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U.S. Nuclear Regulatory Commission Privacy Impact Assessment

Date: 05/28/2004

A. GENERAL SYSTEM/APPLICATION(system) INFORMATION (See definitions at end of document)

1. Person completing this form:

Name	Title	Phone #	E-mail	Office
Edith E. Barnhill	Licensing Assistant	301-415-1065	eeb	NRR

2. System owner:

Name	Title	Phone #	E-mail	Office
Edith E. Barnhill	Licensing Assistant	301-415-1065	eeb	NRR

3. What is the name of this system?

OPERATOR LICENSING TRACKING SYSTEM (OLTS)

4. Briefly describe the purpose of this system (support of what agency function).

The OLTS application was developed to aid NRC Headquarters and Regional Operator Licensing Assistants in tracking applications and operator licenses and in preparing statistical reports.

B. PRIVACY ACT APPLICABILITY

1. Does this system contain any personal information (name, social security number, date of birth, home address, etc) about individuals?

Yes **X** No _____

2. If yes, will the data be retrieved by an individual's name or other personal identifier (i.e. social security number, badge number, etc.)?

Yes ☒ No ☐

If you answer yes to questions 1 and 2 complete section E.

C. INFORMATION COLLECTION APPLICABILITY

1. Will the personal data be collected from or maintained on persons who are not Federal Employees?

Yes ☒ No ☐

2. Will the data be collected from Federal contractors?

Yes ☐ No ☒

3. If the answer is yes to either question 1 or 2, will the data be collected from ten (10) or more persons during a calendar year?

Yes ☒ No ☐

4. If the answer is yes to question 3, Is the information to be collected covered by an existing OMB clearance number? If yes, indicate the clearance number,

3150-0090; -0024;- 0131 with additional information covered by 3150-0018.

D. RECORDS RETENTION AND DISPOSAL SCHEDULE APPLICABILITY

Does this system already have a NARA-approved records disposition schedule? (Reference NUREG-0910, "NRC Comprehensive Records Disposition Schedule" or contact your office Records Liaison Officer.)

Yes ☒ No ☐

If yes, what is the Records Schedule Number. **_GRS 20-3.b(2) (GRS 23-8)**

The primary function of the OLTS is as a tracking system. This function is scheduled under GRS 20-3.b(2) and GRS 23-8. The authorized disposition for GRS20-3.b(2) (GRS 23-8) is, "Destroy or delete when 2 years old, or 2 years after the date of the last entry, whichever is applicable, or when no longer needed whichever is later.

Complete Section E only if the answers to Section B, questions 1 and 2 are "Yes."

E. SYSTEM DATA INFORMATION

1. Type of information maintained in the system

a. Describe the information to be being maintained in the system (e.g. financial, medical, training, personnel, etc)? Give detailed description of the data.

OLTS maintains a record of all applications received for new operator licenses for all power, research and test reactors as well as for renewal license applications. Information includes personnel, medical, training, examination grades and license conditions, and terminations.

2. Source of the data in this system.

The information is collected from the NRC Form 398, "Personal Qualification Statement-Licensee" and NRC Form 396, "Certification of Medical Examination by Facility Licensee."

a. Is data being collected from the subject individual? If yes, what type(s) of data is being collected? **Yes. Name, address, birth date, license type, employer name and address, education, training, experience. Certification of medical information is provided by the facility employer.**

b. Is data on this individual being collected from other NRC files and databases for this system? If yes, identify the files and databases? **No.**

c. Is data on this individual being collected from source(s) other than the subject individual and NRC records? If yes, what is the source(s) and what type(s) of data is being collected? **Yes, The facility and the employee together supply the requested information as named in 2a. The employee and the facility managers must certify as to the accuracy of the information.**

d. How will data collected from source(s) other than the subject individual or NRC records be verified as current, accurate, and complete? **Collected information is certified by facility management before it is submitted. NRC audits a sample of applications.**

3. Attributes of the Data

a. Are the data elements described in detail and documented? If yes, what is the name of the document? **SDLCM documentation, OLTS User's Guide.**

b. Is the use of the data both relevant and necessary for the purpose for which the system is designed? **Yes**

c. Will the system derive new data or create previously unavailable data about an individual through aggregation from the information collected? **No**

