

November 16, 2007

MEMORANDUM TO: Luis A. Reyes  
Executive Director for Operations

FROM: Stephen D. Dingbaum */RA/*  
Assistant Inspector General for Audits

SUBJECT: STATUS OF RECOMMENDATIONS: AUDIT OF NRC'S  
AUTOMATED ACCESS CONTROL AND ENHANCED  
SECURITY SYSTEM (OIG-07-A-10)

REFERENCE: DIRECTOR, OFFICE OF ADMINISTRATION,  
MEMORANDUM DATED OCTOBER 29, 2007

Attached is the Office of the Inspector General (OIG) analysis and status of recommendations as discussed in the agency's response dated October 29, 2007. Based on this response, recommendations 1, 2, 4, 6, 7, 9, 11, 12, and 17 are closed, and recommendations 5, 8, 10, 13, 14, and 15 are resolved. Recommendations 3 and 16 were previously closed. Please provide an updated status of the resolved recommendations by March 25, 2008.

If you have questions or concerns, please call me at 415-5915.

Attachment: As stated

cc: V. Ordaz, OEDO  
M. Malloy, OEDO  
P. Tressler, OEDO  
D. Ash, OEDO  
T. Hagan, ADM  
A. Pretzello, ADM

**Audit Report**  
**Audit of NRC's Automated Access Control and**  
**Enhanced Security System (OIG-07-A-10)**

**Status of Recommendations**

Recommendation 1: Perform an annual assessment of the user list for ACCESS and modify it appropriately in accordance with least-privilege guidance.

Response Dated  
October 29, 2007

ADM performed an annual assessment of the user list for ACCESS and modified it appropriately in accordance with least-privilege guidance (Enclosure 1). This assessment was completed on February 23, 2007, and again on June 28, 2007. The reviews did not identify any issues that needed to be corrected.

OIG Analysis:

The proposed corrective action addresses the intent of OIG's recommendation. This recommendation is closed.

**Status:**

Closed.

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**Status of Recommendations**

Recommendation 2:            Require separate user IDs for each user.

Response Dated  
October 29,, 2007            ADM created separate user lds for each user.

OIG Analysis:                OIG reviewed the list to ensure that each user has a  
separate ID. The proposed corrective action addresses the  
intent of OIG's recommendation. This recommendation is  
closed.

**Status:**                    Closed.

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**Status of Recommendations**

Recommendation 4: Define and document user roles and associated rights.

Response Dated  
October 29, 2007: The ACCESS user roles and associated rights were defined, documented, and established within ACCESS (Enclosure 2).

OIG Analysis: OIG reviewed the document. The proposed corrective action addresses the intent of OIG's recommendation. This recommendation is closed.

**Status:** Closed.

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**Status of Recommendations**

Recommendation 5: Institute quarterly quality assurance reviews of system data to ensure that system data is accurate with regard to special access areas, terminated employees, and terminated contractors.

Response Dated  
October 29, 2007:

ADM instituted quarterly quality assurance reviews of system data. The latest review with corrections began on September 19, 2007. ADM has received responses back from Region I, Region III, Region IV, and TTC for the latest review and has made the needed changes. A response from Region II is anticipated by November 2, 2007.

OIG Analysis:

The proposed corrective action addresses the intent of OIG's recommendation. This recommendation will be closed when ADM provides OIG with documentation indicating that all four regions have conducted the review.

**Status:**

Resolved.

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**Status of Recommendations**

Recommendation 6: Conduct quarterly reviews of super user lists, modify appropriately, and send to special access points-of-contact.

Response Dated  
October 29, 2007: ADM began conducting quarterly reviews of super user lists on June 22, 2007, which included sending the list to the special access points-of-contact, and modified the access according to the findings. ADM's latest quarterly review was completed on September 27, 2007.

OIG Analysis: The proposed corrective action addresses the intent of OIG's recommendation. This recommendation will be closed.

**Status:** Closed.

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**Status of Recommendations**

Recommendation 7: Provide official agency list of departures to all field office badging officials to facilitate removal of terminated employees.

Response Dated  
October 29, 2007:

The list of departures is currently being provided to the regions and TTC on a quarterly basis. ADM added a formal memorandum to the report to make the list an official notification. The latest notification was sent on September 19, 2007. This list also serves to correct any discrepancies between the database information at the regions, TTC, and information at Headquarters.

OIG Analysis:

The proposed corrective action addresses the intent of the recommendation. This recommendation will be closed. .

**Status:**

Closed.

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**Status of Recommendations**

<u>Recommendation 8:</u>	Write and implement badge access system operating procedures that provides system user guidance and addresses the preceding three recommendations.
Response Dated October 29, 2007:	The badge access system operating procedures are being updated to enhance system user guidance and will address the preceding three recommendations. The MAR contractor is currently working on these procedures as part of the Personnel Security Branch (PSB) and Facilities Security Branch (FSB) procedures and expects to have them finalized by November 30, 2007.
OIG Analysis:	The proposed corrective action addresses the intent of OIG's recommendation. This recommendation will be closed when ADM provides OIG with a copy of the operating procedures.
<b>Status:</b>	Resolved.



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**Status of Recommendations**

Recommendation 9: Conduct daily reconciliations of temporary badges and disable access for badges not returned.

Response Dated  
October 29, 2007:

Procedures for daily reconciliation and disabling of temporary badges not returned were initiated on March 15, 2007. The procedure is documented as Enclosure 3 and is completed as a daily routine by DFS staff.

