



Southwest Research Institute®
Surveillance Report



IDENTIFICATION		
Submitted By: Brient, Robert D.	Date: 01-OCT-09	Report Number: 2009-SR-0262
Division: 20 - GEOSCIENCES & ENGINEERING 01.00: CNWRA	Project Number: OHD20.131	
Quality Program: GED (20) QAM		
Associated Report: N/A		
Surveillance Scope: Examine current practices in regard to managing sensitive unclassified, privileged, and export-controlled information.		
References: GED AP-020		
Starting Date: 28-SEP-09	Ending Date: 30-SEP-09	
Person(s) Conducting Test/Exam/Procedure: Pat Mackin, GED managers		
Satisfactory Findings: <p>Considering the evolving nature of SUNSI requirements, the approach to the surveillance was to identify any areas of AP-020 that may need clarification in order to effectively implement SUNSI controls, along with some general observations.</p> <p>Mandatory training of all GED staff on export-controlled information was provided 6/24/2009.</p> <p>Proprietary information is displayed in ELF as header information only. Proprietary information in the QA records vault is stored separately from other records.</p> <p>Access permissions for SUNSI and need to know are determined during the Source Evaluation and Selection process in accordance with AP-001. The computer file access restriction capabilities described in section 5.4(6) have not yet been widely implemented.</p> <p>GED management has expressed the opinion that virtually all NRC-sponsored work in-process and work products are SUNSI. However, the definition of sensitive information provided in AP-020 does not convey this level of inclusiveness. In general, GED does not apply SUNSI identification (AP-020, sections 5.5 and 5.6) and distribution (section 5.9) requirements to routine NRC-sponsored work in-process and work products (hard copy or electronic files).</p>		
Unsatisfactory Findings: None		
Recommendations/Actions: <p>The observations identified in Satisfactory Findings should be evaluated to identify where clarification of AP-020 is needed. In particular, SUNSI should be more clearly defined so that a practical implementation of controls can be accomplished when necessary.</p> <p>An effort should be made to effectively implement the file access restriction capabilities.</p> <p>As currently written, AP-020 requirements for SUNSI are applied to specific information items one by one. If all NRC work in-process and work products are SUNSI, an approach to apply controls generally without one by one attention is desirable.</p>		
Equipment Calibration: Not applicable		
SwRI cc: Ferrill, David A. (20), Mackin, Patrick C. (20), Patrick, Wesley C. (20), Sagar, Budhi (20), Stamatakos, John A. (20)		

APPROVALS

Management Approval: Sagar, Budhi

Date: 08-OCT-09

QA Approval: Brient, Robert D.

Date: 08-OCT-09

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