U.S. Nuclear Regulatory Commission

Privacy Impact Assessment
Radiation Protection Computer Code Analysis &
Maintenance Program (RAMP) Website

Office of the Chief Information Officer (OCIO)

Version 2.0
June 09, 2025

Document Revision History

Date	Version	PIA Name/Description	Author
06/09/2025	2.0	Transferred to the latest template, updated Points of Contact, and Section 5.1 of Privacy Act Determination	OCIO / RES Oasis Systems, LLC
05/20/2025	DRAFT of 2.0	Transferred to the latest template, updated Points of Contact, and Section 5.1 of Privacy Act Determination	OCIO / RES Oasis Systems, LLC
09/20/2023	1.0	RAMP PIA – Initial Release	OCIO / RES Oasis Systems, LLC
08/30/2023	DRAFT	RAMP PIA - Draft Release	OCIO / RES Oasis Systems, LLC

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The agency is subject to the requirements of the E-Government Act and is committed to identifying and addressing privacy risks whenever it develops or makes changes to its information systems. The questions below help determine any privacy risks related to the E-Government Act or later guidance by the Office of Management and Budget (OMB) and the National Institute of Standards and Technology (NIST).

Name/System/Subsystem/Service Name: Radiation Protection Computer Code Analysis & Maintenance Program (RAMP) Website.

Data Storage Location (i.e., Database Server, SharePoint, Cloud, Other Government Agency, Power Platform): Data resides within the Acquia Drupal platform which relies on the physical infrastructure provided by the Amazon Web Services East/West U.S. Public Cloud.

Date Submitted for review/approval: June 23, 2025.

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.

Radiation Protection Computer Code Analysis and Maintenance Program (RAMP) is a U.S. Nuclear Regulatory Commission (NRC) program with the purpose of developing, distributing, maintaining, and providing training for NRC sponsored radiation protection computer codes. The RAMP website is the online repository for the Office of Nuclear Regulatory Research (RES) RAMP computer codes and related documents. Only registered members have access to the RAMP computer codes, online training, and meeting materials. Users access the website via https://ramp.nrc-gateway.gov.

The RAMP website is hosted on a Federal Risk and Authorization Management Program (FedRAMP) authorized cloud platform provided by Acquia Inc. The Acquia Drupal platform relies on the physical infrastructure provided by the Amazon Web Services East/West U.S. Public Cloud.

RAMP is a subsystem of the Office of the Chief Information Officer (OCIO) Third-Party System (TPS). TPS provides a framework for managing cybersecurity compliance for various external Information Technology services used by NRC. TPS and its subsystems have no technical components on the NRC infrastructure.

RAMP supports the agency licensing, inspection, and emergency response functions through development, maintenance, and distribution of the radiation protection computer codes. The RAMP website utilizes a Platform-as-a-Service cloud environment provided by Acquia. The website configurations are implemented through Drupal 9, which provides management modules to properly structure and place content.

Please mark appropriate response below if your project/system will involve the following:

☒ PowerApps	☐ Artificial Intelligence (AI)
☐ Dashboard	☐ Public Website
☐ SharePoint	☐ Internal Website
☐ Cloud Service Provider	☒ Other: Cloud Service Provider - The RAMP website and components run on Aquia's Drupal platform which resides in the AWS cloud. Users access the RAMP website via https://ramp.nrc-gateway.gov/.
☐ Server/Database Design	

1.2 Does this privacy impact assessment (PIA) support a proposed new project, proposed modification to an existing project, or other situation? Select options that best apply in table below.

Mark appropriate response.

