



RECORDS MANAGEMENT OVERSIGHT
INSPECTION REPORT
2014

United States Nuclear Regulatory Commission
Records Management Program

NATIONAL ARCHIVES *and* RECORDS ADMINISTRATION

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EXECUTIVE SUMMARY

In 2013 and 2014, the National Archives and Records Administration (NARA) inspected elements of the records management program at the U.S. Nuclear Regulatory Commission (NRC). NARA conducted this effort under the authority granted it by 44 United States Code (U.S.C.) 2904(c)(7) and 2906 to inspect records management programs and practices of Federal agencies. This inspection was prompted by the fact that NRC records have a direct and high impact on government accountability for the Nation's nuclear energy safety; high public interest in the agency itself and how it functions, as well as, NRC's Moderate Risk scores on the 2010 and 2011 Records Management Self-Assessments (RMSA)¹. The overall objective of this inspection was to determine if the records management program at the NRC is in compliance with regulations under 36 Code of Federal Regulations (CFR) Chapter XII, Subchapter B.

The NRC was created as an independent agency by Congress in 1974 to ensure the safe use of radioactive materials for beneficial civilian purposes while protecting people and the environment. The NRC regulates commercial nuclear power plants and other uses of nuclear materials, such as in nuclear medicine, through licensing, inspection and enforcement of its requirements.

The NRC is headed by a five-member Commission. The President designates one member to serve as Chairman and official spokesperson. The Commission as a whole formulates policies and regulations governing nuclear reactor and materials safety, issues orders to licensees, and adjudicates legal matters brought before it. The Executive Director for Operations (EDO) carries out the policies and decisions of the Commission and directs the activities of the program offices. The offices reporting to the EDO ensure that the commercial use of nuclear materials in the United States is safely conducted. As part of the regulatory process, the four regional offices conduct inspections, enforcement, and emergency response programs for licensees within their purview.

The records management program at NRC is developing plans to manage the challenges related to evolving technologies and information management processes. NRC has been shifting from a paper-based environment to an electronic-based environment since it brought the Agency-wide Document Access and Management System (ADAMS) online in 2000. In 2010 the NRC began to upgrade the platform from ADAMS to IBM FileNet Panagon 8 (P8) called ADAMS P8. The NRC recently deployed enterprise records management software, IBM Enterprise Records Manager (IER), called ADAMS RM, to replace older Foremost RM software that was no longer supported.

¹ Records Management Self-Assessment Reports 2010-2012, National Archives and Records Administration, <http://www.archives.gov/records-mgmt/resources/self-assessment.html>. NRC scores 2010: 73 out of 100, 2011: 79 out of 100, and 2012: 84 out of 100. We note that NRC's scores have incrementally improved since 2010.

The NRC Office of Information Services (OIS) has developed the Information and Records Management (IRM) Program plan to meet the challenges of moving to a fully developed electronic information management system. The IRM Program plan identifies 12 integrated projects including required resources and timelines for completing each of the projects. This is an aggressive approach that the NRC records and information management staff believe will ensure successful development and implementation of the agency's future records and information management program. The IRM Program plan has the full support of the NRC Chief Information Officer (CIO).

During the course of the inspection, NARA visited or had briefings from multiple NRC program offices at the NRC headquarters in Rockville, MD and at Region II in Atlanta, GA, and Region IV in Arlington, TX. While we found areas of concern that need attention, the NRC Information and Records Management Program has a firm foundation and good strategic goals.

Overall, the NRC has a very dynamic records management program. With two exceptions:

- The NRC Agency Records Officer (ARO) lacks the proper authority to coordinate and oversee implementation of the agency's comprehensive records and information management program.
- The ARO has the legal responsibility to attest to the authenticity and integrity of agency records but lacks authority over recordkeeping during the entire lifecycle as illustrated by the fact that the ARO does not have the authority to manage how records are entered into ADAMS, nor how the records are categorized, indexed, and managed within the system.

However, the OIS staff demonstrated a strong dedication to ensuring that NRC's records are effectively and efficiently managed throughout their lifecycle. The NRC has developed the IRM Program plan that, if fully implemented, will move the NRC records program forward to meet the future challenges in managing the agency's records and information.

The NARA inspection team would like to thank, Deborah Armentrout, ARO and Darren Ash, Senior Agency Official for Records Management/Chief Information Officer; and the NRC records management staff for their full cooperation during this inspection.

FINDINGS AND RECOMMENDATIONS

This report contains eight findings and makes sixteen recommendations. The main recommendations apply to management of the NRC records throughout their lifecycle and include:

1. ARO must be assigned the records management responsibility with the appropriate authority to oversee the agency records management program,
2. NRC should fully implement ADAMS and ADAMS RM to ensure effective and efficient management of NRC information resources, and
3. NRC should complete the revisions to NRC NUREG 0910 and implement Revision 5 to align the NRC records with the NRC lines of business.

A complete list of findings and recommendations is included as Appendix C.

To ensure completion of the recommendations as part of the inspection process, NRC will be required to develop a Plan of Corrective Action (PoCA) that specifies how the agency will address each report recommendation, including a timeline for completion of the corrective action(s) for each recommendation. NARA will analyze the proposed remedial actions and work with NRC to ensure the adequacy of its PoCA. Upon approval of the PoCA, NARA looks forward to continuing a cooperative relationship with NRC and assisting with the implementation of the recommendations.

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**UNITED STATES NUCLEAR REGULATORY COMMISSION
RECORDS MANAGEMENT PROGRAM
AT THE NUCLEAR REGULATORY COMMISSION HEADQUARTERS
AND IN REGIONS II AND IV**

INSPECTION REPORT

INTRODUCTION

BACKGROUND

The U.S. Nuclear Regulatory Commission (NRC) was created as an independent agency by Congress in 1974 to ensure the safe use of radioactive materials for beneficial civilian purposes while protecting people and the environment. The NRC regulates commercial nuclear power plants and other uses of nuclear materials, such as in nuclear medicine, through licensing, inspection and enforcement of its requirements.

The NRC is headed by a five-member Commission. The Commission formulates policies and regulations governing nuclear reactor and materials safety, issues orders to licensees, and adjudicates legal matters brought before it. The Executive Director for Operations (EDO) carries out the policies and decisions of the Commission and directs the activities of the program offices. The offices reporting to the EDO ensure that the commercial use of nuclear materials in the United States is safely conducted. As part of the regulatory process, the four regional offices conduct inspection, enforcement, and emergency response programs for licensees within their borders.

The NRC records management program continues to develop plans to manage the challenges related to evolving technologies and information management processes. Beginning in 2000 the NRC began the process of moving from a paper-based environment to an electronic-based environment when it acquired the Agency-wide Document Access and Management System (ADAMS) online in 2000. In 2010 the NRC initiated a program to upgrade the platform from ADAMS to IBM FileNet Panagon 8 (P8) called ADAMS P8. The NRC recently deployed enterprise records management software, IBM Enterprise Records Manager (IER) that is called ADAMS RM, to replace older Foremost RM software that was no longer supported.

The NRC Office of Information Services (OIS) has developed the Information and Records Management (IRM) Program plan to meet the challenges of moving to a fully developed electronic information management system. The IRM Program plan identifies 12 integrated projects including required resources and timelines for completing each of the projects. This is an aggressive approach that the NRC records and information management staff believe will ensure successful development and implementation of the agency's records and information management program. The IRM Program plan has the full support of the NRC Chief Information Officer (CIO).

INSPECTION OBJECTIVE

In late 2013 and early 2014, NARA inspected elements of the records management program at the NRC. NARA conducted this effort under the authority granted it by 44 U.S.C. 2904(c)(7) and 2906 to inspect records management programs and practices of Federal agencies. The overall objective of this inspection was to determine if the records management programs at the NRC are in compliance with regulations under 36 CFR Chapter XII, Subchapter B. Of particular concern was the NRC's management of records maintained in ADAMS as well as its maintenance, scheduling, and disposition of permanent records.

