
U.S. Nuclear Regulatory Commission



Privacy Threshold Analysis Simulation Network (SimNet)

Office of the Chief Human Capital Officer (OCHCO)

Version 1.0

6/07/2023

Instruction Notes:

Please do not enter the PIA document into ADAMS. An ADAMS accession number will be assigned through the e-Concurrence system which will be handled by the Privacy Team

Template Version 2.0 (03/2023)

OCHCO SimNet	Version 1.0
Privacy Threshold Analysis	6/07/2023

Document Revision History

Date	Version	PTA Name/Description	Author
6/07/2023	1.0	OCHCO TTC SimNet Initial Release	OCHCO Oasis Systems LLC
5/17/2023	DRAFT	OCHCO TTC SimNet Draft Release	OCHCO Oasis Systems LLC

OCHCO SimNet	Version 1.0
Privacy Threshold Analysis	6/07/2023

Table of Contents

1	Description	1
2	Characterization of the Information	3
3	Records and Information Management-Retention and Disposal	5
4	Privacy Act Determination	7

OCHCO SimNet	Version 1.0
Privacy Threshold Analysis	6/07/2023

System/Project Name: OCHCO SimNet

Data Storage Location (i.e., Database Server, SharePoint, Cloud, Other Government Agency, Power Platform) - Not Applicable. This is an analog real time training system and does not produce data or records.

Date Submitted for review/approval: 6/7/2023.

1 Description

1.1 Provide the description of the system/subsystem, technology (i.e., Microsoft Products), program, or other data collections (hereinafter referred to as “project”). Explain the reason the project is being created.

The Technical Training Center (TTC) provides training to NRC personnel in a classroom setting using nuclear plant control room simulators. The OCHCO/SimNet infrastructure facilitates simulator engineering functions to support various training platforms deployed at the TTC. OCHCO/SimNet is comprised of the following components and design:

1. Backbone server (hosts the SimServ virtual machine, SVNServer virtual machine, and drive array used for maintaining design basis documents),
2. Simulator engineering workstations (4 simulator engineering laptops, 1 I/O test rack laptop, 2 simulator engineering desktops),
3. Simulator software maintenance sub-network comprised of five servers,
4. Virtual machine laboratory sub-network comprised of one server and one desktop workstation,
5. Five simulator sub-networks for physical control room training simulators which include Westinghouse 4-loop, General Electric BWR/4, Combustion Engineering, Babcox & Wilcox, and Westinghouse AP1000, and
6. Dedicated physical workstation to access NRC firewall allow listed vendor websites to facilitate license management and software updates.

Each sub-network has its own router and multiple network switches that connect simulator desktop workstation and simulator input/output hardware. Using a network address translation (NAT) table, the routers are configured to allow communication from OCHCO/SimNet to a select subset of servers and desktops in the simulator sub-networks to aide in simulator maintenance activities. The simulator network is an isolated network from the internet and the NRC POE.

OCHCO SimNet	Version 1.0
Privacy Threshold Analysis	6/07/2023

Please indicate if your project/system will involve the following:

<input type="checkbox"/> PowerApps	<input type="checkbox"/> Public Website
<input type="checkbox"/> Dashboard	<input type="checkbox"/> Internal Website
<input type="checkbox"/> SharePoint	<input checked="" type="checkbox"/> None
<input type="checkbox"/> Other	

1.2 Does this privacy threshold analysis (PTA) support a proposed new project, proposed modification to an existing project, or other situation? Mark appropriate response in table below.

Status Options	
<input type="checkbox"/>	New system/project
<input type="checkbox"/>	Modification to an existing system/project. <i>If modifying or making other updates to an existing system/project, provide the ADAMS ML of the existing PTA and describe the modification.</i>
<input checked="" type="checkbox"/>	Annual Review <i>If making minor edits to an existing system/project, briefly describe the changes below.</i> Convert PTA to the new template.
<input type="checkbox"/>	Other (explain)

1.3 Points of Contact:

	Project Manager	System Owner/Data Owner/Steward	ISSO	Executive Sponsor
Name	George McCullough	Steve Cochrum	Roger Swiger	N/A
Office/Division /Branch	OCHCO/ADHRTD/RTTB	OCHCO/ADHRTD	OCHCO/ADHRTD	N/A
Telephone	423-855-6462	423-855-6615	423-855-6446	N/A

2 Characterization of the Information

Does this project collect, process, or retain information on: (Check all that apply)

Category of individual	
<input type="checkbox"/>	NRC Federal employees
<input type="checkbox"/>	Other Federal employees
<input type="checkbox"/>	Contractors working on behalf of NRC
<input type="checkbox"/>	Members of the Public (non-licensee workers, applicants before they are licenses etc.)
<input checked="" type="checkbox"/>	Project/system does not collect any personally identifiable information
<input type="checkbox"/>	Other

2.1 Is the project/system collecting information about an individual? If yes, provide a description of the information being collected.

Not Applicable.

2.2 Please list the data fields/information being collected.

Not Applicable.

2.3 Does this project use or collect Social Security Numbers (SSNs)? (This includes truncated SSNs, such as the “last four.”)

Not Applicable.

2.4 Describe how the data is collected for the project. (i.e., NRC Form, survey, questionnaire, existing NRC files/databases, response to a background check).

Not Applicable. No information about an individual could be collected or retained from or by the system. This is an analog real time training system and does not produce data or records.

2.5 If using a form to collect the information, provide the form number, title and/or a link.

Not Applicable.

2.6 If the project/system shares information with any other NRC systems, identify the system, what information is being shared and the method of sharing.

Not Applicable.

2.7 If the project/system connects, receives, or shares information with any external non-NRC partners or systems, identify what is being shared.