Status Options	
☐	New system/project
☐	Modification to an existing system/project. *If modifying or making other updates to an existing system/project, provide the ADAMS ML of the existing PIA and describe the modification.*
☒	Annual Review *If making minor edits to an existing system/project, briefly describe the changes below.* The PIA has been transferred into the latest template, updated Points of Contact, and Section 5.1 of Privacy Act Determination
☐	Other (explain)

1.3 Points of Contact:

Role	Contact Information Name Office/Division/Branch Phone Number
Project Manager(s)	Rigel Flora Office of Nuclear Regulatory Research (RES) / Division of Systems Analysis (DSA) / Radiation Protection Branch (RPB) 301-415-3890
System Owner/Data Owner or Steward	John Tappert Acting Director Office of Nuclear Regulatory Research (RES) 301-415-2486

Role	Contact Information Name Office/Division/Branch Phone Number
ISSM	Jonathan Butler OCIO/ Cyber and Information Security Division (CISD) 301-415-2560
Executive Sponsor	John Tappert Acting Director Office of Nuclear Regulatory Research (RES) 301-415-2486
Other	Business Project Manager Sam Edwards Office of Nuclear Regulatory Research (RES) /Division of Systems Analysis (DSA) /Radiation Protection Branch (RPB) 301-415-1358 Technical Project Manager Wendy Chinchilla Leidos 240-753-0185

2 Authorities and Other Requirements

2.1 What specific legal authorities and/or agreements permit the collection of information for the project?

Provide all statutory and regulatory authorities for operating the project, including the authority to collect the information; NRC internal policy is not a legal authority. Please mark appropriate response in table below.

Mark with an "X" on all that apply.	Authority	Citation/Reference
☐	**Statute**	
☐	**Executive Order**	
☒	**Federal Regulation**	The regulations in Title 10 of the Code of Federation Regulations (10 CFR) Part 20, "Standards for Protection Against Radiation," require all licensees to meet dose limits. The computer codes in RAMP calculate different scenarios for

Mark with an "X" on all that apply.	Authority	Citation/Reference
		dose limits. If the computer code printout determines the dose is below the limits in 10 CFR Part 20, the licensee meets the requirement. If the doses are above the limit, the licensee is required to implement processes to bring the doses below the limit.
☐	**Memorandum of Understanding/Agreement**	
☐	**Other (summarize and provide a copy of relevant portion)**	

2.2 Explain how the information will be used under the authority listed above (*i.e., enroll employees in a subsidies program to provide subsidy payment*)**.**

The information is used to support the development, maintenance, and distribution of the NRC's vast array of radiation protection, dose assessment, and emergency response computer codes, as well as periodic training on the codes.

If the project collects Social Security numbers, state why this is necessary and how it will be used.

RAMP does not collect social security numbers.

3   Characterization of the Information

In the table below, mark the categories of individuals for whom information is collected.

Category of individual	
☒	Federal employees
☒	Contractors
☒	Members of the Public (any individual other than a federal employee, consultant, or contractor)
☒	Licensees
☐	Other

In the table below, is a list of the most common types of PII collected. Mark all PII that is collected and stored by the project/system. If there is additional PII not defined in the table below, a comprehensive listing of PII is provided for further reference in ADAMS at the following link: PII Reference Table.

Categories of Information			
☒	Name	☐	Resume or curriculum vitae
☐	Date of Birth	☐	Driver's License Number
☐	Country of Birth	☐	License Plate Number
☒	Citizenship	☐	Passport number
☐	Nationality	☐	Relatives Information
☐	Race	☐	Taxpayer Identification Number
☐	Home Address	☐	Credit/Debit Card Number
☐	Social Security number (Truncated or Partial)	☐	Medical/health information
☐	Sex (Male or Female)	☐	Alien Registration Number
☐	Ethnicity	☐	Professional/personal references
☐	Spouse Information	☐	Criminal History
☐	Personal e-mail address	☐	Biometric identifiers (facial images, fingerprints, iris scans)
☐	Personal Bank Account Number	☐	Emergency contact e.g., a third-party to contact in case of an emergency
☐	Personal Mobile Number/Home Number	☐	Accommodation/disabilities information
☐	Marital Status	☒	**Other:** The organization the user belongs to, business email address, business mailing address, business telephone number
☐	Children Information		
☐	Mother's Maiden Name		

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

The information is collected on a non-disclosure agreement form, but this information is not maintained in the RAMP system. The non-disclosure agreement forms are stored in ADAMS and protected as personally identifiable information (PII).

