the Issued Significant Enforcement Actions webpage at <https://www.nrc.gov/about-nrc/regulatory/enforcement/current>, under the corresponding 2025 tab. It should be noted that security-related actions, which are typically nonpublic, are not listed on this webpage; however, the data in this report do include those actions. Figure 2 shows the distribution of these actions by category.

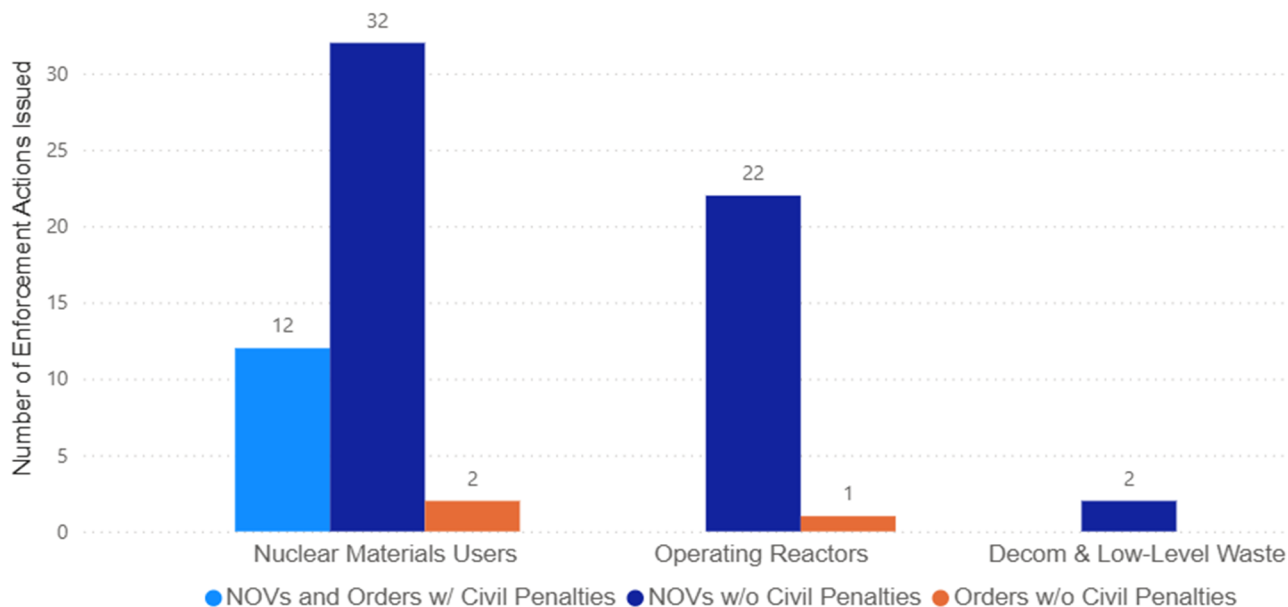


**Figure 2 Escalated enforcement by type of action (CY 2025)**

As shown in figure 2, of the 71 escalated enforcement actions issued in CY 2025, 56 (or approximately 79 percent) were NOVs without CPs. In general, the NRC considers a large percentage of NOVs without CPs to be a positive outcome because it demonstrates that most licensees identify and correct violations themselves—a goal of the Enforcement Program.

NOVs with CPs made up approximately 17 percent of the escalated enforcement actions. These included 12 NOVs with associated CPs.

Figure 3 shows the distribution of escalated enforcement actions issued in CY 2025 by business line. The number of escalated enforcement actions for each business line may also include actions issued to individuals. The nuclear materials user business line includes import/export enforcement actions.



**Figure 3 Escalated enforcement by business line (CY 2025)**

As shown in figure 3, nuclear materials users received the highest number of escalated enforcement actions in CY 2025 (a total of 46), accounting for 63 percent of all actions issued. This was followed by operating reactors, which received 23 actions (or 34 percent of all actions). Fuel facilities and decommissioning and low-level waste accounted for two escalated enforcement actions in CY 2025 (or 3 percent of all actions).

Table 1 breaks down the escalated enforcement actions issued in CY 2025 by region and program office. Historically, Region II has had the fewest escalated enforcement actions because it does not process nuclear materials user cases, which usually make up the highest percentage of escalated enforcement actions (71 percent in CY 2025). In CY 2025, Region II issued a total of two escalated enforcement actions to operating reactors. The locations of NRC offices can be found at <https://www.nrc.gov/about-nrc/locations>. The data in Table 1 have not been normalized for either type or number of licensees in each region.

**Table 1 Escalated Enforcement Actions by Region and Program Office (CY 2025)**

Office/Region	NOVs and Orders with CPs	NOVs without CPs	Orders without CPs	Total
REGION I	2	16	0	18
REGION II	0	2	0	2
REGION III	8	21	2	31
REGION IV	2	13	1	16
OIP	0	3	0	3
NRR	0	1	0	1
<b>Total</b>	<b>12</b>	<b>56</b>	<b>3</b>	<b>71</b>

