

**STATUS OF RECOMMENDATIONS: AUDIT OF NUCLEAR REGULATORY
COMMISSION (NRC) SHARED “S” DRIVE**

OIG-11-A-15

Status of Recommendations

Recommendation 2:

Revise current information security training for NRC staff to address specific practices for protecting Sensitive Unclassified Non-Safeguards Information (SUNSI) on the agency’s shared network drives.

Agency Response Dated
December 19, 2017:

The CUI Final rule became effective on November 14, 2016 and requires that all sensitive information that is not classified be categorized under the CUI rule. SUNSI and Safeguards Information are captured under this definition. Staff anticipates closing this recommendation after NRC CUI policy is published and employees receive training on CUI. The estimated completion date for all staff to take CUI training is the third quarter of FY 2019.

Target Completion Date: Third quarter of FY 2019

Agency Response Dated
May 8, 2019:

The effort to develop an NRC Controlled Unclassified Information (CUI) policy statement and accompanying guidance is in progress. A high-level CUI policy statement is expected to be published in September 2019. In addition, draft Management Directive (MD) 12.6, “NRC Controlled Unclassified Information (CUI) Program,” (currently titled, “NRC Sensitive Unclassified Information Program”) will provide guidance to staff to support the implementation of the NRC’s CUI program. On February 21, 2019, agency comments were formally solicited on draft MD 12.6 (ADAMS Accession No. ML19341A096). Comments are in the process of being resolved by the Office of the Chief Information Officer (OCIO) and draft MD 12.6 is expected to be published in September 2019. After MD 12.6 is published, agency-wide CUI training will be developed in coordination with the Office of the Chief Human Capital Officer (OCHCO). Current estimates reflect that CUI training will be developed during the time frame of September 2019 – March 2020.

Revised Target Completion Date: April 2020

Agency Response Dated
April 22, 2020:

In the August 15, 2019, memorandum, the OIG concluded that the proposed action provided on May 8, 2019, meets the intent of the recommendation and that this recommendation would be closed when OIG receives documentation verifying that training

Enclosure

for NRC staff addresses protection of SUNSI on the agency's shared network drives.

The effort to develop an NRC Controlled Unclassified Information (CUI) policy statement and accompanying guidance is still in progress. Management Directive (MD) 12.6 will provide guidance to staff to support the implementation of the NRC's CUI program once implemented. The Office of the Chief Information Officer (OCIO) anticipates additional delays with publishing the NRC CUI policy statement and draft MD 12.6 as a result of its efforts to resolve internal NRC comments. After MD 12.6 is published, agency-wide CUI training will be developed in coordination with the Office of the Chief Human Capital Officer (OCHCO). The NRC CUI Working Group began development of the CUI training module in December 2019. However, since NRC policy decisions will impact the final content of the CUI training module, this effort is not complete.

Although the NRC has not transitioned to CUI, there is a current need for staff to receive training that addresses the protection of SUNSI on the agency's network drives. As a result, the NRC's annual Computer Security Awareness Training was updated in 2019 to address the protection of SUNSI on shared network drives (ADAMS Accession No. ML20084H788). The NRC believes that the intent of this recommendation has been completed.

Target Completion Date: Completed

Point of Contact: Tanya Mensah, (301) 415-3610

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Status of Recommendations

Recommendation 3:

Develop Controlled Unclassified Information (CUI) policies and guidance for storing and protecting CUI in agency shared drives, and:

- a. post this guidance on the NRC intranet; and
- b. include this guidance in annual training.

Agency Response Dated
December 19, 2017:

The CUI final rule became effective on November 14, 2016. NRC has established a CUI working group which is developing agency CUI policy. Revisions to policy from SUNSI to CUI are being drafted and are expected to be completed by the third quarter of FY 2018. The accompanying guidance and annual training will follow.

Target Completion Date: Third quarter of FY 2019

Agency Response Dated
May 8, 2019:

The effort to develop an NRC CUI policy statement and accompanying guidance is in progress. A high-level CUI policy statement is expected to be published in September 2019. In addition, draft Management Directive (MD) 12.6, “NRC Controlled Unclassified Information (CUI) Program,” (currently titled, “NRC Sensitive Unclassified Information Program”) will provide guidance to staff to support the implementation of the NRC’s CUI program. On February 21, 2019, agency comments were formally solicited on draft MD 12.6 (ADAMS Accession No. ML19341A096). Comments are in the process of being resolved by OCIO and draft MD 12.6 is expected to be published in September 2019 (FY 2019). After MD 12.6 is published, agency-wide CUI training will be developed in coordination with OCHCO. Current estimates reflect that CUI training will be developed during the time frame of September 2019 – March 2020. General CUI training for all staff, contractors, and detailees is expected to occur during the time frame of March 2020 – September 2020. Following the initial CUI training, biennial CUI training is required for the agency (consistent with 32 CFR 2002.20).

Revised Target Completion Date: September 2020

Agency Response Dated
April 22, 2020:

As described in the response to Recommendation 2, OCIO’s efforts to finalize the CUI policy statement and accompanying MD 12.6 have been delayed as a result of the agency’s efforts to resolve internal comments on draft MD 12.6. As a result of the need to provide guidance to NRC staff on the storage and

protection requirements for SUNSI on agency shared drives, OCIO issued YA-19-0102, "Policy Reminder of the U.S. Nuclear Regulatory Commission's policy for protecting sensitive Unclassified Non-Safeguards Information as Described In The NRC Policy For Handling, Marking, and Protecting Sensitive Unclassified Information and Applicable Management Directives," dated December 9, 2019. In YA-19-0102, the NRC staff is reminded of the need to protect SUNSI, including on shared network drives. A link to YA-19-0102 is included on the NRC's SUNSI webpage (<https://drupal.nrc.gov/sunsi>). This guidance was also included in the recent NRC annual Cybersecurity Training (ADAMS Accession No. ML20084H788).

Guidance currently in place under SUNSI, in regard to the protection of SUNSI on shared agency network drives, will be transitioned to CUI policies and training. The draft version of MD 12.6 currently references MD 12.5, "NRC Cybersecurity Program." MD 12.5 already contains the agency requirements for the protection of information that is processed electronically and stored on shared agency drives (Refer to Section V.M.1.j (iv) in MD 12.5). The NRC believes that the intent of this recommendation has been completed.

Target Completion Date: Completed

Point of Contact: Tanya Mensah, (301) 415-3610