- (1) How will aggregated data be maintained, filed, utilized?
- (2) How will aggregated data be validated for relevance and accuracy?
4. If data is consolidated, what controls protect it from unauthorized access/use/modification? **OLTS provides statistical data on exams, grades, etc. Reports are stored in locked file cabinets with the authorized Operator Licensing Assistants at Headquarters and in each of the 4 regional offices. All authorized users sign the Rules of Behavior authorized by the System Security Plan.**
5. How will the data be retrieved from the system?
- a. Can it be retrieved by personal identifier? **X** Yes ___ No. If yes, explain. **Information is retrieved by authorized individuals at headquarters and the regions by the licensee's docket number. The OLTS system is set up only on the computers of NRC staff with a need to access OLTS information.**
- b. Is a password or data description required? **X** Yes ___ No. If yes, explain.
- If yes, explain: **All OLTS users must have access authority granted for the OLTS module in the Security access Module (SAM). OLTS users must have a valid LAN ID and password and be in the RPS Staff File. A separate password is not required.**
6. Describe report(s) that can be produced from this system? **There are approximately 23 reports that can be produced by the OLTS system on an as needed basis. The system contains pertinent information related to the licensing of operators at Power, and Research and Test Reactor facilities. Information pertaining to the employee, his operations history, examination information, qualifications, etc., are retained in this system. Statistical reports regarding types of licenses, license restrictions, waivers, renewals, license denials and appeals, medical conditions and fitness for duty may be generated. All information is retained whether current or historical. Updating is done on an as required basis such as license renewal, termination, change in medical history, new license applied for, etc.**
- a. What are the reports used for? **The system serves as a complete database on all currently licensed operators, as well as maintaining the historical data for operators who have ever held a license. It provides statistical data on exams, grades, licensing actions, etc. Information can be used to prepare reports for Congress regarding the operator licensing process.**
- b. Who has access to these reports? **Operator licensing assistants and their backups have the major access to the OLTS information. Two senior reactor engineers in operator licensing use the information for statistical reports. Others with access to OLTS include the system contractors, an OCIO system manager, a PMAS program analyst, research and test reactor**

examiners. Other Operator Licensing staff may be provided with statistical reports as needed.

7. Records retention

- a. What are the record types contained in this system and the medium on which they reside? (Examples: Type -program records -- Medium - electronic; Type-database -- Medium-electronic; Type-system documentation -- Medium -paper)
Type -program (software) -- Medium - electronic; Type- database -- Medium-electronic; Type-system documentation -- Medium - electronic and paper; Type Report – medium - paper.
- b. What is the NARA authorized retention period for each records series in this system? **Scheduled as shown in the table below.**

Type	Medium	Schedule & Retention Period
Program (Software)	Electronic	GRS 20-10, "Special Purpose Programs." Delete when related master file or database has been deleted or when software program is superseded, and is no longer needed to access legacy records.
Database	Electronic	GRS 20-3.b(2) (GRS 23-8), "Tracking and Control Records." Destroy or delete when 2 years old, or when 2 years after the date of the last entry, whichever is applicable, or when no longer needed which ever is later.
System Documentation	Electronic & Paper	GRS 20-11.a, "Documentation." Destroy or delete when superseded or obsolete, or upon authorized deletion of the related master file or data base, or upon the destruction of the output of the system if the output is needed to protect legal rights, whichever is latest.
System Documentation Related to the Security Plan	Electronic & Paper	GRS 20-11.b, "Documentation." Destroy or delete when superseded or obsolete.
Reports	Paper	GRS 20-3.b(3) Reports created for short-term administrative purposes. Destroy when the agency determines that they are no longer needed for administrative, legal, audit, or other operational purposes.

<p>Note: Certain formal reports may be appropriate for filing in the Headquarters and Regional Operator Licensing Files:</p>		
<p>1) 10 CFR Part 55 Docket Files</p>	<p>Paper</p>	<p>N1-431-90-4, Item 1. Cut off upon latest license expiration/ termination/ revocation, application denial or withdrawal, or issuance of denial letter. Retire to FRC when 3 years old. Destroy when 10 years old.</p>
<p>2) Examination Packages</p>	<p>ADAMS</p>	<p>N1-431-00-8, Item 5.b(4). Cut off electronic examination files upon receipt of the facility's next exam. Destroy 4 years after cutoff.</p>
<p>3) Operator Licensing General Correspondence Files</p>	<p>ADAMS</p>	<p>N1-431-00-8, Item 5.c(4). Cut off electronic files at close of fiscal year. Destroy 10 years after cutoff.</p>

- c. If unscheduled, what are your retention requirements for each records series in this system? **NA.**
- d. What are the procedures for disposing of the data at the end of the retention period? (specifically address: paper copy, magnetic or other forms of media)
The system database will be saved on tape for the minimum 2-year retention period after terminating the system in accordance with GRS 20-3.b(2) and GRS 23-8.
- e. How long will produced reports be maintained? **Only as long as they are needed for information requested. Then they are destroyed in accordance with authorized disposition guidance in GRS 20-3.b(3).**
- f. Where are the reports stored? **Reports are stored in locked file cabinets with the authorized Operator Licensing Assistants at Headquarters and in each of the 4 regional offices.**
- g. Where are the procedures documented? **Procedures are documented in the OLTS User Guide, and are supported by the Operator Licensing Examination Standards, NUREGS 1021 and 1478.**
8. Capability to monitor individuals