During the course of the inspection, NARA visited or had briefings from multiple NRC program offices at the NRC headquarters Rockville, MD and at Region II in Atlanta, GA, and Region IV in Arlington, TX. In addition, NARA collected many supporting documents from NRC. The records management staff and program staff at all the locations were forthcoming throughout the process, providing excellent support and access to relevant information and staff. In this report, NARA presents its finding from the inspection, positive and negative, and recommendations for developing corrective actions to address areas of concern.

SCOPE AND PURPOSE

The general purpose of this inspection was to verify that the records management programs at the NRC have sufficient policies, processes, and procedures for managing active records; ensuring that the storage of inactive records meet regulatory standards; that records are adequately maintained and managed in ADAMS; and ensuring that temporary and permanent records are being handled according to their approved retention schedules.

The scope of the inspection focused on compliance with statutes and regulations in regards to creation, maintenance, and disposition of NRC records; records schedules are applied properly and consistently; maintenance of active records is applied properly and consistently; inactive temporary records are properly managed, stored, and disposed and inactive permanent records regardless of format are transferred to the NARA and meet current transfer guidance. The inspection also examined the controls that the NRC has implemented to mitigate the risks to its records and information and to ensure that agency policies and procedures are implemented. This included verifying that operating policies and procedures are clearly written and communicated, and procedures are in place to implement changes in laws, regulations, and guidance.

METHODOLOGY

To meet the objective of assessing whether the NRC is managing their records appropriately the inspection team examined NRC's records management activities in light of applicable records management sections of the 36 CFR Chapter XII, Subchapter B. To ensure that our inquiries into NRC's records management practices were systematic and grounded in regulation, the NARA inspection team relied on an internally produced set of records management questions that

correlate directly to the CFR. These standardized questions are a subset of NARA Records Management Oversight's "Compliance Guidance Documents" and can be found in Appendix E of this report. The NRC was given a chance to respond to the questions, provide documentation, and to demonstrate various aspects of its records management program.

As part of the pre-inspection process, the NARA inspection team conducted its own background research. Additionally, NRC provided documentation for various elements of its records management practices and procedures many of which were useful to the inspection team as background information. A list of the pre-inspection documents that the NARA team considered most relevant for the purposes of this inspection can be found in Appendix A.

STRUCTURE OF THE REPORT

The findings and recommendations of this report are broken down into six topical areas: Section 1, Information and Records Management Program Plan; Section 2, Records Officer Roles and Responsibilities; Section 3, Agency-wide Document Access and Management System; Section 4, Document Processing Center; Section 5, Microforms; and Section 6, Records Disposition Schedule Issues; Summary of Best Practices.

In accordance with 36 CFR 1239 this report contains:

- (1) An executive summary;
- (2) Introduction, background, and purpose of inspection;
- (3) Inspection methodology, including offices visited;
- (4) Findings and recommendations; and
- (5) Any necessary appendices, such as summaries of each site visit or the inspection instrument.

FINDINGS AND RECOMMENDATIONS

SECTION 1: INFORMATION AND RECORDS MANAGEMENT PROGRAM PLAN

The NRC OIS developed an IRM Program plan in 2013 that lays out the vision, goals, and objectives needed to modernize the records management program. The IRM Program plan was the outcome of earlier assessments and reports. The IRM Program plan delineates 12 interrelated projects that when completed will provide the NRC with dynamic information and records management program for the future. The IRM Program plan includes projects that are aligned with the strategic goals of OIS. The IRM Program plan provides a high-level description of each of the 12 projects, including objectives, tasks, dependencies, projected timeline, resources, and potential impacts. A summary of the projects are included in Attachment 1.

The vision for the IRM Program plan is to provide complete and accurate agency information by developing and implementing policies, procedures, guidance, and tools to ensure effective and efficient capture, use, retrieval, storage, and disposition of information; and to allow staff and the public to access NRC information. This vision is embedded in the NRC's Information Technology/Information Management Strategic Plan for fiscal years 2012–2016. There are four key activities identified in the Strategic Plan:

- Modernize the IRM process to make information capture and categorization more complete and transparent;
- Develop new file plans, records categorization, and retention schedules for use in records capture;
- Improve the staff's knowledge of IRM related to NRC work products; and,
- Incorporate IRM policies into the NRC's capital planning and investment control process and the agency's IT project management methodology.

The ARO explained that in addition to 12 projects identified in the IRM Program plan that there are other projects being considered. The first project is Digital Content Control where the main objective would be to address the lifecycle of digital content, regardless of repository, on a more holistic scale. The second project is to address search options in ADAMS including the streamlining of metadata and record profiles and improving the search engine to allow for more advanced and faster searches. And, a third project is to develop and implement digital and electronic signatures.

Finding 1: The IRM Program plan has 12 clearly identified projects that will strengthen the NRC's IRM program through the implementation of these projects, which over the next several years, will enable the NRC to better manage its records and information.

Recommendation 1: NRC should fully implement all 12 projects identified in the IRM Program plan.

SECTION 2: RECORDS OFFICER ROLES AND RESPONSIBILITIES

The ARO, as the person designated by the head of the agency under 44 USC 3101 and 3102 and 36 CFR 1220.34, has the legal responsibility to attest to the authenticity and integrity of the records management program, and is responsible for implementing and managing a comprehensive records and information management program. 36 CFR 1220.34 requires agencies to assign records management responsibility to a person and office with appropriate authority within the agency to implement program principles, issue directives, ensure incorporation of recordkeeping requirements and records maintenance, storage, and disposition practices. However, due to a recent NRC reorganization and the draft Concept of Operations (CONOPS), the ARO's authority has been reduced. Under this reorganization, ARO now lacks the authority to control recordkeeping over the entire lifecycle.

The NRC ARO is not recognized across the agency, nor empowered to fully coordinate and oversee implementation of the agency's comprehensive records management program. The ARO writes the directives and policies necessary, but does not have the authority to enforce them. This results in unclear and conflicting communication of policies, instructions, and other guidance.

Of particular concern, the ARO has not been given the authority needed to ensure records are captured, identified, and fully managed in the agency's central repository, ADAMS, in shared drives, and in the SharePoint sites. These particular records management tools are overseen by the Information and Data Operations Branch Chief and the Document Processing Center (DPC). These entities both make records management decisions without consulting or including the ARO.

The current separation of records management and recordkeeping responsibilities between IT/IM Policy Branch and the Information and Data Operations Branch is causing considerable confusion, conflicts of interest, and difficulties in setting priorities. The two branches are in different divisions in OIS. Having records and information management responsibility and authority divided among various divisions and branches at the NRC has resulted in confusion whereby staff members don't know where to go for guidance. NRC staff expressed their frustration in not knowing who to contact when dealing with a records management issue.

Due to the confusion over authority in the records management program, staff is making decisions on how to manage records with insufficient or incomplete guidance. Records are being filed in ADAMS incorrectly resulting in difficulty locating and retrieving records. Incorrect filing of records in ADAMS could result in records being destroyed prematurely particularly permanent records. The greatest risk to the NRC in addition to the potential of inadvertent and unauthorized destruction of records would be the loss of public trust.

The ARO has worked to establish a comprehensive and functioning records management program. The ARO is continuing to develop a strategic plan to ensure the records management program moves forward in meeting NRC's business needs and is compliant with OMB/NARA M-12-18 Managing Government Records Directive.

The ARO must be empowered and provided with the adequate resources to develop and implement project priorities to improve the RM program, to ensure the functionality of systems such as ADAMS, and to ensure proper disposition of records and availability of agency information both internally and externally with proper oversight. The ARO needs to be the authoritative and ultimate source for implementation guidance.

