Department of Energy
Privacy Impact Assessment

Name of Project: Washington Savannah River Company (WSRC) Site Personnel Roster (SPR) Savannah River Site (SRS) Site Applications Accreditation Boundary
Bureau: Department of Energy – Savannah River Operations Office
Project's Unique ID: UPI Code: 019-10-01-15-01-1057-00
Date: August 13, 2008

A. CONTACT INFORMATION:

1) **Who are the person(s) completing this document?**

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2) **Who is the system owner?**

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B. SYSTEM APPLICATION/GENERAL INFORMATION:

1) **Does this system contain any information about individuals?** Yes.

   a. **Is this information identifiable to the individual[1]?** Yes

   b. **Is the information about individual members of the public?** Yes

   c. **Is the information about DOE or contractor employees?** Yes.

2) **What is the purpose of the system/application?**

   The primary purpose of the Site Personnel System (SPR) is to track and control present and former U.S. Department of Energy (DOE), National Nuclear Security Administration (NNSA), and contractor employees accessing Departmental facilities and classified information areas.

3) **What legal authority authorizes the purchase or development of this system/application?**

   Department of Energy Organization Act of 1977 (42 U.S.C. [United States Code] 7101 *et seq.*); and Export Administrative Act of 1979 (50 U.S.C. 2401 *et seq.*)

C. DATA IN THE SYSTEM:

1) **What categories of individuals are covered in the system?** The SPR covers former and present DOE, NNSA and contractor employees, and any other persons seeking access to DOE facilities and classified records.

2) **What are the sources of the information in the system?**

   a. **Is the source of the information from the individual or is it taken from another source?** Information is obtained from the badge office for all individuals processed through the badging process. Additional information is provided by the respective personnel systems operated for the companies by whom the individuals are employed. In addition, the SPR system collects information from the individual to whom it pertains.

   b. **What Federal agencies are providing data for use in the system?** DOE – Savannah River Operations Office and NNSA – Savannah River Site Office

   c. **What Tribal, State, and local agencies are providing data for use in the system?** None

   d. **From what other third party sources will data be collected?** None

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[1] "Identifiable Form" – According to the OMB Memo M-02-22, this means information in an IT system or online collections: (i) that directly identifies an individual (e.g., name, address, social security number or other identifying number or code, telephone number, email address, etc.) or (ii) by which an agency intends to identify specific individuals in conjunction with other data elements, i.e., indirect identification. (These data elements may include a combination of gender, race, birth date, geographic indictor, and other descriptors).

e. **What information will be collected from the individual and the public?** The system collects name, social security umber (SSN), home address, gender, and date of birth.

3) **Accuracy, Timeliness, and Reliability**

a. **How will data collected from sources other than DOE records be verified for accuracy?** Source data is collected directly from the individual to whom it pertains and is assumed to be accurate, timely, and complete at the time it was provided.

b. **How will data be checked for completeness?** Data will be manually and electronically reviewed for completeness.

c. **Is the data current? What steps or procedures are taken to ensure the data is current and not out-of-date?** No. Information is generally not updated after the individual's relationship with the site is terminated.

d. **Are the data elements described in detail and documented?** The data elements are documented within the data base description.

D. ATTRIBUTES OF THE DATA:

1) **Is the use of the data both relevant and necessary to the purpose for which the system is being designed?**

Yes. All data collected is relevant and necessary for continued operation of the Site Personnel Roster.

2) **Will the system derive new data or create previously unavailable data about an individual through aggregation from the information collected, and how will this be maintained and filed?**

Yes. An alternate identifier (ID) will be generated within the SPR logic. This unique identifier is used by the enterprise business systems to uniquely identify a person without the use of Personally Identifiable Information (PII) data.

3) **Will the new data be placed in the individual's record?**

Yes

4) **Can the system make determinations about employees/public that would not be possible without the new data?**

N/A

5) **How will the new data be verified for relevance and accuracy?**

Controls within the program maintain uniqueness of the values stored in this column. Quarterly reviews of SPR data perform this as well as other checks to validate accuracy and completeness of the data maintained for each data source.

6) **If the data is being consolidated, what controls are in place to protect the data from unauthorized access or use?**

Data is not being consolidated in this system.

7) **If processes are being consolidated, are the proper controls remaining in place to protect the data and prevent unauthorized access?**

Processes are not being consolidated.

8) **How will data be retrieved? Does a personal identifier retrieve the data? If yes, explain and list the identifiers that will be used to retrieve information on the individual.**

Yes. The SPR can retrieve data by using name, SSN, or the site's computer-generated alternate ID (Comp_Alt_ID).