- a. Will this system provide the capability to identify, locate, and monitor individuals? ☒ Yes ☐ No. If yes, explain.
It can identify, and locate individuals, but it does not monitor. The system maintains an up-to-date record of the individual as it relates to his license activities, his exam grades, his medical condition, etc. The system maintains an address and the facility where the individual is working.
- b. What controls will be used to prevent unauthorized monitoring? **NA**
9. Coverage Under Existing Privacy Act System of Records
- a. Under which Privacy Act system of records (SOR) notice does this system operate (link to list of SOR available on NRC Internal Home page)? Provide number and name. **System NRC-16 "Facility Operator Licensees Record Files (10 CFR Part 55)"**
- b. If the Privacy Act system of records is being modified, will the SOR notice require amendment or revision? ☐ Yes ☒ No. If yes, explain.
10. Access to the Data
- a. Who will have access to the data in the system (users, managers, system administrators, developers, other)? **Five operator licensing assistants and their backups, system contractors, the OCIO system manager, a PMAS program analyst.**
- b. Are criteria, procedures, controls, and responsibilities regarding access documented? **Yes, in the OLTS Users Guide. Also, the OLTS Security Plan gives guidance.**
- c. Will users have access to all data in the system or will users' access be restricted? Explain. **The OLA in the headquarters program office has access to all data; each regional OLA has access only to the individuals in that particular region.**
- d. What controls are in place to prevent the misuse (e.g. browsing) of data by those having access?
Rules of behavior in the security plan.
- e. Do other systems share data or have access to data in this system?
☐ Yes ☒ No. If yes, explain.
- f. Will other agencies share data or have access to data in this system (Federal, State, Local, other)? ☐ Yes ☒ No. If yes, explain.
- g. Were Privacy Act clauses cited and other regulatory measures addressed in contracts with contractors having access to this system? **Yes.**

DEFINITIONS

Personal Information is information about an identifiable individual that may include but not be limited to:

- race, national or ethnic origin, religion, age, marital or family status
- education, medical, psychiatric, psychological, criminal, financial, or employment history
- any identification number, symbol, or other particular assigned to an individual
- name, address, telephone number, fingerprints, blood type, or DNA

Aggregation of data is the taking of various data elements and then turning them into a composite of all the data to form another type of data such as tables or data arrays, or collecting data into a single database.

Consolidation means combining data from more than one source into one system, application, or process. Existing controls for the individual parts should remain or be strengthened to ensure no inappropriate access by unauthorized individuals. However, since individual pieces of data lose their identity, existing controls may actually be diminished - e.g: a summary census report may not point at the individual respondent but rather at a class of respondents, which makes it less personal.

PRIVACY IMPACT ASSESSMENT REVIEW/APPROVAL
(Only For Use of OCIO Staff)

System Name: Operator Licensing Tracking System (OLTS)

Submitting Office: Nuclear Reactor Regulations

A. PRIVACY ACT APPLICABILITY REVIEW

☐ Privacy Act is not applicable.

☒ Privacy Act is applicable - currently covered under System of Records, NRC-16, "Facility Operator Licensees Record Files (10 CFR Part 55)." No modification of the system notice is required.

☐ Privacy Act is applicable. It creates a new system of records. FOIA/PA Team will take the lead to prepare the system notice.

☐ Privacy Act is applicable - currently covered under System of Records, NRC _____. Modification to the system notice is required. FOIA/PA Team will take the lead to prepare to prepare the following changes:

Comments:

Spoke to the system owner, Edith Barnhill. This is not a new system, nor has a modification been made to the system. She was informed that PIA needed to be completed for them to obtain a system security plan.

Date of Review: 06/02/2004

Reviewer's Name	Title
Sandra S. Northern	Privacy Program Officer

B. INFORMATION COLLECTION APPLICABILITY DETERMINATION

 X No OMB information collection clearance is needed.

 OMB information collection clearance is needed.

Comments:

The information collected is covered by existing clearances 3150-0018, 3150-0024, 3150-0090, and 3150-0131.

Date of Review: 06/ 03 /2004

Reviewer's Name	Title
Beth C. St. Mary	Sr. Management Analyst

C. RECORDS RETENTION AND DISPOSAL SCHEDULE DETERMINATION

☐ Currently Unscheduled

☐ Needs to be scheduled.

☒ Existing records retention and disposition schedule covers the system - no modifications needed.

☐ Records retention and disposition schedule must be modified to reflect the following:

Comments:

The primary function of the OLTS is as a tracking system. This function is scheduled under GRS 20-3.b(2) and GRS 23-8 as described in Section D. The information contained in Section E.7, "Records Retention," is correct.

Date of Review: 07/09/04

Reviewer Name's	Title
John Harris	Chief, Records and Archives Services Section

D. SECURITY TECHNICAL REVIEW

_____ Administrative and technical controls provide adequate security

_____ The following security controls should be addressed:

Date of Review: _____ / _____ / _____

Reviewer's Name	Title

APPROVAL OF PRIVACY IMPACT ASSESSMENT:

_____/RA/_____
Brenda J. Shelton
Chief, Records and FOIA/Privacy Services Branch

Date: 07/09/04