

Plan of Corrective Action submitted in response to:
 Records Management Oversight Inspection Report FY 2014
 of the Nuclear Regulatory Commission (NRC)

January 13, 2015

General Response: NRC would like to thank the National Archives and Records Administration (NARA) for their recommendations to improve the NRC's records management program. Many of the recommended actions are currently in progress under the Information and Records Management (IRM) Program Plan. This report validates those activities and underscores the need for a Business Process Improvement (BPI) project.

Progress Reporting Dates: Annual progress reports will be provided for all actionable activities, starting at the end of the quarter following NARA approval of the NRC response.

Report Finding	Report Recommendation(s)	NRC Response	NRC Timeline and Reporting
<p>1. The Information and Records Management (IRM) Program plan has 12 clearly identified projects that will strengthen the NRC's IRM program through the implementation of these projects, which over the next several years, will enable the NRC to better manage its records and information.</p>	<p>1.1. NRC should fully implement all 12 projects identified in the IRM Program plan.</p>	<p>The NRC intends to fully implement all 12 of the IRM projects, which are currently in various stages of implementation. To ensure continued support, the IRM Program Plan will continue to receive executive level support. The schedule for each of these 12 projects has been delineated in the IRM Program plan.</p>	<p>The IRM projects are currently targeted for completion within the next five years. The NRC will inform NARA through annual reporting if any completion dates are amended.</p> <p>Reporting will be based on the percentage of completion for each project at the end of each calendar year. This information will also be reported to the NRC's Executive Director for Operations.</p>
<p>2.1. The NRC ARO does not have sufficient authority to oversee the records and information management program and manage the agency's records throughout their lifecycle but has the legal</p>	<p>2.1. NRC must assign records management responsibility to the ARO with appropriate authority to coordinate and oversee the agency's comprehensive records management</p>	<p>The NRC assigned Records Management (RM) responsibility to the Agency Records Officer (ARO) via memo from the Director of the Office of Information Services (OIS) dated June 26, 2013. Additionally, the ARO will accept the role of Team Leader effective</p>	<p>NRC will report progress for this action as part of the reporting for Recommendation 1.1.</p>

Enclosure

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<p>responsibility to attest to the authenticity and integrity of the records management program.</p>	<p>program. (36 CFR 1220.34)</p>	<p>February 1, 2015. NRC will increase communication of this role and authorities to managers, staff and contractors as follows:</p> <ul style="list-style-type: none"> - IRM Training and Outreach Project: The ARO's role will be clearly defined in the new RM training for all managers, staff, and contractors. (Date Completed: December 31, 2014. - - IRM Policy and Procedures Updates Project: Management Directive 3.53, "NRC's Records and Document Management Program," is currently being revised to include a clear definition of the ARO's role. (Estimated date of completion: March 2016) - Website: Detailed contact information for records management matters will be outlined on the agency website. <p>Best Practices: To ensure the authenticity and integrity of the agency's IRM program, the NRC will conduct quarterly meetings for all NRC information officers to discuss challenges and opportunities.</p>	<p>Meetings will begin the third quarter of FY 2015 and will be reassessed annually for contributions to organizational effectiveness.</p>

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<p>2.2. The NRC ARO does not have a sufficient records management network within NRC offices and programs to ensure that the agency records are being properly managed throughout their lifecycle.</p>	<p>2.2. The NRC ARO should have a network of Points of Contact (POC), with appropriate authority, throughout the agency to ensure the proper management of agency records throughout their lifecycle.</p>	<p>As part of the NRC’s Transforming Assets into Business Solutions (TABS) initiative, there was agreement that OIS would absorb Records Liaison Officer responsibilities and offices would assign a POC with appropriate authority to respond to activities that ensure the proper management of agency records throughout their lifecycle. These activities include:</p> <ul style="list-style-type: none"> • Completing an annual assessment and certification of their office’s recordkeeping based on requirements under 36 CFR. • Designating a primary coordinator to work with OIS to identify continuous improvements in high risk areas and assist in assignments for piloting and implementing tools. • Preparing inactive paper records for off-site storage. 	<p>No further action will be taken.</p>
<p>3. The current ADAMS system, while a suitable document management system, does not provide the NRC with the means to fully manage agency records throughout their lifecycle.</p>	<p>3.1. NRC should fully implement ADAMS Records Manager (ADAMS RM) to ensure that all records in ADAMS are appropriately declared, scheduled, and dispositioned.</p>	<p>The NRC will fully implement the Agencywide Document and Access Management System (ADAMS) RM, as part of fully implementing the IRM Program plan. (Estimated date of completion: FY 2017)</p>	<p>NRC will report progress for this action as part of the reporting under Recommendation 1.1.</p>

