
U.S. Nuclear Regulatory Commission



**Privacy Impact Assessment
Agencywide Documents Access and Management
System (ADAMS)
Office of the Chief Information Officer**

**Version 1.0
6/02/2023**

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| Agencywide Documents Access and Management System (ADAMS) | Version 1.0 |
| Privacy Impact Assessment | 6/02/2023 |

Document Revision History

| Date | Version | PIA Name/Description | Author |
|-----------|---------|----------------------------|----------------------------|
| 6/02/2023 | 1.0 | ADAMS PIA Initial Release. | OCIO Oasis Systems, LLC |
| 5/08/2023 | DRAFT | ADAMS PIA Draft Release. | OCIO Oasis Systems, LLC |

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The agency is subject to the requirements of the E-Government Act and is committed to identifying and addressing privacy risks whenever it develops or makes changes to its information systems. The questions below help determine any privacy risks related to the E-Government Act or later guidance by the Office of Management and Budget (OMB) and the National Institute of Standards and Technology (NIST).

Name/System/Subsystem/Service Name: Agencywide Documents Access and Management System (ADAMS)

Data Storage Location (i.e., Database Server, SharePoint, Cloud, Other Government Agency, Power Platform): Database Servers.

Date Submitted for review/approval: June 2, 2023.

1 Description

1.1 Provide the description of the system/subsystem, technology (i.e., Microsoft Products), program, or other data collections (hereinafter referred to as “project”). Explain the reason the project is being created.

ADAMS is an enterprise-level system used by the U.S. Nuclear Regulatory Commission (NRC) to organize, process, and manage the Agency’s documentary material, which includes documents designated as official agency records (OARs) and non-record reference material, which includes works in progress, drafts, and other non-OAR documentation. ADAMS is the NRC’s record retention system for documentary material and is integrated into many of the Agency’s mission critical standard operating procedures and records management processes. ADAMS is used throughout NRC Headquarters (HQ) and regional offices.

ADAMS provides the following capabilities:

- Document management (intake, classification, and retention),
- Document publishing,
- Document search and retrieval,
- Records management.

ADAMS supports NRC’s content management function: document capture, distribution, search and retrieval, and records management. ADAMS is the official records repository for unclassified records and is tightly integrated into many of NRC’s mission critical standard operating procedures and records management processes.

The ADAMS environment resides primarily in the NRC-managed network on virtual servers maintained in the NRC HQ Data Center. The ADAMS development (DEV) and integration (INT) environments are migrating to the NRC Office of the Chief Information Officer (OCIO) Azure Cloud Services (ACS) tenant.

ADAMS contains one subsystem, the Electronic Information Exchange (EIE) system, which provides an input mechanism to add documents to ADAMS. No further information/discussion of the EIE system is contained in this ADAMS Privacy Impact Assessment (PIA).

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Please mark appropriate response below if your project/system will involve the following:

| | |
|-------------------------------------|--|
| <input type="checkbox"/> PowerApps | <input checked="" type="checkbox"/> Public Website |
| <input type="checkbox"/> Dashboard | <input checked="" type="checkbox"/> Internal Website |
| <input type="checkbox"/> SharePoint | <input type="checkbox"/> None |
| <input type="checkbox"/> Other | |

1.2 Does this privacy impact assessment (PIA) support a proposed new project, proposed modification to an existing project, or other situation? Select options that best apply in table below.

Mark appropriate response.

| Status Options | |
|-------------------------------------|---|
| <input type="checkbox"/> | New system/project |
| <input type="checkbox"/> | Modification to an existing system/project. <i>If modifying or making other updates to an existing system/project, provide the ADAMS ML of the existing PIA and describe the modification.</i> |
| <input checked="" type="checkbox"/> | Annual Review <i>If making minor edits to an existing system/project, briefly describe the changes below.</i> |
| <input type="checkbox"/> | Other (explain) |

1.3 Points of Contact:

| | Project Manager | System Owner/Data Owner/Steward | ISSO | Business Project Manager | Technical Project Manager | Executive Sponsor |
|-------------------------------|-------------------|---------------------------------|--------------------|--------------------------|---------------------------|-------------------|
| Name | Mackenzie Stevens | Gwen Hayden | Luc Phuong | Mackenzie Stevens | Roy Choudhury | David Nelson |
| Office/Division/Branch | OCIO/ITSDOD | OCIO/ITSDOD | OCIO/GEMSD/CSB/IAT | OCIO/ITSDOD | OCIO/ITSDOD/ADSB/CCAT | OCIO |
| Telephone | 301-415-2718 | 301-415-0761 | 301-415-1103 | 301-415-2718 | 301-415-7226 | 301-415-8700 |

