



**UNITED STATES**  
**NUCLEAR REGULATORY COMMISSION**  
WASHINGTON, D.C. 20555-0001

**OFFICE OF THE  
INSPECTOR GENERAL**

April 30, 2020

**MEMORANDUM TO:** Margaret M. Doane  
Executive Director for Operations

**FROM:** Dr. Brett M. Baker */RA/*  
Assistant Inspector General for Audits

**SUBJECT:** STATUS OF RECOMMENDATIONS: AUDIT OF U.S.  
NUCLEAR REGULATORY COMMISSION'S PROCESS  
FOR PLACING OFFICIAL AGENCY RECORDS IN  
AGENCY DOCUMENTS ACCESS AND MANAGEMENT  
SYSTEM (ADAMS) (OIG-19-A-20)

**REFERENCE:** CHIEF INFORMATION OFFICER MEMORANDUM DATED  
APRIL 23, 2020

Attached is the Office of the Inspector General's (OIG) analysis and status of recommendations as discussed in the agency's response dated April 23, 2020. Based on this response, recommendations 1 and 2 are closed while recommendations 3 through 5 are open and resolved. Please provide an updated status of the resolved recommendations by October 29, 2020.

If you have any questions or concerns, please call me at (301) 415-5915, or Vicki Foster, Team Leader, at (301) 415-5909.

Attachment: As stated

cc: C. Haney, OEDO  
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## Audit Report

### AUDIT OF U.S. NUCLEAR REGULATORY COMMISSION'S PROCESS FOR PLACING OFFICIAL AGENCY RECORDS IN ADAMS

(OIG-19-A-20)

#### Status of Recommendations

Recommendation 1: Require NRC's refresher records management training be completed annually by all staff and contractors with email accounts or network access.

Agency Response Dated  
April 23, 2020:

OCIO submitted a formal request on October 8, 2019, to OCHCO/HRTD that all staff and contractors be required to complete the mandatory records management training annually. The Human Capital Council approved the request, and the training requirement was assigned in February 2020, consistent with OCHCO's assignment of all agencywide mandatory training.

The NRC believes the intent of this Office of the Inspector General (OIG) recommendation has been fulfilled.

Target date for completion: Completed

OIG Analysis: OIG reviewed NRC provided documentation that verifies staff are required to complete records management training annually. Therefore, we consider this recommendation closed.

**Status:** Closed.

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(OIG-19-A-20)

#### Status of Recommendations

Recommendation 2: Assess and update NRC's records management training to address NARA requirements.

Agency Response Dated  
April 23, 2020:

OCIO reached out to the OCHCO/HRTD Learning and Talent Development Branch, requesting an update to the mandatory records management training to include those items identified as deficient by OIG. With OCHCO/HRTD's agreement, the OCIO Governance and Enterprise Management Services Division, Information Management Services Branch, added a set of Microsoft PowerPoint slides to the existing training covering the additional content areas noted.

The NRC believes the intent of this recommendation has been fulfilled.

Target date for completion: Completed

OIG Analysis: OIG reviewed the PowerPoint slides that were added to the records management training and determined that it meets all requirements from the National Archives and Records Administration (NARA). Therefore, we consider this recommendation closed.

**Status:** Closed.

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(OIG-19-A-20)

#### Status of Recommendations

Recommendation 3: Conduct an initial review of ADAMS to identify and remove personal papers, and implement a policy to conduct such reviews on a periodic basis.

Agency Response Dated  
April 23, 2020:

OCIO established an internal procedure to conduct these reviews on a recurring basis and continues to search to identify and remove personal papers. In cases in which it is unclear whether identified documents are "personal papers", OCIO may consult with owners to make the appropriate determination. The NRC believes the intent of this recommendation has been fulfilled.

Target date for completion: Completed

OIG Analysis:

The proposed actions meet the intent of the recommendation. OIG will close the recommendation after verifying that NRC has identified and removed personal papers from ADAMS and has implemented an agency policy for periodically reviewing ADAMS for personal papers.

**Status:**

Open: Resolved.

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### AUDIT OF U.S. NUCLEAR REGULATORY COMMISSION'S PROCESS FOR PLACING OFFICIAL AGENCY RECORDS IN ADAMS

(OIG-19-A-20)

#### Status of Recommendations

Recommendation 4: Strengthen internal controls to prevent individuals from entering personal papers in ADAMS.

Agency Response Dated  
April 23, 2020:

Several actions have been taken in response to this recommendation:

(1) OCIO issued Yellow Announcement (YA) "Guidance on Handling of Personal Papers," YA-20-0019, dated March 18, 2020, reminding staff of agency policy that personal papers must not be placed in ADAMS.

(2) Phase I – Completed. NRC Form 665 was modified and published on February 19, 2020 to include a warning box advising users submitting documents into ADAMS of the above noted policy along with a reference to "Guidance for Determining the Public Availability of NRC Records" (published April 2009) for additional information.

(3) Phase II – In response to concerns about adverse impacts on users, the NRC modified its solution from a popup window that is automatically triggered every time a staff member attempts to add a document and requires staff confirmation that the document is NOT of a personal nature. Instead, the NRC will add a static warning message on the ADAMS Navigator page advising submitters that personal papers must not be placed in ADAMS. This warning message is planned to be deployed by the end of Third Quarter (Q3) FY 2020.

Target date for completion: Q3 FY 2020

OIG Analysis:

The proposed actions meet the intent of the recommendation. OIG will close the recommendation after verifying NRC has completed these approaches that will strengthen internal controls to prevent individuals from entering personal papers in ADAMS.

**Status:**

Open: Resolved.

## Audit Report

### AUDIT OF U.S. NUCLEAR REGULATORY COMMISSION'S PROCESS FOR PLACING OFFICIAL AGENCY RECORDS IN ADAMS

(OIG-19-A-20)

#### Status of Recommendations

Recommendation 5: Strengthen internal controls to ensure use of the Capstone tool and compliance with NARA requirements.

Agency Response Dated  
April 23, 2020:

The staff will discuss the advantages of an "Opt-Out" approach to Capstone with the Commission and OEDO.

The NRC is determining how to properly configure and implement this approach within the Office 365 platform. Once implemented, the agency will deliver revised training to Capstone Officials.

With the "Opt-Out" approach, the NRC determined that it is not necessary for the ARO to conduct periodic reviews of the compliance of Capstone Officials' e-mail capture.

Target date for completion: Q4 FY 2020

OIG Analysis: The proposed actions meet the intent of the recommendation. OIG will close the recommendation after verifying that NRC has implemented processes and procedures to ensure Capstone Officials use the Capstone tool in compliance with NARA requirements.

**Status:** Open: Resolved.