3.2 If using a form (paper or web) to collect the information, provide the form number, title and/or a link to the form.

NRC non-disclosure agreement form.

3.3 Who provides the information? Is it provided directly from the individual or a third-party.

Information is provided directly from the individual.

3.4 Explain how the accuracy of the data collection is validated. If the project does not check for accuracy, please explain why.

All information will be collected from the subject individual and will be verified by an approving official.

3.5 Will PII data be used in a test environment? If so, explain the rationale for this and how the PII information is protected.

No.

3.6 What procedures are in place to allow the subject individual to correct inaccurate or erroneous privacy information?

The subject individual can submit an updated Non-Disclosure Agreement (NDA) by downloading the form from the website and completing the form, and then eFax or email the form to RAMP@nrc.gov.

4 Data Security

4.1 Describe who has access to the data in the project (i.e., internal NRC, system administrators, external agencies, contractors, public).

System administrators and users (registered members) have access to the data in the project.

4.2 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.

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

If so, identify what agreements are in place with the external non-NRC partner or system in the table below.

Agreement Type	
☐	Contract Provide Contract Number:
☐	License Provide License Information:
☐	Memorandum of Understanding Provide ADAMS ML number for MOU:
☒	Other: RAMP is FedRAMP authorized. Acquia documents information on the functional properties of security controls within their FedRAMP documentation. The Acquia NRC Authority to Operate (ATO) letter was approved on July 15, 2019 and is available in the OCIO CSO FISMA Repository.
☐	None

4.4 Describe how the data is accessed and describe the access control mechanisms that prevent misuse.

RAMP utilizes PIV cards for NRC users, password-based authentication for non-NRC users and role-based access controls. The RAMP SSP details the current system security controls used to prevent the misuse of data.

4.5 Explain how the data is transmitted and how confidentiality is protected (i.e., encrypting the communication or by encrypting the information before it is transmitted).

The CSP transmits the data via secure, encrypted connections (SSH, HTTPS).

4.6 Describe where the data is being stored (i.e., NRC, Cloud, Contractor Site).

Data is stored within the Aquia's Drupal platform which resides in the AWS cloud.

4.7 Explain if the project can be accessed or operated at more than one location.

N/A.

4.8 Can the project be accessed by a contractor? Have the contractors completed an IT-II investigation? Do they possess an NRC badge?

Yes, Leidos badged contractors have access to RAMP to maintain the website and perform their job duties. Different roles exist within the system for various levels of privileged access.

4.9 Explain the auditing measures and technical safeguards in place to prevent misuse of data.

NRC relies on the CSP to secure all data in accordance with agencywide mandates and ensure that only authorized users can access the system. The CSP implements functional requirements into the technical design and implementation of the system and undergoes annual assessments to test the current safeguards.

In addition, see the RAMP SSP for all security controls.

4.10 Describe if the project has the capability to identify, locate, and monitor (i.e., trace/track/observe) individuals.

No.

4.11 Define which FISMA boundary this project is part of.

RAMP is a subsystem of the NRC's TPS.

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

Authorization Status	
☐	Unknown
☐	No *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.*
☐	In Progress provide the estimated date to receive an ATO. Estimated date:
☒	Yes Indicate the data impact levels (Low, Moderate, High, Undefined) approved by the Chief Information Security Officer (CISO) Confidentiality-Low Integrity-Low Availability-Low

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

The TPS EA number is 20180002.

5 Privacy Act Determination

5.1 Is the data collected retrieved by a personal identifier?

Mark the appropriate response.