Finding 2.1: The NRC ARO does not have sufficient authority to oversee the records and information management program and manage the agency's records throughout their lifecycle but has the legal responsibility to attest to the authenticity and integrity of the records management program.

Recommendation 2.1: NRC must assign records management responsibility to the ARO with appropriate authority to coordinate and oversee the agency's comprehensive records management program. (36 CFR 1220.34)

In analyzing the overall records management program at the NRC it was found that within the headquarters program offices that administrative assistants are designated as records management Points of Contact (POC), and many are given the title of Records Liaison Officer (RLO). Often these administrative assistants do not always have the knowledge, expertise, or authority to effectively manage records within the programs. If program offices had technical assistants (TAs) as records management POCs, it would provide for a greater level of knowledge, expertise, and authority in managing program records. In this way the POCs would be decision makers or have direct access to the program decision makers in how to effectively manage program records. This recommendation was also included in the NRC Transforming Assets into Business Solutions (TABS) initiative.

Finding 2.2: The NRC ARO does not have a sufficient records management network within NRC offices and programs to ensure that the agency records are being properly managed throughout their lifecycle.

Recommendation 2.2: The NRC ARO should have a network of Points of Contact (POC), with appropriate authority, throughout the agency to ensure the proper management of agency records throughout their lifecycle.

SECTION 3: AGENCY-WIDE DOCUMENT ACCESS AND MANAGEMENT SYSTEM (ADAMS)

The ADAMS document management system utilizes IBM FileNet P8 software. The system captures digital scans of paper records and born digital records. The system is widely used throughout the NRC and is the resource for accessing agency's records. The NRC maintains a secure backup of ADAMS by having the system replicated in Region IV. Seventeen electronic systems feed records into ADAMS. Hard copy are scanned and input into ADAMS by the DPC. The DPC processes approximately 100,000 images annually. In 2013, 74% of the records entered into ADAMS were electronic and the remaining 26% were scanned paper documents.

ADAMS currently holds approximately 20 terabytes (TB) and has three libraries for managing the records of the NRC. The Main Library is the repository for the records of the NRC since 2000. The Legacy Library holds metadata that points to microfiche records created before 2000. Licensing Support Network (LSN) contains approximately seven million documents. In addition, ADAMS provides space for all agency offices and staff to maintain working files. However, records are being created and maintained in other systems, particularly the SharePoint system. The purpose of ADAMS is for all NRC records to be maintained in one repository.

The NRC is working on a major project to improve its ability to determine, track, and manage authoritative source documents. The effort is designed to avoid unnecessary duplication within a system or among multiple systems. Some staff feel that there are too many systems/repositories (e.g. SharePoint, Outlook Exchange) that contain duplicative information and that waste agency resources. Shared drives and SharePoint are used for working files, but all final documents should go into ADAMS. Most offices use SharePoint for working files. The final records are then moved into ADAMS. However some offices do not delete the working files from SharePoint. As a result there is an estimated 15 TB of data in the SharePoint, much of it duplicated in ADAMS.

The search functionality of ADAMS is not robust, and agency staff struggle to locate records held in the system. Staff complained that the search function is difficult to use and frequently provides unwanted results. Staff often resorts to using Google to search on the public iteration of ADAMS rather than using the internal ADAMS search capability. NRC records management staff are recommending the development and implementation of a controlled file taxonomy that

will provide a controlled metadata set to all records in the ADAMS system and enable better search results.

The NRC recently installed enterprise records management software, known as IBM IER (IBM Enterprise Records), called ADAMS RM, which replaced older Foremost RM software. ADAMS RM has records retention, records freeze (litigation hold) and vital records capabilities. The system is currently being deployed in phases. More than 100,000 temporary Adjudication and Hearing records were the first to be entered into ADAMS RM. As yet no permanent records have been declared in ADAMS RM. The goal of ADAMS RM is to have all NRC records ingested and scheduled in the system. The records management staff noted that procedures for transfer to NARA of records declared as permanent in ADAMS RM have not been developed at this time.

Finding 3: The current ADAMS system, while a suitable document management system, does not provide the NRC with the means to fully manage agency records throughout their lifecycle.

Recommendation 3.1: NRC should fully implement ADAMS RM to ensure that all records in ADAMS are appropriately declared, scheduled, and dispositioned.

Recommendations 3.2: NRC should develop and implement clearly defined guidelines and requirements for inputting all records into ADAMS.

Recommendation 3.3: NRC should develop policies requiring that when final documents are placed in ADAMS that the offices review the working documents in SharePoint, ADAMS or other systems and dispose of those working files appropriately.

Recommendation 3.4: NRC should implement requirements that prohibit documents from being undeclared in ADAMS for longer than a specified amount of time.

Recommendation 3.5: NRC should develop and implement file schemas and taxonomies for managing records in ADAMS from input to final disposition.

Recommendation 3.6: NRC should reengineer the ADAMS search engine to allow agency staff to search and retrieve records efficiently

SECTION 4: DOCUMENT PROCESSING CENTER

The DPC scanned over 26,000 documents into ADAMS in 2013. The documents are scanned to meet NARA digital requirements. Paper documents are scanned as Tagged Image Files (TIF) and converted to Portable Document Format (PDF) at 300 DPI (dots per inch), and saved with optical character recognition (OCR). Documents are Fast Web enabled so that they can be viewed while downloading. ADOBE Professional's Fast Web View feature is applied to PDF's generated by the DPC as a means to improve loading and viewing times. Data files such as input/output files or calculation data, non-PDFs, do not get processed as records in ADAMS but are stored in the file center in their original medium (such as a CD or DVD) with an annotation in the ADAMS profile as to where to find the data files.

The processing of documents into ADAMS is done on a priority basis. Routine processing takes 8 hours. The submitting office can request expedited and immediate processing if needed. Expedited processing is 6 hours and immediate is 4 hours. Documents are then published to the ADAMS web with public releasable documents linked to public ADAMS. During the processing of documents into ADAMS, the NRC uses a Documents Tracking System (DTS) that tracks documents through the entire process.

Documents processed into ADAMS by the DPC are processed through the Official Records Processing (ORP). A document does not become an "official" record in ADAMS until it is through the ORP. The document is converted to PDF from its original format. This has worked well for MS Word, MS Excel and MS PowerPoint documents, but does not work well for JPEG and MPEG and other complex formats.

When received for processing at the DPC, all documents are reviewed and assigned a Records Information Distribution System Code (RIDS Code). There are over 900 RIDS Codes and associated templates. This is issue for NRC staff as there are so many RIDS Codes and templates, and DPC will create a new template whenever an office indicates they have a new document type even if the document type exists for another office. Some NRC staff expressed concerns about the number of RIDS Codes indicating that the number should be reduced to a more manageable number. The RIDS Codes are included on the NRC Form 665 (ADAMS Document Submission) which is used to provide metadata and profiling information for each document to be entered into ADAMS.

Once the document is approved for entry into ADAMS, it goes to Autoadd, to be profiled and indexed. The profile information is stored with the document. Once a document is declared a record, the users no longer have any control over the document. It was mentioned by NRC staff that the DPC staff will occasionally change the profiling information for a document, which makes it difficult for the agency staff to find and retrieve the document in the future. This occurs even though the DPC is required to follow the guidance set forth in the profiling templates as defined by NRC staff. Some offices place records in ADAMS directly and bypass the DPC process. This is only done by program staff with permission from the DPC.

The DPC employs two-layer quality control. Document Error Tracking System (DETS) tracks all documents. DPC uses OCR software “Prime Recognition” for scanned files which does not edit the OCR files. All scanned images are given a quality control (QC) check. For the QC, “Focus PitStop” is used which verifies document requirements such as 300 DPI. DPC does not make any corrections or modifications to documents. If a document fails the QC check, it is returned to the owning project manager. Before a document is made available it receives a final QC, and is approved for release. The NRC Form 665 profile is stored with the document.