2. Authorities and Other Requirements

2.1 What specific legal authorities and/or agreements permit the collection of information for the project?

Provide all statutory and regulatory authorities for operating the project, including the authority to collect the information; NRC internal policy is not a legal authority. Please mark appropriate response in table below.

| Mark with an "X" on all that apply. | Authority | Citation/Reference |
|-------------------------------------|---|---|
| <input checked="" type="checkbox"/> | Statute | 44 United States Code (U.S.C.) Chapters 31 & 33 |
| <input type="checkbox"/> | Executive Order | |
| <input checked="" type="checkbox"/> | Federal Regulation | 36 Code of Federation Regulations (CFR) Subpart B |
| <input type="checkbox"/> | Memorandum of Understanding/ Agreement | |
| <input type="checkbox"/> | Other (summarize and provide a copy of relevant portion) | |

2.2 Explain how the information will be used under the authority listed above (i.e., *enroll employees in a subsidies program to provide subsidy payment*).

NRC staff collect programmatic and administrative information to facilitate the activities necessary to conduct the NRC's day-to-day business. A portion of the vast amounts of programmatic and administrative documents that are added to ADAMS may contain information about an individual. NRC staff also collect this information to facilitate the records lifecycle management process and to comply with the regulations governing Federal records management. The licensing, technical, and adjudicatory information stored in ADAMS supports the NRC's mission.

The publicly available information in ADAMS is used by external users searching the Agency's policies, regulations, and material related to NRC licensing activities.

If the project collects Social Security numbers, state why this is necessary and how it will be used.

The content of a document that is added to ADAMS may include any type of information about an individual but is normally workplace-related or business-related information. Information about an individual (e.g. Federal employee, contractor, licensee employee, general public) may be maintained in ADAMS if information about an individual is included as part of a document that is added into ADAMS.

The Replacement Reactor Program System (RRPS) is the Federal system of record for Operating License Records (OL Records), which contains personally identifiable information (PII) of applicants for, and holders of, operator licenses at nuclear power plants. RRPS uses ADAMS as a storage service provider for these records, which are owned and maintained by RRPS personnel. OL Records consist of application files, examination files, historical files,

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medical files, license files, and violation files related to the application, issuance, maintenance and, if necessary, revocation of an individual's operator license at a nuclear power facility regulated by the NRC.

It is not the agency's policy or practice to make documents identified as containing PII available to the public. In cases where such a document must be made public, the PII is redacted, and the redacted version is made public; the original remains non-public. Internal access to documents containing PII is also restricted to those with a need-to-know.

3 Characterization of the Information

In the table below, mark the categories of individuals for whom information is collected.

| Category of individual | |
|-------------------------------------|---|
| <input checked="" type="checkbox"/> | Federal employees |
| <input checked="" type="checkbox"/> | Contractors |
| <input checked="" type="checkbox"/> | Members of the Public (any individual other than a federal employee, consultant, or contractor) |
| <input checked="" type="checkbox"/> | Licensees |
| <input checked="" type="checkbox"/> | Other: Parties to NRC Adjudicatory proceedings, Nuclear Industry organizations, Members of Congress, Agreement States, Local governments, and Foreign governments and international organizations. |

In the table below, is a list of the most common types of PII collected. Mark all PII that is or may be collected and stored by the project/system. If there is additional PII not defined in the table below, a comprehensive listing of PII is provided for further reference in ADAMS at the following link: [PII Reference Table 2023](#).

| Categories of Information | | | |
|-------------------------------------|---|-------------------------------------|--|
| <input checked="" type="checkbox"/> | Name | <input checked="" type="checkbox"/> | Resume or curriculum vitae |
| <input checked="" type="checkbox"/> | Date of Birth | <input checked="" type="checkbox"/> | Driver's License Number |
| <input checked="" type="checkbox"/> | Country of Birth | <input checked="" type="checkbox"/> | License Plate Number |
| <input checked="" type="checkbox"/> | Citizenship | <input checked="" type="checkbox"/> | Passport number |
| <input checked="" type="checkbox"/> | Nationality | <input checked="" type="checkbox"/> | Relatives Information |
| <input checked="" type="checkbox"/> | Race | <input checked="" type="checkbox"/> | Taxpayer Identification Number |
| <input checked="" type="checkbox"/> | Home Address | <input checked="" type="checkbox"/> | Credit/Debit Card Number |
| <input checked="" type="checkbox"/> | Social Security number (Truncated or Partial) | <input checked="" type="checkbox"/> | Medical/health information |
| <input checked="" type="checkbox"/> | Gender | <input checked="" type="checkbox"/> | Alien Registration Number |
| <input checked="" type="checkbox"/> | Ethnicity | <input checked="" type="checkbox"/> | Professional/personal references |
| <input checked="" type="checkbox"/> | Spouse Information | <input checked="" type="checkbox"/> | Criminal History |
| <input checked="" type="checkbox"/> | Personal e-mail address | <input checked="" type="checkbox"/> | Biometric identifiers (facial images, fingerprints, iris scans) |
| <input checked="" type="checkbox"/> | Personal Bank Account Number | <input checked="" type="checkbox"/> | Emergency contact (e.g., a third party to contact in case of an emergency) |

