

## U.S. Nuclear Regulatory Commission Privacy Impact Assessment

**Instructions:**      ***Section A, B, C, and D must be completed for all systems. Section E must be completed if yes is the answer to Section B, questions 1 and 2.***

**Date:** 8/29/2005

### **A.    GENERAL SYSTEM/APPLICATION INFORMATION**

(See definitions at end of document)

1.      Person completing this form:

Name	Title	Phone No.	Office
Michael MacWilliams	IT Specialist	301-415-1877	MLM4

2.      System owner:

Name	Title	Phone No.	Office
Michael MacWilliams	IT Specialist	301-415-1877	MLM4

3.      What is the name of this system?

Reactor Program System (RPS)

4.      Briefly describe the purpose of this system. What agency function does it support?

The RPS is categorized as a major application. It is an IT tool that provides planning, scheduling and reporting capabilities to support the NRC reactor inspection and licensing programs. RPS is used by NRR and the Regions to plan and schedule work assignments and inspection activities. The assignments and schedules entered into RPS are passed electronically to the Human Resources Management System (HRMS). Time and Labor hours are retrieved from HRMS, and a copy of the NRR and the Regions data is stored in RPS. The RPS database also includes inspection and licensing information, plant performance indicators, inspection follow-up items, NRC staff data, facility characteristics, and other reactor regulatory data. Inspection follow-up information is put into RPS after the Inspection Report has been

approved. The official record copy of Inspection Reports is maintained in ADAMS. The RPS data base does not contain any official record copies of information or Social Security Numbers. The data in RPS is one of the tools used by NRC managers to assess the effectiveness and uniformity of the implementation of the NRC reactor inspection and licensing programs. Data from RPS are posted on the NRC external web site to provide the public a one-stop location to obtain reactor related information.

5. Note below whether this Privacy Impact Assessment supports a proposed new system or a proposed modification to an existing system.

\_\_\_\_\_ New System                        X   Modify Existing System

## **B. PRIVACY ACT APPLICABILITY**

1. Does this system collect, maintain, or disseminate personal information in identifiable form (e.g., 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 (e.g., social security number, badge number, etc.)?

Yes   X\*   No \_\_\_\_\_

\*The capability exists. Some reports show individual information but it is requested by some other criteria, for example by org (data for each member of the org is shown by name ) or by TAC (data for each person charging to the TAC is shown by individual name.)

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 by persons who are not Federal employees?

Yes \_\_\_\_\_ No   X  

2. Will the data be collected from Federal contractors?

Yes \_\_\_\_\_ No   X  

3. If the answer is yes to either question 1 or 2, will the data be collected from 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-\_\_ \_\_ \_\_ \_\_

**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 or John Harris, OIS.)

Yes \_\_\_\_ No X

If yes, list the records schedule number \_\_\_\_\_

***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 maintained in the system (e.g., financial, medical, training, personnel.) Give a detailed description of the data.

The RPS data base contains a staff table with employee name, HRMS-ID organization code, room number, and telephone number. The HRMS-ID is used to electronically retrieve Time and Labor (T&L) data from HRMS. The data base does not contain Social Security Numbers. The data base also has inspection and licensing information (TAC numbers, inspection report numbers), plant performance indicators, inspection follow-up items, safety issue data, facility characteristics, project schedules, facility (docket) file, hours reported to HRMS (actual hour data), inspection plans, and work assignment schedules.

2. *Source of the data in this system*

- a. Are data being collected from the subject individual? If yes, what types of data are being collected?

Name, organization

- b. Are data on this individual being collected from other NRC files and databases for this system? If yes, identify the files and databases.

T&L data is downloaded from HRMS.

- c. Are data on this individual being collected from a source or sources other than the subject individual and NRC records? If yes, what is the source and what type of data is being collected?

No

- d. How will data collected from sources other than the subject individual or NRC records be verified as current, accurate, and complete?

N/A

3. *Attributes of the data*

- a. Are the *data elements* described in detail and documented? If yes, what is the name of the document? Where is it located?

Data elements are identified in RPS SDLCM and PMM documents including the RPS user guides. All documentation is maintained by an OIS contractor in the Rational Suite CM library.

- 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 (i.e., create) 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, and utilized?

N/A

- (2) How will aggregated data be validated for relevance and accuracy?

N/A

4. If data are consolidated, what *controls* protect it from unauthorized access, use, or modification?

N/A

5. How will the data be *retrieved* from the system?

- a. Can it be retrieved by personal identifier? \_\_\_X Yes \_\_\_ No.

If yes, explain.

There is one table in RPS called the 'Staff File' where the records are retrieved by the staff's name. Access to this table is restricted to 2-3 individuals in each office/region who are normally the HRMS coordinators. This table contains data such as the name, organization code, HRMS-ID, T&A unit, phone number, PIC code, and RITS status of NRC staff.

- b. Is a password or data description required? ☒ Yes ☐ No.  
If yes, explain.