Key to Program Offices

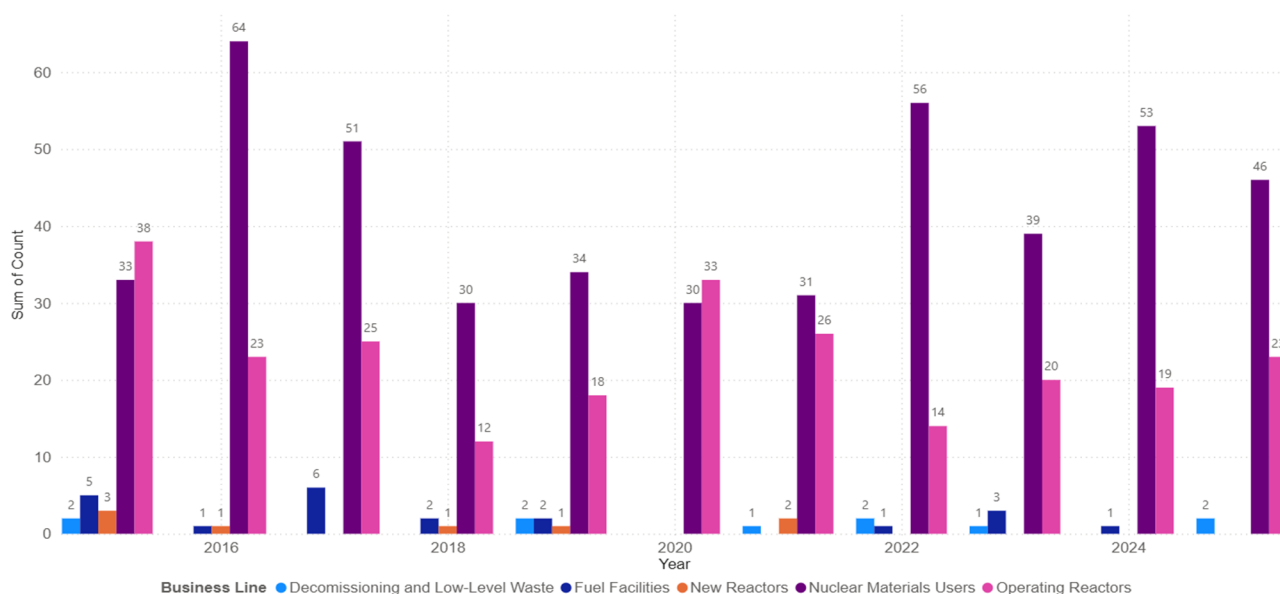
NRR—Office of Nuclear Reactor Regulation

OIP—Office of International Programs

### 1. Escalated Enforcement Trends

As previously noted, the NRC issued 71 escalated enforcement actions in CY 2025. This was slightly lower than the number issued in CY 2024 (73) and lower than the annual average over the past 10 years (76).

Figure 4 shows escalated enforcement trends from CY 2015 through CY 2025 by business line. As shown in the figure, the number of enforcement actions for nuclear materials users remained generally consistent from CY 2018 until CY 2022, when it rose significantly. In CY 2025, the number of enforcement actions for nuclear materials users (46) decreased and is slightly lower than the 10-year average (47). However, in CY 2025, the number of enforcement actions for operating reactors (23) rose from CY 2024; however, it is slightly lower than the 10-year average (25) of enforcement actions.



**Figure 4 Escalated enforcement by business line (CY 2015–CY 2025)**

## 2. Civil Penalty Actions

The levying of a CP is a significant action, and it most often reflects issues of a repetitive nature, the inability of a licensee to identify and correct issues, or instances involving elements of willfulness. In CY 2025, the NRC processed 12 enforcement actions totaling \$203,400 in proposed CPs. All of these 12 enforcement actions were associated with nuclear materials users.

Of the 12 CP cases, two involved “willfulness,” which is defined as either deliberate misconduct or careless disregard. The Commission is particularly concerned with the identification of willful violations. The NRC’s regulatory program relies on licensees and their contractors, employees, and agents to act with integrity and communicate with candor; therefore, the NRC may consider a violation involving willfulness to be more egregious than the underlying violation taken alone, and the NRC may increase the SL accordingly.

The total proposed CP amount issued in CY 2025 was slightly higher than the amount issued in CY 2024 but lower than the 5-year average. This higher 5-year average was partly because, in CY 2021, a number of proposed CPs were issued to operating reactors whose base CP amounts are substantially higher than those for other licensee types. In CY 2025, the NRC issued no CPs at operating reactors.

Figure 5 shows the total dollar amount of proposed CPs from CY 2021 through CY 2025 by business line.

