

U.S. Nuclear Regulatory Commission

Privacy Impact Assessment

Instructions: Section A, B, C, and D must be completed for all systems. Section E must be completed if yes is the answer to Section B, questions 1 and 2.

Date: March 13, 2006

A. GENERAL SYSTEM/APPLICATION INFORMATION

(See definitions at end of document)

1. Person completing this form:

Name	Title	Phone No.	Office
Richard Kristobek	Senior IT Specialist	415-5025	T8D21

2. System owner:

Name	Title	Phone No.	Office
Tim Harris	Section Chief	415-7218	T8F26

3. What is the name of this system?

Licensing Tracking System (LTS)

4. Briefly describe the purpose of this system. What agency function does it support?

The Licensing Tracking System (LTS) tracks material licensee applications for use of byproduct, source, and special nuclear materials. LTS is used to manage the licensing and inspection of medical, academic, and industrial uses of nuclear materials, and is critical to the NRC's ability to carry out our responsibility as an independent regulatory agency. This supports the Materials Users Licensing and Inspection Program.

5. Does this Privacy Impact Assessment support a proposed new system or a proposed modification to an existing system.

This submission is in support of the re-certification and re-authorization process for the LTS. The system, which currently exists, will not be modified.

_____ New System **X** Modify Existing System

B. PRIVACY ACT APPLICABILITY

1. Does this system collect, maintain, or disseminate personal information in identifiable form (e.g., name, social security number, date of birth, home address, etc.) about individuals ?

Yes **X** No _____

Yes. The only "personal information in identifiable form" collected by and maintained in LTS are names of authorized users and the Radiation Safety Officer supplied by the license applicant business.

2. If yes, will the data be retrieved by an individual's name or other personal identifier (e.g., social security number, badge number, etc.)?

Yes _____ No **X**

If you answer yes to questions 1 and 2, complete Section E.

C. INFORMATION COLLECTION APPLICABILITY

1. Will the personal data be collected from or maintained by persons who are not Federal employees?

Yes **X** No _____

2. Will the data be collected from Federal contractors?

Yes _____ No **X**

3. If the answer is yes to either question 1 or 2, will the data be collected from 10 or more persons during a calendar year?

Yes **X** No _____

4. If the answer is yes to question 3, is the information to be collected covered by an existing OMB clearance number? If yes, indicate the clearance number, 3150-0120.

D. RECORDS RETENTION AND DISPOSAL SCHEDULE APPLICABILITY

Does this system already have a NARA-approved records disposition schedule?
(Reference NUREG-0910, "NRC Comprehensive Records Disposition Schedule," or
contact your office Records Liaison Officer or Jeffrey Bartlett, OIS.)

Yes X No

If yes, list the records schedule number N1-431-00-13 Item 6.e

The records schedule referenced (ADAMS) is the schedule that covers the records of the Licensing Tracking System (LTS).

<p><i>Complete Section E only if the answers to Section B, questions 1 and 2 are Yes.</i></p>
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E. SYSTEM DATA INFORMATION

1. *Type* of information maintained in the system
 - a. Describe the information to be maintained in the system (e.g., financial, medical, training, personnel.) Give a detailed description of the data.

2. *Source* of the data in this system
 - a. Are data being collected from the subject individual? If yes, what types of data are being collected?

 - b. Are data on this individual being collected from other NRC files and databases for this system? If yes, identify the files and databases.

 - c. Are data on this individual being collected from a source or sources other than the subject individual and NRC records? If yes, what is the source and what type of data is being collected?

 - d. How will data collected from sources other than the subject individual or NRC records be verified as current, accurate, and complete?

3. *Attributes* of the data
 - a. Are the *data elements* described in detail and documented? If yes, what is the name of the document? Where is it located?