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| Categories of Information | | | |
|-------------------------------------|------------------------|-------------------------------------|---|
| <input checked="" type="checkbox"/> | Personal Mobile Number | <input checked="" type="checkbox"/> | Accommodation/disabilities information |
| <input checked="" type="checkbox"/> | Marital Status | <input checked="" type="checkbox"/> | Other: ADAMS is a document repository for the NRC. Documents in ADAMS can contain various types of information, including different categories of PII. |
| <input checked="" type="checkbox"/> | Children Information | | |
| <input checked="" type="checkbox"/> | Mother's Maiden Name | | |

3.1 Describe how the data is collected for the project. (i.e., NRC Form, survey, questionnaire, existing NRC files/databases, response to a background check).

ADAMS does not directly collect information from an individual. Information placed into ADAMS is collected or generated by the NRC through other means, e.g. in response to adjudicatory filings, rulemakings, or other regulatory matters (to include records collected by RRPS, as documented in section 2.2).

The content of a document that is added to ADAMS may include any type of information about an individual but is normally workplace-related or business-related information. Information about an individual may be maintained in ADAMS if information about an individual is included as part of a document that is added into ADAMS.

Internal sources of information which may contain PII include:

- Electronic files generated by NRC staff in various formats (e.g. text, images, graphics, spreadsheets, or any combination of these formats)
- Email from the NRC email system
- OL Records from RRPS

External sources of information which may contain PII include:

- NRC Licensees and Applicants
- Parties to NRC Adjudicatory proceedings
- Nuclear Industry organizations
- Members of Congress
- Other Federal Agencies
- Agreement States
- Local governments
- Members of the public commenting on NRC regulations and publications
- Foreign governments and international organizations

The methods of collection used include:

- EIE submissions
- Paper documents (scanned into ADAMS)
- CD-ROM submissions
- Email and Facsimile (Fax) submissions
- Interface with RRPS
- Interface with Web Based Licensing (WBL) submissions.
- Interface with Mission Analytics Portal (MAP-X), currently for Web-Based Relief Requests (WRR) submissions

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3.2 If using a form to collect the information, provide the form number, title, and/or a link.

ADAMS does not directly collect information from an individual. Information placed into ADAMS is collected or generated by the NRC through other means, which can include any form in the NRC Forms library.

Document submissions made to the Document Processing Center (DPC) contain the NRC Form 665, "ADAMS Document Submission", specifying document availability (e.g., publicly or non-publicly available) and access security level. However, NRC Form 665 is not published in ADAMS.

3.3 Who provides the information? Is it provided directly from the individual or a third party.

ADAMS does not directly collect information from an individual. Information placed into ADAMS is collected or generated by the NRC through other means, e.g. in response to adjudicatory filings, rulemakings, or other regulatory matters. Refer to section 3.1 regarding information sources.

3.4 Explain how the accuracy of the data collection is validated. If the project does not check for accuracy, please explain why.

The NRC rulemaking "Electronic Maintenance and Submission of Information" (E-Rule) and its accompanying regulatory document, "Guidance for Electronic Submissions to the NRC" govern the electronic submission, including fax submissions, of documents to the NRC, which may be accessed at ML13031A056.

The Agency's DPC evaluates the EIE and CD-ROM submittals against the criteria specified in the electronic submission guidance document and processes the document(s) that meet its criteria into ADAMS. Documents that do not meet one or more of the guidance document criteria will not be processed into ADAMS. The DPC will forward these submittals to the submitter and/or the appropriate NRC office staff in order to resolve the issue and obtain a submittal that can be processed into ADAMS. The owners of internal information are responsible for accuracy and completeness of the information added to ADAMS.

3.5 Will PII data be used in a test environment? If so, explain the rationale.

No.