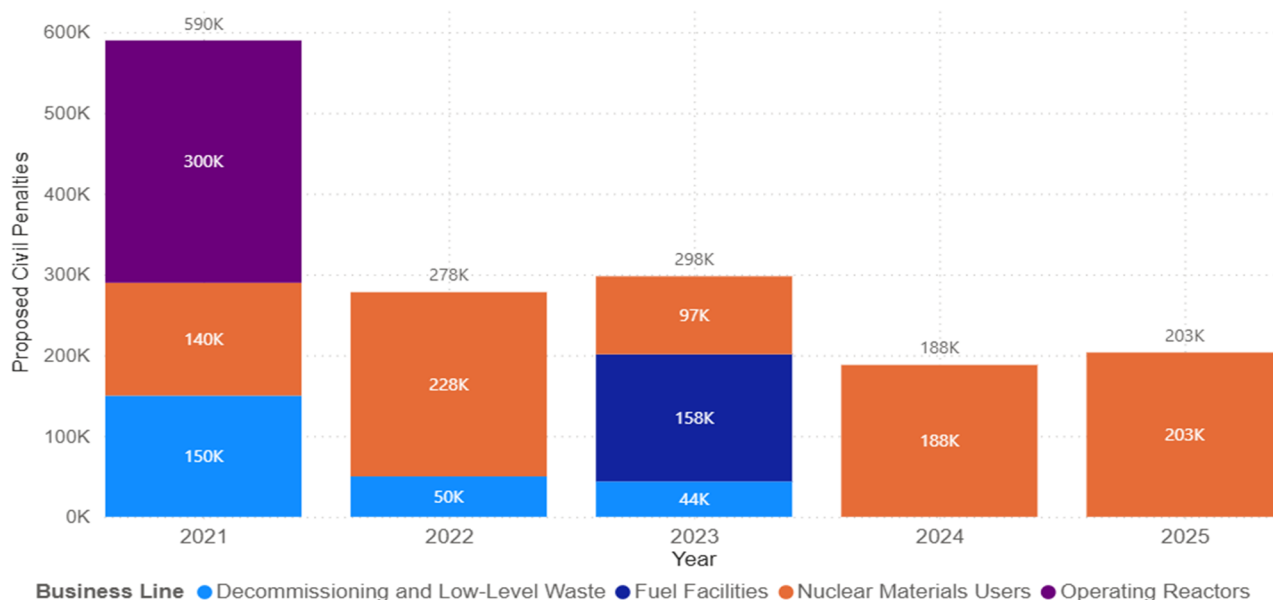


Figure 5 Proposed CPs by business line (CY 2021–CY 2025)

## 3. Notices of Violation without Civil Penalties

In accordance with Section 2.3.4, “Civil Penalty,” of the Enforcement Policy, a CP may not be warranted for escalated enforcement actions evaluated under traditional enforcement if either of the following criteria are met:

- The identified violation was the first nonwillful SL III violation identified during the past 2 years or during the last two inspections (whichever period is longer) at the licensee's facility, and the licensee took adequate corrective action to prevent its recurrence.
- The identified violation was not the first nonwillful SL III violation identified during the past 2 years or during the last two inspections, but the licensee identified the violation and took adequate corrective action to prevent its recurrence.

Violations assessed under the ROP SDP are normally not considered for CPs unless they have actual consequences. In addition, when appropriate, the NRC may use enforcement discretion to refrain from proposing a CP, regardless of the normal CP assessment process described above.

In CY 2025, the NRC issued a total of 56 escalated NOVs without CPs (compared to 54 in CY 2024), 10 to operating reactor licensees, 31 to nuclear materials user licensees, 2 to decommissioning and low-level waste licensees, and 13 to individuals (licensed or nonlicensed). Of the 10 NOVs issued to operating reactor licensees, 5 were associated with white SDP findings under the ROP and 5 were SL III violations. For the 13th consecutive year, the NRC issued no red SDP findings with or without associated violations.

#### **4. Enforcement Program Timeliness**

The NRC issues escalated enforcement actions in cases involving violations assessed at SL I, II, or III (and SL IV for individuals) dispositioned under the traditional enforcement process; violations associated with white, yellow, or red findings issued to reactor licensees participating in the ROP; and orders that impose sanctions.

The timeliness of escalated enforcement actions associated with investigations (cases involving potential willfulness or discrimination) at operating reactor and materials user licensees is an output measure (external goal) reported annually to Congress as part of the NRC's Congressional Budget Justification (NUREG-1100). To stress the importance of issuing timely escalated enforcement actions, the agency has set two performance goals: (1) 100 percent of cases not based on investigations by the Office of Investigations (OI) are to be completed within an NRC processing time not to exceed 160 days (internal performance indicator), and (2) 100 percent of OI-related cases are to be completed within an NRC processing time not to exceed 330 days (Congressional Budget Justification performance indicator).