Safeguards Information (SGI) are processed along with other, less sensitive documents but stored separately on Safeguards Information Local Area Network and Electronic Safe (SLES). Classified information is handled in designated classified areas and not by the DPC.

Finding 4.1: While the DPC does a commendable job in processing over 100,000 documents annually, there are processes that have evolved over time that appear to be cumbersome and have resulted in a less productive environment.

Recommendation 4.1: NRC should conduct a business process reengineering of the DPC processes and procedures.

Finding 4.2: The DPC has created over 900 templates for use in profiling and processing documents into ADAMS. Many of the templates have similar fields and in some cases are the same except for the office creating or using the template.

Recommendation 4.2.1: The templates utilized by the DPC should be examined and where possible combined with similar templates thereby reducing the number templates in use.

Recommendation 4.2.2: The DPC should examine requests for new templates by comparing the profiling data to already existing templates.

Recommendation 4.2.3: The DPC should contact document owners before changing profiling information.

SECTION 5: MIRCOFORMS

Extensive microfiche collections documents and records are still in existence in parts of the agency. For the most part these microfiche collections duplicate information held in paper records at the Washington National Records Center (WNRC). In certain, but rare, instances, the microfiche may contain the most authoritative information; however, the microfiche is often not a complete record. The result has been that offices have used inaccurate or incomplete information when making decisions or conducting business activities with other agencies or commercial enterprises. Agency staff will use the microfiche record as it is more convenient than requesting the paper records from the WNRC. The ARO and records management staff

expressed a desire to get better organizational control over this agency resource. The effort is to retrieve the paper records and compare them to the microfiche, scan the most complete and accurate records, declare it in ADAMS, and dispose of the microfiche and paper.

Finding 5: NRC staff utilizes microform records in lieu of papers because the microforms are more convenient even though the microforms may be incomplete or inaccurate.

Recommendation 5.1: NRC must use accurate and complete information and records when conducting agency business activities by having staff retrieve the paper records from the WNRC in lieu of using microfiche (36 CFR 1222).

Recommendation 5.2: NRC should take the necessary measures to remove the microfiche from use by NRC staff.

SECTION 6: RECORDS DISPOSITION SCHEDULE ISSUES

Agency records stored at the WNRC are, in some cases, stored under incorrect disposition authorities. This was discovered when the WNRC sent the NRC approximately 1,300 Disposal Notices to the NRC in 2013. Some of the notices indicated disposal authorities using the NRC NUREG 0910, Rev 3 (Rev 3). Rev 3 had been superseded by NUREG 0910, Rev 4 (Rev 4) in 2005. This problem was caused by the fact that NRC's Archival Facility Accountability System (AFAS) system has old disposal authorities in it - Rev 3 or Rev 2 instead of Rev 4. The AFAS system is used by NRC records management staff when processing records for transfer to the WNRC. This issue was future exacerbated by the fact that someone from NRC records management staff had instructed the WNRC not to use the new Rev. 4 and to continue using Rev. 3. This done without the knowledge of the NRC ARO, and was only discovered through discussions between the ARO and the WNRC staff.

It was recently found that the NRC disposal authorities were hard coded into AFAS and could not be changed. The AFAS system was never updated when the NRC introduced Rev 4 in 2005. There were considerable changes made to retention periods for both temporary and permanent records between Rev 3 and Rev 4. The result is that records, some permanent, are at risk of being destroyed prematurely or of being not maintained their required retention periods. Although NRC staff was updating NARA's SF135 with Rev. 4, there was confusion with the old retentions in AFAS still be generated which also contributed to NARA's Archives and Records Centers Information System (ARCIS) having incorrect dispositions assigned to some NRC records stored at the WNRC. Fortunately, the problem was recognized by the NRC ARO before any records were actually disposed of, but it has taken a significant amount of resources to review and correct the Disposal Notices and begin updating AFAS.

A records disposition schedule is the core to a successful records management program and essential to ensure identification, availability and reliability of agency information. The NRC records disposition schedule, while very detailed, aligns with NRC Offices and not to current

lines of business. This can cause a risk when offices reorganize and retention schedules do not reflect the newly formed office or their records.

The current authorized version of NUREG 0910, Rev 4 contains over 1600 items making records retention implementation overly complex; and NUREG 0910, Rev 3 is the records schedule aligned with the AFAS system. This causes considerable risk to the records because changes in retention periods are not properly identified and assigned to the records being tracked in AFAS. This has resulted in permanent records to be identified as temporary. While to our knowledge no records have been inappropriately destroyed, using the wrong version in the AFAS system increases the risk of premature or inappropriate destruction of agency records.

Finding 6: NRC records in storage at the WNRC were found to have incorrect retention periods assigned. The records involved had retention periods based on NUREG 0910, Rev 3, and the retention periods had not been updated with the implementation of NUREG 0910, Rev 4. The NUREG 0910, Rev 3 retention periods were also being used by NRC records staff in AFAS.

Recommendation 6: NRC must review the retention periods assigned to all records currently in storage at the WNRC to ensure that the records have the correct disposal authorities assigned (36 CFR 1225).

SUMMARY OF BEST PRACTICES

Overall the NRC has a very dynamic records management program. The OIS staff has demonstrated a strong dedication to ensuring that the NRC's records are effectively and efficiently throughout their lifecycle. The NRC has developed an IRM Program plan that if fully implemented, will move the NRC records program forward to meet the future challenges in managing the agency's records and information.

The ADAMS P8 system provides the NRC the means to electronically manage the vast majority of agency records while providing public access to most of the agency's records and information. Once the NRC fully implements the ADAMS RM program, they will have a fully integrated records and information management system ensuring the effective and efficient use of the agency's information resources. The NRC has already integrated the ADAMS RM program for two records collections – Adjudicatory Hearings Dockets and the Licensing Support Network consisting of 7 TB of Yucca Mountain project records including 12 billion emails.

NRC is considering implementation of Capstone approach to email. They are also planning to implement a policy for deletion of unmanaged emails older than 180 days. The administrative group supporting the Office of the Secretary of the Commission and the Commissioners will have the most records subject to Capstone. However, the staff seemed unsure of the Capstone process and how it might be applied to the commissioner's email. The RM staff noted a potential need to use PDF to capture email records. This does not comply with the latest transfer guidance

recommendations. Further discussion between NARA and NRC concerning this approach is recommended.

The records management staff have been working to develop a revised records disposition schedule NUREG 0910, Rev 5 which will be an aggregated (Big Bucket) schedule aligning the agency records to its lines of business.

The NRC has also ensures the availability of the agency's records in the event of any unforeseen disasters by replicating all ADAMS records and information in the Region VI office.

APPENDIX A: RELEVANT PRE-INSPECTION DOCUMENTS

NARA Records Management Self-Assessment (RMSA) 2010, 2011 and 2012

ADAMS Desk Reference Guide, August 2008

Directive 3.53, NRC Records and Document Management Program

NRC One OIS-Organizational Chart

NRC Draft Concept of Operations (CONOPS), Version 2.2, April 22, 2013

NRC Information and Records Management (IRM) Program, November 6, 2013

NRC NUREG-0910 Revision 4, NRC Comprehensive Records Disposition Schedule

APPENDIX B: AUTHORITIES AND FOLLOW-UP ACTIONS

AUTHORITIES

- 44 U.S.C. Chapter 29
- 36 CFR Chapter XII, Subchapter B
- 36 CFR 1239, Program Assistance and Inspections

FOLLOW-UP ACTIONS

- ACTION PLAN

Nuclear Regulatory Commission (NRC) will submit to NARA a Plan of Corrective Action (PoCA) that specifies how the agency will address each inspection report recommendation, including a timeline for completion and proposed progress reporting dates.

The plan must be submitted within 60 days after the date of transmittal of the final report to the head of the agency.

