

June 10, 2003

MEMORANDUM TO: Stephen D. Dingbaum
Assistant Inspector General for Audits

FROM: William D. Travers **/RA/**
Executive Director for Operations

SUBJECT: OFFICE OF THE INSPECTOR GENERAL MANAGEMENT AUDITS OF
THE REGIONS (OIG-03-A-06 THROUGH OIG-03-A-10)

This memorandum provides the staff's responses to your memoranda dated March 14, 2003, on the findings and recommendations discussed in the Office of the Inspector General's (OIG's) reports on the management audits of the NRC regional offices, OIG-03-A-06 through OIG-03-A-09 (see Attachments 1 through 4, respectively), and the associated report on Headquarters action needed on issues identified from the regional audits, OIG-03-A-10 (see Attachment 5).

Attachments:

1. Staff Response to OIG-03-A-06 (Region I)
2. Staff Response to OIG-03-A-07 (Region II)
3. Staff Response to OIG-03-A-08 (Region III)
4. Staff Response to OIG-03-A-09 (Region IV)
5. Staff Response to OIG-03-A-10 (Headquarters)

cc: Chairman Diaz
Commissioner Dicus
Commissioner McGaffigan
Commissioner Merrifield

June 10, 2003

MEMORANDUM TO: Stephen D. Dingbaum
Assistant Inspector General for Audits

FROM: William D. Travers **/RA/**
Executive Director for Operations

SUBJECT: OFFICE OF THE INSPECTOR GENERAL MANAGEMENT AUDITS OF
THE REGIONS (OIG-03-A-06 THROUGH OIG-03-A-10)

This memorandum provides the staff's responses to your memoranda dated March 14, 2003, on the findings and recommendations discussed in the Office of the Inspector General's (OIG's) reports on the management audits of the NRC regional offices, OIG-03-A-06 through OIG-03-A-09 (see Attachments 1 through 4, respectively), and the associated report on Headquarters action needed on issues identified from the regional audits, OIG-03-A-10 (see Attachment 5).

Attachments:

1. Staff Response to OIG-03-A-06 (Region I)
2. Staff Response to OIG-03-A-07 (Region II)
3. Staff Response to OIG-03-A-08 (Region III)
4. Staff Response to OIG-03-A-09 (Region IV)
5. Staff Response to OIG-03-A-10 (Headquarters)

cc: Chairman Diaz
Commissioner Dicus
Commissioner McGaffigan
Commissioner Merrifield

Distribution: (G20030132 thru G20030136)

IG File	EDO r/f	W. Dean	P. Norry	W. Kane	C. Paperiello
M. Malloy	P. Shea	RAs	R. Zimmerman	M. Springer	P. Bird
OCIO	S. Morris	C. Schum	OGC	CFO	D. Galik
J. Himes					

ADAMS Accession No.

Publicly Available, Non-Sensitive

DOCUMENT NAME: C:\ORPCheckout\FileNET\ML031631258.wpd

OFFICE	OEDO	OEDO	AO	DEDR	EDO
NAME	MMalloy	CSSchum	WMDean	WFKane	WDTravers
DATE	05/28/03	06/02/03	06/04/03	06/10/03	06/10/03

OFFICIAL RECORD COPY

STAFF RESPONSE TO OIG-03-A-06, MANAGEMENT AUDIT OF REGION I

OIG-03-A-06, Recommendation 1: Develop and implement quality control procedures to ensure that metric data is reliable.

Response

Agree. By October 1, 2003, Region I will develop and implement a quality control procedure for validation of metrics data used in the Region I Operating Plan.

OIG-03-A-06, Recommendation 2: Maintain documentation to support metric data reported in Region I Operating Plans.

Response

Agree. The process discussed in OIG-03-A-06 Recommendation 1 will include a provision for maintaining sufficient records to support the metric data reported in the Region I operating plan. Completion date: October 1, 2003.

