

January 30, 2008

MEMORANDUM TO: Luis A. Reyes  
Executive Director for Operations

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

SUBJECT: STATUS OF RECOMMENDATIONS: SYSTEM  
EVALUATION OF THE INTEGRATED PERSONNEL  
SECURITY SYSTEM (IPSS) (OIG-05-A-08)

REFERENCE: DIRECTOR, OFFICE OF ADMINISTRATION  
MEMORANDUM DATED JANUARY 18, 2008

Attached is the Office of the Inspector General's analysis and status of the recommendations as discussed in the agency's response dated January 18, 2008. Based on this response, recommendations 1, 2, 3, 4, 5, 7, and 8 remain in resolved status with an expected completion date of August 29, 2008. Recommendation 6 was closed previously. Please provide an updated status of the resolved recommendations by September 15, 2008.

If you have any questions or concerns, please call me at 415-5915, or Beth Serepca at 415-5911.

Attachment: As stated

cc: V. Ordaz, OEDO  
M. Malloy, OEDO  
P. Tressler, OEDO

**Audit Report**  
**System Evaluation of the Integrated Personnel Security System (IPSS)**  
**OIG-05-A-08**

**Status of Recommendations**

<u>Recommendation 1:</u>	Re-certify and re-accredit IPSS based on an independent, comprehensive, and fully documented assessment of all management, operational, and technical controls.
Response Dated January 18, 2008:	The Office of Administration (ADM) completed the security categorization document changes requested by the Office of Information Services (OIS) and resubmitted the package to OIS on December 17, 2007. Approval is anticipated by March 17, 2008. Once ADM receives this approval, we will begin working with the OIS security documentation contractor to develop the system security plan package, which includes the Contingency Plan, and to conduct a self-assessment of the updated security measures. As a result, the tentative completion date for Recommendations 1, 2, 3, 4, 5, 7, and 8 has been revised to August 29, 2008.
OIG Response:	The proposed action addresses the intent of OIG's recommendation. Recommendation 1 will be closed after OIG has reviewed documentation showing that the re-certification and re-accreditation of IPSS is complete.
Status:	Resolved.

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**Status of Recommendations**

<u>Recommendation 2:</u>	Update the IPSS Risk Assessment Report to include: (1) Tables with accurate risk levels and all identified vulnerability/threat pairs, (2) Recommendations for all identified risks, or provide a rationale for providing only recommended controls for high and medium level risks, and (3) A complete risk assessment of actual threats and vulnerabilities to IPSS.
Response Dated January 18, 2008:	The Office of Administration (ADM) completed the security categorization document changes request by the Office of Information Services (OIS) and resubmitted the package to OIS on December 17, 2007. Approval is anticipated by March 17, 2008. Once ADM receives this approval, we will begin working with the OIS security documentation contractor to develop the system security plan package, which includes the Contingency Plan, and to conduct a self-assessment of the updated security measures. As a result, the tentative completion date for Recommendations 1, 2, 3, 4, 5, 7, and 8 has been revised to August 29, 2008.
OIG Response:	The proposed action addresses the intent of OIG's recommendation. This recommendation will be closed after OIG reviews the updated IPSS Risk Assessment Report and determines that the components listed above are included.
<b>Status:</b>	Resolved.

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**Status of Recommendations**

Recommendation 3: Update the IPSS System Security Plan to include: (1) Complete contact information for the responsible organization; (2) Consistent identification of the system owner; (3) Complete contact information for personnel supporting the system, including the Program Manager, and other NRC organizations providing support; (4) Assignment of security responsibility in a section consistent with NIST guidance; and (5) Complete contact information for personnel with security responsibilities, including other NRC organizations with security responsibilities for the system.

Response Dated  
January 18, 2008:

The Office of Administration (ADM) completed the security categorization document changes requested by the Office of Information Services (OIS) and resubmitted the package to OIS on December 17, 2007. Approval is anticipated by March 17, 2008. Once ADM receives this approval, we will begin working with the OIS security documentation contractor to develop the system security plan package, which includes the Contingency Plan, and to conduct a self-assessment of the updated security measures. As a result, the tentative completion date for Recommendations 1, 2, 3, 4, 5, 7, and 8 has been revised to August 29, 2008.

OIG Response:

The proposed action addresses the intent of OIG's recommendation. This recommendation will be closed after OIG reviews the updated IPSS System Security Plan and determines that the components listed above are included.

**Status:**

Resolved.

