ADAMS ML092230172

U.S. Nuclear Regulatory Commission

Privacy Impact Assessment

(*Designed to collect the information necessary to make relevant determinations regarding the applicability of the Privacy Act, the Paperwork Reduction Act information collections requirements, and record management requirements.)*

for the

Licensing Tracking System Version 2.0 (LTS)

Date: August 7, 2009

A. GENERAL SYSTEM INFORMATION

1. Provide brief description of the system:

   The Licensing Tracking System version 2.0 (referred to as "LTS" from this point forward) is a web-based intranet application that replaces the legacy mainframe system. The 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 its responsibility as an independent regulatory agency.

2. What agency function does it support?

   LTS supports the Materials Users Licensing and Inspection Program.

3. Describe any modules or subsystems, where relevant, and their functions.

   N/A

4. Points of Contact:

Project Manager	Office/Division/Branch	Telephone
Menelik Yimam	FSME/PBPA/OB	301-415-0200
Business Project Manager	Office/Division/Branch	Telephone
Doug Broaddus	FSME/DMSSA/NMPD/SMPB	301-415-8124
Technical Project Manager	Office/Division/Branch	Telephone
Nima Ashkeboussi	FSME/DMSSA/LB	301-415-7637

Executive Sponsor	Office/Division/Branch	Telephone
Charles Miller	FSME	301-415-7197

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

   a. ___ New System __**X**_ Modify Existing System ____ Other (Explain)

   b. If modifying an existing system, has a PIA been prepared before?

      Yes

      (1) If yes, provide the date approved and ADAMS accession number.

      April 4, 2006, ML060890392

B. <u>INFORMATION COLLECTED AND MAINTAINED</u>

(These questions are intended to define the scope of the information requested as well as the reasons for its collection. Section 1 should be completed only if information is being collected about individuals. Section 2 should be completed for information being collected that is not about individuals.)

1. **INFORMATION ABOUT INDIVIDUALS**

   a. Does this system maintain information about individuals?

      Yes

      (1) If yes, what group(s) of individuals (e.g., Federal employees, Federal contractors, licensees, general public) is the information about?

      Licensees and Federal employees

   b. What information is being maintained in the system about individuals (describe in detail)?

      Licensees: Names of licensee contacts, authorized users of byproduct/source materials, Radiation Safety Officers (RSO).

      Federal (NRC) employees: Names of inspectors.

   c. Is the information being collected from the subject individuals?

      No, the LTS does not collect the names directly from the individuals. The licensee submits an application, which includes the names of the individuals with the stated title/role. The NRC's LTS application

administrators then pull the names from these applications and enter them into LTS.

(1) If yes, what information is being collected from the individuals?

d. Will the information be collected from 10 or more individuals who are **not** Federal employees?

Yes

(1) If yes, does the information collection have OMB approval?

Yes

(a) If yes, indicate the OMB approval number:

OMB clearance number 3150-0120

e. Is the information being collected from internal files, databases, or systems?

No

(1) If yes, identify the files/databases/systems and the information being collected.

N/A

f. Is the information being collected from an external source(s)?

Yes – licensee applications

(1) If yes, what is the source(s) and what type of information is being collected?

Licensee applicants submit an application, which includes the names of the licensee's contact, authorized users of byproduct/source materials, and the RSO.

g. How will this information be verified as current, accurate, and complete?

This information is verified during the manual business process of reviewing licensee applications, which is conducted by the Office of Federal and State Materials and Environmental Management Programs (FSME). After the initial application is reviewed, the LTS application administrator then enters the information from the application into LTS.

h. How will the information be collected (e.g. form, data transfer)?

Licensee applicants submit the application form via email, mail, or fax.

i. What legal authority authorizes the collection of this information?

10 CFR Parts 30, 32, 33, 34, 35, 36, 39, 40, and 70

j. What is the purpose for collecting this information?

Licensee contact name is collected for the purpose of identifying a Point of Contact for the Licensee organization. Names of authorized users of byproduct/source materials are collected for the purpose of assigning the individual to a license.

2. **INFORMATION NOT ABOUT INDIVIDUALS**

a. What type of information will be maintained in this system (describe in detail)?