OIG-03-A-06, Recommendation 3: Finalize the Occupant Emergency Plan in accordance with Federal and agency requirements.

Response

Agree. The Occupant Emergency Plan (OEP) was updated and issued in a distinctive red binder to all Region I employees on April 25, 2003. We consider this item to be complete.

OIG-03-A-06, Recommendation 4: Provide training and guidance to those assigned duties under the [Occupant Emergency] plan.

Response

Agree. All of the individuals currently assigned to Health and Safety Committee duties under the OEP have been provided appropriate training in first aid, cardiopulmonary resuscitation, use of the automatic external defibrillator, and protection from blood-borne pathogens. Training has also been provided in the conduct of evacuation drills. Periodic retraining will be provided to the members of the Committee, as well as to any replacement employees assigned duties on the Committee. A read-and-sign program has been established and will be used to familiarize assigned managers and others with specific duties under the plan. In addition, as discussed in the response to OIG-03-A-06 Recommendation 3, the updated OEP was issued in a distinctive red binder to all Region I employees on April 25, 2003. Also, as discussed in the response to OIG-03-A-06 Recommendation 5, as part of the Region I seminar held during the week of May 5, 2003, all employees were provided a training briefing on the OEP. We consider this item to be complete.

OIG-03-A-06, Recommendation 5: Ensure that all staff are familiar with the [Occupant Emergency] plan.

Response

Agree. As part of the Region I seminar held the week of May 5, 2003, Region I provided a training briefing on the OEP to all employees. Additionally, as discussed in the response to OIG-03-A-06 Recommendation 3, the updated OEP was issued in a distinctive red binder to all Region I employees on April 25, 2003. As part of the Region I new employee orientation program, the region's Health and Safety Officer will provide new employees with a copy of the OEP and a briefing on its contents. We consider this item to be complete.

OIG-03-A-06, Recommendation 6: Conduct drills to make sure the [Occupant Emergency] plan is workable.

Response

Agree. Region I has made arrangements in conjunction with the Region I Health Safety Committee and the Federal Protective Services to develop and conduct an evacuation drill to be held this summer. Drills will be conducted annually thereafter.

OIG-03-A-06, Recommendation 7: Implement a process for replacing employees with an emergency response role when they no longer work in the regional office.

Response

Agree. Region I will use a computer-generated tracking system to remind the OEP Coordinator on a quarterly basis to review the list of Health and Safety Committee members identified in the OEP. Based on this quarterly review, Region I will replace employees no longer working in Region I and will arrange training required for membership on the Committee. We consider this item to be complete.

OIG-03-A-06, Recommendation 8: Keep the door closed between the reception area and the rest of the regional office space and require use of the key card to gain further entry into the regional office.

Response

Agree. Region I implemented this recommendation while the OIG audit was under way, and continues to maintain the door closed as part of the Region I building security program. We consider this item to be complete.

OIG-03-A-06, Recommendation 9: Ensure contractors and all technical staff receive required security training.

Response

Agree. A system has been in place for a number of years requiring new Region I employees to meet with a designated Region I member soon after reporting for duty for a briefing on building security. These briefings (and other required briefings) are documented in a checklist maintained by the Region I Human Resources staff in the employee's Official Personnel File. A

system was not in place to assure contractors received a similar briefing. A checklist similar to the one used for Region I employees was developed on April 25, 2003, for use with contractors. The checklist will be retained in ADAMS to demonstrate completion of this process. All current contractor employees have received a briefing on building security. We consider this item to be complete.

OIG-03-A-06, Recommendation 10: Assign a System Security Officer for the security of stand-alone systems used to process unclassified safeguards information in Region I.

Response

Agree. A system security officer (SSO) and a back-up have been assigned to each stand-alone system used to process safeguards information. The Region I Information System Security Officer (ISSO) will function as the SSO in the event that primary and back-up SSOs are out of the office. In the event that the SSO leaves Region I, then the back-up SSO will be appointed as SSO and another back-up SSO will be appointed. We consider this item to be complete.