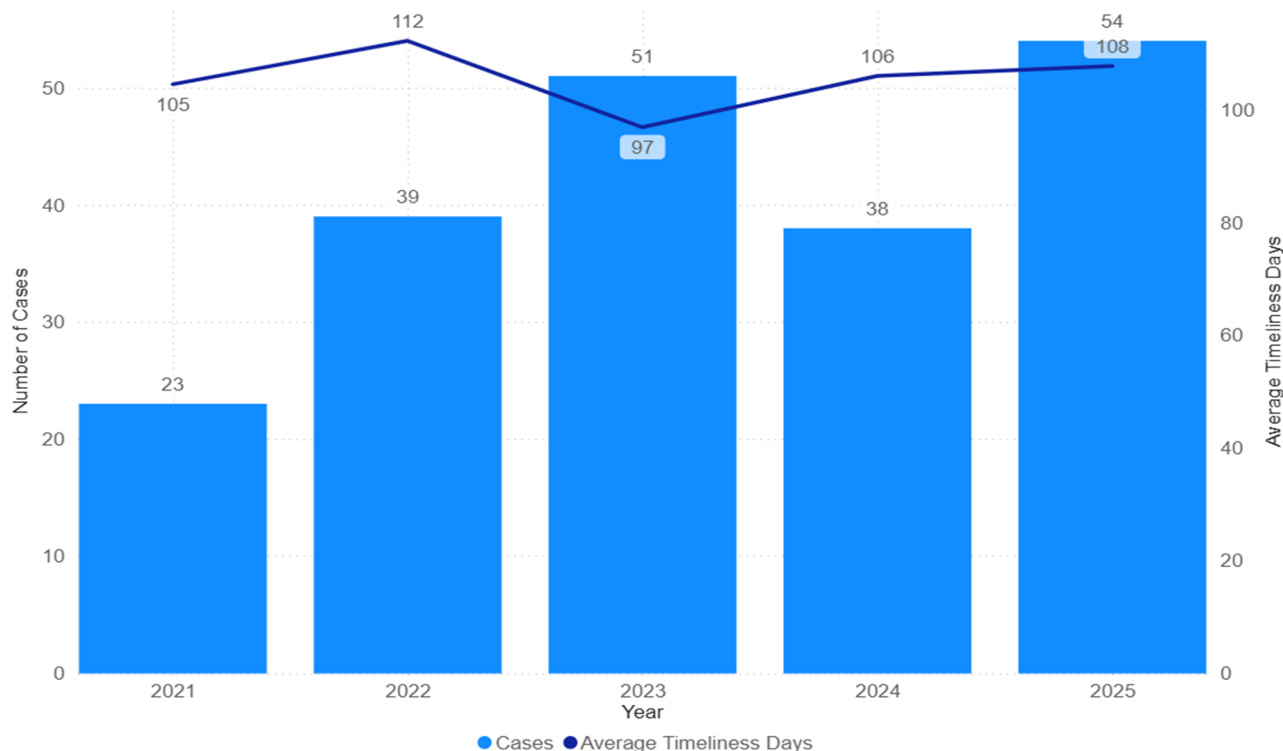
The NRC processing time starts on the latest of (1) the inspection exit date for non-OI-related cases, (2) the date of the memorandum forwarding the OI report to the staff for OI-related cases, (3) the date the NRC is informed that the U.S. Department of Justice declined to initiate a potential criminal prosecution, and (4) the date of the U.S. Department of Labor decision that is the basis for the action. For purposes of timeliness reporting, the NRC may group multiple related escalated enforcement actions and treat them as a single case. For example, the NRC may disposition a violation and take escalated enforcement action against a licensee and one or more individuals. Although multiple enforcement actions may be involved, the NRC will treat these separate actions as one case in its timeliness reporting, to avoid biasing timeliness data either positively or negatively.

In CY 2025, the NRC staff processed all 54 non-OI-related enforcement cases within 160 processing days and all 13 OI-related enforcement cases within 330 processing days (these numbers (54 and 13) are associated with enforcement cases, not enforcement actions). In CY 2025, OE developed the enforcement panel efficiency process to support the existing modified panel process. This process supports the Accelerating Deployment of Versatile, Advanced Nuclear for

## Enforcement Program Annual Report

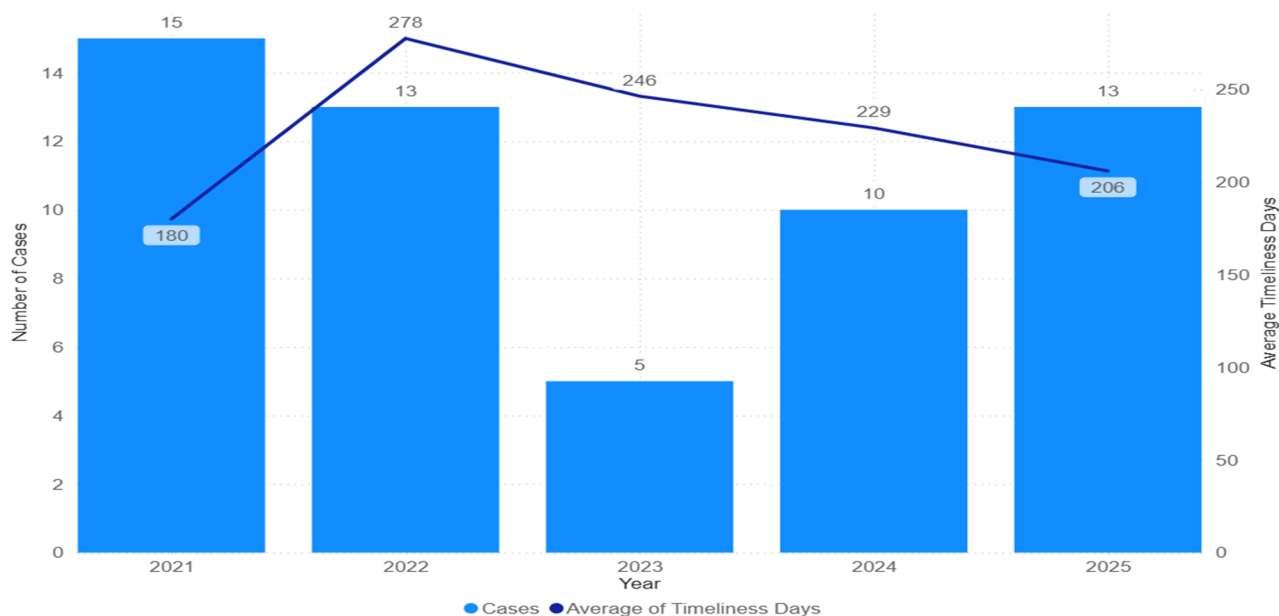
Clean Energy Act of 2024 ([ADVANCE Act](#)) Section 507 by providing a structured approach to process enforcement actions for investigation and inspection cases based on significance. Its purpose is to streamline the decision-making process for escalated enforcement actions, ensure alignment with safety and risk consideration, and grant regions broader authority for certain enforcement issues.

Figure 6 shows that, on average, the NRC took 108 processing days for non-OI-related enforcement case work, which is well below the agency goal of 160 processing days.