Licensee information (Licensee organization name, organization address and organization phone number); License Information (License number, material type, possession limit, places of use, license applications, status, docket number, primary and secondary program codes, action types, milestones, and milestone dates); Fee categories; inspection priority; inspection dates; and status of inspection

b. What is the source of this information? Will it come from internal agency sources and/or external sources? Explain in detail.

The information comes from the license application and from NRC (reviewers in each Region and HQ).

c. What is the purpose for collecting this information?

To track license information (e.g. applications status, payment, and usage)

C. <u>USES OF SYSTEM AND INFORMATION</u>

(These questions will identify the use of the information and the accuracy of the data being used.)

1. Describe all uses made of the information.

To track license information (e.g. applications status, payment, and usage)

2. Is the use of the information both relevant and necessary for the purpose for which the system is designed?

   Yes

3. Who will ensure the proper use of the information?

   Information System Security Officer (ISSO) and System Owner

4. Are the data elements described in detail and documented?

   Yes

   a. If yes, what is the name of the document that contains this information and where is it located?

      LTS User Guide in LTS VOB in ClearCase

5. Will the system derive new data or create previously unavailable data about an individual through aggregation from the information collected?

   No

   a. If yes, how will aggregated data be maintained, filed, and utilized?

      N/A

   b. How will aggregated data be validated for relevance and accuracy?

      N/A

   c. If data are consolidated, what *controls* protect it from unauthorized access, use, or modification?

      N/A

6. How will the information be *retrieved* from the system (be specific)?

   An LTS user can access information via queries and screen look ups in the LTS application.

7. Will this system provide the capability to identify, locate, and monitor (e.g., track, observe) individuals?

   No.

   a. If yes, explain.

N/A

(1) What controls will be used to prevent unauthorized monitoring?

N/A

8. Describe the report(s) that will be produced from this system.

The following are reports that are generated from LTS: Reviewer Report; Office Report; Report of Actions Completed; Active NRC Licenses in Each Region by Program Code; Actions Past Tickler; Fiscal YTD Report; Pending Assigned Actions; Actions Assigned to Region/HQ; Expired; License Within 90 Days of Expiration Date; Pending Actions over 60 Days - Summary; License Fee Worksheet; Actions Completed by Program Code - Monthly; Days Since Report for Pending Items; and ad hoc reports (upon specific request).

a. What are the reports used for?

Used to track applications, inspections, performance metrics, action types, and other activities pertaining to license applications.

b. Who has access to these reports?

Authorized LTS users

D. RECORDS RETENTION AND DISPOSAL

*(This question is intended to establish whether the information, data, or records contained in this system has an approved records retention schedule. (*Reference NUREG-0910*, NRC Comprehensive Records Disposition Schedule.)*

1. Has a retention schedule (either under the General Records Schedule or NRC-specific) for this system been approved by the National Archives and Records Administration (NARA)?

Yes

a. If yes, list the schedule number and approved disposition.

These records are scheduled under NARA approved disposition instructions covered in N1-431-08-12 ((ML0914706450). Item 2 of the schedule specifically covers the records in the Master File, and carries the following disposition instructions:
TEMPORARY. Cut off License Information when the license or certificate is terminated and mark the license as Terminated.

Delete/destroy the license information 20 years after cut off and when no longer required for business reasons.

2. If you answered "No" to question D.1, complete the following section.

   a. Does the information in the system:

Have historical value?	YES	NO
Document NRC business decisions?	YES	NO
Contain data used to make a judgment or conclusion?	YES	NO
Provide statute or required regulatory information?	YES	NO

   b. What is the value of the information to your organization and the Agency?

      (1) When will it no longer be needed?

   c. How will information, no longer required for current business operations, be maintained?

      (1) Will it be separated from currently active information?

   d. Does this electronic information system replace a previously "paper-based" information file system?

      (1) If so, which files?

E. <u>ACCESS TO DATA</u>

1. INTERNAL ACCESS

   a. What organizations (offices) will have access to the information in the system?

      FSME, Office of the Chief Financial Officer (OCFO), Regions

      (1) For what purpose?

      OCFO users access LTS for Part 171 billing purposes. All other LTS users access LTS to track applications,

inspections, performance metrics, action types, and other activities pertaining to license applications.

(2) Will access be limited?

