



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

OFFICE OF THE
INSPECTOR GENERAL

October 3, 2008

MEMORANDUM TO: R. William Borchardt
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 (OIG-05-A-08)

REFERENCE: DIRECTOR, OFFICE OF ADMINISTRATION,
MEMORANDUM DATED SEPTEMBER 15, 2008

Attached is the Office of the Inspector General analysis and status of the recommendations as discussed in the agency's response dated September 15, 2008. Based on this response, recommendations 1, 2, 3, 4, 5, and 8 remain resolved with an expected completion date of March 31, 2009. Recommendation 7 is now closed. Recommendation 6 was closed previously. Please provide an updated status of these recommendations by April 30, 2009.

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

Attachment: As stated

cc: V. Ordaz, OEDO
J. Arildsen, OEDO
P. Shea, OEDO

Audit Report

SYSTEM EVALUATION OF THE INTEGRATED PERSONNEL SECURITY SYSTEM OIG-05-A-08

Status of Recommendations

Recommendation 1: Re-certify and re-accredit IPSS based on an independent, comprehensive, and fully documented assessment of all management, operational, and technical controls.

Agency Response Dated
September 15, 2008: We received assurances from the CSO that the development of the security plan package will begin in October 2008 and be completed by December 31, 2008. CSO requires an additional 60 days to review and edit the package, as appropriate. Therefore, the completion date for Recommendations 1, 2, 3, 4, and 5 and accreditation of IPSS has been revised to March 31, 2009.

OIG Analysis: 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.

Audit Report

SYSTEM EVALUATION OF THE INTEGRATED PERSONNEL SECURITY SYSTEM OIG-05-A-08

Status of Recommendations

Recommendation 2: 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.

Agency Response Dated
September 15, 2008:

We received assurances from the CSO that the development of the security plan package will begin in October 2008 and be completed by December 31, 2008. CSO requires an additional 60 days to review and edit the package, as appropriate. Therefore, the completion date for Recommendations 1, 2, 3, 4, and 5 and accreditation of IPSS has been revised to March 31, 2009.

OIG Analysis:

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.

Status:

Resolved.

Audit Report

SYSTEM EVALUATION OF THE INTEGRATED PERSONNEL SECURITY SYSTEM OIG-05-A-08

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.

Agency Response Dated
September 15, 2008: We received assurances from the CSO that the development of the security plan package will begin in October 2008 and be completed by December 31, 2008. CSO requires an additional 60 days to review and edit the package, as appropriate. Therefore, the completion date for Recommendations 1, 2, 3, 4, and 5 and accreditation of IPSS has been revised to March 31, 2009.

OIG Analysis: 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.

Audit Report

SYSTEM EVALUATION OF THE INTEGRATED PERSONNEL SECURITY SYSTEM OIG-05-A-08

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.

Agency Response Dated
September 15, 2008: We received assurances from the CSO that the development of the security plan package will begin in October 2008 and be completed by December 31, 2008. CSO requires an additional 60 days to review and edit the package, as appropriate. Therefore, the completion date for Recommendations 1, 2, 3, 4, and 5 and accreditation of IPSS has been revised to March 31, 2009.

OIG Analysis: 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.

Audit Report

SYSTEM EVALUATION OF THE INTEGRATED PERSONNEL SECURITY SYSTEM OIG-05-A-08

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.

Agency Response Dated
September 15, 2008: We received assurances from the CSO that the development of the security plan package will begin in October 2008 and be completed by December 31, 2008. CSO requires an additional 60 days to review and edit the package, as appropriate. Therefore, the completion date for Recommendations 1, 2, 3, 4, and 5 and accreditation of IPSS has been revised to March 31, 2009.

OIG Analysis: 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.

Audit Report

SYSTEM EVALUATION OF THE INTEGRATED PERSONNEL SECURITY SYSTEM OIG-05-A-08

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.

Agency Response Dated
September 15, 2008:

The IPSS Contingency Plan was completed on June 27, 2008 (ML081930774). We consider this recommendation closed.

OIG Analysis:

OIG verified that the IPSS Contingency Plan was completed and included the necessary components. NRC's action fulfilled the intent of OIG's recommendation. This recommendation is therefore closed.

Status:

Closed.

Audit Report

SYSTEM EVALUATION OF THE INTEGRATED PERSONNEL SECURITY SYSTEM OIG-05-A-08

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).

Agency Response Dated
September 15, 2008: We received assurances from the CSO that the development of the security plan package will begin in October 2008 and be completed by December 31, 2008. CSO requires an additional 60 days to review and edit the package, as appropriate. Therefore, the completion date for Recommendations 1, 2, 3, 4, and 5 and accreditation of IPSS has been revised to March 31, 2009.

OIG Analysis: 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.