- PROGRESS REPORTS

NRC will submit to NARA progress reports on the implementation of the action plan until all actions are completed.

- NARA REVIEW

NARA will analyze the adequacy of NRC's action plan, provide comments to NRC on the plan within 60 calendar days of receipt, assist NRC in implementing recommendations, and inform NRC when progress reports are no longer needed.

APPENDIX C: COMPLETE LIST OF FINDINGS AND RECOMMENDATIONS

Finding 1: The IRM Program plan has 12 clearly identified projects that will strengthen the NRC's IRM program through the implementation of these projects, which over the next several years, will enable the NRC to better manage its records and information.

Recommendation 1: NRC should fully implement all 12 projects identified in the IRM Program plan.

Finding 2.1: The NRC ARO does not have sufficient authority to oversee the records and information management program and manage the agency's records throughout their lifecycle but has the legal responsibility to attest to the authenticity and integrity of the records management program.

Recommendation 2.1: NRC must assign records management responsibility to the ARO with appropriate authority to coordinate and oversee the agency's comprehensive records management program. (36 CFR 1220.34)

Finding 2.2: The NRC ARO does not have a sufficient records management network within NRC offices and programs to ensure that the agency records are being properly managed throughout their lifecycle.

Recommendation 2.2: The NRC ARO should have a network of Points of Contact (POC), with appropriate authority, throughout the agency to ensure the proper management of agency records throughout their lifecycle.

Finding 3: The current ADAMS system, while a suitable document management system, does not provide the NRC with the means to fully manage agency records throughout their lifecycle.

Recommendation 3.1: NRC should fully implement ADAMS RM to ensure that all records in ADAMS are appropriately declared, scheduled, and dispositioned.

Recommendations 3.2: NRC should develop and implement clearly defined guidelines and requirements for inputting all records into ADAMS.

Recommendation 3.3: NRC should develop policies requiring that when final documents are placed in ADAMS that the offices review the working documents in SharePoint, ADAMS or other systems and dispose of those working files appropriately.

Recommendation 3.4: NRC should implement requirements that prohibit documents from being undeclared in ADAMS for longer than a specified amount of time.

Recommendation 3.5: NRC should develop and implement file schemas and taxonomies for managing records in ADAMS from input to final disposition.

Recommendation 3.6: NRC should reengineer the ADAMS search engine to allow agency staff to search and retrieve records efficiently

Finding 4.1: While the DPC does a commendable job in processing over 100,000 documents annually, there are processes that have evolved over time that appear to be cumbersome and have resulted in a less productive environment.

Recommendation 4.1: NRC should conduct a business process reengineering of the DPC processes and procedures.

Finding 4.2: The DPC has created over 900 templates for use in profiling and processing documents into ADAMS. Many of the templates have similar fields and in some cases are the same except for the office creating or using the template.

Recommendation 4.2.1: The templates utilized by the DPC should be examined and where possible combined with similar templates thereby reducing the number templates in use.

Recommendation 4.2.2: The DPC should examine requests for new templates by comparing the profiling data to already existing templates.

Recommendation 4.2.3: The DPC should contact document owners before changing profiling information.

Finding 5: NRC staff utilizes microform records in lieu of papers because the microforms are more convenient even though the microforms may be incomplete or inaccurate.

Recommendation 5.1: NRC must use accurate and complete information and records when conducting agency business activities by having staff retrieve the paper records from the WNRC in lieu of using microfiche (36 CFR 1222).

Recommendation 5.2: NRC should take the necessary measures to remove the microfiche from use by NRC staff.

Finding 6: NRC records in storage at the WNRC were found to have incorrect retention periods assigned. The records involved had retention periods based on NUREG 0910, Rev 3, and the retention periods had not been updated with the implementation of NUREG 0910, Rev 4. The NUREG 0910, Rev 3 retention periods were also being used by NRC records staff in AFAS.

Recommendation 6: NRC must review the retention periods assigned to all records currently in storage at the WNRC to ensure that the records have the correct disposal authorities assigned (36 CFR 1225).

APPENDIX D: NRC OFFICES VISITED DURING INSPECTION

Headquarters, Rockville, MD, December 11-13, 2013

Office of Information Services
Document Processing Center
Office of Federal and State Materials and Environmental Management
Office of Nuclear Reactor Regulation
Office of New Reactors
Office of Enforcement
Office of Nuclear Security and Incident Response
Office of the Secretary/Commission
Office of Investigation

Region II, Atlanta, GA, March 4-6, 2014

Regional Counsel/Enforcement and Investigations
Region State Liaison Officer
Division of Reactor Projects
Division of Construction Inspections
Division of Construction Projects
Division of Reactor Safety
Office of Investigation
Division of Fuel Facility Inspections

Region IV, Arlington, TX, April 22-24, 2014

Division of Nuclear Materials Safety
Division of Reactor Safety
Response Coordination Branch
Division of Reactor Projects
Office of Investigation
Public Affairs
Allegations
Division of Resource Management & Administration

Headquarters, Rockville, MD, June 9-10, 2014

Office of Information Services
Document Processing Center
Office of Nuclear Reactor Regulation

APPENDIX E: SELECTED COMPLIANCE QUESTIONS

Specific Questions/Areas to be Addressed:

***Records Management Roles and Responsibilities/Competencies:
(Completed by NRC Records Officer (RO) prior to the first meeting)***

Senior Agency Official

Does the NRC have a Senior Agency Official (SAO) designated in response to M-12-18 OMB/NARA Managing Government Records Directive?

If yes, does the Records Officer have any direct communication with the SAO or is this done through other levels of management?

Records Management Program Structure

What office does the records management program report to? (i.e., Chief Records Officer, Head of Administration, etc...?)

Is the records management program adequately represented within senior management?

Records Officer

Does the RO have formally assigned responsibility for the development and implementation of agency-wide programs to identify, develop, issue, and monitor recordkeeping requirements for the agency?

If no, who at NRC is formally assigned this responsibility?

Describe the responsibilities and duties of the NRC Records Officer, including but not limited to the following:

Does the NRC Records Officer (RO):

- identify unscheduled records and submit to NARA requests for disposition authority through ERA?
- approve and review SF 135s for records stored off-site by NARA's Federal Records Center Program?
- mandate records management training for all staff, covering especially employees' responsibility to identify and manage the Federal records in their control?
- conduct audits, reviews, and/or evaluations?

- work with IT to ensure records management functionality is incorporated into systems? If yes, is the RO recognized as a stakeholder in the design and development process for IT systems?

Records Management Program staffing

In addition to the RO, does the NRC have other staff with full-time records management responsibilities? If yes,

- how many?
- what responsibilities do they have?
- is records management included in their position description?

Does the NRC have a network throughout the agency to assist the RM program?
(NARA refers to these as Records Liaison Officers, but agencies may have a different title)

If yes:

Where do the Records Officer and Records Liaison Officers (RLOs) fit into the organizational structure?

- Are there RLOs in each office or program? If yes, is there an established description of what RM expects the RLO to do? If yes, please provide a copy.
- Are the RLO duties included in the official duties or is it an ad hoc 'other duties as assigned' fashion?
- Please describe the relationship between the RO and the RLOs including forms of communication, how often, is this an established working group that interacts with each other as well as the RO.
- What support from office heads or program supervisors does the RLO receive in support of the performance of tasks assigned by the RO?
- How much of their time is devoted to performing records management duties?

Knowledge and Skills

For the RO and RLOs determine the adequacy of professional development, training, and resources they are provided to fulfill their responsibilities.

- Please describe the level of familiarity with 36 CFR and Federal recordkeeping requirements, and knowledge of basic records management terms, definitions, and concepts, consistent with their duties for the Records Officer, other RM Staff and RLOs.
- Does the NRC provide training and other opportunities for professional development to maintain core competencies?
- Does the NRC provide internal training in RM and NRC RM policies specifically tailored for RM staff and RLOs? If yes, from whom do they receive this training and how often? Please provide samples.