**Figure 6 Non-OI-related case timeliness (CY 2021–CY 2025)**

Figure 7 shows the trend in case processing times for OI-related escalated enforcement actions over the past 5 CYs. In CY 2025, on average, it took the NRC 206 days to issue an OI-related enforcement action. This is within the congressional goal of 330 processing days and is lower than the 5-year average.



Note: The numbers of non-OI-related (54) and OI-related (13) escalated enforcement cases do not add up to the total number of escalated enforcement actions (71) because some cases involved the issuance of multiple enforcement actions to licensees and individuals.

Figure 7 OI-related case timeliness (CY 2021–CY 2025)

## 5. Alternative Dispute Resolution

Alternative dispute resolution (ADR) refers to a variety of voluntary processes, such as mediation and facilitated dialogue, to assist parties in resolving disputes and potential conflicts outside of the courts. The NRC’s enforcement ADR program uses mediation by a neutral third party with no decision-making authority. Participation in the process is voluntary, and the content of the final mutual agreement is normally formalized in a confirmatory order.

The term “enforcement ADR” refers to the use of mediation (1) after OI has completed its investigation and an enforcement panel has concluded that pursuit of an enforcement action appears to be warranted, and (2) in escalated nonwillful, traditional enforcement cases with the potential for CPs.

Under OE’s enforcement ADR process, the NRC may offer mediation at any of three points in the enforcement process: (1) before a predecisional enforcement conference, (2) after the initial enforcement action (typically the issuance of an NOV and proposed imposition of a CP), or (3) upon the imposition of a CP and before a hearing request. ADR typically allows the NRC to institute broader or more comprehensive corrective actions than those typically achieved through the normal enforcement process (i.e., restoring compliance).

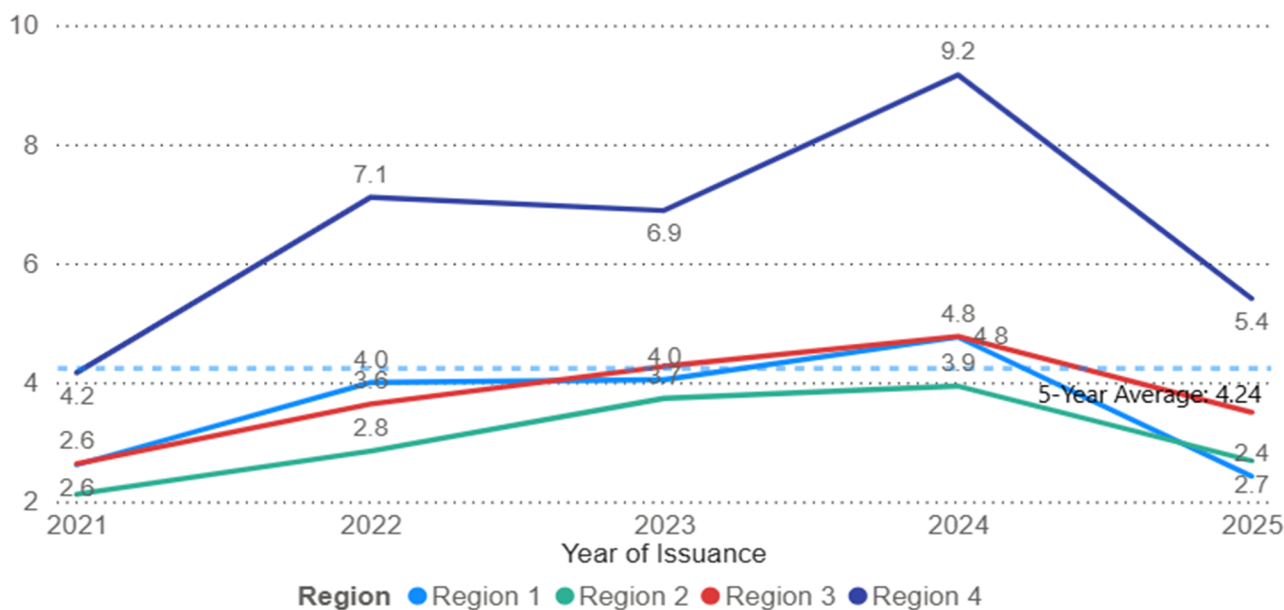
In CY 2025, the NRC participated in three ADR mediation sessions that resulted in orders confirming the terms of the parties’ agreement.

ADR program guidance and specific ADR data can be found at the following link: <https://www.nrc.gov/about-nrc/regulatory/enforcement/adr.html>.

### C. Nonescalated Enforcement

Nonescalated enforcement actions include SL IV NOVs and NCVs under traditional enforcement and NOVs and NCVs associated with green SDP findings under the ROP. The Reactor Program System captures enforcement-related information for operating reactors, and the Web-Based Licensing System records nonescalated actions for nuclear materials users.