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<p>3. The current ADAMS system, while a suitable document management system, does not provide the NRC with the means to fully manage agency records throughout their lifecycle.</p>	<p>3.2. NRC should develop and implement clearly defined guidelines and requirements for inputting all records into ADAMS.</p>	<p>The IRM Policy and Procedures Updates project will include clear records management lifecycle guidance, including document input. (Estimated date of completion: CY 2019).</p> <p>NRC is considering a business process improvement (BPI) project with the goal of simplifying the ADAMS document input process.</p>	<p>NRC will report progress for this action as part of the reporting under Recommendation 1.1.</p> <p>NRC will report on the BPI project on an annual basis.</p>
<p>3. The current ADAMS system, while a suitable document management system, does not provide the NRC with the means to fully manage agency records throughout their lifecycle.</p>	<p>3.3. NRC should develop policies requiring that when final documents are placed in ADAMS that the offices review the working documents in SharePoint, ADAMS or other systems and dispose of those working files appropriately.</p>	<p>Supportive on-going activities include:</p> <ul style="list-style-type: none"> - Guidance: Recently developed guidance includes requirements to review and properly disposition working documents after final documents are added to ADAMS. Guidance will be released to staff in CY 2015. - RM Toolkit: NRC has tips on the handling of working papers after a project is completed in the RM Toolkit located on an internal website. - IRM Training and Outreach Project: Newly developed RM training for all managers, employees, and contractors includes information about employees' responsibilities for handling drafts and working papers. <p>- (Date Completed: December 31,</p>	<p>NRC will report progress for these actions as part of the reporting under Recommendation 1.1.</p>

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		2014) <ul style="list-style-type: none"> - Clean-Up Effort: NRC will develop a project plan to direct a clean-up effort for current repositories to include a specification that items will be deleted after a specified period of time if they have not been declared as records. The project plan will be incorporated into the IRM Program plan as a separate project or as a milestone in a current project. - IRM Policy and Procedures Update Project: NRC will provide clear and practical guidance on the management of working files. (Estimated date of completion: CY 2019) 	
3. The current ADAMS system, while a suitable document management system, does not provide the NRC with the means to fully manage agency records throughout their lifecycle.	3.4. NRC should implement requirements that prohibit documents from being undeclared in ADAMS for longer than a specified amount of time.	As mentioned in NRC's response to Finding 3.3, the IRM Policy and Procedures Updates project will provide clear and practical guidance on managing drafts in ADAMS, and will prohibit documents from being undeclared ("draft class") for longer than one year. (Estimated date of completion: CY 2019)	NRC will report progress for this action as part of the reporting under Recommendation 1.1.
3. The current ADAMS system, while a suitable document management system, does not provide the NRC with the	3.5. NRC should develop and implement file schemas and taxonomies for managing records in	The IRM Taxonomy and the ADAMS RM projects include activities for implementing file schemas and taxonomies. (Estimated dates of	NRC will report progress for this action as part of the reporting under Recommendation 1.1.

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means to fully manage agency records throughout their lifecycle.	ADAMS from input to final disposition.	completion: FY 2015 and FY 2017, respectively)	
3. The current ADAMS system, while a suitable document management system, does not provide the NRC with the means to fully manage agency records throughout their lifecycle.	3.6. NRC should reengineer the ADAMS search engine to allow agency staff to search and retrieve records efficiently.	<p>The NRC is enhancing search capabilities and document retrieval in ADAMS as follows:</p> <ul style="list-style-type: none"> - IRM Taxonomy project: NRC is building taxonomies to facilitate document location and improve metadata for searchability. (Estimated date of completion: FY 2015) - IRM Training and Outreach Project: NRC will continuously offer training for ADAMS searches for the duration of the IRM Program. (Estimated date of completion: CY 2019) - NRC will explore new technology and tools as funding allows 	NRC will report progress for this action as part of the reporting under Recommendation 1.1.
4.1. While the DPC does a commendable job in processing over 100,000 documents annually, there are processes that have evolved over time that appear to be cumbersome and have resulted in a less productive environment.	4.1. NRC should conduct a business process reengineering of the DPC processes and procedures.	NRC is considering a BPI project with the goal of simplifying the ADAMS document input process, to include DPC processes.	NRC will report on the BPI project on an annual basis.