Directives and Other Policy Issuances:
(Completed by NRC RO prior to the first meeting)

NRC will provide NARA with copies of:

- all current NRC records management directives, orders, bulletins, and similar authoritative issuances;
- copy of revisions to disposition authorities or manuals not yet submitted or approved by NARA
- copy of the current master file plan;
- copies of any current guidance/memoranda formally assigning this responsibility for development and implementation of guidance for the management of electronic media; and
- copies of any current Electronic Document Management Systems and/or Records Management Applications technical requirements documents.
- copies of any RM requirements incorporated into IT design and development

Following are questions that will be addressed during the inspections at each office. The purpose of these questions is to provide clear determination of how the offices are managing their records programs. The inspection team will also have additional questions not listed here generated by the discussions with agency staff during the course of the inspection.

The inspection team will not be asking each of these questions item by item. These questions are listed here so that the team has a checklist of what needs to be investigated.

Recordkeeping Requirements:

Records Management Guidance:

Does NRC have policies and procedures readily accessible on the intranet? How are updates to policies and procedures disseminated to staff?

Are records management responsibilities for records management staff defined in the guidance?

Does NRC have a records management orientation for new employees, and are employees informed that they are responsible and accountable for keeping accurate and complete records of their activities? Are exit briefings conducted for departing employees and senior officials?

Controls and Oversight:

Does NRC have written procedures for oversight activities to ensure the proper management of records?

Does NRC conduct surveys of the operation of the records management program at all organizational levels? Does this include an inventory of business processes and existing records to identify any unscheduled records?

Creation, Maintenance, Storage, and Disposition:

Does NRC have written guidance for handling information that is restricted from release under the Privacy Act or for records containing other information exempt from disclosure under FOIA?

Does NRC have written guidance for handling classified records and information and for ensuring segregation from unclassified records and information?

Does NRC have written procedures that address records management controls in alternate work site locations? What records issues have been identified and addressed?

Do NRC procedures, directives, and other issuances cover the record status of working papers/files and drafts?

Oversight Records:

For what industries or organizations does the agency conduct oversight?

Does the agency receive any records from the organizations over which it has oversight? If yes, describe the records received, including format and media.

What records series does the agency create and maintain for its oversight function?

Are these records maintained in hard copy or electronic media?

Are any of these records permanent? If yes, are they maintained as hard copy or electronic records?

Are these records maintained separately from other agency records?

How does the agency manage Confidential Business Information (CBI), PII, Classified or sensitive information received from organizations over which it has oversight?

Does the agency manage these records differently from other agency records?

Files Maintenance:

Do NRC records schedules cover all records in all media, and are the schedules fully implemented?

Does NRC guidance specify a well-defined filing structure through specified file labels for records, including a designated hierarchy of electronic file headers and sub-folders, to be used on file folders?

Does the NRC file plan include disposition instructions and citations to records schedules?

Does NRC guidance specify well-defined file structures, naming conventions, and taxonomies for electronic records? Does it ensure that these file structures, naming conventions, and taxonomies are used by staff when establishing and implementing electronic recordkeeping systems?

Does NRC have procedures in place to ensure that permanent records are identified and filed separately from temporary records?

Inactive Records Storage:

Is NRC storing permanent or unscheduled records at a commercial or agency storage facilities, and has the agency created documentation sufficient to identify and locate files?

Is NRC storing records under the appropriate conditions based on the retention period of the records and in compliance with 36 CFR 1232.12?

Are non-textual records being stored in environmentally appropriate space?

Before transferring records to a records storage facility has the agency created documentation sufficient to identify and locate files?

Records Disposition:

Which records management staff are responsible for the activities related to the disposition of records?

Who approves destructions/removals of records? Are records authorized for disposal only as provided in agency record schedules?

Has NRC issued a handbook, guidance, or a directive that contains records disposition policies and procedures as well as the NARA-approved records schedules?

Are permanent records transferred to NARA according to the NARA-approved schedules?

Are temporary records destroyed when NARA-approved retention periods expire?

What controls does the NRC have in place to prevent unauthorized removal or alienation of records?

What controls exist to ensure that records are not destroyed prior to their approved retention period or while they are covered by litigation hold or freeze?

Are unauthorized destruction/dispositions reported to NARA?

Electronic Records Management Requirements (Not Including E-mail):

General:

Has NRC assigned responsibility for development and implementation of guidance on the management of all records created, received, maintained, used, or stored on electronic media?

Has NRC integrated the management of electronic records with other records and information resources management programs?

Does NRC ensure that records management functionalities are incorporated into the design, development, and implementation of its electronic information systems?

Does NRC have procedures in place to ensure that records management requirements, including recordkeeping requirements and disposition, are addressed before approving new electronic information systems or enhancements to existing systems?

Does the records management staff work with information technology staff and does records management staff participate in the design, development, and implementation of new electronic information systems?

Migration:

Does NRC have migration strategies for electronic records and information and associated metadata?

Shared Drives and Unstructured Data:

Does NRC have policies and procedures that address records and information stored on shared drives? If yes, do the policies and procedures cover permissions, access controls, and acceptable formats for long-term records and information?

Does the record management staff work with information technology staff to ensure the integrity of the shared drives?

Are employees trained in the appropriate use of the shared drive to file records and information and their responsibilities for retention?

ERMS/RMA:

Does NRC or any office/component unit within the agency currently have a fully functioning Electronic Records Management System (ERMS) or a Records Management Application (RMA) for maintaining and preserving electronic records?

NRC has ADAMS which is the official recordkeeping system for the agency. Describe how the agency enters records into ADAMS, how they are maintained, and how they are dispositioned.

In addition to ADAMS the NRC maintains a number of other electronic information systems (CSTS and TLTS, RVID, NMED, ISI-DB, PITA and FFITS, etc).

Describe how these systems relate to ADAMS, how records are maintained in the systems, if and how are the records transferred to ADAMS.

Cloud Computing:

Does NRC or any office/component unit use cloud computing technologies?

If yes, what Records Management safeguards have been put in place?

Does RM staff maintain any inventory of records that are being stored in the cloud?

How does RM ensure records retention implementation in the cloud environment?

Audiovisual and Engineering Records Requirements:

Inventory, Identification, and Labeling:

Does NRC maintain and keep current an inventory of all generations of audiovisual records and their locations?

Does each engineering series have an identification scheme? Are identification designations assigned to each item in each series?

Preservation and Storage:

Does NRC maintain temporary and permanent audiovisual and engineering records separately?

Are responsible agency staff familiar with preservation standards as outlined in 36 CFR 1237 and other guidance?

Does NRC conduct regular preservation assessments of its audiovisual and engineering records?

Does NRC conduct regular reviews of environmental controls in storage areas that contain audiovisual and engineering records?

Training:

Has NRC developed and implemented an internal training program for records management staff covering their roles and responsibilities pertaining to records creation, maintenance, and disposition activities including the application of agency records management guidance?