3.6 What procedures are in place to allow the subject individual to correct inaccurate or erroneous information?

The information owners are responsible for accuracy and completeness of the information added to ADAMS.

4 Data Security

4.1 Describe who has access to the data in the project (i.e., internal NRC, system administrators, external agencies, contractors, public).

All NRC office staff (employees and contractors) may have access to the information in ADAMS, except for OL Records. Only select RRPS users from the Office of Nuclear Reactor Regulation (NRR) can access this data. All application users must be authenticated to access the system

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and must be a member of an appropriate Access Control List (ACL) to access the data. System administrators must have an individual administrator account and password to access the system. Their access to data / permitted privileged actions are controlled by inclusion of the account in the appropriate administrative group account.

Other Federal agencies, licensees, state, local, and tribal governments, participants in adjudicatory hearings, and members of the general public have access to the publicly available information in ADAMS.

4.2 If the project/system shares information with any other NRC systems, identify the system, what information is being shared and the method of sharing.

- Public Meeting Notice System (PMNS): requires read-only access to the Docket table in the Master Data Management system (MDMS) database to retrieve specific Docket Number data.
- The EIE system is a document ingestion system for various regulatory required documents, which are added into ADAMS for official recordkeeping. ADAMS provides accession numbers (ADAMS ML) back to EIE for submitted documents. In addition, EIE provides service list membership to ADAMS in order to populate ACLs for authorization purposes to Electronic Hearing Docket (EHD) Protective Order File (POF) documents.
- RRPS uses ADAMS as a storage repository for OL Records.
- An NRC-issued laptop is used by the Atomic Safety and Licensing Board Panel (ASLBP) to access pre-filed adjudicatory documents in ADAMS.
- The WBL system ingests documents containing license and related information into the ADAMS Main Library, which returns live links back to WBL so that users may access the records in ADAMS while in WBL.
- The MAP-X portal is a cloud-based web application used by authenticated licensees to submit an NRC form (requesting relief from certain regulatory requirements) for retention in the ADAMS Main Library.

4.3 If the project/system connects, receives, or shares information with any external non-NRC partners or systems, identify what is being shared.

As per NRC CSO-PROS-1323, "Information Security Continuous Monitoring Process", MOUs/ISAs are "required between NRC and external entities; not between internal NRC systems". As ADAMS connections with RRPS, WBL, and MAP-X are internal, MOUs/ISAs are not required.

The publicly available documents are released to the public via publishing to the ADAMS Public Libraries (Publicly Available Records System (PARS) and Public Licensing Support Network (LSN)) where they can be accessed through various NRC-provided web sites. In addition, copies of all the PARS content are copied to the Unified Public Web Search repository where they can be searched via the publicly available Google search engine. Links to all these sites are provided on the NRC's public website.

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Identify what agreements are in place with the external non-NRC partner or system in the table below.

| Agreement Type | |
|-------------------------------------|---|
| <input type="checkbox"/> | Contract Provide Contract Number: |
| <input type="checkbox"/> | License Provide License Information: |
| <input type="checkbox"/> | Memorandum of Understanding Provide ADAMS ML number for MOU: |
| <input type="checkbox"/> | Other |
| <input checked="" type="checkbox"/> | None |

4.4 Describe how the data is accessed and describe the access control mechanisms that prevent misuse.

Internal access to ADAMS is restricted to NRC users with active NRC Local Area Network/Wide Area Network (LAN/WAN) accounts and passwords and ADAMS accounts. Level of access to documents depends upon a user's role(s) and need-to-know and is restricted by object (package, folder, and document) access rights. The users are authenticated via a Lightweight Directory Access Protocol (LDAP), which has an interface linked to the NRC's OCIO Information Technology Infrastructure (ITI) system Active Directory services (Single Sign-On).

ADAMS relies on the Agency Rules of Behavior to ensure proper information usage by individuals that have been granted access to the ADAMS Main Library. Role-based access controls and need-to-know within ADAMS also limit misuse of data.

Except for POF documents, there are no security controls to authenticate external access to the ADAMS Public Libraries as this access is anonymous. Each POF document requires a valid NRC-approved digital certificate and inclusion in the appropriate ACL in order to view that document.

At the object level (packages, folders, and documents), all content is restricted to those assigned a valid security role (assigned by the owner of the object). Except for POF documents, a user without assigned rights is not able to see the object, much less access its contents. Within the POF interface, business needs mandate that the authenticated user can see the title of the document but may not access the contents without the user's inclusion in the appropriate ACL.