OIG Analysis:

The proposed corrective action addresses the intent of OIG's recommendation. This recommendation will be closed.

**Status:**

Closed.

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**Status of Recommendations**

Recommendation 10: Replace the current visitor badges with expiring paper badges.

Response Dated  
October 29, 2007:

ADM was unsuccessful in utilizing paper badges in the past (sticker-type badges damaged clothing or simply fell off), but will research the possibility of clip-on disposable paper badges to replace the current visitor badges. This research will be completed and the approach decided upon by April 30, 2008, as part of the security contract for HSPD-12 consulting services.

OIG Analysis:

The proposed corrective action addresses the intent of OIG's recommendation. This recommendation will be closed when ADM provides indication to OIG that paper badging of visitors is underway or evidence that ADM reviewed this approach and found it infeasible.

**Status:**

Resolved.

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**Status of Recommendations**

Recommendation 11:     Include clauses in new contracts imposing a financial penalty for badges not returned.

Response Dated  
October 29, 2007:

The Division of Contracts now includes a clause in contracts that discusses the timely completion of contractor security or access application packages and establishes that failure to comply with this requirement may be a basis to cancel the award or terminate the contract for default or offset costs and delays incurred by the NRC. Because the timely return of badges, like the timely completion of security packages, is also a contract requirement, the same contract enforcement requirements for possible offset costs would apply. Because of this, no specific wording of a financial penalty specifically linked to not returning a badge is included (ML071930402).

OIG Analysis:

The proposed corrective action addresses the intent of OIG's recommendation. This recommendation will be closed.

**Status:**

Closed.

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**Status of Recommendations**

Recommendation 12: Reiterate to NRC project officers the need to notify DFS immediately when a contractor no longer needs access to NRC facilities.

Response Dated  
October 29, 2007:

ADM, through its Project Manager Acquisition Training Workshops, has reiterated to Project Managers the need to notify the Division of Facilities and Security (DFS) immediately when a contractor no longer needs access to NRC facilities. Please refer to the workshop manual on page IG-174, version 0701-0430 for the latest training material on this subject, or go to the web page:  
<http://www.internal.nrc.gov/ADM/documents/acquisitionoverviewhandbook.pdf>.

OIG Analysis: The proposed corrective action addresses the intent of OIG's recommendation. This recommendation will be closed.

**Status:** Closed.

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**Status of Recommendations**

Recommendation 13: In accordance with NRC requirements for listed systems, develop an ACCESS system security plan and appoint an Information System Security Officer.

Response Dated  
October 29, 2007:

The security categorization documents have already been completed for ACCESS and are in concurrence. The Information System Security Officer for ACCESS is officially listed in the security categorization document. Once the Office of Information Services (OIS) has accepted the Security Categorization for ACCESS, ADM will initiate the remainder of the system security plan for listed systems to obtain the Authority to Operate for the system if it has not been upgraded to HSPD-12 compliance. This effort is anticipated to be completed by June 2008.

OIG Analysis:

The proposed corrective action addresses the intent of OIG's recommendation. This recommendation will be closed when ADM provides OIG with a copy of the approved security plan and the security categorization document listing the appointed ISSO.

**Status:**

Resolved.

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**Status of Recommendations**

Recommendation 14:      Develop documentation to support the ACCESS interim authority to operate.

Response Dated  
October 29, 2007:

The security categorization documents have already been completed for ACCESS and are in the concurrence phase. Several of the documents came back for updating to newer templates and have caused a delay in the process. Once the Security Categorization is approved by OIS Security, it is anticipated that OIS will grant ACCESS the Interim Authority to Operate (IATO). The IATO is expected to be granted by January 31, 2008.

OIG Analysis:

The proposed corrective action addresses the intent of OIG's recommendation. This recommendation will be closed when ADM provides OIG with a copy of the documentation and the IATO for ACCESS.

**Status:**

Resolved.

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**Status of Recommendations**

Recommendation 15: Complete the actions necessary to address the ACCESS weaknesses contained in the penetration test reports.

Response Dated  
October 29, 2007:

ADM will review the list of ACCESS weaknesses found in the penetration test reports and classify them into categories of high, medium, and low. Because ACCESS is on a fully closed network, it is not imperative that many of the findings from the penetration tests be corrected. ADM will work with OIS to determine the corrective action needed to resolve the weaknesses. Due to other high priorities for both ADM and OIS, the corrective action has been delayed and will be completed by February 29, 2008. DFS will then determine a schedule to correct those actions impacting the highest weaknesses.

OIG Analysis:

The proposed corrective actions address the intent of OIG's recommendation. This recommendation will be closed when ADM provides OIG with documentation listing the corrective actions and their completion dates.

**Status:** Resolved.

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**Status of Recommendations**

Recommendation 17: Alternatively, limit distribution of keys to a smaller number of TTC staff and use security keys that cannot easily be duplicated.

Response Dated  
October 29, 2007:

The TTC staff researched the cost of security keys that cannot easily be duplicated. This would require not only replacing the keys but the entire mechanism on all of the access doors. The TTC found this to be an excessive cost. The TTC changed their policies and procedures and the keys are strictly controlled and documented within the current environment.

OIG Analysis:

The proposed corrective action addresses the intent of OIG's recommendation. Because it is not a cost-effective option, this recommendation will be closed.

**Status:**

Closed.