APPENDIX F: ACRONYMS AND ABBREVIATIONS

ADAMS	Agency-wide Document Access and Management System
ADAMS-RM	Agency-wide Document Access and Management System-Records Manager
AFAS	Archival Facility Accountability System
ARCIS	Archives and Records Centers Information System
ARO	Agency Records Officer
CIO	Chief Information Officer
CFR	Code of Federal Regulations
CONOPS	Concept of Operations
COOP	Continuity of Operations Plan
DETS	Document Error Tracking System
DPC	Document Processing Center
DPI	Dots Per Inch
DTS	Documents Tracking System
EDMS	Electronic Document Management System
EDO	Executive Director of Operations
ERMS	Electronic Records Management System
FOIA	Freedom of Information Act
GAO	Government Accountability Office
IER	IBM Enterprise Records Manager
IRM	Information and Records Management (Program Plan)
IG	Inspector General
IT	Information Technology
IT/IM	Information Technology/Information Management
LSN	Licensing Support Network
NRC	Nuclear Regulatory Commission
NUREG	Nuclear Regulation
OCR	Optical Character Recognition
OIS	Office of Information Services

ORP	Official Records Processing
PDF	Portable Document Format
PoCA	Plan of Corrective Action
QC	Quality Control
RIDS	Records Information Distribution System
RLO	Records Liaison Officer
RM	Records Management
RMA	Records Management Application
RMSA	Records Management Self-Assessment
SGI	Safeguards Information
SLES	Safeguards Information Local Area Network and Electronic Safe
TA	Technical Assistant
TABS	Transforming Assets into Business Solutions
TB	Terabytes
TIF	Tagged Image File
WNRC	Washington National Records Center

U.S. Nuclear Regulatory Commission

Information and Records Management Program

Plans and Activities

FY 2014–FY 2019

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Office of Information Services

Portfolio Management and Planning Division

IT/IM Policy Branch

Draft, November 6, 2013 (without resources)

OVERVIEW

The vision for the Information and Records Management (IRM) program is to provide complete and accurate agency information by developing policies, procedures, guidance, and tools for the capture, use, storage, and disposition of information to allow staff and the public to access U.S. Nuclear Regulatory Commission (NRC) information repositories, now and in the future. This vision is embedded in the NRC's Information Technology/Information Management (IT/IM) Strategic Plan for fiscal years 2012–20162, as follows:

Goal 1: Effective Information Access—NRC staff and stakeholders can quickly and easily access the information they need.

Strategy 5: Improve the completeness and accuracy of NRC records and information.

Key Activities:

- Modernize the IRM process to make information capture and categorization more complete and transparent.
- Develop new file plans, records categorization, and retention schedules for use in records capture.
- Improve the staff's knowledge of IRM related to NRC work products
- Incorporate IRM policies into the NRC's capital planning and investment control process and the agency's IT project management methodology (PMM).

The purpose of this document is to lay out the vision, objectives, and plans for a modernized IRM program. This plan will strengthen the NRC's IRM program through a series of projects that, over the next several years, will enable the NRC to better manage its information. This plan is the culmination of many assessments, reports, and project plans, all of which provided a direction for modernizing the program to support the NRC's future information management goals, especially those linked to the transition to electronic government and more efficient work processes. This plan lays out a compliant program, including resource estimates required to implement and sustain an agencywide IRM program.

This plan also includes projects that are aligned with the strategic goals for the Office of Information Services for fiscal year (FY) 2014, specifically supporting "Improve the Usability of NRC Information" and the following strategies:

2 OIS is currently updating the IT/IM Strategic Plan to cover FY 2014 – FY 2018.

- Improve information delivery capability.
- Improve search capability and access to information.
- Facilitate data capture.
- Improve data quality.

IDENTIFICATION OF PROJECTS

The following diagram depicts the individual projects that comprise the IRM program. These projects are already underway or proposed to be initiated as key activities linked to the IT/IM Strategic Plan, Goal 1: Effective Information Access.



The scope of the IRM program is to provide an integrated approach to managing the various information and records initiatives that, when taken together, comprise a holistic IRM program. Below, the IRM plan provides a high-level description of each of the 12 projects, including objectives, tasks, dependencies, projected timeline, resources, and potential impacts. A section follows that presents a chart of the complete resource requirements, as well as one that identifies the most critical projects.

KEY PROJECTS AND CRITICAL RESOURCE NEEDS

1. Policy and Procedure Updates

Objective: Develop IRM policies and procedures that incorporate statutory and regulatory information and records management requirements. IRM policies embody a comprehensive, consistent, and cost-effective approach to managing information assets that rests on a shared vision of IRM and its role at the NRC. IRM policies, guidance, and procedures will be updated to allow the transformation of the way the NRC does business and to use technologies more efficiently.

2. Vital Business Information (VBI)

Objective: Develop an ongoing VBI program that supports the Continuity of Operations (COOP) program, as required by the Federal Emergency Management Agency, to ensure that vital agency records are protected and efficiently recoverable or salvageable in an emergency and sufficient to resume agency operations during and after a disaster.

3. Records Retention Revisions

Objective: Establish records retentions that are understandable and implementable in an electronic environment. NUREG-0910, "NRC Comprehensive Records Disposition Schedule," was last updated in 2005. This NUREG is arranged by individual offices and was developed to support paper records processes. It contains over 800 items and is difficult to use. In addition, the schedules are based on the media on which the information exists; whereas, NARA approved media-neutral schedules in 2007. NUREG-0910 will be updated to be organized by lines of business instead of individual offices. Retentions will be based on a newer retention structure (buckets) of transitory, short term, intermediate, long term, and extended long term. The updated NUREG will be sortable by retention, disposition, office, and lines of business.

4. Digitization

Objective: Institute processes and procedures to continuously reduce the amount of paper-based information and the reliance on microfiche. Legacy information will be easily accessible to staff and stakeholders for decision making. Also, supports Government-wide initiatives such as openness, transparency, and managing government information electronically.

5. File Taxonomy

Objective: Develop a structured and consistent way to describe and organize information, similar to how the NRC uses business lines for organizing budget information and activity codes for describing staff work hours. File taxonomy is a way to categorize information and records by lines of business (LOBs) that serves as a

framework to structure the agency's content for use throughout the life cycle (creation, collaboration, security, access, publishing and storage, retrieval, and disposition). The File taxonomy will be embedded as high-level folders within ADAMS (and other repositories of agency information). In addition, related subject topics will be assigned to cross business lines. The subject topics will allow staff to identify their content to suit their functional needs at the lower level while still maintaining a structure for the "greater good" of enabling records to be accessible now and in the future.

6. ADAMS Records Manager

Objective: Deploy technology for the sound, practical capture and management of electronic data to support business processes, litigation searches and holds, preservation of information, and compliance with Federal laws. Of immediate and critical need is the ability to embed records retention and VBI rules in ADAMS. For clarification, "declaring an Official Agency Record" in ADAMS is merely an NRC term for creating a PDF document that cannot be changed and possibly publishing it for the public. This process falls short of good recordkeeping practices and compliance. However, the NRC owns an IBM application, IBM Enterprise Records, that, when integrated with IBM P8, has the capability to attach necessary recordkeeping metadata to a document with little or no human intervention and appropriately "declare" and maintain it as a record. Likewise, the IBM tools to support workflow processes can be developed to support updates to VBI as well as notification of records retention and disposition and records litigation holds.

7. E-mail Capture

Objective: E-mail capture approaches will be developed based on a three-pronged strategy as recognized by industry and NARA best practices. One will be to use technology to automate the capture and filing of e-mail messages based on predetermined business rules. The second will be to delete e-mail automatically from the system for e-mail that has not been filed by the user. Finally, the third approach will be to have e-mail of permanent value, such as that of high-level officials, captured and categorized as such when they are created.

This approach is aligned with the NARA approach for managing e-mail which is referred to as "Capstone." It was developed to offer agencies the option of using a more simplified and automated approach to managing e-mail, as opposed to using either print and file systems or records management applications that require staff to file e-mail records individually.

8. RM Compliance Integration: IT Systems Lifecycle Compliance with Records Management Requirements

Objective: Systems that create or maintain structured or unstructured data will have lifecycle records management (RM) capabilities if the data falls under the definition

of a Federal record. The required RM compliance requirements will be incorporated, via manual or automated processes, during the development phases of the NRC systems that generate and contain Federal records. Compliance with RM requirements must be built in rather than added later at a greater throughout the NRC system lifecycle. In addition to compliance, life-cycle management will reduce data storage by applying deletion rules to unneeded, outdated information.

