

Nuclear Regulatory Commission
Computer Security Office
CSO Office Instruction

Office Instruction: **CSO-ADM-0100**

Office Instruction Title: **Preparing and Maintaining CSO Office Instructions**

Revision Number: **2.0**

Effective Date: **April 8, 2013**

Primary Contacts: **Kathy Lyons-Burke, SITSO**

Responsible Organization: **CSO/PST**

Summary of Changes: CSO-ADM-0100, "Preparing and Maintaining CSO Office Instructions," provides guidance regarding format and content of instructions for CSO staff.

Training: As needed

ADAMS Accession No.: ML13066A706

Concurrences				
Primary Office Owner		Policy, Standards, and Training		
			Signature	Date
Directors	CSO	Thomas Rich	Jon Feibus for /RA/	01-Apr-13
	PST	Kathy Lyons-Burke	/RA/	01-Apr-13
	FCOT	Paul Ricketts	Ray Hardy for /RA/	01-Apr-13
	CSAAR	Thorne Graham	Charles Watkins for /RA/	01-Apr-13

Concurrence Meeting Conducted on 01-Apr-13			
Attendees:	Jon Feibus	Kathy Lyons-Burke	Ray Hardy
	Charles Watkins		

CSO Office Instruction

CSO-ADM-0100

Preparing and Maintaining CSO Office Instructions

1 PURPOSE

The purpose of CSO-ADM-0100, "Preparing and Maintaining CSO Office Instructions," is to provide instructions for CSO staff and managers regarding the development of internal Computer Security Office Instructions (OI) that apply to CSO staff. CSO-ADM-0100 defines a framework for the CSO to develop internal office guidance, processes, and procedures and defines the process for preparing and maintaining these documents.

2 GENERAL REQUIREMENTS

CSO develops OIs when CSO management deems OI development appropriate and necessary. OIs are intended to facilitate CSO staff work.

CSO revises OIs using the process described in this instruction. Memoranda, e-mails, verbal direction, or other informal communications do not supersede the instructions in an OI. Line management may, on rare occasions, need to approve a deviation from an established OI.

Each OI is managed by the responsible CSO manager (i.e., Senior IT Security Officer (SITSO) or Chief Information Security Officer (CISO),) and the individual most responsible for the effort is listed as the primary contact. Requests for OI modification must be approved by the responsible manager.

3 SPECIFIC REQUIREMENTS

The naming convention for CSO OIs is "CSO-ADM-nnnn", where "nnnn" corresponds to the assigned number for the document. Number assignments are obtained from the Policy, Standards, and Training (PST) SITSO and can be found on the CSO G: drive.

3.1 Initiating and Preparing Office Instructions

Any CSO staff member or CSO manager (SITSO or CISO) may suggest an OI. The suggestion is forwarded to the appropriate CSO manager. The manager decides if the OI should be pursued (if within the responsibility of his or her organization) or may refer the suggestion to another manager. Managers may also decide to pursue an OI in response to an issue. The responsible manager assigns a primary contact and assists in defining the subject and schedule for developing, reviewing, and issuing the OI.

The primary contact uses the format identified in this instruction (fonts - Arial 11, headers, headings - OI title and number, etc.) to develop an OI and includes the contents as summarized in Section 3.2.

3.2 Office Instruction Sections and Content

These sections describe the parts of the OI.

3.2.1 Cover sheet

The first page of the OI is a cover sheet that identifies pertinent information about the OI. Information on the cover sheet includes: OI identifier, OI Title, Revision Number, Effective Date, Primary Contact, Responsible Organization, Summary of changes, Training information, the ADAMS Accession Number, the CSO concurrence block, and the table indicating who provided concurrence and when. The cover sheet of this instruction provides a sample of an OI cover sheet. If a specific concurrence meeting was not conducted and concurrence was performed via email, the concurrence table title is changed to “Concurrence Meeting Conducted via Email and concluded on <Date>”

3.2.2 Purpose

This section provides a brief statement of the purpose of the OI.

3.2.3 General Requirements

This section provides the higher level guidance and context (e.g., why we have the document), as well as the overarching requirements intended to satisfy specific task requirements, agency policies, and performance goals.

3.2.4 Specific Requirements or Other Appropriate Title

This section provides the basic procedural requirements and guidance (what staff actually need to do). The section explains the requirements as clearly as possible. This may be done by a step-by-step breakdown, a chronological approach, a flowchart, or other scheme. The main features of the activity or function are described, including but not limited to:

- Initiating an activity (e.g., travel request, budget transfer)
- Planning for the work
- Executing the plan (conducting the reviews, performing the activity or function, etc.)
- Controlling changes to the plan and reporting changes and progress
- Closing out the activity

3.2.5 Additional Sections as Required

These sections are added where appropriate to convey needed information.

3.2.6 References

If applicable, this section lists key references that an employee must follow in conjunction with use of the OI, (e.g., Management Directives, OMB Circulars, etc.).

