

February 15, 2006

MEMORANDUM TO: Stephen D. Dingbaum
Assistant Inspector General for Audits

FROM: Jacqueline E. Silber */RA/*
Deputy Executive Director for
Information Services and Administration,
and Chief Information Officer
Office of the Executive Director for Operations

SUBJECT: RESPONSE TO RECOMMENDATIONS: AUDIT OF
NRC'S INTEGRATED PERSONNEL SECURITY SYSTEM
(OIG-06-A-06)

The following responds to the recommendations in the subject audit report.

The Integrated Personnel Security System (IPSS) was developed for NRC by PEC Solutions, Inc. (PEC). The contract with PEC expired on January 31, 2006. The Office of Administration (ADM) received the IPSS configuration management documents and source code from PEC on February 7, 2006. These documents are being transferred to the agency's information systems maintenance contractor, Lockheed Martin Information Technology (LMIT), so that they can complete modifications to IPSS to respond to several Office of Inspector General (OIG) recommendations. It is anticipated that the subject LMIT task order will be in place by April 28, 2006, and the modifications will be completed by December 29, 2006. The actions to respond to Recommendations 3, 6, and 14 will be initiated after completion of the IPSS modifications.

Recommendation 1:

Assign an Office of Information Systems project manager to work closely with DFS for the remainder of the IPSS development process.

Response:

Agree. The Office of Information Systems (OIS) has assigned a project manager to work closely with ADM for the remainder of the IPSS development process (Enclosure 1). We consider this recommendation to be closed.

Recommendation 2:

Correct the reinvestigations notifications report so that all overdue cases are identified and submitted for reinvestigation.

CONTACT: Sharon D. Stewart, ADM
(301) 415-8080

S. Dingbaum

Response:

Agree. On December 29, 2005, ADM modified the stored procedure to update the notifications web page within IPSS to retrieve all required reinvestigations for all clearances and accesses. We will verify that the stored procedure is producing accurate notifications through our quality control approach developed in response to Recommendation No. 8.

Recommendation 3:

Develop and implement a consolidated data entry guide for IPSS users and update it every 6 months or as needed.

Response:

Agree. We will update and implement the current IPSS users' guide with the latest procedures, based on the modifications completed by LMIT, by March 30, 2007. ADM will review this user's guide every six months or within three months after major system modifications are completed, whichever comes first, to determine if updates are necessary.

Recommendation 4:

Review and correct the most recent reinvestigation dates within IPSS.

Response:

Agree. The most recent reinvestigation dates will be reviewed and corrected within IPSS by March 30, 2007. This will require acquiring contract support to retrieve, review, and validate approximately 8,000 files.

Recommendation 5:

Change IPSS to eliminate the requirement to duplicate clearance data within the system.

Response:

Agree. It is anticipated that this requirement will be eliminated as part of the modifications to be completed by LMIT by December 29, 2006.

Recommendation 6:

Eliminate data that was purposely duplicated as a workaround in IPSS records for individuals with a clearance.

Response:

Agree. We will delete the duplicated data once the effort identified in our response to Recommendation No. 5 above is completed. The presence of this duplicated data in IPSS is not detrimental to its functionality. This action is anticipated to be completed by December 12, 2007.

S. Dingbaum

Recommendation 7:

Perform top-to-bottom cleanup effort of every active file; support this effort with clear written guidance as to what data goes in what field.

Response:

Agree. We will develop clear written guidance as to what information goes in each field by March 31, 2006. The top-to-bottom cleanup effort is anticipated to be completed by March 30, 2007, in conjunction with contract support specified in the response to Recommendation No. 4.

Recommendation 8:

Develop and implement an overall quality control approach to ensure continued data accuracy.

Response:

Agree. We will develop and implement an overall quality control approach by June 29, 2006.

Recommendation 9:

Fix the planned controls to prevent incorrect badge issuance and incorrect clearance assignment.

Response:

Agree. Planned controls to prevent incorrect badge issuance and incorrect clearance assignment will be incorporated into the modifications completed by LMIT by December 29, 2006.

Recommendation 10:

Add date logic controls to ensure that OPM investigation dates follow in logical chronological order.

Response:

Agree. This functionality will be included in the modifications to be completed by LMIT by December 29, 2006.

Recommendation 11:

Redefine IPSS user roles in accordance with least privilege requirements.

Response:

Agree. We completed the redefinition of IPSS user roles in accordance with least privilege requirements on December 29, 2005. A copy of the revised role definitions is provided in Enclosure 2. We consider this recommendation to be closed.

S. Dingbaum

Recommendation 12:

Review role assignments annually and make appropriate adjustments.

Response:

Agree. On December 29, 2005, we reviewed role assignments for IPSS users. As a result, adjustments were made to the assignments for a security officer and for contract personnel security processors to eliminate roles that were not appropriate for their job duties. A copy of the revised role assignments is provided in Enclosure 3. We will complete an annual review of role assignments by January 30 of each succeeding year.

Recommendation 13:

Add audit trail capabilities to IPSS.

Response:

Agree. PEC informed ADM that the current version of IPSS would be slowed down to the point of impacting functionality if the audit trail logs were turned on. ADM will request that LMIT assess the impact of this action and complete the actions required to add audit trail capabilities to IPSS by December 29, 2006.

Recommendation 14:

Review audit trail reports monthly to ensure appropriate use of IPSS.

Response:

Agree. After the audit trail capability described in Recommendation 13 is activated, we will begin reviewing audit trail reports on a monthly basis to ensure appropriate use of IPSS.

Recommendation 15:

Require future IPSS users to sign an integrity statement before being granted access to the system. Also require existing users to sign an integrity statement.

Response:

Agree. All new IPSS users will sign a "Notification of Responsibility to Protect Privacy Act Information" (Enclosure 4) prior to being granted access to the system. Existing users will also be required to sign this notice by March 31, 2006.

Recommendation 16:

Develop a records disposition schedule for IPSS and incorporate it into DFS procedures and the IPSS users manual.

S. Dingbaum

Response:

In our review of this recommendation, we learned that NUREG-0910, entitled "NRC Comprehensive Records Disposition Schedule," page 2.1.1, has an authorized disposition schedule for the Central Personnel Clearance Index (CPCI, see Enclosure 5). Since IPSS replaced the CPCI, we will work with OIS to revise Schedule 2 by August 31, 2006, to delete CPCI, add IPSS, and ensure the disposition schedule is appropriate for IPSS.

Recommendation 17:

Conduct a cost-benefit analysis to determine whether the agency should continue to develop IPSS versus replacing the system. As part of the cost-benefit analysis consider current Federal personnel security requirements.

Response:

Agree. We will conduct a cost-benefit analysis to determine whether the agency should continue to develop IPSS versus replacing the system by June 20, 2007. It is anticipated that this effort will be conducted concurrently with the planning and implementation of Homeland Security Presidential Directive 12, Part II.

Enclosures:

As stated (5)

cc: Chairman Diaz
Commissioner McGaffigan
Commissioner Merrifield
Commissioner Jaczko
Commissioner Lyons
SECY

S. Dingbaum

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