For all components, ADAMS relies on NRC ITI for security controls over access to the forward-facing web servers that host the libraries. This includes compliance with Homeland Security's mandate for using secure ports and protocols to establish communication between the user's browser and the web servers that access the public libraries.

4.5 Explain how the data is transmitted and how confidentiality is protected (i.e., encrypting the communication or by encrypting the information before it is transmitted).

ADAMS transmits content to staff over the NRC's ITI internal network.

ADAMS publishes public content to external-facing web servers for access by the general public and select members of adjudicatory proceedings. The publicly available documents are released to the public via publishing to the ADAMS Public Libraries (PARS and LSN) where they can be accessed through various NRC-provided web sites. In addition, copies of all the

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PARS content is copied to the Unified Public Web Search repository where they can be searched via the publicly available Google search engine. Links to all these sites are provided on the NRC's public website.

4.6 Describe where the data is being stored (i.e., NRC, Cloud, Contractor Site).

ADAMS database servers are hosted at NRC HQ.

4.7 Explain if the project can be accessed or operated at more than one location.

The ADAMS Main Library is accessed by NRC HQ and all regional offices' staff users via the NRC LAN/WAN. External public libraries (PARS and LSN) are accessed by external users via the Internet.

ADAMS may only be accessed remotely by NRC staff through the NRC's ITI Virtual Private Network (VPN) or the Azure Virtual Desktop (AVD).

4.8 Can the project be accessed by a contractor? If so, do they possess an NRC badge?

Yes. The NRC contractors, who are authorized for ADAMS access in order to fulfill their contractual obligations, are under the same access control, including accounts, passwords, and access rights at the document level, as other NRC internal users, on a need-to-know basis.

All contractors supporting ADAMS are, at a minimum, NRC IT-I cleared, possessing NRC badges.

4.9 Explain the auditing measures and technical safeguards in place to prevent misuse of data.

The security controls recommended by the National Institute of Standards and Technology (NIST) Special Publication (SP) 800-53 Rev. 5 have been implemented in ADAMS to prevent misuse of data. Please see the ADAMS System Security Plan and the ADAMS P8 Audit and Accountability Policy and Procedures document for more information.

4.10 Describe if the project has the capability to identify, locate, and monitor (i.e., trace/track/observe) individuals.

N/A.

4.11 Define which FISMA boundary this project is part of.

ADAMS is in its own FISMA boundary, which includes ADAMS and its subsystem, EIE.

4.12 Is there an Authority to Operate (ATO) associated with this project/system?

| Authorization Status | |
|-------------------------------------|--|
| <input type="checkbox"/> | Unknown |
| <input type="checkbox"/> | No <i>If no, please note that the authorization status must be reported to the Chief Information Security Officer (CISO) and Computer Security Organization (CSO's) Point of Contact (POC) via e-mail quarterly to ensure the authorization remains on track.</i> |
| <input type="checkbox"/> | In Progress provide the estimated date to receive an ATO. Estimated date: |
| <input checked="" type="checkbox"/> | Yes Indicate the data impact levels (Low, Moderate, High, Undefined) approved by the Chief Information Security Officer (CISO) Confidentiality – Moderate Integrity – Moderate Availability – Moderate |

4.13 Provide the NRC system Enterprise Architecture (EA)/Inventory number. If unknown, contact [EA Service Desk](#) to get the EA/Inventory number.

EA Number: 9501.

5 Privacy Act Determination

5.1 Is the data collected retrieved by a personal identifier?

Mark the appropriate response.

| Response | |
|-------------------------------------|---|
| <input type="checkbox"/> | Yes, the PII is retrieved by a personal identifier (i.e., individual's name, address, SSN, etc.) |
| <input type="checkbox"/> | List the identifiers that will be used to retrieve the information on the individual. |
| <input checked="" type="checkbox"/> | No, the PII is not retrieved by a personal identifier. If no, explain how the data is retrieved from the project. Although there are some documents in ADAMS that contain information about individuals, it is not the practice or policy of the NRC to retrieve information in ADAMS by an individual's name or unique identifier (other than the name of the author). ADAMS was designed and developed as the NRC's information management system. It was not developed as a system to collect or maintain information "about" individuals. ADAMS contains document profile data fields, two of which collect the name of a document's author and the document's recipient. The name of a document author and/or recipient is collected for administrative purposes, not for the purpose of collecting or retrieving records or information "about" the named individual. Also, the capability does exist to search for documents using an individual's name or personal identifier (or any other text) in a document text search. |

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5.2 For all collections where the information is retrieved by a personal identifier, the Privacy Act requires that the agency publish a System of Record Notice (SORN) in the Federal Register. As per the Privacy Act of 1974, "the term 'system of records' means a group of any records under the control of any agency from which information is retrieved by the name of the individual or by some other personal identifier assigned to the individual.

