

Frequently Asked Questions

Background

The Department of Energy (DOE) is responsible for implementation of the Nuclear Waste Policy Act (NWPA), Public Law 97-425, as amended. The NWPA provides for the siting, construction, and operation of a repository for the permanent disposal of high-level radioactive waste and spent nuclear fuel, in a manner that fully protects the health and safety of the public and the quality of the environment.

The President has designated Yucca Mountain, in Nevada, as the site for the first repository; the Congress has affirmed this designation. DOE is preparing an application to obtain a license from the U.S. Nuclear Regulatory Commission (NRC) to construct the Yucca Mountain repository. The NRC has issued a regulation, “Procedures Applicable to Proceedings for the Issuance of Licenses for the Receipt of High-level Radioactive Waste at a Geologic Repository,” in [10 CFR 2](#), Subpart J, which defines the scope and process of discovery for the licensing proceeding to adjudicate DOE’s anticipated license application. This regulation includes provisions that require DOE to make electronically available through the Licensing Support Network (LSN) its “documentary material” relevant to the licensing proceeding. The NRC also has issued regulatory guidance regarding the LSN, [Regulatory Guide 3.69](#).

Purpose of the FAQs

The DOE Office of General Counsel (OGC) has provided guidance dated November 3, 2006, ([OGC LSN Guidance](#)) that addresses the ongoing LSN responsibilities of individuals and organizations working on the Yucca Mountain Project, which is managed by the Office of Civilian Radioactive Waste Program (OCRWM). Mr. Dong Kim has been designated as the DOE LSN Project Manager. This Frequently Asked Questions (FAQs) document is intended to provide additional assistance to persons working on the Yucca Mountain Project. This document is not intended as a comprehensive presentation of LSN requirements or the [OGC LSN Guidance](#). The user should refer to the NRC regulations and guidance and the OGC guidance memoranda, which are linked to this FAQ document.

Points of Contact

As organizations involved in the repository program address their ongoing LSN responsibilities, additional questions may arise, and updates to this document may be issued. Questions can be directed to the LSN point of contact for your organization; to Ms. Martha Crosland ((202) 586-5793) or Ms. Angela Kordyak ((202) 586-4301) of the DOE OGC; or to the LSN Project Manager, Mr. Dong Kim ((202) 586-1223).

1. REGULATORY REQUIREMENTS

1a. Purpose of LSN

Q. What is the LSN?

A. The NRC regulations that govern the licensing proceeding for DOE's license application, [10 CFR Part 2](#), Subpart J, "Procedures Applicable to Proceedings for the Issuance of Licenses for the Receipt of High-Level Radioactive Waste at a Geologic Repository," require DOE to make available its "documentary material" on the LSN six months before DOE submits the license application. The production of documentary material on the LSN is intended to be a substitute for the traditional NRC document discovery process.

1b. NRC Guidance

Q. Has the NRC provided guidance for complying with the LSN regulations in 10 CFR Part 2?

A. Yes. In June 2004, the NRC issued Revision 1 of the [Regulatory Guide 3.69](#), which provides NRC guidance on the scope of documentary material. This Regulatory Guide lists topics and types of documents that should be considered as potential documentary material for production on the LSN.

1c. Documentary Material – Definition

Q. What is the definition of "documentary material" that DOE must make available on the LSN?

A. There are basically three classes of documentary material:

(1) Documents with information that DOE intends to cite or rely on in the License Application, or that DOE otherwise intends to cite or rely on in the licensing proceeding (referred to as, Supporting Information);

(2) Documents in DOE's possession, or that DOE develops, that contain information that DOE is aware contradicts, is inconsistent with, or otherwise undermines the Supporting Information (referred to as Non-Supporting Information).

(3) Reports and studies developed by DOE that contain information on the topics addressed in Regulatory Guide 3.69 and relevant to the License Application, regardless of whether they contain Supporting or Non-Supporting Information and also regardless of whether DOE intends to cite or rely on them.

1.d Segregating and Retaining Documents – Purpose

Q. What is the purpose of segregating and retaining documents that are not submitted for potential inclusion in the LSN?

A. In addition to the LSN, other forms of discovery will be available to the parties during the NRC licensing process. Certain classes of documents – as set forth in the [OGC LSN Guidance](#) – must be preserved for potential use during the “derivative discovery” phase of the licensing proceeding.

1e. Segregating and Retaining Documents – Individual and Organizational Responsibilities

Q: With whom does the responsibility lie for segregating and retaining documents?

A: You are responsible for ensuring documents you author, or receive from outside the project, are retained in accordance with the [OGC LSN Guidance](#). You must personally retain these documents unless your organization has alternative arrangements for retaining the documents. If you stop working on the Yucca Mountain Project, you are responsible for advising your organization’s LSN Point of Contact of any documents you have retained for potential derivative discovery, so arrangements can be made for their preservation.