3.2.7 Change History

This section provides a change history table that conveys the date of revision in the format nn-Mmm-yy, the document version, a brief description of the changes made, the method used to announce and distribute the document, and an indication of the training available for the documented activity. The CSO-ADM-0100 change history table is an example.

3.2.8 Appendices

If applicable, appendices can be used for guidance details, templates, or other information that are difficult to confine within the body of the OI. The format, content, and organization of appendices will depend on the subject of the OI.

3.3 Office Instruction Review and Approval

Each OI must be provided to the CISO and SITSOs for review and comment. The review period is 2 weeks in duration, but when there is urgency, a 1 week minimum may be applied. Each manager obtains comments from their staff as appropriate. The primary contact must schedule a concurrence meeting at the same time the document is provided for review. The concurrence meeting must occur at the end of the review period. Invited attendees to the concurrence meeting must include all CSO managers. Each manager may delegate the review meeting as appropriate. The CISO provides final OI approval.

The review meeting is conducted and any issues are raised. The attendees at the meeting determine if the document is approved if the issues are addressed as discussed at the meeting or if another review meeting is needed. If another meeting is required, this phase begins again when the revision is completed. If the document is approved, the primary contact begins the OI finalization phase.

3.4 Office Instruction Finalization

All OIs and significant documents related to OIs are official agency records. An OI will be available to the public, unless it contains Sensitive Unclassified Non-safeguards Information (SUNSI). Once an OI is approved, the primary contact must:

- Record final approval in the document in ADAMS
- Ensure the OI is posted to the CSO web page in the “Administrative Process and Procedures” area of the page.
- Request that the document be made into an official agency record
- Provide notification to all CSO staff regarding the finalization of the OI

3.5 Maintaining Office Instructions

The primary contact and respective manager are responsible for maintaining the OI. CSO updates OIs to reflect changes in organizations; changes in regulations, policies, or processes; corrections and improvements identified during use of the OI; and for other reasons that come to the attention of the primary contact or responsible manager.

All CSO staff and managers are expected to identify problems with or possible improvements to OIs, and to notify the primary contact by e-mail. The primary contact monitors the use of the OI by talking with the staff, considering the staff’s questions and suggestions, and by occasionally checking documents or other outputs associated with the OI. The primary contact and responsible manager initiate, as necessary, minor or major revisions to the OI.

The primary contact formally reviews the OI at least annually to ensure that the guidance remains accurate and effective. The review comprises the instruction, a sampling of the associated products, and discussions with or surveys of selected internal (and possibly external) stakeholders. The review shall be documented with an email to the CISO. If the primary contact and responsible manager believe that an OI no longer serves a useful purpose or that maintaining the OI is not cost beneficial, the CISO may rescind the OI. The responsible manager presents the proposal during a routine CSO management meeting and the management team decides whether to retain or rescind the OI. OIs, or parts thereof, may also be merged with other OIs or incorporated into other guidance documents.

3.6 Revising CSO Office Instructions

Revisions to OIs are classified as either minor or major.

3.6.1 Minor OI Revisions

Minor revisions have little impact on the allocation of CSO resources and do not change the overall intent of the OI. CSO staff and managers propose minor revisions to the OI primary contact to correct identified errors, reflect revisions in other procedures or policies, and incorporate suggested clarifications or improvements. The responsible manager approves minor revisions. The responsible manager describes minor changes to OIs during routine CSO management meetings. The revision number is incremented by a tenth for the revised OI. The OI primary contact follows the process described in section 3.4 to finalize the document after manager approval is obtained.

3.6.2 Major OI Revisions

Major revisions are changes in policy or procedural matters that warrant office-level approval or that increase or decrease resource estimates by more than one FTE/year. Proposed major changes are discussed during routine CSO management meetings. The primary contact and responsible manager are responsible for major revisions. Major OI revisions follow the same approval process as a new OI.

3.7 Office Instruction Training

Primary contacts and responsible managers shall work with other CSO organizations to define and deliver appropriate training for each revision of an OI. Training may include self-study, meeting presentations, dedicated sessions, and incorporation into qualification programs. In determining the appropriate training strategy, the staff shall consider the importance of the changes to the OI in terms of meeting legal requirements, the relationship of the procedure to agency policies and performance goals, and how the procedure is used (e.g., frequent or infrequent, general, or specific).

CSO-ADM-0100 Change History

Date	Version	Description of Changes	Method Used to Announce & Distribute	Training
27-May-09	0.0	Initial issuance	Posting on CSO web page and announcement at CSO biweekly	Upon request
30-Mar-10	1.0	Update to reflect addition of concurrence meeting and documentation of meeting on cover page	Posting on CSO web page and announcement at CSO biweekly	Upon request
01-Apr-13	2.0	Separated out agency-wide instructions from the CSO instructions	Email to CSO staff and posting to CSO administrative procedures web page	Upon request