Mark the appropriate response in the table below.

| Response | |
|-------------------------------------|---|
| <input type="checkbox"/> | Yes, this system is covered by an existing SORN. (See existing SORNs: https://www.nrc.gov/reading-rm/foia/privacy-systems.html) Provide the SORN name, number, (List all SORNs that apply): |
| <input type="checkbox"/> | SORN is in progress |
| <input type="checkbox"/> | SORN needs to be created |
| <input type="checkbox"/> | Unaware of an existing SORN |
| <input checked="" type="checkbox"/> | No, this system is not a system of records and a SORN is not applicable. |

5.3 When an individual is asked to provide personal data (i.e., form, webpage, survey), is a Privacy Act Statement (PAS) provided?

A Privacy Act Statement is a disclosure statement required to appear on documents used by agencies when an individual is asked to provide personal data. It is required for any forms, surveys, or other documents, including electronic forms, used to solicit personal information from individuals that will be maintained in a system of records.

Mark the appropriate response.

| Options | |
|-------------------------------------|------------------------------|
| <input type="checkbox"/> | Privacy Act Statement |
| <input checked="" type="checkbox"/> | Not Applicable |
| <input type="checkbox"/> | Unknown |

5.4 Is providing the PII mandatory or voluntary? What is the effect on the individual by not providing the information?

The information owners are responsible for providing notice at the time of collection whether or not PII disclosure is mandatory.

6 Records and Information Management-Retention and Disposal

The National Archives and Records Administration (NARA), in collaboration with federal agencies, approves whether records are **Temporary** (eligible at some point for destruction/deletion because they no longer have business value) or **Permanent** (eligible at some point to be transferred to the National Archives because of historical or evidential significance). Records/data and information with historical value, identified as having a "permanent" disposition, are transferred to the National Archives of the United States at the end

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of their retention period. All other records identified as having a “temporary” disposition are destroyed at the end of their retention period in accordance with the NARA Records Schedule or the General Records Schedule.

These determinations are made through records retention schedules and NARA statutes (44 United States Code (U.S.C.), 36 Code of Federation Regulations (CFR)). Under 36 CFR, agencies are required to establish procedures for addressing Records and Information Management (RIM) requirements. This includes strategies for establishing and managing recordkeeping requirements and disposition instructions before approving new electronic information systems or enhancements to existing systems.

The following questions are intended to determine whether the records/data and information in the system have approved records retention schedules and disposition instructions, whether the system incorporates RIM strategies including support for [NARA’s Universal Electronic Records Management \(ERM\) requirements](#), and if a mitigation strategy is needed to ensure compliance.

If the project/system:

- Does not have an approved records retention schedule and/or
- Does not have an *automated* RIM functionality.
- Involves a cloud solution.
- And/or if there are additional questions regarding Records and Information Management - Retention and Disposal, please contact the NRC Records staff at ITIMPolicy.Resource@nrc.gov for further guidance.

If the project/system has a record retention schedule or an automated RIM functionality, please complete the questions below.

6.1 Does this project map to an applicable retention schedule in NRC’s Comprehensive Records Disposition Schedule (NUREG-0910), or NARA’s General Records Schedules?

| | |
|-------------------------------------|---|
| <input type="checkbox"/> | <u>NUREG-0910, “NRC Comprehensive Records Disposition Schedule”</u> |
| <input checked="" type="checkbox"/> | <u>NARA’s General Records Schedules</u> |
| <input type="checkbox"/> | Unscheduled |

6.2 If so, cite the schedule number, approved disposition, and describe how this is accomplished.

| | |
|---|---|
| System Name (include sub-systems, platforms, or other locations where the same data resides) | ADAMS |
| Records Retention Schedule Number(s) | Each NRC document declared as an Official Agency Record in ADAMS is designated an authorized disposition in Records Manager. This disposition covers the ADAMS Portable Document Format (PDF) files, Tag Image File Format (TIFF) files, as well as the ADAMS data related to digital signatures, and data regarding final NRC management and staff concurrences in documents that are linked to and considered |