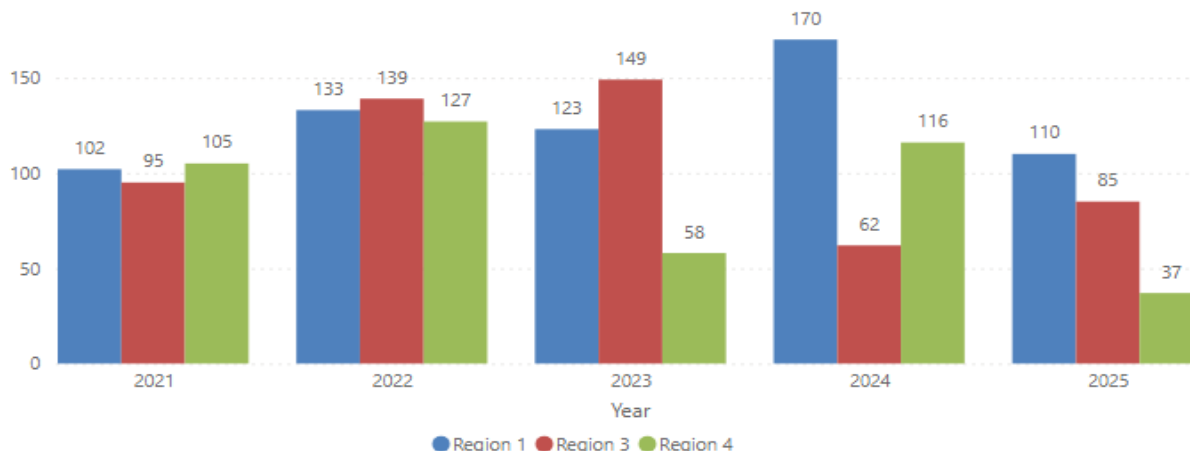
Figure 8 shows the trend in the number of nonescalated enforcement actions at reactor licensees for each region over the past 5 years. This information, obtained from the Reactor Program System, was normalized to show the average number of nonescalated actions per operating reactor in each region. Figure 8 shows that, from CY 2021 through CY 2025, this number has steadily become more consistent across three regions; in particular, Regions I, II, and III are all averaging around three nonescalated actions. However, the average for Region IV remains higher. In CY 2022 through CY 2024, on average, the number of nonescalated enforcement actions per operating reactor rose across the four regions likely because of the resumption of pre-pandemic levels of in-person presence at licensee facilities and restoration of inspection sample size requirements. In CY 2025, the number of nonescalated actions per operating reactors trends downward to a more consistent average across all four regions. This downward trend in CY 2025 may be attributed to the NRC’s response to section 507 of the ADVANCE Act. Specifically, section 507 requires assessment of specific elements of oversight and inspections that may be modified using technology, improved planning, and continually updated risk-informed, performance-based assessment, and the identification and assessment of measures to improve oversight and inspections. OE will continue to monitor future data for any continued trends.



Note: This figure reflects information available from the Reactor Program System as of February 20, 2026.

**Figure 8 Nonescalated enforcement actions per operating reactor, by region (CY 2021–CY 2025)**

## Findings by Region and Year – Selected: SL IV - NCV, SL IV



**Note:** In previous reports, this chart was based on summarized data that underrepresented the total number of findings. The chart has been revised using improved data analytics and detailed source data, resulting in a more accurate accounting of findings. Therefore, the numbers shown in this report are not directly comparable to those in prior reports. This figure reflects information available from the Web-Based Licensing System as of February 27, 2026.

**Figure 9 Nonescalated enforcement actions for nuclear materials users (CY 2021–CY 2025)**

Figure 9 shows the trend in the number of nonescalated enforcement actions for nuclear materials users for each region over the past 5 years. In CY 2023 and CY 2024, the number of SL IV NOVs and NCVs issued to nuclear materials users tended to remain steady, but there was a noticeable decline in total number of nonescalated violations issued in CY 2025. This decline in CY 2025 may be attributed to the NRC’s response to section 507 of the ADVANCE Act, as described above.

## II. Enforcement Case Work

### A. Significant Enforcement Actions

In calendar year (CY) 2025, the U.S. Nuclear Regulatory Commission (NRC) processed several noteworthy enforcement actions, as summarized below. A complete description can be found on the Issued Significant Enforcement Actions website at <https://www.nrc.gov/about-nrc/regulatory/enforcement/current.html>, under the corresponding 2025 tab.

#### [Curium US, LLC \(EAF-RIII-2025-0146\)](#)

St. Louis, MO

On December 17, 2025, the NRC issued an NOV and proposed imposition of a CP in the amount of \$72,000 for an SL II problem associated with six related violations. The violations involved the licensee's failure to: (1) control the occupational dose to the annual limits, as required by Title 10 of the *Code of Federal Regulations* (10 CFR) 20.1201(a)(1)(i) and 10 CFR 20.1201(a)(2)(ii), (2) use procedures and engineering controls to achieve occupational doses that were as low as reasonably achievable (ALARA), as required by 10 CFR 20.1101(b), (3) conduct its program in accordance with radioactive waste management procedures, as required by License Condition 23.O, (4) make surveys that were reasonable under the circumstances to evaluate the magnitude and extent of radiation levels and potential radiological hazards, as required by 10 CFR 20.1501(a)(2), (5) properly label containers of licensed material, as required by 10 CFR 20.1904(a), and (6) perform audits, as required by License Condition 23.P.

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Idaho Falls, ID

On September 30, 2025, the NRC issued a confirmatory order (CO) to International Isotopes, Inc. (INIS), memorializing commitments reached during an alternative dispute resolution (ADR) mediation session held on August 6, 2025. The ADR session was associated with seven apparent violations involving INIS licensed activities that had a direct impact on a nonlicensee NRC applicant in an adjoining physical space. INIS agreed to complete wide-ranging corrective actions. As a result of the CO, the NRC will not cite the apparent violations and will not issue an associated CP.