Access to LTS is restricted to users approved by FSME.

b. Will other systems share or have access to information in the system?

LTS Licensee information (Licensee organization name and organization address), fee categories, docket numbers, and license numbers, will be pushed to the Fees System.

Inspection related data (e.g. inspection priority, status of inspection, milestones, milestone dates, and tickler dates) from the Inspection Planning System (IPS) is uploaded into LTS.

Human Resources Management System (HRMS) Time & Labor uses docket numbers from LTS; however, HRMS gets this information from the Fees System and does not directly interface with LTS.

Reactor Program System (RPS) is similar, it uses the LTS licensee organization name, organization address, docket numbers, and license numbers, but accesses this information from the Fees System and does not directly interface with LTS.

c. How will information be transmitted or disclosed?

This information will be pushed to the Fees System via an encrypted SSH/Secure File Transfer Protocol (SFTP) connection over the dedicated line that exists between the NRC and the National Institutes of Health. LTS users can only access LTS from inside the NRC intranet. IPS data is entered into LTS by LTS administrators.

d. What controls will prevent the misuse (e.g., unauthorized browsing) of information by those having access?

LTS Rules of Behavior will be established and signed by each user prior to accessing the system. The Rules of Behavior will require authorized users to protect the system and its information from unauthorized access. In addition, LTS is only accessible from within the NRC intranet and leverages the session lock and identification and authentication controls provided by the NRC Information Technology Infrastructure (Centralized Active Directory Authentication (CADA)).

e. Are criteria, procedures, controls, and responsibilities regarding access documented?

This is planned for completion prior to ATO.

(1) If yes, where?

The controls regarding access will be documented in the LTS Security Plan. Responsibilities and criteria for access will be documented in the Roles and Responsibilities. Procedures regarding access will be documented.

2. **EXTERNAL ACCESS**

a. Will external agencies/organizations/public share or have access to the information in this system?

No direct external access to information in the LTS.

However, licensee organization name, licensee organization address, status, docket number, license number, primary and secondary program codes, RSO, places of use, and possession limits are e-mailed to U.S. Customs and Border Protection in a password-protected Excel spreadsheet on a bi-weekly basis.

(1) If yes, who.

b. What information will be shared/disclosed and for what purpose?

c. How will this information be transmitted or disclosed?

F. <u>TECHNICAL ACCESS AND SECURITY</u>

1. Describe security controls used to limit access to the system (e.g., passwords). Explain.

LTS application uniquely identifies and authenticates users using the NRC CADA single sign-on solution, which meets Level 2 authentication requirements, using the NRC Windows account credentials (username and strong password). LTS is only accessible from within the NRC intranet.

2. Will the system be accessed or operated at more than one location (site)?

The LTS will operate from one central database location, with desktop accessibility by authorized users.

a. If yes, how will consistent use be maintained at all sites?

N/A

3. Which user group(s) (e.g., system administrators, project manager, etc.) have access to the system?

End users and administrators

4. Will a record of their access to the system be captured?

Yes, the LTS application audit mechanism will capture end user and application administrator access to the LTS application. The operating system audit mechanism will capture system administrator access. The CADA auditing mechanism will capture identification and authentication actions with regard to user attempts to log into the LTS application.

a. If yes, what will be collected?

The following information is captured in the audit records: date and time of the event; the component of the information system (Internet Protocol (IP) address) where the event occurred; type of event; user/subject identity; and the outcome (success or failure) of the event.

5. Will contractors have access to the system?

Yes

a. If yes, for what purpose?

System administration functions

- Ensure that the following Federal Acquisition Regulation (FAR) clauses are referenced in all contracts/agreements/purchase order where a contractor has access to a Privacy Act system of records to ensure that the wording of the agency contracts/agreements/purchase order make the provisions of the Privacy Act binding on the contractor and his or her employees:
  - 52.224-1 Privacy Act Notification.
  - 52.224-2 Privacy Act.

6. What auditing measures and technical safeguards are in place to prevent misuse of data?

The LTS application audit mechanism captures end user and application administrator access to the LTS application. The operating system audit mechanism captures system administrator access. The CADA auditing mechanism captures identification and authentication actions with regard to user attempts to log into the LTS application.

