

U.S. Nuclear Regulatory Commission

UPDATED 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

Agencywide Documents Access and Management System

Date: August 18, 2010

A. GENERAL SYSTEM INFORMATION

1. Provide brief description of the system:

The Agencywide Documents Access and Management System (ADAMS) is the NRC's records management system. ADAMS is used to organize, process, and manage documentary material - Official Agency Records (OARs) and the NRC staff's "work in progress" (non-record reference materials and draft OARs).

2. What agency function does it support?

ADAMS supports the Agency's content management function: document capture, distribution, search and retrieval, and records management. ADAMS is the system of record for OARs, and is tightly integrated into many of the Agency's mission critical standard operating procedures and records management processes.

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

ADAMS is currently in the operational phase of its lifecycle and undergoing a major hardware upgrade and software migration from the IBM FileNet Content Services (CS) platform to the IBM FileNet P8 platform. Also, the Electronic Hearing Docket System (EHD), recently modified and upgraded, has been migrated into ADAMS.

ADAMS consists of non-public libraries, accessible to the NRC staff via web or client/server interfaces, and public libraries, accessible to the public via the NRC Public Web Site.

The non-public ADAMS libraries support document and e-mail capture, distribution, search and retrieval, and records management by the NRC staff.

The non-public ADAMS libraries are as follows:

- **Main Library (ML)** contains the OARs, non-record reference materials, and draft OAR's documents.
- **P8 Main Library (P8 ML)** is synchronized with ML so that both libraries contents are identical. P8 ML is running on the FileNet P8 platform. It will replace the ADAMS Main Library when the FileNet CS platform is retired.
- **Legacy Library (LL)** contains over 2.5 million bibliographic citation records describing the NRC's programmatic documents dated prior to November 1, 1999. These data records were originally maintained and available in the Agency's Nuclear Documents System (NUDOCS) and the publicly available Bibliographic Retrieval System (BRS).

The public ADAMS libraries support document search and retrieval by members of the general public.

The public ADAMS libraries are as follows:

- **Publicly Available Records System (PARS)** contains copies of publicly available documents replicated from the ML.
- **High-Level Waste Collection System (HLWC)** is a subset of the ADAMS publicly available documents relevant to the Yucca Mountain High-Level Waste (HLW) Repository license application.
- **Electronic Hearing Docket System (EHD)** is a subset of the ADAMS documents relevant to the NRC's General Proceedings (GP) and HLW hearings.
- **Public Legacy Library (PLL)** contains approximately 2 million records from LL that were made available to the public.

4. Points of Contact:

Project Manager	Office/Division/Branch	Telephone
Gary Young	OIS/IRSD/IMB	301-415-7104
Business Project Manager	Office/Division/Branch	Telephone
Benjamin Partlow	OIS/IRSD/IMB	301-415-8444
Technical Project Manager	Office/Division/Branch	Telephone

Khrosrow (KG) Golshan	OIS/BPIAD/BPPMB	301-415-5016
Executive Sponsor	Office/Division/Branch	Telephone
Joseph Holonich	OIS/IRSD	301-415-7545

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

a. New System 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.

The Privacy Impact Assessment for ADAMS approved on 5/25/2005, ML050890049.

The Privacy Impact Assessment for NextGen Content Management System (at present, ADAMS FileNet P8 platform) approved on 4/10/2008, ML080920458.

The Privacy Impact Assessment for EHD approved on 2/8/2006, ML060240075.

B. INFORMATION COLLECTED AND MAINTAINED

(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, information about an individual (e.g. Federal employee, contractor, licensee employee, general public) may be maintained in ADAMS if information about an individual is included as part of a document that is added into ADAMS.

Information related to the workplace such as an employee's name, title, work telephone number, official work address/location, and work e-mail address is not treated as personally identifiable information (PII) by NRC. Additionally, NRC's Office of General Counsel has advised that home addresses, home phone numbers, or home e-mail addresses within

adjudicatory filings, documents associated with agency rulemakings, and correspondence received from the public on regulatory matters will not be treated as PII.

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

The content of a document that is added to ADAMS may include any type of information about an individual, but is normally workplace-related or business-related information.

It is not the agency's policy or practice to make documents identified as containing PII available to the public. In cases where such a document must be made public, the PII is redacted and the redacted version is made public; the original remains non-public. Internal access to documents containing PII is also restricted to those with a need to know.

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

No, ADAMS does not directly collect information from an individual. Information placed into ADAMS is collected or generated by the NRC through other means in response to adjudicatory filings, rulemakings, or other regulatory matters. This type of information received from individuals is exempt from the Paperwork Reduction Act for this system.

- 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 Office of Management and Budget (OMB) approval?