	Response
☐	**Yes, the PII is retrieved by a personal identifier (i.e., individual's name, address, SSN, or other unique number, etc.)** **List the identifiers that will be used to retrieve the information on the individual.**
☒	**No, the PII is not retrieved by a personal identifier.** **If no, explain how the data is retrieved from the project.** NRC users must login to the RAMP website using SAML credentials. Non-NRC users must use their RAMP user ID and password in order to download codes. No information about individuals is retrieved from the system.

5.2 For all collections where the information is retrieved by a personal identifier, the Privacy Act requires that the agency publish a System of Record Notice (SORN) in the Federal Register. *As per the Privacy Act of 1974, "the term 'system of records' means a group of any records under the control of any agency from which information is retrieved by the name of the individual or by some other personal identifier assigned to the individual.*

Mark the appropriate response in the table below.

	Response
☐	*Yes, this system is covered by an existing SORN. (See existing SORNs: https://www.nrc.gov/reading-rm/foia/privacy-systems.html)* *Provide the SORN name, number, (List all SORNs that apply):*
☐	**SORN is in progress**
☐	**SORN needs to be created**
☐	**Unaware of an existing SORN**
☒	**No, this system is not a system of records and a SORN is not applicable.**

5.3 When an individual is asked to provide personal data (i.e., form, webpage, survey), is a Privacy Act Statement (PAS) provided?

> *A Privacy Act Statement is a disclosure statement required to appear on documents used by agencies when an individual is asked to provide personal data. It is required for any forms, surveys, or other documents, including electronic forms, used to solicit personal information from individuals that will be maintained in a system of records.*

Mark the appropriate response.

Options	
☐	**Privacy Act Statement**
☒	**Not Applicable**
☐	**Unknown**

5.4 Is providing the PII mandatory or voluntary? What is the effect on the individual by not providing the information?

Yes. The individual will only have access to the codes and related documents they are approved for, based on the approved non-disclosure agreement.

6 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.

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

☐	NUREG-0910, "NRC Comprehensive Records Disposition Schedule
☐	NARA's General Records Schedules
☒	Unscheduled

6.2 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)	Radiation Protection Computer Code Analysis & Maintenance Program (RAMP) Website
Records Retention Schedule Number(s)	N/A
Approved Disposition Instructions	This system will 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. Until the approval of such schedule, these records and information are permanent. Their willful disposal or concealment (and related offenses) is punishable by fine or imprisonment, according to 18 U.S.C., Chapter 101, and Section 2071. Implementation of retention schedules is mandatory under 44 U.S. 3303a (d), and although this does not prevent further development of the project, retention

	functionality or a manual process must be incorporated to meet this requirement.
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.	No. RES should coordinate with the records retention group to identify which retention schedules are applicable to RAMP. The retention schedule should support the RAMP website redesign in terms of how the content/data is managed. Retention schedules to be considered for RAMP may include: According to NRC Management Directive 10.131 – Protection of NRC Employees Against Ionizing Radiation, records shall be maintained according to NUREG 0910, 2.17 item 19 (NMSS) and 2.25 item 19 (REGIONS). These schedules refer to: Radiation Protection Program Records. Part of the description for these records state, "…records documenting equipment calibrations, and computations determining exposure hazard or compliance with the requirements of Management Directive 10.131…"Temporary. Cut off electronic files at close of fiscal year. Destroy 75 years after cutoff.
Disposition of Temporary Records Will the records/data or a composite be automatically or manually deleted once they reach their approved retention?	Acquia the CSP is responsible for the retention of the data.

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? **NRC Transfer Guidance (Information and Records Management Guideline - IRMG)**	N/A

7 Paperwork Reduction Act

The Paperwork Reduction Act (PRA) of 1995 requires that agencies obtain an Office of Management and Budget (OMB) approval in the form of a "control number"—before promulgating a paper form, website, surveys, questionnaires, or electronic submission from 10 or more members of the public. If the data collection is from federal employees regarding work-related duties, then a PRA clearance is not necessary.