The LTS application implements roles-based authorization, granting access to users based on their role. The role assignment function is restricted to the application administrator. With regard to system administrator access, assigned authorizations to access the LTS servers are enforced using the Windows operating system roles-based access control mechanism.

All LTS servers have anti-virus software, host-based intrusion prevention software, and host-based firewalls installed. Anti-virus software is configured for at least daily virus-definition updates. Network protections include layered firewall design that implements rule sets to deny all and permit by exception. Access control lists are implemented on routers to support device authentication via IP address and port filtering.

7. Are the data secured in accordance with FISMA requirements?

   The modified system (LTS version 2.0) certification and accreditation (C&A) is in progress with a planned completion for Fall 2009

   a. If yes, when was Certification and Accreditation last completed?

      Previous C&A was completed April 2003. Current C&A planned for completion by Fall 2009.

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

System Name: Licensing Tracking System (LTS) Version 2.0

Submitting Office: Office of Federal and State Materials and Environmental Management Programs (FSME)

A. PRIVACY ACT APPLICABILITY REVIEW

_X_ Privacy Act is not applicable.

___ Privacy Act is applicable.

Comments:

The capability does exist to retrieve information by the name of a licensee contact person, authorized user, RSO, or an NRC inspector (as data fields), however the capability to retrieve -- is not enough to consider the LTS a Privacy Act system of records. Maintaining these names in the LTS is essentially administrative, and not for the purpose of gathering information about those individuals. The purpose of the LTS is to track material licensee applications for use of byproduct, source, and special nuclear materials and to manage the licensing and inspection of medical, academic, and industrial uses of nuclear materials. The LTS does not maintain any personally identifiable information. The name, address, and telephone number maintained in the LTS is that of the licensee and is considered business related information.

Reviewer's Name	Title	Date
Sandra S. Northern	Privacy Act Program Analyst	August 26, 2009

B. INFORMATION COLLECTION APPLICABILITY DETERMINATION

___ No OMB clearance is needed.

___ OMB clearance is needed.

_X_ Currently has OMB Clearance. Clearance No. 3150-0120

Comments:

The information for the Licensing Tracking System is captured on NRC Form 313, "Application for Material License," and NRC Forms 313A Series. This information is approved by OMB under OMB Clearance Number 3150-0120.

Reviewer's Name	Title	Date

Tremaine Donnell	Acting Information Collections Team Leader	August 20, 2009

C. RECORDS RETENTION AND DISPOSAL SCHEDULE DETERMINATION

___ No record schedule required.

___ Additional information is needed to complete assessment.

___ Needs to be scheduled.

__x__ 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:

Reviewer's Name	Title	Date
Mary L. Haynes	Records Management Analyst	Aug. 20, 2009

D. BRANCH CHIEF REVIEW AND CONCURRENCE

__X__ This IT system **does not** collect, maintain, or disseminate information in identifiable form from or about members of the public.

___ This IT system **does** collect, maintain, or disseminate information in identifiable form from or about members of the public.

I concur in the Privacy Act, Information Collections, and Records Management reviews:

/RA/ Date ***08/26/2009***

Russell A. Nichols, Chief
Records and FOIA/Privacy Services Branch
Information and Records Services Division
Office of Information Services

TRANSMITTAL OF PRIVACY IMPACT ASSESSMENT/
PRIVACY IMPACT ASSESSMENT REVIEW RESULTS

TO: **Charles Miller, Director, Office of Federal and State Materials and Environmental Management Programs (FSME)**	
Name of System: **Licensing Tracking System (LTS) Version 2.0**	
Date RFPSB received PIA for review: **August 11, 2009**	Date RFPSB completed PIA review: **August 26, 2009**
Noted Issues: The Privacy Act is not applicable. No personally identifiable information. Approved information collection under OMB Clearance Number 3150-0120. Approved NARA disposition schedule.	
Russell A. Nichols, Chief Records and FOIA/Privacy Services Branch Office of Information Services	Signature/Date: ***/RA/ 08/26/2009***
Copies of this PIA will be provided to: *James Shields, Acting Director* *Business Process Improvement and Applications Division* *Office of Information Services* *Paul Ricketts* *Senior IT Security Officer (SITSO)* *FISMA Compliance and Oversight Team* *Computer Security Office*	