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| | <p>part of the official records.</p> <p>The NARA-approved records retention and disposition requirements for ADAMS records are described on the NRC’s public website and may be accessed via the following link: https://www.nrc.gov/reading-rm/records-mgmt.html</p> <p><u>The retention for the Master file is scheduled as follows:</u></p> <ul style="list-style-type: none"> • GRS 3.2 Items 050 & 051, Backup of master files and databases <p><u>Retention for Documentation is scheduled as follows:</u></p> <ul style="list-style-type: none"> • GRS 3.1 Items 050 & 051, Data administration records <p>Additional information related to Information Systems Security are scheduled under the GRS 3.2, Information Systems Security Records</p> |
| <p>Approved Disposition Instructions</p> | <p><u>The retention for the Master file is scheduled as follows:</u></p> <ul style="list-style-type: none"> • GRS 3.2 Item 050, Backup of master files and databases. File identical to permanent records scheduled for transfer to the National Archives. <p>Temporary. Destroy immediately after the identical records have been captured in a subsequent backup file or at any time after the transfer request has been signed by the National Archives, but longer retention is authorized if required for business use.</p> <ul style="list-style-type: none"> • GRS 3.2 Item 051, Backup of master files and databases. File identical to temporary records authorized for destruction by a NARA-approved records schedule. <p>Temporary. Destroy immediately after the identical records have been deleted or replaced by a subsequent backup file, but longer retention is authorized if required for business use.</p> |

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| | <p><u>Retention for Documentation is scheduled as follows:</u></p> <ul style="list-style-type: none"> GRS 3.1 Item 050, Data administration records. Documentation necessary for preservation of permanent electronic records. Permanent. Transfer to the National Archives with the permanent electronic records to which the documentation relates. GRS 3.1 Item 051, Data administration records. All documentation for temporary electronic records and documentation not necessary for preservation of permanent records. Temporary. Destroy 5 years after the project/activity/transaction is completed or superseded, or the associated system is terminated, or the associated data is migrated to a successor system, but longer retention is authorized if required for business use. <p>Additional information related to Information Systems Security are scheduled under the: GRS 3.2, Information Systems Security Records.</p> |
| <p>Is there a current automated functionality or a manual process to support RIM requirements? This includes the ability to apply records retention and disposition policies in the system(s) to support records accessibility, reliability, integrity, and disposition.</p> | <p>Yes, ADAMS contains built-in automated records management processing tools.</p> |
| <p>Disposition of Temporary Records Will the records/data or a composite be automatically or manually deleted once they reach their approved retention?</p> | <p>Temporary Records are automatically marked as being ready for disposition once they reach their approved retention. Once marked, Records Management staff review and manually delete the records accordingly.</p> |
| <p>Disposition of Permanent Records Will the records be exported to an approved format and transferred to the National Archives based on approved</p> | <p>Yes, Permanent Records are exported in PDF and TIFF format to the National Archives in accordance with their approved retention and disposition instructions.</p> |

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| retention and disposition instructions? If so, what formats will be used? NRC Transfer Guidance (Information and Records Management Guideline - IRMG) | |
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7 Paperwork Reduction Act

The Paperwork Reduction Act (PRA) of 1995 requires that agencies obtain an Office of Management and Budget (OMB) approval in the form of a "control number"—before promulgating a paper form, website, surveys, questionnaires, or electronic submission from 10 or members of the public. If the data collection is from federal employees regarding work-related duties, then a PRA clearance is not necessary.

7.1 Will the project be collecting any information from 10 or more persons who are not Federal employees?

N/A - ADAMS does not collect any information but organizes, processes, and manages existing Agency documents.

7.2 Is there any collection of information addressed to all or a substantial majority of an industry (i.e., Fuel Fabrication Facilities or Fuel Cycle Facilities)?

No.

7.3 Is the collection of information required by a rule of general applicability?

N/A - ADAMS does not collect any information but organizes, processes, and manages existing Agency documents. Therefore, an OMB clearance is not needed.

Note: For information collection (OMB clearances) questions: contact the NRC's Clearance Officer. Additional guidance can be found on the NRC's internal Information Collections Web page at: <https://intranet.nrc.gov/ocio/33456>.

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8 Privacy Act Determination

Project/System Name: Agencywide Documents Access and Management System (ADAMS).

Submitting Office: Office of the Chief Information Officer (OCIO).

