

ATTACHMENT 3.1-4 TO RMPP 3.1, REVISION 0

CONFIDENTIAL INFORMATION AND FILES

Upon receipt of an allegation and during the investigation of an allegation, the allegor may request and reasonably expect that his/her identity will be protected as confidential information, except for the -situations as long as the criteria inoutlined section 3.2 of RMPPAttachment 3.1-2 3.1 have been met. Basic rules to protect the identity of the allegor and other sensitive information are outlined below.

- 1) Restrict staff discussions to those individuals who truly need-to-know.

The allegor's identity and other information that would reveal their identity should be withheld from other Radioactive Materials Program staff not involved with the investigation.

- 2) Restrict access to the hardcopy and computer files by storing in a secure file.

All information regarding the allegor's identity and other sensitive information will be stored in the specific Allegations File (AF). The AF will be maintained in a padlocked filing cabinet. Access is limited to Radioactive Materials Program staff and the file is secured when not in use. (Pad!Lockedable file cabinet and an electronic version that is controlled).

- 3) Protect access to information during work.

Files are not left lying open if the work area is not occupied. Computer screens are not left open if the work area is not occupied. At the end of the day, the hardcopy AF is placed in the padlocked secure file. Computer files are saved on the secured computer space. Drafts are not developed outside this computer space. Field notes, received forms, etc. are kept secured or are disposed of.

- 4) Be wary of faxes and e-mails if you must utilize them.

Faxes are sent being very careful to enter the correct telephone number. Calls should be made prior to sending a fax to alert the recipient and a confirmation call should be made to confirm the fax was received. Generally, it is not prudent to use e-mail to transmit confidential information. If you must use e-mail or fax, use in accordance with 1 V.S.A. § 317.

- 5) Ensure that reports and correspondence to other entities do not contain information that could lead to the identification of the allegor or confidential source or other sensitive information.

Other entities could include: the licensee, applicant, the Nuclear Regulatory Commission or other federal agency, another state or local agency, or another agreement state. If the RMP has chosen to refer the allegation to the licensee, the original information submitted by the allegor should be omitted. The information should be re-worded to reflect the basic facts and

Commented [SJ1]: The criteria is only listed in the Attachment (with reference to the attachment in 3.2). VT may want to consider including the criteria in 3.2 as well as this attachment.

Commented [SJ2]: Although NRC Comment 65 suggested this language, suggest these further revisions for clarity.

Commented [OF3]: NRC comment 65

Commented [SJ4]: Edited for consistency with 1.3.2, 1.4.10, 3.1.5, and 3.2.1, as well as to address NRC Comment 44

Commented [SJ5]: Unclear how electronic versions will be controlled. Also, as noted in other comments, VT indicated in response to NRC Comment 40 that all documents are maintained only electronically.

Commented [IW6]: NRC Comment 66

Commented [SJ7R6]: NRC comment 66 addressed item two. With suggested edits to that item, the original comment is addressed.

Commented [IW8]: NRC Comment 67

Commented [SJ9R8]: Okay

any language should be removed that could be used to identify the alleged.