9) **What kinds of reports can be produced on individuals? What will be the use of these reports? Who will have access to them?**

Reports are generally for populations (i.e., all contractor employees, all DOE employees, all subcontractors, etc), rather than individuals. Access to reports is controlled based on need-to-know and the principle of least privilege.

10) **What opportunities do individuals have to decline to provide information (e.g., where providing information is voluntary) or to consent only to particular uses of the information (other than required or authorized uses)?**

Collection of the information in the SPR system is required to identify a site employee to site business systems without the use of PII and to be able to provide computer accounts on the site network. Access to or use of the information contained in SPR will be limited to authorized individuals for required management and reporting.

E. MAINTENANCE AND ADMINISTRATIVE CONTROLS:

1) **If the system is operated in more than one site, how will consistent use of the system and data be maintained in all sites?**

The system was developed, maintained and operated for DOE-SR.

2) **What are the retention periods of data in the system?**

Retention periods are in accordance with applicable DOE and National Archives Records Administration (NARA) record schedules. Additional information can be obtained at http://cio.energy.gov/records-management/adminrs.htm.

3) **What are the procedures for disposition of the data at the end of the retention period? How long will the reports produced be kept? Where are the procedures documented?**

Retention periods are in accordance with applicable DOE and National Archives Records Administration (NARA) record schedules. Additional information can be obtained at http://cio.energy.gov/records-management/adminrs.htm.

4) **Is the system using technologies in ways that the DOE has not previously employed (e.g., monitoring software, Smart Cards, Caller-ID)?**

No

5) **How does the use of this technology affect public/employee privacy?**

N/A

6) **Will this system provide the capability to identify, locate, and monitor individuals?**

No

7) **What kinds of information are collected as a function of the monitoring of individuals?**

N/A

8) **What controls will be used to prevent unauthorized monitoring?**

N/A

9) **Under which Privacy Act system of records notice does the system operate?**

DOE-51 Employee and Visitor Access Control Records

10) **If the system is being modified, will the Privacy Act system of records notice require amendment or revision?**

No

F. **ACCESS TO DATA:**

1) **Who will have access to the data in the system?**

Only authorized individuals will have access to the information based on need-to-know and the principle of least privilege. Furthermore, the appropriate local, state or federal agencies will use certain records maintained in SPR to ensure Departmental compliance with other regulatory requirements. Access to or use of the information provided will be limited to authorized individuals for required management and reporting.

2) **How is access to the data by a user determined?**

The system owner determines who has access. Access to data is on a need-to-know basis in accordance with the job roles and responsibilities of individuals.

3) **Will users have access to all data on the system or will the user's access be restricted?**

User's access will be restricted based on the need for access to data.

4) **What controls are in place to prevent the misuse (e.g., unauthorized browsing) of data by those having access?**

Technical and administrative controls are in place to prevent the misuse of data by individuals with access.

5) **Are contractors involved with the design and development of the system and will they be involved with the maintenance of the system? If yes, were Privacy Act contract clauses included in their contracts and other regulatory measures addressed?**

Contractors are involved in the implementation and maintenance of the system. Personal information may be disclosed to these contractors and their officers and employees in performance of their contracts. Those individuals provided this type of information is subject to the same limitations applicable to DOE officers and employees under the Privacy Act, 5 U.S.C. 552a.

Pertinent contract language states that data covered by the Privacy Act may be disclosed to contractors and their officers and employees. Any information that is obtained or viewed shall be on a need-to-know basis. Contractors are required to safeguard all information that they may obtain in accordance with the provisions of the Privacy Act and the requirements of the DOE. The contractor shall ensure that all DOE documents and software processed, and the information contained therein, are protected from unauthorized use and mishandling by assigned personnel.

6) **Do other systems share data or have access to the data in the system? If yes, explain?**

Yes. SPR may interface with other site business systems. PRORAD and MedGate may validate personal employee information (e.g., name, social security number, company and organization codes, etc.) with SPR.

7) **Who will be responsible for protecting the privacy rights of the public and employees affected by the interface?**

The system owner for other systems to have access to data within the SPR application must grant permission. Once provided, it is the responsibility of the other system owners to protect the data provided by SPR.

8) **Will other agencies share data or have access to the data in this system?**

No

9) How will the data be used by the other agency?

N/A

10) Who is responsible for assuring proper use of the data?

N/A

PIA Approval Signatures

Original copy signed and on file with the DOE Privacy Office.