The NRC currently has OMB information collection approvals as required for documents that collect information from 10 or more non-federal employees. However, where NRC may obtain information from an individual in response to adjudicatory filings, rulemakings, or other regulatory matters, this information is exempt from the Paperwork Reduction Act.

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

Yes, the internal sources of information, which may contain PII, include:

- Electronic files generated by the NRC staff in various formats (e.g., text, images, graphics, spreadsheets, or any combination of these formats)
- E-Mail from the NRC e-mail system

- The information from the Digital Data Management System (DDMS) relevant to the Atomic Safety and Licensing Board Panel (ASLBP) hearings and proceedings

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

Yes, external sources, whose submissions may contain PII, include:

- NRC Licensees and Applicants
- Parties to NRC Adjudicatory proceedings
- Nuclear Industry organizations
- Members of Congress
- Other Federal Agencies
- Agreement States
- Local governments
- Members of the public commenting on NRC regulations and publications
- Foreign governments and international organizations

The methods used include:

- Electronic Information Exchange (EIE) submissions
- Paper documents (scanned into ADAMS)
- CD-ROM Submissions
- E-Mail and Facsimile (Fax) Submissions

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

The NRC rulemaking “Electronic Maintenance and Submission of Information” (E-Rule) and its’ accompanying regulatory document, “Guidance for Electronic Submissions to the NRC” govern the electronic submission, including Fax submissions, of documents to the NRC, ML032580290.

The Document Processing Center (DPC) evaluates the EIE and CD-ROM submittals against the criteria specified in the electronic submission guidance document and process the document(s) that meet its criteria into ADAMS. Documents that do not meet one or more of the guidance document criteria will not be processed into ADAMS. The DPC will forward these submittals to the submitter and/or the appropriate NRC office staff in order to resolve the issue and obtain a submittal that can be processed into ADAMS.

The owners of internal information are responsible for accuracy and completeness of the information added to ADAMS.

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

The information is added into ADAMS via electronic data transfer mechanisms that is built into the various ADAMS client software (e.g., ADAMS Viewer, ADAMS Document Manager, ADAMS Outlook Integration, etc.).

- i. What legal authority authorizes the collection of this information?
44 U.S.C. Chapter 31; 44 U.S.C. Chapter 33; 36 CFR Subpart B.
- j. What is the purpose for collecting this information?

A portion of the vast amounts of programmatic and administrative documents that are added to ADAMS may contain information about an individual. The NRC staff collects programmatic and administrative information to facilitate the activities to conduct the NRC's day-to-day business. The NRC staff also collects this information to facilitate its records management obligations and to comply with the regulations governing Federal records management. The licensing, technical, and adjudicatory information stored in ADAMS supports the NRC's mission.

2. **INFORMATION NOT ABOUT INDIVIDUALS**

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

With limited exceptions, the OARs stored in ADAMS, both programmatic and administrative, are related to the following:

- NRC policy, direction, and oversight activities
- Nuclear reactor licensing, operation, safety, research, and inspection and enforcement activities
- Radioactive waste licensing, operation, safety, research, and inspection and enforcement activities
- Nuclear materials licensing, safety, research, and inspection and enforcement activities
- Accounting case and subject files, budget records, license fee case files, contract case files, Department of Energy work orders, interagency agreements, and other related records
- Information resources management activities
- Facility and property management activities
- Records of the Office of the General Counsel, Office of the Secretary, ASLBP, and Office of Commission Appellate Adjudication.
- Records of the Offices of Congressional Affairs, International Programs, State Programs, Public Affairs, and Regional Public Affairs Offices

ADAMS contains the bibliographic descriptions of the programmatic records dated prior to November 1, 1999, which were originally maintained in NUDOCS and the Public Document Room's BRS.

ADAMS public libraries, PARS and PLL, contain the publicly available data copied from ML and LL.

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

The information stored in ADAMS originates from both internal and external sources. The internal sources consist of the NRC staff and contractors. The external sources are comprised of licensees, members of the general public, and other government agencies (as stated in B.1.e. and f.).

- c. What is the purpose for collecting this information?

The NRC staff collects this information to facilitate the activities to conduct the day-to-day business. The NRC staff also collects this information to facilitate its records management obligations and to comply with the regulations governing Federal records management. The licensing, technical, and adjudicatory information stored in ADAMS supports the NRC's mission.

C. USES OF SYSTEM AND INFORMATION

(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.

The information stored in ADAMS is used by the NRC internal users to conduct the Agency's day-to-day business activities. The publicly available information is used by external users searching the Agency's policies, regulations, and material related to NRC licensing activities.

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?

ADAMS employs an access control mechanism that allows content owners to determine who will have access to content and the level of that access (create, read, update, delete).