OIG-03-A-06, Recommendation 11: Prepare a System Security Plan for the security of the stand-alone system used to process unclassified safeguards information in Region I.

Response

Agree. System Security Plans have been provided for each stand-alone system used to process safeguards information to the NRC Senior Information Technology Security Officer (SITSO) for review and approval (see response to OIG-03-A-10 Recommendation 5). Approval of the plans is expected by no later than June 16, 2003.

OIG-03-A-06, Recommendation 12: Develop and implement guidance for a thorough, up-to-date employee orientation process.

Response

Agree. Besides the routine in-processing of new employees by the Region I Human Resources staff, the region's employee orientation program, which has been in place for a number of years, includes a thorough review of the major areas that new employees need to begin work, such as travel, building security, security ownership, standards of conduct, ethics, Hatch Act, sexual harassment prevention, workplace violence, Union membership, and the role of the OIG at the NRC. After identification by OIG during the audit that a handbook in the employee orientation binder was out-of-date, Region I reviewed all forms and handouts in the binder to assure that the most up-to-date information available was included. The binder now includes the latest versions of the booklets entitled "The IG at the NRC," "Fraud Awareness," and "IG and OSC Investigations Handbook." We consider this item to be complete.

OIG-03-A-06, Recommendation 13: Immediately discontinue use of the NRC Employee Handbook dated September 1988.

Response

Agree. See the response to OIG-03-A-06 Recommendation 12. We consider this item to be complete.

STAFF RESPONSE TO OIG-03-A-07, MANAGEMENT AUDIT OF REGION II

OIG-03-A-07, Recommendation 1: Develop and implement quality control procedures to ensure that metric data is valid and reliable.

Response

Agree. Corrective actions are ongoing. By October 1, 2003, Region II will implement a quality control procedure for validation of metrics data used in the Region II Operating Plan.

Region II has also completed action in response to the OIG finding that the Operating Plan Quarterly Reports do not contain cumulative data. This was accomplished in the Region II First Quarter Operating Plan Report for Fiscal Year 2003.

OIG-03-A-07, Recommendation 2: Maintain documentation to support metric data reported in Region II Operating Plans.

Response

Agree. Some actions in response to this recommendation have been completed and others are ongoing. Region II has determined there is value in establishing documentation systems for certain metrics where there is a computerized data system for collection of the metric input and where there is value added to how the metric result is used. For example, a metric used by the agency to report performance to Members of the U.S. Congress should have a sound and thorough documentation system. For other metrics, where the data used to evaluate the metric is not extensive (e.g., based on a few actions per year), Region II plans to establish a simple documentation system. These systems will eventually all be described in Regional Office Instruction (ROI) 1303, "Operating Plan Inputs." For those data sources that come from agency or regional computerized databases (e.g., the Office of Nuclear Material Safety and Safeguards' Materials Licensing Tracking System), the databases provide the documentation to support the metric data reported in the Operating Plan Report, and this will be noted in the Region II procedures. For other metrics where there is not a computerized database, the data collection is performed manually and it may not be cost effective to establish an extensive documentation system. In these cases, Region II is identifying the documentation method and having the Chief, Resource Management Branch maintain how the metric was generated for the result reported in the latest quarterly Operating Plan Report. This process is ongoing and expected to be complete for all metrics in the Region II Operating Plan by the end of Fiscal Year 2003.

OIG-03-A-07, Recommendation 3: Redesign the reactor inspection report timeliness metric to measure each type of report separately to gain better insights.

Response

Agree. Region II has revised the metric to separately measure those inspection reports that are due in 30 days (e.g., routine reports) and those that are due in 45 days (e.g., integrated and team reports). Region II has also changed the data collection method by using the Inspection Report Tracking System for the data input for this metric, rather than collecting the data manually. This has improved the reliability of the metric. We consider this item to be complete.

OIG-03-A-07, Recommendation 4: Assign a System Security Officer for the security of stand-alone systems used to process classified and unclassified safeguards information.