Privacy Officer Review

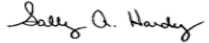
| Review Results | | Action Items |
|-------------------------------------|---|---|
| <input type="checkbox"/> | This project/system does not contain PII. | No further action is necessary for Privacy. |
| <input checked="" type="checkbox"/> | This project/system does contain PII ; the Privacy Act does NOT apply, since information is NOT retrieved by a personal identifier. | Must be protected with restricted access to those with a valid need-to-know. |
| <input type="checkbox"/> | This project/system does contain PII ; the Privacy Act does apply. | SORN is required- Information is retrieved by a personal identifier. |

Comments:

Although there are some documents in ADAMS that contain information about individuals, it is not the practice or policy of the NRC to maintain ADAMS as a system of records keyed to individuals, or to retrieve by an individual's name or unique identifier (other than the name of the author). ADAMS was designed and developed as the NRC's information management system. It was not developed as a system to collect or maintain information "about" individuals. ADAMS contains document profile data fields, two of which collect the name of a document's author and the document's recipient. The name of a document author and/or recipient is collected for administrative purposes, not for the purpose of collecting or retrieving records or information "about" the named individual. Also, the capability does exist to search for documents using an individual's name or personal identifier (or any other text) in a document text search. OMB guidelines make it clear that it is not sufficient that an agency has the capability to retrieve information indexed under a person's name, but the agency must in fact retrieve records in this way in order for a system of records to exist. The retrieval of information by name or other personal identifier must be an agency practice to create a system of records and not a practice by those outside the agency.

This system may contain documents that include personally identifiable information (PII). Documents that contain PII will have restricted access. Information related to the workplace, such as an employee's name, title, work telephone number, official work address/location, and work e-mail address is not treated as PII by NRC. Additionally, NRC's Office of General Counsel has advised that home addresses, home phone numbers, or home e-mail addresses - within adjudicatory filings, documents associated with agency rulemakings, and correspondence received from the public on regulatory matters will not be treated as PII.

History/Background: A request for a legal opinion (July 2003) was submitted to OGC to readdress the issue of whether or not ADAMS should be considered a Privacy Act system of records. OGC reconfirmed on September 15, 2003, that ADAMS does not constitute a system of records for purposes of the Privacy Act. The basic concept of ADAMS has not been modified.

| Reviewer's Name | Title |
|---|-----------------|
|  Signed by Hardy, Sally on 06/28/23 | Privacy Officer |


9 OMB Clearance Determination

NRC Clearance Officer Review

| Review Results | |
|-------------------------------------|--|
| <input checked="" type="checkbox"/> | No OMB clearance is needed. |
| <input type="checkbox"/> | OMB clearance is needed. |
| <input type="checkbox"/> | Currently has OMB Clearance. Clearance No. _____ |

Comments:

ADAMS is not a collection instrument and is covered by the requirements of the Paperwork Reduction Act.


| Reviewer's Name | Title |
|--|--------------------------|
|  Signed by Cullison, David on 06/12/23 | Agency Clearance Officer |

10 Records Retention and Disposal Schedule Determination

Records Information Management Review

| Review Results | |
|-------------------------------------|--|
| <input type="checkbox"/> | No record schedule required. |
| <input type="checkbox"/> | Additional information is needed to complete assessment. |
| <input type="checkbox"/> | Needs to be scheduled. |
| <input checked="" type="checkbox"/> | Existing records retention and disposition schedule covers the system - no modifications needed. |

Comments:

| Reviewer's Name | Title |
|---|--|
|  Signed by Dove, Marna on 06/16/23 | Sr. Program Analyst, Electronic Records Manager |

11 Branch Chief Review and Concurrence

| Review Results | |
|-------------------------------------|---|
| <input type="checkbox"/> | This project/system does not collect, maintain, or disseminate information in identifiable form. |
| <input checked="" type="checkbox"/> | This project/system does collect, maintain, or disseminate information in identifiable form. |
| <input type="checkbox"/> | I concur with the Privacy Act, Information Collections, and Records Management reviews. |



Signed by Harris, Kathryn
on 07/05/23

Chief
Cyber Security Branch
Governance and Enterprise Management
Services Division
Office of the Chief Information Officer

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ADDITIONAL ACTION ITEMS/CONCERNS

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|---|---|
| Name of Project/System: Agencywide Documents Access and Management System (ADAMS). | |
| Date CSB received PIA for review: June 2, 2023 | Date CSB completed PIA review: July 5, 2023 |
| Action Items/Concerns: | |
| <p><i>Copies of this PIA will be provided to:</i></p> <p><i>Thomas G. Ashley, Jr.</i> <i>Director</i> <i>IT Services Development and Operations Division</i> <i>Office of the Chief Information Officer</i></p> <p><i>Garo Nalabandian</i> <i>Chief Information Security Officer (CISO)</i> <i>Office of the Chief Information Officer</i></p> | |