June 26, 2009

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

FROM: Kathryn O. Greene, Director */RA/*
                    Office of Administration

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

This memorandum provides a status update on Recommendations 1, 2, 3, 4, 5, and 8 in the subject audit report. In the March 30, 2009, status memorandum (ML090820407), the Office of Administration (ADM) outlined an approach to consolidate the Integrated Personnel Security System (IPSS), the Automated Access Control and Computer Enhanced Security System (ACCESS), and the Homeland Security Presidential Directive 12 (HSPD-12) Personal Identity Verification (PIV) System into a single umbrella system for certification and accreditation (C&A) purposes. It was necessary to reverse this decision when the timelines for completion of the C&A requirements for the single umbrella system was beyond what was acceptable for IPSS. The certification package for IPSS has been finalized and is in office concurrence.

Recommendation 1

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

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.

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            301-415-7050

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 info 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 National Institute of Standards and Technology guidance; and (5) complete contact information for personnel with security responsibilities, including other NRC organizations with security responsibilities for the system.

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.

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.

Recommendation 8

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

Response to Recommendations 1, 2, 3, 4, 5 and 8

The Certification package for IPSS will be submitted to the Computer Security Office (CSO) for Accreditation by June 30, 2009. CSO estimates that a reasonable timeframe to review the final package, present it to the Designated Approving Authorities, and receive an Authority to Operate is August 31, 2009.

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