Response

Agree. This has been accomplished, along with several other changes made to improve the controls over the processing of classified, safeguards, and sensitive, official use information in Region II. Region II performed several audits to self-identify the changes needed and incorporated these into Regional Office Instructions (ROIs 2010, 2020, 2030, 2040, 2050, and 2060) issued on March 24-26, 2003, including a process for assigning backup SSOs. We consider this item to be complete.

OIG-03-A-07, Recommendation 5: Prepare a System Security Plan for the security of the stand-alone system used to process classified and unclassified safeguards information.

Response

Agree. This has been accomplished, along with several other changes made to improve the controls over the processing of classified, safeguards, and sensitive, official use information in Region II. As a result of the OIG audit and several Region II audits, the Regional Security Plan has been revamped and placed into several, individual plans that meet the requirements specified in the NRC Management Directives, Volume 12, "Security." These plans have been reviewed and approved by the appropriate individuals, including the NRC Senior Information Technology Security Officer (SITSO). We consider this item to be complete.

STAFF RESPONSE TO OIG-03-A-08, MANAGEMENT AUDIT OF REGION III

OIG-03-A-08, Recommendation 1: Develop and implement quality control procedures to ensure that metric data is valid and reliable.

Response

Agree. Region III has formed a working group to develop and document quality control procedures to ensure that metric data reported in its Operating Plan is valid and reliable. We anticipate completion of this effort in time to initiate use of the process by October 1, 2003.

OIG-03-A-08, Recommendation 2: Maintain documentation to support metric data reported in Region III Operating Plans.

Response

Agree. The process discussed in the response to OIG-03-A-08 Recommendation 1 will include provisions for maintaining sufficient records to support the metric data reported in the Region III Operating Plan.

OIG-03-A-08, Recommendation 3: Update the Occupant Emergency Plan and Safety and Health Program to reflect current information about members of the occupant emergency team.

Response

Agree. The Region III Occupant Emergency Plan (RP-9906) is in the process of being revised and will reflect current information about members of the Occupant Emergency Team. This effort will be completed by June 30, 2003.

OIG-03-A-08, Recommendation 4: Develop individual procedures pertaining to disabled staff, visitors, and staff assigned to assist these individuals.

Response

Agree. The revised Region III Occupant Emergency Plan (RP-9906) will include procedures pertaining to disabled staff, visitors, and staff assigned to assist these individuals. This effort will be completed by June 30, 2003.

OIG-03-A-08, Recommendation 5: Train members of the occupant emergency team on their responsibilities in an emergency situation.

Response

Agree. Members of the occupant emergency team will be initially trained on their responsibilities in an emergency situation by June 30, 2003. Refresher training will occur on an annual basis. Employees assigned to replace members on the occupant emergency team will be trained as soon as possible, but no later than 15 working days of that assignment.

OIG-03-A-08, Recommendation 6: Update the regional security plan to reflect current practice with regard to contractors and badge control.

Response

Agree. The Region III Security Plan (RP-9905) will be subdivided into individual regional procedures consistent with the NRC Management Directives, Volume 12, "Security." Current practices and policies regarding contractors will be incorporated in a new regional procedure on facility security. This effort will be completed by September 1, 2003.

OIG-03-A-08, Recommendation 7: Document the site access process.

Response

Agree. The site access process will be incorporated in a new regional procedure on personnel security. This effort will be completed by September 1, 2003. A divisional instruction will also be developed by September 1, 2003, to provide guidance to staff who process site access requests.

OIG-03-A-08, Recommendation 8: Assign a System Security Officer for the security of stand-alone systems used to process unclassified safeguards information.

Response

Agree. A System Security Officer (SSO) has been assigned for the security of each of the two stand-alone systems used to process unclassified, safeguards information in Region III. The names of these SSOs and their alternates were included in the security system plans forwarded to the NRC Senior Information Technology Officer (SITSO) on February 24, 2003, for review and approval. We consider this item to be complete.