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**System Evaluation of the Integrated Personnel Security System (IPSS)**  
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**Status of Recommendations**

Recommendation 4: Update the IPSS System Security Plan to include a section on planning for security in the life cycle and a section on incident response capability.

Response Dated  
January 18, 2008:

The Office of Administration (ADM) completed the security categorization document changes requested by the Office of Information Services (OIS) and resubmitted the package to OIS on December 17, 2007. Approval is anticipated by March 17, 2008. Once ADM receives this approval, we will begin working with the OIS security documentation contractor to develop the system security plan package, which includes the Contingency Plan, and to conduct a self-assessment of the updated security measures. As a result, the tentative completion date for Recommendations 1, 2, 3, 4, 5, 7, and 8 has been revised to August 29, 2008.

OIG Response:

The proposed action addresses the intent of OIG's recommendation. This recommendation will be closed after OIG reviews the updated IPSS System Security Plan and determines that the sections listed above are included.

**Status:**

Resolved.

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**Status of Recommendations**

Recommendation 5: Update the IPSS System Security Plan to describe all controls currently in place. In-place controls are those marked at least at Level 3 in the self-assessment and that were documented as passed in the last Security Test and Evaluation Report, or in any test and evaluation on controls added since publication of that report.

Response Dated  
January 18, 2008:

The Office of Administration (ADM) completed the security categorization document changes requested by the Office of Information Services (OIS) and resubmitted the package to OIS on December 17, 2007. Approval is anticipated by March 17, 2008. Once ADM receives this approval, we will begin working with the OIS security documentation contractor to develop the system security plan package, which includes the Contingency Plan, and to conduct a self-assessment of the updated security measures. As a result, the tentative completion date for recommendations 1, 2, 3, 4, 5, 7, and 8 has been revised to August 29, 2008.

OIG Response:

The proposed action addresses the intent of OIG's recommendation. This recommendation will be closed after OIG reviews the updated IPSS System Security Plan and determines that it includes all controls currently in place.

**Status:**

Resolved.

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**Status of Recommendations**

Recommendation 7: Update the IPSS Contingency Plan to include: (1) A description of the system covered in the contingency plan. The description should include the system architecture, location(s), and any other important technical considerations. A system architecture diagram, including security devices (e.g., firewalls, internal and external connections), is useful; (2) Complete and up-to-date contact information for all personnel, including backup personnel responsible for implementing the IPSS Contingency Plan; (3) A description of the overall structure of contingency teams, including the hierarchy and coordination mechanisms and requirements among the teams. The description should include an overview of team member roles and responsibilities in a contingency situation. Teams and team members should be designated for specific response and recovery roles during contingency plan activation; (4) More detailed steps for recovery actions and assign procedures to the appropriate recovery team(s); and (5) Procedures for restoring system operations, with a focus on how to clean the alternate site of any equipment or other materials belonging to the organization.

Response Dated  
January 18, 2008:

The Office of Administration (ADM) completed the security categorization document changes requested by the Office of Information Services (OIS) and resubmitted the package to OIS on December 17, 2007. Approval is anticipated by March 17, 2008. Once ADM receives this approval, we will begin working with the OIS security documentation contractor to develop the system security plan package, which includes the Contingency Plan, and to conduct a self-assessment of the updated security measures. As a result, the tentative completion date for Recommendations 1, 2, 3, 4, 5, 7, and 8 has been revised to August 29, 2008.

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**Status of Recommendations**

OIG Response:           The proposed action addresses the intent of OIG's recommendation. This recommendation will be closed after OIG reviews the updated IPSS Contingency Plan and determines that it includes the components listed above.

**Status:**                   Resolved.



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**Status of Recommendations**

Recommendation 8: Update the IPSS System Security Plan and/or IPSS self-assessment to consistently define the protection requirements (confidentiality, integrity, availability).

Response Dated  
January 18, 2008:

The Office of Administration (ADM) completed the security categorization document changes requested by the Office of Information Services (OIS) and resubmitted the package to OIS on December 17, 2007. Approval is anticipated by March 17, 2008. Once ADM receives this approval, we will begin working with the OIS security documentation contractor to develop the system security plan package, which includes the Contingency Plan, and to conduct a self-assessment of the updated security measures. As a result, the tentative completion date for recommendations 1, 2, 3, 4, 5, 7, and 8 has been revised to August 29, 2008.

OIG Response:

The proposed action addresses the intent of OIG's recommendation. This recommendation will be closed after OIG reviews the updated IPSS System Security Plan and/or IPSS self-assessments and determines that they consistently define the protection requirements.

**Status:**

Resolved.