If yes, explain: Users who access RPS data using ad hoc query software such as Crystal Reports must have a unique User-id and password. All RPS users must have access authority granted for the module they are using.

6. Describe the report or reports that can be produced from this system.

- a. What reports are produced from the system?

There are over 100 Reports available to authorized users of RPS. Each of the 13 RPS modules has reports available in the module menu.

- b. What are the reports used for?

RPS reports are used for planning, scheduling, reporting, and analyzing inspection activities at nuclear power reactor facilities in the United States. They are used to monitor the implementation of the policy and inspection guidance for programs assigned to the NRC regional offices and to assess the effectiveness and uniformity of the region's implementation of those programs. They are used to plan and schedule licensing and other reactor regulatory activities.

- c. Who has access to these reports?

Authorized users of RPS. Only NRC employees have access to RPS. Data from RPS is posted on the Web for the public. However, no staff names are posted on the Web, no capability exists to do this.

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 - electronic and paper)

Type- database -- Medium-electronic

Type-system documentation -- Medium -electronic and paper

- b. What is the NARA-authorized retention period for each records series in this system?

Unscheduled. The only data with NARA authorized retention is actual hours which is T&L data, not RPS data. Even though the data is kept forever, the required NARA retention cycle is one year.

- c. If unscheduled, what are your retention requirements for each records series in this system?

The RPS data retention cycle is for the life of the application. The reports have any combination of reporting cycles, so we cannot readily get rid of the data. Currently RPS has actual hour data starting in FY94. Other data such as docket related data will be maintained for the life of the NRC.

- 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)?

None.

- e. How long will produced reports be maintained?

There is no need to maintain paper reports as long as the source data is available. Hardcopy report are not routinely maintained. They are destroyed when no longer needed.

- f. Where are the reports stored?

N/A

- g. Where are the procedures for maintaining the data/reports documented?

N/A

- h. How will unused or unwanted reports be disposed of?

Reports that contain personal information in identifiable form from HRMS will be disposed of in the Classified and Sensitive Unclassified Waste containers. All reports that do not contain personal information in identifiable form from HRMS will be disposed of through normal trash disposal.

8. Capability to *monitor individuals*

- a. Will this system provide the capability to identify, locate, and monitor (e.g., track, surveillance) individuals? \_\_\_ Yes X\_\_\_ No. If yes, explain.

The RPS staff file has the organization that an employee is assigned to. For Resident Inspectors, it has the plant they are assigned to.

- b. What controls will be used to prevent unauthorized monitoring?

None. Staff organization and inspector assignment information is available in multiple other sources including the NRC telephone book.

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.

The use of HRMS data by the RPS is covered as a routine use under NRC-21, "Payroll Accounting Records."

- b. If the Privacy Act System of Records is being modified, will the SOR notice require amendment or revision? \_\_\_ Yes \_\_\_ No. ☒ X  
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)?

Authorized users, managers, system administrators, developers. The general public does not have access to RPS.

- b. Are criteria, procedures, controls, and responsibilities regarding access documented? If so, where?

Yes. NRC Inspection Manual Chapter 0306.

- c. Will users have access to all data in the system or will users' access be restricted? Explain.

Access is restricted for each of the RPS modules to authorized users. Within some modules access/update is further restricted to certain data by only authorized users.

- d. What controls are or will be in place to prevent the misuse (e.g., unauthorized browsing) of data by those having access?

None

- e. Do other systems share data or have access to data in this system? \_\_\_X\_\_\_ Yes \_\_\_ No. If yes, explain.

RPS data is used by HRMS (OCFO), TACS (OCFO), FEES (OCFO), AMS (OE), EATS (OE), OIMIS (OI), PNMS (OIS), LTS (NMSS), IPS (REGION 1), ROE, OLTS, and HFIS.

- 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 (or will be cited) and were other regulatory measures addressed in contracts with contractors having access to this system? ☒ Yes ☐ No. If yes, explain.

Yes, the RPS maintenance (CISSCO) contract has the required Privacy Act clauses.

## 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**  
(For Use by OIS Staff)

System Name: Reactor Program System (RPS)

Submitting Office: Office of Nuclear Reactor Regulation (NRR)

**A. PRIVACY ACT APPLICABILITY REVIEW**

☐ Privacy Act is not applicable.

☒ Privacy Act is applicable. Currently the use of employee HRMS data is listed as a routine use under System of Records, NRC-21. No modification to the system notice is required.

☐ Privacy Act is applicable. 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 the following changes:

**Comments:**

Mike MacWilliams informed me that this revision removes the storage/use of social security numbers in the RPS. The collection of time and labor data from the HRMS is authorized under NRC-21, "Payroll Accounting Records," as a routine use by NRC as a project management tool in various management records and reports (i.e. work performed, work load projections, scheduling, project assignments, budget).

In M. MacWilliams' e-mail response to my questions on this PIA he asked that we incorporate his answers, which result in changes, directly into the PIA. These questions and answers were shared with the other reviewers. Changes incorporated are:

Do you agree that the 9th sentence in A.4. should be revised to have the wording "or any other personal privacy data" removed. RPS does maintain an employee's name, time and labor data, and organization.