OIG-03-A-08, Recommendation 9: Prepare a System Security Plan for the security of the stand-alone systems used to process unclassified safeguards information.

Response

Agree. Security system plans were developed for the two stand-alone systems in Region III and forwarded to the NRC Senior Information Technology Security Officer (SITSO) on February 24, 2003, for review and approval (see response to OIG-03-A-10 Recommendation 5). Approval of the plans is expected by no later than June 16, 2003.

OIG-03-A-08, Recommendation 10: Develop and implement guidance for a thorough, up-to-date employee orientation process.

Response

Agree. The employee orientation process will be revised and the associated regional procedure will be updated accordingly. This process will be completed by October 1, 2003.

STAFF RESPONSE TO OIG-03-A-09, MANAGEMENT AUDIT OF REGION IV

OIG-03-A-09, Recommendation 1: Develop and implement quality control procedures to ensure that metric data is valid and reliable.

Response

Agree. Region IV has initiated a task group to develop a process for management and control of performance measures. The process will provide for quality controls sufficient to ensure the validity and reliability of regional performance measures that are reported to senior management. We anticipate completion of this effort in time to initiate use of the process beginning October 1, 2003.

OIG-03-A-09, Recommendation 2: Maintain documentation to support metric data reported in Region IV operating plans.

Response

Agree. The process discussed in the response to OIG-03-A-09 Recommendation 1 will include a provision for maintaining sufficient records to support the metric data reported in the Region IV operating plans.

OIG-03-A-09, Recommendation 3: Update the Occupant Emergency Plan or regional practices so that policy and practice are the same.

Response

Agree. The April 3, 2003, revision of the Region IV Occupant Emergency Plan (OEP) conformed policy and practice, including the method for documenting the annual review of the OEP by all Arlington-based employees and the method for training of all emergency responders. We consider this item to be complete.

OIG-03-A-09, Recommendation 4: Add the 911 responsibility to the regional emergency card and post it at the receptionist's desk.

Response

Agree. The April 3, 2003, revision of the Region IV OEP eliminated the regional emergency card and replaced it with a requirement to post instructions in every office. We anticipate completion of the posting by June 30, 2003. The instructions are posted at the receptionist's desk.

OIG-03-A-09, Recommendation 5: Add information concerning the first-response medical team into the Occupant Emergency Plan or document the team's role elsewhere.

Response

Agree. This was incorporated in the April 3, 2003, revision of the Region IV Occupant Emergency Plan. We consider this item to be complete.

OIG-03-A-09, Recommendation 6: Write a Region IV security plan, describing measures used to protect employees and the facility.

Response

Agree. This action was completed with the issuance of the Region IV Physical Security Plan issued on February 12, 2003.

OIG-03-A-09, Recommendation 7: Document security procedures to facilitate reassignment to duties or to be used if the primary person is unavailable.

Response

Agree. This action was completed with the issuance of the Region IV Physical Security Plan issued on February 12, 2003.

OIG-03-A-09, Recommendation 8: Assign a System Security Officer for the security of the stand-alone system used to process unclassified safeguards information.

Response

Agree. Region IV, in coordination with the Office of the Chief Information Office (OCIO), is taking action to improve our control of sensitive unclassified safeguards information (SGI). Region IV submitted a proposed security plan via a memorandum dated February 28, 2003 (ADAMS Accession Number ML030590474), which was approved by OCIO on April 17, 2003. This plan identifies the controls for processing SGI using computers and the primary and alternate security officers for each system. The region is adhering to this plan while incorporating it into a regional procedure. We consider this item to be complete.

OIG-03-A-09, Recommendation 9: Prepare a System Security Plan for the security of the stand-alone system used to process unclassified safeguards information.

Response

Agree. A System Security Plan was developed for the stand-alone system used to process sensitive unclassified safeguards information, and approved by the NRC Senior Information Technology Security Officer (SITSO) on April 17, 2003. We consider this item to be complete.