- b. Is the use of the data both relevant and necessary for the purpose for which the system is designed?
- c. Will the system derive (i.e., create) new data or create previously unavailable data about an individual through aggregation from the information collected?
 - (1) How will aggregated data be maintained, filed, and utilized?
 - (2) How will aggregated data be validated for relevance and accuracy?
- 4. If data are consolidated, what *controls* protect it from unauthorized access, use, or modification?
- 5. How will the data be *retrieved* from the system?
 - a. Can it be retrieved by personal identifier? ___ Yes ___ No.
If yes, explain.
 - b. Is a password or data description required? _____ Yes _____ No.
If yes, explain.
- 6. Describe the report or reports that can be produced from this system.
 - a. What reports are produced from the system?
 - b. What are the reports used for?
 - c. Who has access to these reports?
- 7. *Records retention*
 - a. What are the record types contained in this system and the medium on which they reside? (Examples: type - program records, medium - electronic; type - database, medium - electronic; type - system documentation, medium - paper.)

- b. What is the NARA-authorized retention period for each records series in this system?
 - c. If unscheduled, what are your retention requirements for each records series in this system?
 - d. What are the procedures for disposing of the data at the end of the retention period (specifically address paper copy, magnetic, or other forms of media)?
 - e. How long will produced reports be maintained?
 - f. Where are the reports stored?
 - g. Where are the procedures for maintaining the data/reports documented?
 - h. How will unused or unwanted reports be disposed of?
8. Capability to *monitor individuals*
- a. Will this system provide the capability to identify, locate, and monitor (e.g., track, surveillance) individuals? ___ Yes ___ No. If yes, explain.
 - b. What controls will be used to prevent unauthorized monitoring?
9. Coverage Under Existing *Privacy Act System of Records*
- a. Under which Privacy Act System of Records (SOR) notice does this system operate (link to list of SOR available on NRC Internal Home Page)? Provide number and name.
 - b. If the Privacy Act System of Records is being modified, will the SOR notice require amendment or revision? ___ Yes ___ No. If yes, explain.
10. Access to the Data

- a. Who will have access to the data in the system (users, managers, system administrators, developers, other)?
- b. Are criteria, procedures, controls, and responsibilities regarding access documented? If so, where?
- c. Will users have access to all data in the system or will users' access be restricted? Explain.
- d. What controls are or will be in place to prevent the misuse (e.g., unauthorized browsing) of data by those having access?
- e. Do other systems share data or have access to data in this system?
___ Yes ___ No. If yes, explain.
- f. Will other agencies share data or have access to data in this system (Federal, State, local, other)? ___ Yes ___ No. If yes, explain.
- g. Were Privacy Act clauses cited (or will be cited) and were other regulatory measures addressed in contracts with contractors having access to this system?
_____ Yes _____ No. If yes, explain.

DEFINITIONS

Personal Information is information about an identifiable individual that may include but not be limited to:

- race, national or ethnic origin, religion, age, marital or family status
- education, medical, psychiatric, psychological, criminal, financial, or employment history
- any identification number, symbol, or other particular assigned to an individual
- name, address, telephone number, fingerprints, blood type, or DNA

Aggregation of data is the taking of various data elements and then turning them into a composite of all the data to form another type of data such as tables or data arrays, or collecting data into a single database.

Consolidation means combining data from more than one source into one system, application, or process. Existing controls for the individual parts should remain or be strengthened to ensure no inappropriate access by unauthorized individuals. However, since individual pieces of data lose their identity, existing controls may actually be diminished; e.g., a summary census report may not point at the individual respondent but rather at a class of respondents, which makes it less personal.

PRIVACY IMPACT ASSESSMENT REVIEW/APPROVAL
(For Use by OIS Staff)

System Name: **Licensing Tracking System (GLTS)**

Submitting Office: **Office of Nuclear Material Safety and Safeguards (NMSS)**

A. PRIVACY ACT APPLICABILITY REVIEW

Privacy Act is not applicable.

Privacy Act is applicable. Currently covered under System of Records, NRC _____.
No modification to the system notice is required.

Privacy Act is applicable. Creates a new system of records. FOIA/PA Team will take the lead to prepare the system notice.