**A.4. should be revised to have the wording "or any other personal privacy data" removed.**

Item B.2. - Is information in the RPS actually retrieved by an employee's name or does the capability just exist?

**The capability exists. Some reports show individual information but it is requested by some other criteria. for example by org (data for each member of the org is shown by name ) or by TAC (data for each person charging to the TAC is shown by individual name.)**

Item E.6.c. - Is any employee data posted on the public Web? **No. No staff names are ever posted on the public Web. No capability to do this.**

Item E.9.a. - I believe your statement should be revised to state "The use of HRMS data by the RPS is covered as a routine use under NRC-21, "Payroll Accounting Records." Do you agree? **I agree**

Item E.3.a. replace the words "the RPS maintenance contractor in the Rational Suite PM library" with "an OIS contractor in the Rational Suite CM library."

Item E.5.a. Replace the existing text with "There is one table in RPS called the 'Staff File' where the records are retrieved by the staff's name. Access to this table is restricted to 2-3 individuals in each office/region who are normally the HRMS coordinators. This table contains data such as the name, organization code, HRMS-ID, T&A unit, phone number, PIC code, and RITS status of NRC staff."

This system does not collect, maintain, or disseminate information about the public.

Reviewer's Name	Title	Date
Sandra S. Northern	Privacy Program Officer	09/15/2005

## B. INFORMATION COLLECTION APPLICABILITY DETERMINATION

☒ No OMB clearance is needed.

☐ OMB clearance is needed.

☐ Currently has OMB Clearance.

Comments:

This system does not collect information from either Federal employees and contractors and no OMB clearance is needed.

Reviewer's Name	Title	Date
Christopher J. Colburn	Team Leader, Information Collections	09/15/2005

## C. RECORDS RETENTION AND DISPOSAL SCHEDULE DETERMINATION

☐ Additional information is needed to complete assessment.

☒ 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 Records and FOIA/Privacy Services Branch (RFPSB) has reviewed the PIA for the NRR Reactor Program System. The system is not presently covered by a National Archives and Records Administration (NARA) approved records disposition schedule, and requires going through the records scheduling process.

NRR is requested to submit NRC Form 616, "Notification of Electronic System Design or Modification," and NRC Form 637, "NRC Electronic Information System Records Scheduling Survey," to help identify the system recordkeeping requirements and initiate the records scheduling process for system data. In accordance with the NARA regulations at 36 CFR 1234.20(a), the resulting recordkeeping requirements and NARA approved disposition instructions must be built into the systems design. NRR must note that system data cannot be destroyed except in accordance with a NARA approved records disposition schedule.

Although the official record of RPS programmatic documents may be located in ADAMS as described in Section A.4, NARA requires scheduling systems with duplicate copies of programmatic documents to ensure the value of such material is appraised. I am not sure of the reference made in Section E.7(b) that the required NARA retention cycle is one year, and believe that the comment is in error.

Reviewer's Name	Title	Date
John Harris	Chief, Records and Archives Services Section, RFPSB, IRSD, OIS	9/19/05

#### **D. BRANCH CHIEF REVIEW AND CONCURRENCE**

  X   Does not constitute a Privacy Impact Assessment required by the E-Government Act of 2002.

       Does constitute a Privacy Impact Assessment required by the E-Government Act of 2002 and requires approval of the Director, IRSD.

CONCUR IN REVIEW:   R/A   Date: 09/20/05

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

#### **E. DIVISION DIRECTOR APPROVAL OF PRIVACY IMPACT ASSESSMENT:**

*(Approval is only required when Yes is given to Section B, questions 1 and 2 and Section C, question 1. The system collects, maintains, or disseminates personal information in identifiable form about members of the public.)*

\_\_\_\_\_  
Francine F. Goldberg, Director  
Information and Records Services Division

Date: \_\_\_\_/\_\_\_\_/\_\_\_\_

**TRANSMITTAL OF PRIVACY IMPACT ASSESSMENT  
AND  
PRIVACY IMPACT REVIEW RESULTS**

<b>TO:</b> <b>Office of Nuclear Reactor Regulation (NRR)</b>	<b>Office Sponsor:</b> <b>Michael MacWilliams</b>	
Reginald Mitchell, Director Business Process Improvement and Applications Division, OIS	<b>Name of System:</b> <b>Reactor Program System (RPS)</b>	
Charlotte L. Turner, Director Program Management, Policy Development and Analysis Staff, OIS	<b>Date PIA Received:</b> 08/30/05	<b>Date PIA Completed:</b> 09/19/05
<p><b>Noted Application Development and System Security Issues:</b></p> <p><b>None.</b></p>		
<b>Title:</b> Brenda Shelton, Chief, Records and FOIA/Privacy Services Branch	<b>Signature:</b> R/A	<b>Date:</b> 9/20/05