OIG-03-A-09, Recommendation 10: Develop and implement guidance for a thorough, up-to-date employee orientation process.

Response

Agree. Region IV has established a task group to review needs and establish a schedule to develop an up-to-date employee orientation process. We anticipate completion of that effort by August 30, 2003.

OIG-03-A-09, Recommendation 11: Immediately discontinue the use of the NRC Employee Handbook dated September 1988.

Response

Agree. This was done immediately after the OIG onsite exit meeting on March 22, 2002. Pending completion of the task group effort discussed in the response to OIG-03-A-09 Recommendation 10, Region IV modified its existing employee orientation checklist to eliminate reference to the 1988 Employee Handbook and instead, directs the new employee to the Agency Map & Compass on the internal NRC web page. We consider this item to be complete.

OIG-03-A-09, Recommendation 12: Implement public meeting policies routinely.

Response

Agree. Region IV reviewed its public meeting policy and revised it on December 6, 2002. The purpose of the revision was to incorporate pertinent sections of the Nuclear Regulatory Commission (NRC) Public Meeting Policy (67 FR 36920, May 28, 2002) to require use of the NRC's Public Meeting Checklist and to emphasize that the staff should annotate the category of meeting in public meeting notices. The Regional Administrator met with the management team on January 7, 2003, and emphasized the importance of adherence to our public meeting policy. Division managers and branch chiefs are scheduled to meet with their staff to further emphasize the proper implementation of the region's public meeting policy, including the proper use of public meeting feedback forms and the documentation of meeting summaries. Finally, Region IV will further review its public meeting policy guidance once Management Directive 3.5, *Public Attendance at Certain Meetings Involving the NRC Staff*, is updated to ensure that we continue to conform with agency public meeting policy. We consider this item to be complete.

OIG-03-A-09, Recommendation 13: Document exceptions in regional policy.

Response

Agree. There were no exceptions documented in the December 6, 2002, revision of the Region IV public meeting policy. However, the region has not revised its position with respect to the documentation of predecisional enforcement conferences in the enforcement action correspondence. As part of the planned review of the public meeting policy discussed in the response to OIG-03-A-09 Recommendation 12, Region IV will consider whether any exceptions to the public meeting policy are appropriate. Any exceptions will be clearly documented in the Region IV policy guide. Region IV will complete this action within 60 days of the issuance of the revised Management Directive 3.5.

STAFF RESPONSE TO OIG-03-A-10, HEADQUARTERS ACTION NEEDED ON ISSUES IDENTIFIED FROM REGIONAL AUDITS

OIG-03-A-10, Recommendation 1: Develop a standard procedure to ensure each region has a consistent understanding of the nature, purpose and data needed to support each metric reported in the regional operating plans.

and

OIG-03-A-10, Recommendation 2: Determine which administrative metrics should be included in the regional operating plans.

Response

We are combining discussion of our corrective actions because we believe that OIG-03-A-10 Recommendation 2 is the first element of the standard procedure addressed in OIG-03-A-10 Recommendation 1.

Agree. The use of operating plans is an iterative process and our focus to date has been on the programmatic areas that directly support our mission to protect the public health and safety. As you noted in the report, these metrics are generally consistent from region to region and clearly are more reliable than the administrative data. In the original operating plan guidance, we did specify a minimal number of administrative metrics to be reported on by all offices, including the regions. Although we have not developed other metrics since then, we had given the Office Directors (ODs) and Regional Administrators (RAs) the flexibility to track areas they deemed appropriate. Even following our current efforts to expand oversight of the administrative areas, we will continue to allow ODs and RAs oversight flexibility when quality control procedures are exercised. We are currently updating the NRC's Strategic Plan. This plan will include, for the first time, a goal and measures for the Corporate Management area. A natural progression of that inclusion is to determine the necessary internal operating metrics.