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

Yes. Every document in ADAMS has a Document Profile that stores information about the document (e.g., author, title, docket number, public availability, etc.). The required, and some optional, property fields are populated by the document owner and fully completed by the Document Processing Center (DPC) staff when the document is declared as an OAR.

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

The complete list of the ADAMS Document Profile Properties is located in NUREG/BR-0273 Rev 4, 9e ADAMS Desk Reference Guide, April 2010.

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)?

ADAMS employs search tools that allow retrieval of the content of documents, as well as the metadata from the document profiles.

Search criteria includes: document date, accession number, docket number, document type, case or reference number, title, document text, author name.

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

No.

- a. If yes, explain.

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

N/A

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

ADAMS support tools are capable of generating the following administrative reports:

- ADAMS Sensitive Unclassified Non-Safeguards Information (SUNSI) Reviewer Reports - list of the documents with a date in the SUNSI Review Date property and the Document Sensitivity value other than “Sensitive-Internal-Periodic Review Required” or “Sensitive-Security-Related-Periodic Review Required”
- ADAMS Admin Reports - list by office of user group membership
- Main-PARS Differences – list of differences between ML and PARS at the folder, document, or property level
- Public Release Timeliness Report – list by office of internal and/or external documents and their timeline to public release
- E-RIDS – list of the routing and distribution codes

The ADAMS public web applications provide the built-in user reports to allow the public users to save their document search results, including document profile data.

- a. What are the reports used for?

The administrative reports are used for monitoring and managing functions. The user reports are used by the public users to save their search results.

- b. Who has access to these reports?

Access to administrative reports is available only to the NRC staff and is based upon user role and access control list. The internal and external users have access to different sets of user reports based on a search library.

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?

Yes.

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

The NARA approved records retention and disposition requirements for ADAMS records are contained throughout NUREG-0910, NRC’s

Comprehensive Records Retention Schedule, ML051390495, as well as NARA's General Records Schedules.

Each NRC record declared as a record in ADAMS is designated an authorized disposition, which is currently assigned from the ForeMost application. This disposition covers the ADAMS PDF (Portable Document Format) files, TIFF (Tagged Image File Format) files, as well as the ADAMS data related to digital signatures, and data that evidence final NRC management and staff concurrences in documents that are linked to and considered part of the official records.

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 an existing paper-based or electric information file system?

(1) If so, which files?

E. ACCESS TO DATA

1. INTERNAL ACCESS

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

All NRC offices may have access to the information in ADAMS.

(1) For what purpose?

The content supports business processes and knowledge discovery.

(2) Will access be limited?

Yes, access is dependent upon a user's role(s) and need-to-know. A document owner determines who will have access to the document and the level of that access (e.g., None, Viewer, Author, Owner, and Admin), and can restrict access to specific individuals and/or user groups.

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

Yes, the DDMS and ADAMS exchange the information related to the ASLBP hearings and proceedings.

c. How will information be transmitted or disclosed?

ADAMS transmits content over the NRC's infrastructure and delivers it to the internal users' workstations via web-based and client-server clients. ADAMS also employs publishing applications that copy the data to DDMS and deliver the content to the NRC Public Web Site.

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

The security controls recommended by the National Institute of Standards and Technology (NIST) Special Publication (SP) 800-53, are applied to ADAMS to prevent the misuse of information. As stated earlier, access to specific documents can be restricted to individuals and/or user groups to prevent unauthorized browsing or modification.

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

Yes, the criteria, procedures, controls, and responsibilities regarding access are documented.

1. If yes, where?

ADAMS System Security Plan

F. EXTERNAL ACCESS

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

Yes.

(1) If yes, who.

Other federal agencies, licensees, state, local, and tribal governments and members of the general public have access to the publicly available information in ADAMS, i.e. PARS, HLWC, EHD, and PLL.

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

The publicly available documents are published to the NRC public Web site to be viewed and searched by members of the general public, external stakeholders, and other Federal agencies to fulfill the NRC's mandate to share information with the public.

c. How will this information be transmitted/disclosed?

The publicly available documents are released to the public through the ADAMS Public Libraries and accessible from the NRC's public Web site.

G. TECHNICAL ACCESS AND SECURITY

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

Internal access to the system is restricted by accounts and passwords. Level of access depends upon a user's role(s) and need-to-know and is restricted by access rights. The users are authenticated by an interface linked to the NRC's directory services (Single Sign-On) or by an ADAMS desktop client.

There are no security controls to limit external access to the ADAMS Public Libraries as this access is anonymous.

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

ADAMS is operated at the NRC Data Center in Rockville, MD. It is accessed by all regional offices via the NRC LAN/WAN and by the external users via the Internet.

a. How will consistent use be maintained at all sites?

ADAMS is located and operated at one location. The NRC users access ADAMS through their web browser or client/server clients that have standard configuration and lend a common look and feel regardless of user location. The external web interface supports different browsers;

therefore, external users' experience with ADAMS is not affected by location or browser software.