#### [Saint Francis Medical Center \(EA-24-114/EAF-RIII-2024-0018\)](#)

Cape Girardeau, MO

On March 20, 2025, the NRC issued an NOV and proposed imposition of a CP in the amount of \$14,400 to Saint Francis Medical Center (licensee) for an SL II problem associated with four related violations. The violations involved the licensee's failure to (1) have a written directive that was dated and signed by an authorized user before the administration of a therapeutic dosage of unsealed byproduct material, as required by 10 CFR 35.40(a), (2) provide high confidence that the patient's identity was verified before each administration and each administration was in accordance with the written directive, as required by 10 CFR 35.41(a), (3) train all individuals involved in yttrium-90 microsphere use, commensurate with the individual's duties, as required by the licensee's License Condition 14.C, and (4) ensure that radiation safety activities were being performed in accordance with licensee-approved procedures and regulatory requirements, as required by 10 CFR 35.24(b).

### Quad Cities Nuclear Power Station (EAF-RIII-2025-0074)

Warrenville, IL

On July 16, 2025, the NRC issued a CO to Quad Cities Nuclear Power Station (Quad Cities) memorializing commitments reached during an ADR mediation session held June 17–18, 2025. The ADR session was associated with six apparent violations involving a reactor pressure vessel valve mispositioning event. Quad Cities agreed to complete wide-ranging corrective actions. As a result of the CO, the NRC will not cite the apparent violations and will not issue an associated CP.

### **B. Hearing Activities**

No hearing activities resulted from enforcement actions in CY 2025.

### **C. Enforcement Orders**

In CY 2025, the NRC issued three orders to licensees, nonlicensees, and individuals. The three orders were COs that were issued to confirm commitments associated with ADR settlement agreements. The CY 2025 orders are found at the following link, under the 2025 tab for Reactor and Materials: <https://www.nrc.gov/about-nrc/regulatory/enforcement/current>.

### **D. Enforcement Actions Supported by the Office of Investigations**

In CY 2025, the Office of Investigations investigated 7 cases that were substantiated for willfulness (enforcement actions may not have been taken on some of these cases) and 42 cases that were unsubstantiated. Additionally, the Office of Investigations conducted 29 assists-to-staff activities in CY 2025. This assistance provides the NRC staff with clarifying information about concerns to better inform decision-making, allowing the agency to take the most appropriate action.

### **E. Actions Involving Individuals and Nonlicensee Organizations**

In CY 2025, the NRC issued 13 escalated enforcement actions to individuals (11 SL III NOVs, and 2 SL IVs). The CY 2025 individual actions are found at the following link: <https://www.nrc.gov/about-nrc/regulatory/enforcement/current/individual-actions/2025>.

### **F. Enforcement Actions Involving Discrimination**

In CY 2025, no escalated enforcement actions resulted from a substantiated allegation of discrimination.

### **G. Use of Judgment and Discretion in Determining Appropriate Enforcement Sanctions**

Within its statutory authority, the NRC may choose to exercise discretion and either escalate or mitigate enforcement sanctions or otherwise refrain from taking enforcement action. This exercise of discretion allows the NRC to determine actions that are appropriate for a particular case, consistent with the policy. After considering the general tenets of the policy and the safety and security significance of a violation and its circumstances, the NRC may exercise judgment and discretion in determining the SL of the violation and the appropriate enforcement sanction.

In CY 2025, the NRC exercised discretion in 6 enforcement cases, compared to 13 enforcement cases in CY 2024, to address violations of agency requirements. The NRC exercised enforcement discretion three times using Section 3.3, "Violations Identified Because of Previous Enforcement Action," of the NRC Enforcement Policy; one time for Enforcement Guidance Memorandum (EGM)-13-003, "Interim Guidance for Dispositioning Violations Involving 10 CFR 35.60 and 10 CFR 35.63 for the Calibration of Instrumentation to Measure the Activity of Rubidium-82 and the determination of Rubidium-82 Patient Dosages," dated April 18, 2013, (Agencywide Documents Access and Management System Accession No. [ML13101A318](#)); and two times for issuance of notices of enforcement discretion (NOEDs). NOEDs issued to power reactor licensees are found at the following link: <https://www.nrc.gov/reading-rm/doc-collections/enforcement/notices/noedreactor>.

### **H. Withdrawn Actions**

In CY 2025, licensees disputed seven violations issued by the NRC (two green noncited violations and five SL IV NOVs). Licensees can challenge enforcement actions for several reasons; for example, a licensee might dispute the requirements, the facts of the case, the NRC's application of the policy, or the significance of the violation. Licensees may also provide clarifying information that was not available at the time of the inspection. For any of these reasons, the NRC may have to revisit enforcement actions and, in some instances, recategorize or withdraw them.

The NRC withdrew three of seven violations in CY 2025.

### III. Ongoing Activities

#### A. Enforcement Policy and Guidance

##### 1. Enforcement Policy Revisions

On August 12, 2025, the Office of Enforcement (OE) revised the U.S. Nuclear Regulatory Commission (NRC) Enforcement Policy (EP) to incorporate the Interim Enforcement Policy for “Enforcement Discretion for General Licensee Adoption of Certificate of Compliance Holder-Generated Changes under 10 CFR 72.48.”

##### 2. Enforcement Manual Guidance

The staff periodically revises the Enforcement Manual (EM) to reflect changes to the policy, operating experience, and stakeholder input. In calendar year (CY) 2025, the staff revised the EM twice to (1) withdraw an enforcement guidance memorandum (EGM), (2) revise an existing EGM, and (3) revise several sections of the EM to reflect current enforcement practices and to clarify guidance where needed. The EM changes are found at the following link:

<https://www.nrc.gov/reading-rm/basic-ref/enf-man/cnindex.html>.