2. DOE GUIDANCE

2a. DOE Direction

Q. Has the Department provided direction on which documents should be submitted for inclusion in LSN and through what process they should be provided?

A. Yes. Since 2002, the DOE Office of General Counsel has provided guidance regarding DOE's LSN obligations. On November 3, 2006, the DOE General Counsel issued a memorandum entitled "Ongoing Licensing Support Network Obligations" (the [OGC LSN Guidance](#)). This guidance clarifies ongoing document submittal and retention obligations of personnel working on matters related to the Yucca Mountain Project. As directed by OGC and DOE management, **the November 2006 memorandum should be used as the primary reference for ongoing DOE LSN obligations of personnel in affected DOE and contractor organizations working on the Yucca Mountain Project.**

2b. Records Management Procedure – Effect on LSN Submittal and Retention Obligations

Q. How does the recently revised Records Management procedure (AP 17.1Q) affect the submittal of documents for the LSN and the retention of other documents for derivative discovery?

A. Individuals that perform Yucca Mountain Project work that is subject to procedures that require records to be submitted to the Records Processing Center (e.g., [Procedure AP 17.1Q](#)) must follow those procedures. When submitting records to the Records Processing Center, the organization's Records Coordinator must designate on the transmittal form whether they are LSN-Relevant and whether they contain privileged information. Submitting a document to the Records Processing Center fulfills the owner's LSN obligations with regard to that document. The Records Processing Center staff will review submitted documents and forward copies as appropriate for inclusion in LSN. Also, you do not need to retain copies of documents submitted to the Records Processing Center for potential use in derivative discovery, since the Records Processing Center will permanently retain a copy of such documents.

2c. Guidance for Work Not Subject to OCRWM Procedures

Q. What are the submittal requirements for work products that are not subject to the OCRWM Records Management procedures?

A. DOE and contractor personnel who create a document that is not subject to OCRWM Records Management procedures are required to submit a copy of the document, once finalized, to their organizations' LSN Point of Contact IF the document is LSN-Relevant. Each document should be accompanied by a copy of the submittal form attached to the [OGC LSN Guidance](#), on which the privileges, if any, thought to be applicable to the document should be noted.

2d. Emails — Obligations for Emails Sent or Received on the OCRWM Lotus Notes System

Q. What guidance has been given for applying the Managing Electronic Mail Records procedure ([AP 17.3Q](#)) to the submittal of documents for LSN?

A. [AP 17.3Q](#) provides a procedure to ensure that email records are appropriately created, retained, and dispositioned. OCRWM Lotus Notes email account users must use the template within Lotus Notes to categorize for potential relevance and privilege each email they send, as well as each email they receive from outside that system. All emails categorized as potentially relevant are sent to DOE's Automated Litigation Support (ALS) Contractor, which fulfills the submittal requirement for such emails.

2e. Emails – Obligations for Emails Sent or Received Outside the OCRWM Lotus Notes System

Q. What are the LSN submittal obligations for emails neither sent nor received on the OCRWM Lotus Notes system?

A. Personnel at affected DOE organizations and contractors without OCRWM Lotus Notes email accounts are required to submit LSN-Relevant emails from their respective email systems. They can do so by sending a copy to one of the OCRWM Lotus Notes addresses established to capture external email. For example, personnel working for the lead lab should cc: "lead_lab@notes.ymp.gov"; others may cc: "ocrwm_rpc@notes.ymp.gov. Alternatively, emails can be submitted in paper or electronic form to the organization's LSN Point of Contact, using the transmittal form provided in the November 3, 2006, DOE OGC guidance.

Personal email accounts should not be used for matters related to the Yucca Mountain Project.

3. INDIVIDUAL AND ORGANIZATIONAL RESPONSIBILITIES FOR SUBMITTING DOCUMENTS FOR INCLUSION IN LSN

3a. Individual Responsibilities — General

Q. Is each individual participant in the Yucca Mountain Project responsible for submitting potentially relevant documents for inclusion in the LSN?

A. Yes. Each individual is responsible for:

- Submitting documents to the Records Processing Center (if subject to OCRWM [Procedure AP 17.1Q](#)) and identifying the potential relevancy and privilege status of those documents
- Submitting to the organization's LSN Point of Contact any other LSN-Relevant documents the individual creates or receives from sources outside the Yucca Mountain Project
- Categorizing emails using the ERMS template on the OCRWM Lotus Notes system
- Submitting LSN-Relevant emails from other email systems

3b. Individual Responsibilities – Documents Received from Others

Q. If I am the recipient of and not the author of a potentially LSN-Relevant document, do I still have to submit it?

A. If the author of the document is a Yucca Mountain Project participant, then the author is responsible for submitting the document. Each project member has the independent duty to submit LSN-Relevant documents which that member authors or receives from outside the project. You are required to submit LSN-Relevant documents authored by someone else only if that person is not a Yucca Mountain Project participant.

3c. Individual Responsibilities -- Email

Q. Are email messages potentially relevant to the licensing proceeding for Yucca Mountain required to be submitted for inclusion in the LSN?