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

The user groups will include, but are not limited to, the NRC staff records liaison officers, records management staff, records managers, DPC staff, and operators and system administrators.

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

Yes.

- a. If yes, what will be collected?

The system (at a minimum) will keep track of the user IDs, when they log into the system, what content they access, and when they access it.

5. Will contractors have access to the system?

Yes.

- a. If yes, for what purpose?

The NRC contractors authorized for ADAMS access in order to fulfill their contractual obligations are under the same access control, including accounts, passwords, and access rights at the document level, as other NRC internal users, on a need to know basis.

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

The security controls recommended by NIST SP 800-53 Rev. 3 have been implemented in ADAMS to prevent misuse of data.

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

Yes.

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

ADAMS was granted an ATO on July 7, 2008.

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

System Name: Agencywide Documents Access and Management System (ADAMS)

Submitting Office: Office of Information Services

A. PRIVACY ACT APPLICABILITY REVIEW

Privacy Act is not applicable.

Privacy Act is applicable.

Comments:

In determining whether an agency maintains a system of records keyed to individuals, the entire situation must be looked at, including the agency's function, the purpose for which the information is gathered, and the agency's actual retrieval practice and policies. Although there are some documents in ADAMS that contain information about individuals, it is not the practice or policy of the NRC to maintain ADAMS as a system of records keyed to individuals, or to retrieve by an individual's name or unique identifier (other than the name of the author).

ADAMS was designed and developed as the NRC's information management system. It was not developed as a system to collect or maintain information "about" individuals. ADAMS contains document profile data fields, two of which collect the name of a document's author and the document's recipient. The name of a document author and/or recipient is collected for administrative purposes, not for the purpose of collecting or retrieving records or information "about" the named individual. Also, the capability does exist to search for documents using an individual's name or personal identifier (or any other text) in a document text search. OMB guidelines make it clear that it is not sufficient that an agency has the capability to retrieve information indexed under a person's name, but the agency must in fact retrieve records in this way in order for a system of records to exist. The retrieval of information by name or other personal identifier must be an agency practice to create a system of records and not a practice by those outside the agency.

Background: A request for a legal opinion (July 2003) was submitted to OGC to re-address the issue of whether or not ADAMS should be considered a Privacy Act system of records. OGC reconfirmed on September 15, 2003, that ADAMS does not constitute a system of records for purposes of the Privacy Act. The basic concept of ADAMS has not been modified.

Reviewer's Name	Title	Date
Sandra S. Northern	Privacy Act Program Analyst	August 31, 2010

B. INFORMATION COLLECTION APPLICABILITY DETERMINATION

- No OMB clearance is needed.
- OMB clearance is needed.
- Currently has OMB Clearance. Clearance No. _____

Comments:

The system does not collect information directly from any members of the public. Therefore, no OMB clearance is needed.

Reviewer's Name	Title	Date
Tremaine Donnell	Team Leader, Information Collections Team	August 31, 2010

C. RECORDS RETENTION AND DISPOSAL SCHEDULE DETERMINATION

- No record schedule required.
- Additional information is needed to complete assessment.
- Needs to be scheduled.
- 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 Haynes	Records Management Analyst	August 25,2010

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/

08/31/2010

Date _____

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

**TRANSMITTAL OF PRIVACY IMPACT ASSESSMENT/
PRIVACY IMPACT ASSESSMENT REVIEW RESULTS**

TO: Joseph Holonich, Director, Information and Records Services Division, Office of Information Services	
Name of System: Agencywide Documents Access and Management System (ADAMS)	
Date PIA received for review: August 18, 2010	Date PIA review completed: August 31, 2010
<p>Noted Issues:</p> <p>No information collection issues.</p> <p>No Privacy Act issues.</p> <p>This system may contain documents that include personally identifiable information (PII). Documents that contain PII will have restricted access. Information related to the workplace such as an employee's name, title, work telephone number, official work address/location, and work e-mail address is not treated as PII by NRC. Additionally, NRC's Office of General Counsel has advised that home addresses, home phone numbers, or home e-mail addresses within adjudicatory filings, documents associated with agency rulemakings, and correspondence received from the public on regulatory matters will not be treated as PII.</p> <p>No records management issues.</p>	
Russell A. Nichols, Chief Information Services Branch Information and Records Services Division Office of Information Services	Signature/Date: <i>/RA/ 08/31/2010</i>
<p><i>Copies of this PIA will be provided to:</i></p> <p><i>James C. Corbett, Director Business Process Improvement and Applications Division Office of Information Services</i></p> <p><i>Paul Ricketts Senior IT Security Officer (SITSO) FISMA Compliance and Oversight Team Computer Security Office</i></p>	