The usefulness of information for decision making at the regional and headquarters levels can only be assured with the proper controls of a standardized procedure. Headquarters and regional offices must collaboratively develop and implement a consistent understanding of the nature, purpose and data used for a metric and its expected outcome. Consistent with the approach used in the program areas, the administrative Headquarters office, the regions as a whole, or an independent region that develops a particular measure will be designated as the lead for that measure. The lead office (or the regions as a whole) is responsible for establishing and overseeing the programs for achieving the established targets and for ensuring that performance data comply with the standards for data verification and validation. The standards for data verification and validation include the following: communicating the nature, purpose and process for collecting, analyzing, and reporting performance data; ensuring that analytical techniques for data analysis are technically sound and consistently applied; and ensuring that performance data are reported according to the guidance and schedule set by OEDO. This process is usually initiated by OEDO through a meeting with the appropriate offices and regions. OEDO and the offices/regions coordinate throughout the development, implementation, monitoring, and reporting of measures as part of the agency's on-going Program, Budgeting, and Performance Management process (PBPM).

We have already begun efforts to identify metrics to be included in the operating plan. The first activity, which has been completed, was to identify the administrative metrics that are currently being reported by the offices. The following is a summary and time line of the planned activities to ensure that all appropriate administrative metrics are included in operating plans and that they are understood and are consistently tracked across the offices and regions:

<u>Completion</u>	<u>Activity</u>
March 2003	Review all the administrative metrics currently being reported in the operating plans (Completed)
July 2003	Determine which metrics will be reported in relation to the Corporate Management section of the Strategic Plan
July 2003	DEDO review of all measures from the first two activities to determine which metrics will be reported in the operating plan
July 2003	Meet with administrative offices to discuss roles and responsibilities of a lead organization with regard to performance measurement
August 2003	Meet with all offices to communicate administrative metric reporting requirements. Each lead organization will be responsible for discussing the nature and purpose of each metric as well as the means for capturing data and reporting
September 2003	Issue guidance for FY 2004 operating plans, which will focus on the administrative metrics

OIG-03-A-10, Recommendation 3: Conduct a lessons-learned review to assess how effectively the Continuity of Operations Plan duties transition from headquarters to the alternate site.

Response

Agree. The results of planned Continuity of Operations (COOP) exercises have been documented in lessons learned reports. However, emergency communications lines have been diverted more often for situations that were judged to be temporary and not require formal COOP activation (power outage, bomb threat, fire alarm, gas leak). Participants exchanged informal notes about the results in those situations but the requirement was not formalized until the NRC COOP Plan was revised recently to state, "DIRO [Division of Incident Response Operations] will, with the alternate COOP site, document lessons learned from exercises and events, revise procedures as necessary, and review the COOP Plan annually" (see Section 3.4). We consider this item to be complete.

OIG-03-A-10, Recommendation 4: Maintain a list of information technology systems and equipment as required by the Continuity of Operations Plan.

Response

Agree. A list of information technology systems, current as of September 2002, was provided recently to the Government Accounting Office in support of its audit of Federal agency Continuity of Operations (COOP) plans. Both NRC Headquarters and the alternate COOP site are undergoing renovations that will affect the list. We will update the list by January 2004 after renovations are complete.

OIG-03-A-10, Recommendation 5: Remind all NRC employees to comply with NRC policies and procedures to protect sensitive data on stand-alone computer systems.

Response

Agree. Each regional office has submitted security plans for all stand-alone computers in the regions that are processing classified information, unclassified safeguards information, and/or sensitive unclassified information. The NRC Senior Information Technology Security Officer (SITSO) is coordinating the review and approval of these plans. Approval of all the plans is expected to be completed by no later than June 16, 2003. In addition, we will issue a network announcement reminding all NRC employees about compliance with NRC policies and procedures to protect sensitive data on stand-alone computer systems. This announcement will also be posted on the internal web site for information technology security (<http://csb.nrc.gov/security/security.asp>). This action will be completed by May 30, 2003.