Not Applicable.

OCHCO SimNet	Version 1.0
Privacy Threshold Analysis	6/07/2023

Identify what agreements are in place with the external non-NRC partners or systems in the table below.

Agreement Type	
<input type="checkbox"/>	Contract Provide Contract Number:
<input type="checkbox"/>	License Provide License Information:
<input type="checkbox"/>	Memorandum of Understanding Provide ADAMS ML number for MOU:
<input type="checkbox"/>	Other
<input checked="" type="checkbox"/>	None

2.8 Describe how the data is accessed (NRC network/remotely) and the access control mechanisms that prevent misuse.

This is an analog real time training system and does not produce data or records.

2.9 Define the FISMA boundary this project/system is part of.

OCHCO SimNet.

2.10 Is there an Authority to Operate (ATO) associated with this project/system?

Authorization Status	
<input type="checkbox"/>	Unknown
<input type="checkbox"/>	No <i>If no, please note that the authorization status must be reported to the Chief Information Security Officer (CISO) and Computer Security Organization (CSO's) Point of Contact (POC) via e-mail quarterly to ensure the authorization remains on track.</i>
<input type="checkbox"/>	In Progress provide the estimated date to receive an ATO. Estimated date:
<input checked="" type="checkbox"/>	Yes Indicate the data impact levels (Low, Moderate, High, Undefined) approved by the Chief Information Security Officer (CISO) Confidentiality-Low Integrity-Low Availability-Low

2.11 Provide the NRC system Enterprise Architecture (EA)/Inventory number. If unknown, contact [EA Service Desk](#) to get the EA/Inventory number.

The EA number is 20040048.

3 Records and Information Management-Retention and Disposal

The National Archives and Records Administration (NARA), in collaboration with federal agencies, approves whether records are **Temporary** (eligible at some point for destruction/deletion because they no longer have business value) or **Permanent** (eligible at some point to be transferred to the National Archives because of historical or evidential significance). Records/data and information with historical value, identified as having a “permanent” disposition, are transferred to the National Archives of the United States at the end of their retention period. All other records identified as having a “temporary” disposition are destroyed at the end of their retention period in accordance with the NARA Records Schedule or the General Records Schedule.

These determinations are made through records retention schedules and NARA statutes (44 United States Code (U.S.C.), 36 Code of Federation Regulations (CFR)). Under 36 CFR, agencies are required to establish procedures for addressing Records and Information Management (RIM) requirements. This includes strategies for establishing and managing recordkeeping requirements and disposition instructions before approving new electronic information systems or enhancements to existing systems.

The following questions are intended to determine whether the records/data and information in the system have approved records retention schedules and disposition instructions, whether the system incorporates RIM strategies including support for [NARA’s Universal Electronic Records Management \(ERM\) requirements](#), and if a mitigation strategy is needed to ensure compliance.

If the project/system:

- Does not have an approved records retention schedule and/or
- Does not have an *automated* RIM functionality
- Involves a cloud solution
- And/or if there are additional questions regarding Records and Information Management - Retention and Disposal, please contact the NRC Records staff at ITIMPolicy.Resource@nrc.gov for further guidance.

If the project/system has a record retention schedule or an automated RIM functionality, please complete the questions below.

3.1 Does this project map to an applicable retention schedule in NRC’s Comprehensive Records Disposition Schedule (NUREG-0910), or NARA’s General Records Schedules?

<input type="checkbox"/>	NUREG-0910, “NRC Comprehensive Records Disposition Schedule
<input type="checkbox"/>	NARA’s General Records Schedules
<input checked="" type="checkbox"/>	<p>Unscheduled</p> <p>This is an analog real time training system and does not produce data or records. Additional information/data/records may need to be scheduled; therefore, NRC records personnel will need to work with staff to develop a records retention and disposition schedule for records created or maintained.</p>

OCHCO SimNet	Version 1.0
Privacy Threshold Analysis	6/07/2023

3.2 If so, cite the schedule number, approved disposition, and describe how this is accomplished.

System Name (include sub-systems, platforms, or other locations where the same data resides)	N/A
Records Retention Schedule Number(s)	
Approved Disposition Instructions	
Is there a current automated functionality or a manual process to support RIM requirements? This includes the ability to apply records retention and disposition policies in the system(s) to support records accessibility, reliability, integrity, and disposition.	
Disposition of Temporary Records Will the records/data or a composite be automatically or manually deleted once they reach their approved retention?	
Disposition of Permanent Records Will the records be exported to an approved format and transferred to the National Archives based on approved retention and disposition instructions? If so, what formats will be used? <u>NRC Transfer Guidance (Information and Records Management Guideline - IRMG)</u>	

Note: Information in *Section 3, Records and Information Management-Retention and Disposal*, does not need to be fully resolved for final approval of the privacy impact assessment.

STOP HERE - The remaining page will be completed by the Privacy Officer

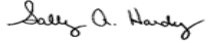
OCHCO SimNet	Version 1.0
Privacy Threshold Analysis	6/07/2023

4 Privacy Act Determination

Review Results		Action Items
<input checked="" type="checkbox"/>	This project/system does not contain PII.	No further action is necessary for Privacy.
<input type="checkbox"/>	This project/system does contain PII	A privacy impact assessment is required

Comments:

No information about an individual could be collected or retained from or by the system. This is an analog real time training system and does not produce data or records.

Reviewer's Name	Title
 Signed by Hardy, Sally on 06/21/23	Privacy Officer

I concur with this analysis.



Signed by Harris, Kathryn
on 06/23/23

Chief
Cyber Security Branch
Governance and Enterprise Management
Services Division
Office of the Chief Information Officer