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U.S. Nuclear Regulatory Commission

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**Privacy Threshold Analysis  
Postage Meter System (PMS)  
Office of Administration**

**Version 1.0  
6/30/2023**

Template Version 2.0 (03/2023)

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## Document Revision History

Date	Version	PTA Name/Description	Author
6/30/2023	1.0	PMS PTA Initial Release.	ADM Oasis Systems, LLC
6/16/2023	DRAFT	PMS PTA Draft Release.	ADM Oasis Systems, LLC

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**System/Project Name:** Postage Meter System (PMS).

**Data Storage Location (i.e., Database Server, SharePoint, Cloud, Other Government Agency, Power Platform):** Cloud.

**Date Submitted for review/approval:** June 30, 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 U.S. Nuclear Regulatory Commission’s (NRC) Office of Administration (ADM) manages mail services for Headquarters (HQ), Regional Offices, and the Technical Training Center (TTC) in accordance with United States Postal Service (USPS) Federal directives and regulations. PMS allows NRC to manage mail activities as required by Federal statutes by automating the mail management process. It ensures official business mail is processed efficiently and sent the most cost-effective way by selecting the proper class, weight and shipping services (FedEx, USPS, UPS, etc.). PMS also allows support staff to generate statistical reports on mail and shipping activities.

ADM is migrating the current on-premises PMS solution to the cloud in the Pitney Bowes Software-as-a-Service (SaaS) solution.

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

<input type="checkbox"/> PowerApps	<input checked="" type="checkbox"/> Public Website
<input type="checkbox"/> Dashboard	<input type="checkbox"/> Internal Website
<input type="checkbox"/> SharePoint	<input 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 checked="" 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> The current on-premises PMS service is migrating to the cloud. ADAMS ML: ML17276A160
<input type="checkbox"/>	Annual Review <i>If making minor edits to an existing system/project, briefly describe the changes below.</i>
<input type="checkbox"/>	Other (explain)

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### 1.3 Points of Contact:

	Project Manager	System Owner/Data Owner/Steward	ISSO	Executive Sponsor
<b>Name</b>	Jackie Nicholson	Jennifer Golder	Tamar Katz	N/A
<b>Office/Division /Branch</b>	ADM/DFS/DCASB	ADM	ADM/DRMA/ BITT	N/A
<b>Telephone</b>	301-415-2095	301-287-0741	301-415-2500	N/A

## 2 Characterization of the Information

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

Category of individual	
<input checked="" type="checkbox"/>	NRC Federal employees
<input checked="" type="checkbox"/>	Other Federal employees
<input checked="" type="checkbox"/>	Contractors working on behalf of NRC
<input checked="" type="checkbox"/>	Members of the Public (non-licensee workers, applicants before they are licenses, etc.)
<input 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.**

Information entered into PMS is used for management of premium mailing and shipping services. This information includes name (first and last), work address, and work phone number in order to calculate postage costs and track deliveries to the NRC. PMS does not store any information.

**2.2 Please list the data fields/information being collected.**

Refer above to section 2.1.

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

No.

**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).**

Information entered on the NRC Form 420, “Request for Premium Cost Mail Service,” includes name (first and last), work address, and work phone number of the mail/package recipient in order to calculate postage costs and track deliveries to the NRC. The information on the NRC Form 420 is not stored or retained by the system, they are maintained in a locked filing cabinet onsite in the mailroom.

Please note, due to COVID-19 and expansion of the NRC Telework Program, official work location and work telephone number used for mail services may be an individual’s home address and cell phone number. However, as this information is associated with an individual’s

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professional identity, this is not considered personally identifiable information (PII).

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

PMS processes information entered on the NRC Form 420, which includes name (first and last), work address, and work phone number in order to calculate postage costs and track deliveries to the NRC. This form is available in the NRC Forms Library and in hard copy format in the Mail Service Center. Completed forms are stored in a locked file cabinet in the mailroom.

**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.**

N/A.

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

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.**

Authorized support personnel will access the SaaS application through the Information Technology Infrastructure (ITI) Identity, Credential, and Access Management (ICAM) Authentication Gateway, via Single Sign-On (SSO) on the NRC network.

However, while the system is being stood up, the application and peripheral devices are currently accessed internally via username, password, and one-time password (OTP).

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

PMS is included as a service under the ADM Support Services (ASS) subsystem of the MASS FISMA boundary.

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**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 checked="" type="checkbox"/>	In Progress provide the estimated date to receive an ATO. Estimated date: January 31, 2024
<input type="checkbox"/>	Yes <b>Indicate the data impact levels (Low, Moderate, High, Undefined) approved by the CISO</b> Confidentiality: Integrity: Availability:

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

EA Number: S0003.

### 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.

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**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](mailto: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"/>	<a href="#">NUREG-0910, “NRC Comprehensive Records Disposition Schedule”</a>
<input checked="" type="checkbox"/>	<a href="#">NARA’s General Records Schedules</a>
<input type="checkbox"/>	Unscheduled

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

<b>System Name (include sub-systems, platforms, or other locations where the same data resides)</b>	PMS
<b>Records Retention Schedule Number(s)</b>	<p><a href="#">GRS 5.5 Item 010</a> – “Mail, printing, and telecommunication services administrative and operational records”</p> <p><a href="#">GRS 5.5 Item 020</a> – “Mail, printing, and telecommunications control records”</p> <p><a href="#">GRS 5.5 Item 030</a> – “Metered mail records”</p> <p><a href="#">GRS 5.2 Item 020</a> – Transitory and Intermediary Records</p>
<b>Approved Disposition Instructions</b>	<p><u>GRS 5.5 Item 010:</u> Temporary – Destroy when 3 years old, or 3 years after applicable agreement expires or is cancelled, as appropriate, but longer retention is authorized if required for business use.</p> <p><u>GRS 5.5 Item 020:</u> Temporary – Destroy when 1 year old or when superseded or obsolete, whichever is applicable, but longer retention is authorized if required for business use.</p> <p><u>GRS 5.5 Item 030:</u> Temporary – Destroy when 6 years old, but longer retention is authorized if required for</p>



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	business use.
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.	<p>Information entered on hard copies of NRC Forms are manually destroyed by authorized NRC personnel.</p> <p>Information entered into the PMS system to calculate postage costs and generate reports are automatically deleted to support RIM requirements.</p>
<p><b>Disposition of Temporary Records</b></p> <p>Will the records/data or a composite be automatically or manually deleted once they reach their approved retention?</p>	<p>Information entered on hard copies of NRC Forms are manually destroyed.</p> <p>Information entered into the PMS system to calculate postage costs and generate reports are automatically deleted once they reach their approved retention.</p>
<p><b>Disposition of Permanent Records</b></p> <p>Will the records be exported to an approved format and transferred to the National Archives based on approved retention and disposition instructions?</p> <p>If so, what formats will be used?</p> <p><a href="#"><u>NRC Transfer Guidance (Information and Records Management Guideline - IRMG)</u></a></p>	N/A – records are not permanently retained within PMS.

**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**

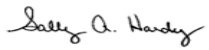
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## 4 Privacy Act Determination


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

### Comments:

The PMS system does not maintain/store information. NRC Form 420 is stored in a locked file cabinet in the mailroom.

Reviewer's Name	Title
 Signed by Hardy, Sally on 08/16/23	Privacy Officer

I concur with this analysis.

  
 Partlow, Benjamin signing on behalf  
 of Harris, Kathryn  
 on 08/16/23  
 \_\_\_\_\_  
 Chief  
 Cyber Security Branch  
 Governance and Enterprise Management  
 Services Division  
 Office of the Chief Information Officer