9. Litigation Preparedness

Objective: Establish prescribed procedures to respond to litigation notices, track responses, implement record holds, and document the effort. The development of these procedures will eliminate the agency going into “reactive mode” and reaching out on an ad hoc basis to staff without a coordinated effort. OIS is responsible for policy, procedures, custody, and disposition of information and records, but it is not always called upon to actively participate in requests for information. Discovery and litigation preparedness will be addressed by working with OGC so that OIS is part of the process and not reacting to the process. Best practices in industry and those recommended by the U.S. Department of Justice will be incorporated.

10. Training and Outreach

Objective: Develop and conduct appropriate and mandatory training for staff and contractors from high level officials to administrative support about recordkeeping responsibilities.

11. Controlled Unclassified Information (CUI)

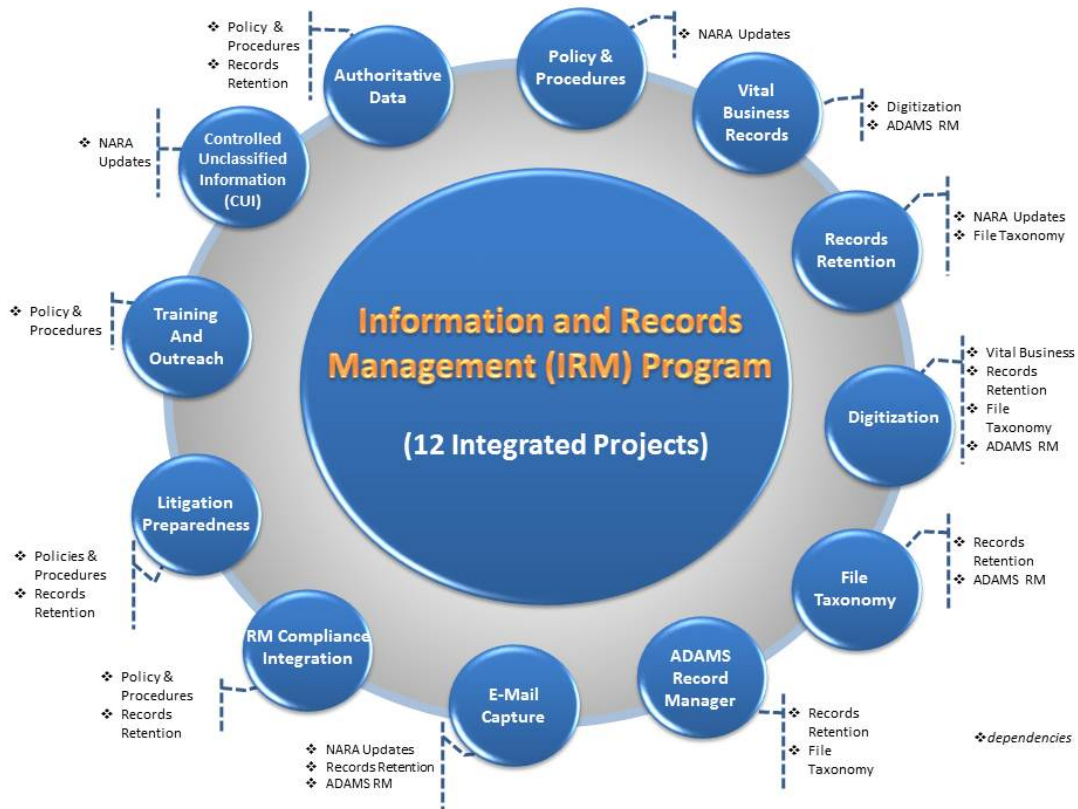
Objective: Transition from SUNSI to CUI as required by Executive Order 13556. The CUI Executive Agent (EA), Information Security Oversight Office, NARA estimates publication of the final policy in July 2014.

12. Authoritative Data

Objective: Eliminate the need to produce and maintain duplicative data that simplifies data interfaces between systems, reduces operational costs, and effectively maintain data quality.

PROJECT INTERDEPENDENCIES

The following diagram depicts project interdependencies in which meeting milestones within one project are critical for the success of another. The chart also shows where the completion of an NRC project also relies on the publication of NARA updates and guidance.

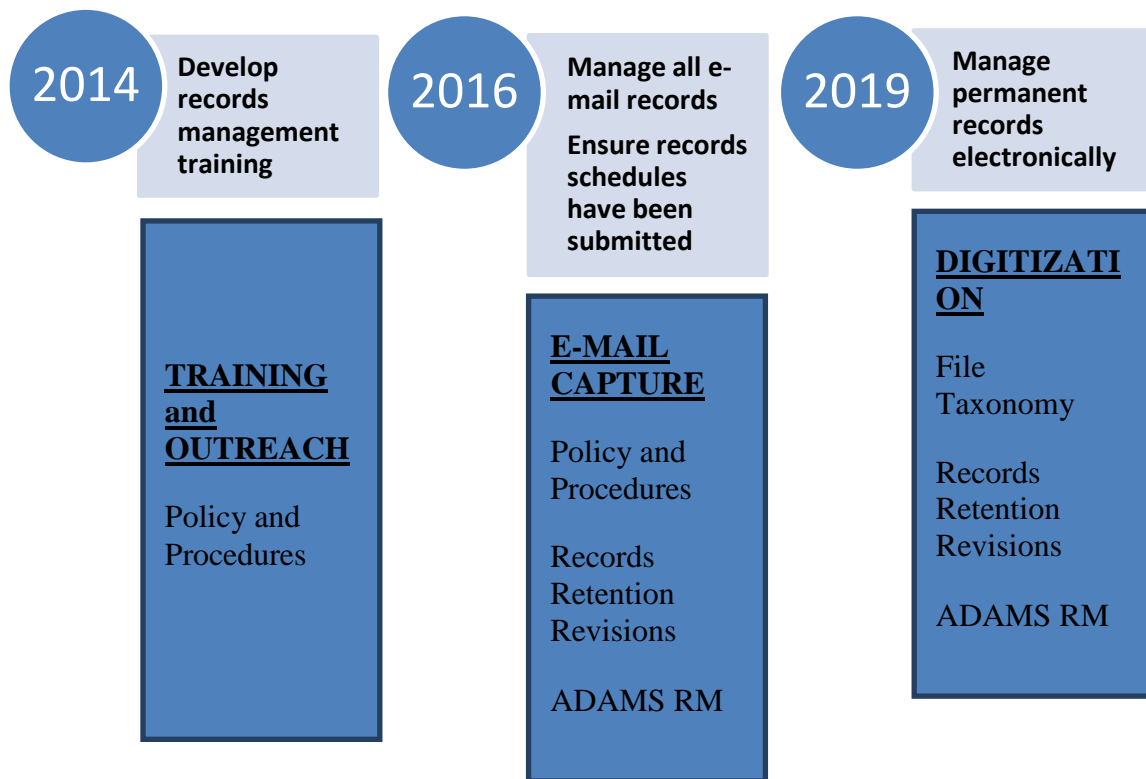


PRIORITY FOCUS

A significant risk to the success of the IRM program is sufficient and consistent funding to effectively execute the planned activities. Budgetary constraints will require IT/IM programs to be prioritized to maximize the benefits to the agency mission. The most critical of the 12 IRM projects are prioritized to align with in the Presidential Directive, M-12-18, which establishes primary timelines required by agencies to meet goal of electronic recordkeeping to ensure transparency, efficiency, and accountability.

In the diagram below, the priority projects from this plan are identified, and when they and other integrated projects must be accomplished in order to meet the Presidential Directive, M-12-18 deadlines.

PRESIDENTIAL DIRECTIVE TIMELINE and IRM PROJECTS





NATIONAL
ARCHIVES

NATIONAL ARCHIVES *and*
RECORDS ADMINISTRATION