Privacy Act is applicable. Currently covered under System of Records, NRC _____.
Modification to the system notice is required. FOIA/PA Team will take the lead to prepare the following changes:

Comments:

Richard Kristobek confirmed that this system is going to be replaced by the new Web-Based Licensing (WBL). Until this happens, the LTS needs to renew/extend its accreditation which expires April 3.

The LTS sits on a main frame at NIH. Only NRC staff have access to this system. The only information that is collected or maintained "about" an individual are the names of the authorized users of a device and the names of Radiation Safety Officers. This information is provided by the licensee. No information is retrieved from the LTS by an individual's name or personal identifier.

Reviewer's Name	Title	Date
Sandra S. Northern	Privacy Program Officer	March 31, 2006

B. INFORMATION COLLECTION APPLICABILITY DETERMINATION

No OMB clearance is needed.

OMB clearance is needed.

Currently has OMB Clearance.

Comments:

The information for the Licensing Tracking System is being captured from NRC Form 313, "Application for Material License". This information is approved by OMB under OMB clearance number 3150-0120.

Reviewer's Name	Title	Date
Christopher J. Colburn	Team Leader	April 4, 2006

C. RECORDS RETENTION AND DISPOSAL SCHEDULE DETERMINATION

Additional information is needed to complete assessment.

Needs to be scheduled.

Existing records retention and disposition schedule covers the system - no modifications needed.

Records retention and disposition schedule must be modified to reflect the following:

Comments:

The information provided in item D indicates that there is a records schedule that has been established for this system. This is not accurate. In response to the PIA dated 4/21/05 that was submitted for SafeSource Phase 1, (which is intended to replace the LTS system), "Neither the LTS and the proposed system (SafeSource) have an approved records disposition schedule."

RFPSB hopes to gain approval for a generic disposition schedule to cover "superseded unscheduled systems" that has been forwarded to NARA that could be applied to the LTS system once the SafeSource system is fully operational and verification of the data transfer from the LTS system is complete. Application of this generic schedule would eliminate the need to develop a system specific schedule for the LTS system.

Consequently, further records management review is required for the LTS system. However, the issues discussed above do not preclude moving forward with certification of the LTS System.

Reviewer's Name	Title	Date
Jeff Bartlett	Senior Records Analyst	03/31/06

D. BRANCH CHIEF REVIEW AND CONCURRENCE

- Does not constitute a Privacy Act Assessment required by the E-Government Act of 2002
- Does constitute a Privacy Act Assessment required by the E-Government Act of 2002 and requires approval of the Director, IRSD.

CONCUR IN REVIEW: /RA/ Date: 04/04/2006
Brenda J. Shelton, Chief
Records and FOIA/Privacy Services Branch

E. DIVISION DIRECTOR APPROVAL OF PRIVACY IMPACT ASSESSMENT:

(Approval is only required when Yes is given to Section B, questions 1 and 2 and Section C, question 1. The system collects, maintains, or disseminates personal information in identifiable form about members of the public.)

_____ Date:
John J. Linehan, Director, Information and Records Services Division

**TRANSMITTAL OF PRIVACY IMPACT ASSESSMENT/
PRIVACY IMPACT REVIEW RESULTS**

TO: (Sponsoring Office) Office of Nuclear Material Safety and Safeguards (NMSS)	Office Sponsor Tim Harris	
Reginald W. Mitchell, Director Business Process Improvement and Applications Division, OIS	Name of System Licensing Tracking System (LTS)	
Kathy L. Lyons-Burke, CISSP Senior IT Security Officer (SITSO)/Chief Information Security Officer (CISO), OIS	Date Received: 03/29/2006	Date Completed: 04/04/2006
<p>Noted Application Development and System Security Issues:</p> <p>No Privacy Act issues.</p> <p>This information collection is approved by OMB under OMB clearance number 3150-0120.</p> <p>Further records management review is required for the LTS system. However, the outstanding records management issues do not preclude moving forward with certification of the LTS System.</p>		
Brenda J. Shelton, Chief Records and FOIA/Privacy Services Branch, OIS	Signature: <i>/RA/</i>	Date: 04/04/2006