7.1 Will the project be collecting any information from 10 or more persons who are not Federal employees?

Yes.

7.2 Is there any collection of information addressed to all or a substantial majority of an industry (i.e., Fuel Fabrication Facilities or Fuel Cycle Facilities)?

No.

7.3 Is the collection of information required by a rule of general applicability?

Yes, users must fill out an NDA to have access to the codes.

Note: For information collection (OMB clearances) questions: contact the NRC's Clearance Officer. Additional guidance can be found on the NRC's internal Information Collections Web page at: https://intranet.nrc.gov/ocio/33456.

8 Privacy Act Determination

Project/System Name: RAMP

Submitting Office: RES/OCIO
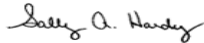
Privacy Officer Review

Review Results		Action Items
☐	This project/system **does not contain PII.**	**No further action** is necessary for Privacy.
☒	This project/system **does contain PII**; the Privacy Act does **NOT** apply, since information is NOT retrieved by a personal identifier.	**Must be protected with restricted access** to those with a valid need-to-know.
☐	This project/system **does contain PII**; the **Privacy Act does apply**.	**SORN is required-** Information is **retrieved** by a personal identifier**.**

Comments:

The RAMP system does not contain PII. The RAMP website only stores limited business-related information, including users' first and last names, their organization, membership type (foreign or domestic), and user ID.

However, NDAs associated with RAMP do contain PII. These documents are stored in ADAMS, and access to them should be restricted strictly to individuals with a need-to-know. Appropriate access controls should be implemented to ensure compliance with privacy and data protection requirements.

Reviewer's Name	Title
Sally A. Hardy Signed by Hardy, Sally on 07/29/25	Privacy Officer

9 OMB Clearance Determination

NRC Clearance Officer Review

Review Results
☐ No OMB clearance is needed.
☐ OMB clearance is needed.
☒ Currently has OMB Clearance. Clearance No. 3150-0240

Comments:

The OMB clearance number provided is for the NDA.

Reviewer's Name	Title
Kristen C. Benney Signed by Benney, Kristen on 07/14/25	Agency Clearance Officer
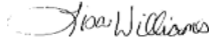
10 Records Retention and Disposal Schedule Determination

Records Information Management Review

Review Results	
☐	No record schedule required.
☐	Additional information is needed to complete assessment.
☒	Needs to be scheduled.
☐	Existing records retention and disposition schedule covers the system - no modifications needed.

Comments:

Reviewer's Name	Title
Signed by Dove, Marna on 07/28/25	Sr. Program Analyst, Electronic Records Manager
Signed by Williams, Lisa on 07/23/25	Records and Information Management Specialist

11 Review and Concurrence

	Review Results
☐	This project/system **does not** collect, maintain, or disseminate information in identifiable form.
☒	This project/system **does** collect, maintain, or disseminate information in identifiable form.

I concur with the Privacy Act, Information Collections, and Records Management reviews.

Signed by Nalabandian, Garo
on 07/29/25

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Director
Chief Information Security Officer
Cyber Information Security Division
Office of the Chief Information Officer

ADDITIONAL ACTION ITEMS/CONCERNS

Name of Project/System:
Radiation Protection Computer Code Analysis & Maintenance Program (RAMP) Website

Date CISD received PIA for review:	**Date CISD completed PIA review:**
June 23, 2025	July 28, 2025

Action Items/Concerns:
The RAMP system does not contain PII. The RAMP website stores only limited business-related information, including users' first and last names, the organization they are affiliated with, their membership type (foreign or domestic), and user ID.
The NDA is used as part of the access vetting process for the RAMP system. The NDA form collects PII, including country of citizenship, business email address, and business telephone number. These forms are not stored in the RAMP system but are instead maintained in ADAMS.
Because the NDAs contain PII, access to them in ADAMS must be restricted to individuals with a valid need-to-know, in accordance with privacy and data protection policies.