October 22, 2012

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

FROM: James P. Flanagan, Director /RA/
                    Office of Information Services

SUBJECT: STATUS OF RECOMMENDATIONS: AUDIT OF THE
                    NUCLEAR REGULATORY COMMISSION'S SHARED "S"
                    DRIVE (OIG-11-A-15) UPDATE

In response to your May 8, 2012, memorandum to the Executive Director for Operations, below is an updated status of the four resolved recommendations.

Recommendation 2:

Revise current information security training for NRC staff to address specific practices for protecting Sensitive Unclassified Non-Safeguards Information (SUNSI) on the agency's shared network drives.

Response:

Due to competing priorities, staff changes, and limited funding, no action has taken place on this recommendation other than to identify the team of individuals who would jointly work on this action. OIS and OCHCO plan to address this recommendation when funding becomes available. The point of contact for Recommendation 2 is Russell A. Nichols, OIS/IRSD/ISB, (301) 415-6874.

Recommendation 3:

Develop Controlled Unclassified Information (CUI) policies and guidance for storing and protecting CUI in agency shared drives, and
        a. post this guidance on the NRC intranet; and
        b. include this guidance in annual training.

CONTACT: Russell A. Nichols, OIS/IRSD/ISB
            (301) 415-6874

Response:

The federal-wide CUI Working Group continued developing policies for safeguarding CUI. Draft policies have been developed but have not yet been sent to agencies for coordination. At this time, the draft policy states that CUI shall be processed only on information systems that employ security controls approved by the agency head or their designee. Security controls must meet standards issued by the National Institute of Standards and Technology. However, the policies are still in the formulation stage and could be changed after coordination with agencies, which may begin in January 2013. Therefore, Recommendations 3, 3a, and 3b, are not expected to be completed until sometime in FY 2014. The point of contact for this recommendation is Russell A. Nichols, OIS/IRSD/ISB, (301) 415-6874.

Recommendation 4:

Provide Information Technology (IT) coordinators with role-based training focusing on NRC information and network security policies, and means for ensuring staff compliance with these policies.

Response:

An iLearn Web-based training course has been completed and was submitted to iLearn for loading on September 11, 2012. The request number is 2985. However, release of the course is in abeyance pending a decision by the Office of the Executive Director for Operations regarding the Transforming Assets into Business Solutions (TABS) recommendation about the appropriate role of the IT Coordinators. The point of contact for Recommendation 4 is Judy L. Petsch, CSO/PSTT, (301) 415-5148.

Recommendation 5:

Implement procedures for quality assurance checks following network upgrades to ensure that access controls are preserved in shared network drives that process documents containing SUNSI/CUI.

Response:

A slight change in approach to this recommendation has taken place. As of September 2012, the IT infrastructure services and support contractor performs manual quality assurance (QA) checks as part of the standard QA process post file moves. The contractor may choose to implement automated tools to perform this activity at a later time, but the actual solution (manual verses an automated process) is at their discretion. The contractual requirement is for the contractor to perform QA checks. The point of contact for Recommendation 5 is Michael D. Williams, OIS/ICOD/DDB/NIT, (301) 415-7827.

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