##### Enforcement Guidance Memoranda

OE issues EGM to provide temporary guidance on the interpretation of specific provisions of the policy. The full text of all publicly available EGM (appendix A to the EM) is available on the NRC’s public website at <https://www.nrc.gov/reading-rm/basic-ref/enf-man/app-a.html>. OE revised one EGM in CY 2025. On September 2, 2025, the staff issued EGM-23-001, Revision 1, “Interim Guidance for Dispositioning Violations Associated with the Enhanced Weapons, Firearms Background Checks, and Security Event Notification Rule” (Agencywide Documents Access and Management System Accession No. [ML25050A603](#)).

#### B. Enforcement Program Initiatives

In CY 2025, OE engaged in several activities designed to enhance and continuously improve the NRC’s Enforcement Program. Typical activities include development and improvement of internal office procedures, enhanced staff knowledge and training, and mentoring of new staff members by more experienced staff.

##### 1. Program Enhancements

Throughout the year, the staff worked on several initiatives to keep the Enforcement Program effective and efficient, including the following:

- As part of agency activities to support the Accelerating Deployment of Versatile, Advanced Nuclear for Clean Energy Act of 2024 ([ADVANCE Act](#)), OE implemented a graded approach, including decision-making and resource expenditures, for processing and determining enforcement actions commensurate with the safety significance and complexity of cases. This effort facilitates more streamlined decision making and reduces resource expenditures for issues of lower safety significance and less complexity.

- The agency launched a new modernized and integrated case work database for investigations, allegations, and the Enforcement Program. The new database, Allegations, Resolution, Investigation, and Enforcement System (ARIES), will streamline interoffice communications by reducing repetitive data entry, enhancing search capabilities, achieving greater transparency of data sharing across these program areas, and gaining efficiencies by use of an integrated platform. The NRC will continue these enhancements in CY 2026 to achieve greater system effectiveness and functionality.
- The staff conducted internal audits of OE databases (i.e., ARIES) to ensure the integrity of the data and to extract the appropriate figures, statistics, and information for the OE annual report and other OE reporting requirements (e.g., the semiannual report to Congress).
- The staff conducted an internal audit of Reactor Oversight Process (ROP) nonescalated NOVs and violations issued over the past 5 years under Title 10 of the *Code of Federal Regulations* (10 CFR) Part 50, “Domestic Licensing of Production and Utilization Facilities,” Appendix B, “Quality Assurance Criteria for Nuclear Power Plants and Fuel Reprocessing Plants,” Criterion XVI, “Corrective Action.” The audit sampled 28 records across all four regions and identified no areas of concern.

## 2. Knowledge Management

Activities associated with training and knowledge transfer in CY 2025 include the following:

- OE continued developing and posting a series of short, focused videos in Microsoft Teams to provide detailed training and refresher training for enforcement specialists and other staff and managers who become involved with the enforcement process. These videos are intended for internal staff use to raise the overall knowledge level and proficiency of program personnel. The series are structured to serve as either overall training, if the videos are used in sequence, or just-in-time training, if individual videos are selected.
- OE further developed and enhanced internal office procedures, internal Enforcement Program SharePoint sites, and Microsoft Teams pages to ensure the consistency of Enforcement Program implementation and the functionality of OE web-based programs.
- OE continued to enhance the ARIES guidance document to assist staff when working in the system. OE also provided several hours of online training and continued to answer staff questions about the operation of the system.
- OE continued outreach training to various offices and NRC staff on the NRC’s Enforcement Program to provide a better understanding of the program’s structure, purpose, and key processes.

## C. Regional Accomplishments

In CY 2025, the regional offices periodically reviewed enforcement actions issued by each region to ensure effective performance and to identify opportunities for continuous improvement. The reviews encompassed reactor and materials cases involving both nonescalated and escalated enforcement actions; they included activities that required a high degree of coordination with other NRC stakeholders.

## D. Calendar Year 2026 Focus Areas

During CY 2026, OE plans to address the following focus areas:

- With Commission approval through staff requirements memoranda and *Federal Register* notice ([91 FR 9890](#)), to revise and update the EP with the changes described in SECY-24-0009, “Proposed Revisions to the U.S. Nuclear Regulatory Commission Enforcement Policy,” dated January 25, 2024 ([ML22318A123](#)), and the Interim Enforcement Policy revision, update the Enforcement Manual to incorporate new guidance associated with the EP changes.
- Monitor the wholesale revisions of regulations and guidance required by Executive Order 14300, “Ordering the Reform of the Nuclear Regulatory Commission,” dated May 23, 2025, and evaluate for potential impacts to the Enforcement Program.
- Support the revisions to the ROP baseline inspection program and inspection finding screening process, described in [SECY-26-0014](#) “Recommendations to Revise the Reactor Oversight Process Baseline Inspection Program” and [Staff Requirements – SECY-26-0014](#) “Recommendations to Revise the Reactor Oversight Process Baseline Inspection Program.”
- Continue knowledge management activities, such as training development, and revision of internal office procedures to improve the consistency of Enforcement Program implementation and decision-making.
- Develop and refine the enforcement specialist qualification program in both content and formality to support a broader base-level knowledge for new enforcement specialists.
- Support the agency’s reorganization goal by implementing any necessary program adjustments to streamline decision making, consolidate functions, and align NRC structure with national goals for efficient licensing and adoption of innovative nuclear technology.