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<p>4.2. The DPC has created over 900 templates for use in profiling and processing documents into ADAMS. Many of the templates have similar fields and in some cases are the same except for the office creating or using the template.</p>	<p>4.2.1. The templates utilized by the DPC should be examined and where possible combined with similar templates thereby reducing the number of templates in use.</p>	<p>The IRM Taxonomy project addresses this finding by implementing a process to validate and limit duplicative template use when declaring records in ADAMS. (Estimated date of completion: FY 2015)</p> <p>NRC is considering a BPI project with the goal of simplifying the ADAMS document input process, to include the use of templates.</p>	<p>NRC will report progress for this action as part of the reporting under Recommendation 1.1.</p> <p>NRC will report on the BPI project on an annual basis.</p>
<p>4.2. The DPC has created over 900 templates for use in profiling and processing documents into ADAMS. Many of the templates have similar fields and in some cases are the same except for the office creating or using the template.</p>	<p>4.2.2. The DPC should examine requests for new templates by comparing the profiling data to already existing templates.</p>	<p>NRC has a current process to review new templates that includes a comparison of the requested template to already existing templates.</p> <p>NRC is considering a BPI project with the goal of simplifying the ADAMS document input process, to include the use of templates.</p>	<p>NRC will report on the BPI project on an annual basis.</p>
<p>4.2. The DPC has created over 900 templates for use in profiling and processing documents into ADAMS. Many of the templates have similar fields and in some cases are the same except for the office creating or using the template.</p>	<p>4.2.3. The DPC should contact document owners before changing profiling information.</p>	<p>NRC is considering a BPI project with the goal of simplifying the process of inputting documents into ADAMS to include DPC processes, such as if, or when, the DPC should communicate when changes must be made to ADAMS profiles.”</p>	<p>The NRC will report on the BPI project on an annual basis.</p>
<p>5. NRC staff utilizes microform records in lieu of papers because the microforms are more convenient even though</p>	<p>5.1. NRC must use accurate and complete information and records when conducting agency</p>	<p>NRC currently has three supportive projects underway:</p> <ul style="list-style-type: none"> - IRM Digitization project: The NRC 	<p>NRC will report progress for these actions as part of the reporting under Recommendation 1.1.</p>

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the microforms may be incomplete or inaccurate.	business activities by having staff retrieve the paper records from the WNRC in lieu of using microfiche (36 CFR 1222).	<p>plans to eventually eliminate microfiche, once all records have been accounted for electronically or via disposition. The IRM project plans are currently being updated and will include an estimated date of completion to eliminate the microfiche as part of the IRM Digitization project. (Estimated date of completion: CY 2019)</p> <ul style="list-style-type: none"> - IRM Policy and Procedures Update project: The NRC has created and released policies to staff emphasizing that the official records must be requested from Records Resource, as microfiche is a reference copy only and should not be utilized to make agency decisions. (Estimated date of completion: CY 2019) - IRM Training and Outreach Project: The policy on microfiche usage is included as a scenario in the forthcoming RM training for all managers, employees, and contractors. (Date completed: December 31, 2014) 	
5. NRC staff utilizes microform records in lieu of papers because the microforms are more convenient even though	5.2. NRC should take the necessary measures to remove the microfiche from use by NRC staff.	As mentioned in NRC's response to Finding 5.1, the NRC plans to eventually eliminate microfiche as part of the IRM Digitization Plan, once all records have	No separate progress reporting is necessary.

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<p>the microforms may be incomplete or inaccurate.</p>		<p>been accounted for electronically or via disposition.</p> <p>In the interim, the NRC has centralized the microfiche readers and any printout or electronic file will be watermarked as "Reference Copy" to facilitate using the authoritative copies in ADAMS.</p>	
<p>6. NRC records in storage at the WNRC were found to have incorrect retention periods assigned. The records involved had retention periods based on NUREG 0910, Rev 3, and the retention periods had not been updated with the implementation of NUREG 0910, Rev 4. The NUREG 0910, Rev 3 retention periods were also being used by NRC records staff in AFAS.</p>	<p>6. NRC must review the retention periods assigned to all records currently in storage at the WNRC to ensure that the records have the correct disposal authorities assigned (36 CFR 1225).</p>	<p>NRC is currently addressing this issue with the following:</p> <ul style="list-style-type: none"> - Records freeze: On October 10, 2014, NRC requested a freeze for one year on all NRC records to allow time for correction of the schedules in NARA's tracking systems. - Crosswalk: The NRC has successfully created a crosswalk of all retention schedules from Revision 3 to Revision 4 of NUREG-0910. These correct disposition authorities will now be used to update the NRC and NARA's tracking systems, the Archival Facility Accountability System (AFAS) and the Archives and Records Center Information System (ARCIS) respectively. 	<p>Completion is expected by the end of FY 2015. NRC will report progress for this action as part of the reporting under Recommendation 1.1.</p>