A. Yes. NRC defines the term “document” to include emails, so email messages and attachments that meet the regulatory definition of “documentary material” must be made available in the LSN.

The OCRWM Lotus Notes electronic mail system is an official OCRWM project record-keeping system. Users should use this system to create, maintain, use, and disposition email records in accordance with [AP 17.3Q](#). Users with OCRWM Lotus Notes email accounts must complete the categorization template supplied upon creation of the e-mail (or receipt of email from outside sources) to categorize the e-mail for LSN relevance and privilege.

Users who do not have OCRWM Lotus Notes email accounts can submit LSN-Relevant emails from other email systems by sending a copy to one of the OCRWM Lotus Notes addresses established to capture external email. For example, personnel working for the lead lab should cc: "lead_lab@notes.ymp.gov". Alternatively, emails can be submitted in paper or electronic form to the organization's LSN Point of Contact, using the transmittal form provided in the [OGC LSN Guidance](#). Personal email accounts should not be used for matters related to the Yucca Mountain Project.

3d. Email Exclusions

Q. What types of email should not be treated as LSN-Relevant?

A. Emails should be treated as LSN-Relevant only if the email message or its attachments contain either Supporting or Non-Supporting Information. The following kinds of emails do **NOT** contain Supporting or Non-Supporting Information and should **NOT** be categorized as LSN-Relevant:

- Emails that solely concern the schedule or process for preparing or reviewing the License Application or other documents
- Emails that solely concern the date, time, location and topic of meetings
- Emails that merely distribute a draft of a document for review with no substantive analysis or commentary about the draft
- Emails that merely distribute copies of reports or studies (as the record copies of these reports or studies are to be submitted to the Records Processing Center for inclusion in the LSN)
- Emails that solely concern internal administrative matters such as budgets, financial management, personnel matters, office space or payroll information
- Emails that solely concern procurement matters
- Emails that solely concern DOE's processes to collect documents for the LSN

3e. Privileged Information in Emails

Q. How should privileged information in emails be handled?

A. LSN-Relevant emails that contain any potentially privileged information, including privacy-protected information or information that is sensitive unclassified, must be accompanied by the notation that they are privileged. The Lotus Notes email template prompts the user to designate whether an email is privileged. It is also recommended that the sender state the privileged status of the email in the subject or body of the email.

3f. Individual Responsibilities – Electronic Records

Q. How should electronic records be submitted for inclusion in the LSN?

A. Individuals performing work under [AP 17.1Q](#) should submit records to the Records Processing Center in accordance with that procedure by providing a file directory listing

all files contained on the electronic media and two copies on compact disks, digital videodiscs, DLT, or 3-1/2" diskettes (see Attachment 1 of the procedure). LSN-Relevant records are to be submitted to the Records Processing Center within 14 calendar days of completion. Submittal to the Records Processing Center fulfills the obligation to submit the electronic records with regard to LSN. Individuals working for organizations not subject to OCRWM's Records Management procedures should provide electronic files on disk to the organization's LSN Point of Contact.

3g. Electronic Documents with Hidden Text

Q: If I submit an electronic Word file for which the "track changes" function has been activated, will the "track changes" information (specifically edited information, superseded text, or comments) appear when the file is made available on the LSN?

A: Yes. The process the Automated Litigation Services (ALS) Contractor uses to format electronic files for production on the LSN captures all metadata text associated with an electronic file, including hidden information such as comments and modifications. Because drafts are not required to be produced on the LSN, it is not necessary to produce the edited information. Therefore, you should print out the document and submit a paper copy as required by the Records Processing Center. For certain types of data that are not easily printed, submit the electronic document with the metadata (i.e. edited information) removed.

3h. Replacing Documents with Hidden Text

Q: I have submitted an electronic document to the ALS Contractor in the past that contains metadata (i.e. edited information) that is not relevant but is privileged. Can I replace the document with another version that does not contain the metadata (i.e. edited information)?

A: Possibly. Contact the OCRWM Information Center at 1-800-255-6972 and provide them with specific document identification information and the privileged information of concern included. If the document has been released on the LSN, then the participant accession number is the best way to uniquely identify the document. Removal of the document or protection of the privileged information depends on where the document is in production. You will be contacted by the ALS Contractor if resubmittal or additional actions are required

3i. Individual Responsibilities – Paper Documents

Q: What are the responsibilities with regard to submittal of paper records?

A: Individuals who perform Yucca Mountain Project work that is subject to procedures that require records to be submitted to the Records Processing Center (e.g., Procedure [AP 17.1Q](#)) must follow those procedures. LSN-Relevant records are to be submitted to the Records Processing Center within 14 calendar days of completion. When submitting records to the Records Processing Center, the organizational Records Coordinator must designate on the transmittal form whether they are considered LSN-Relevant and contain potentially privileged information. Submitting a document to the Records Processing

Center fulfills the LSN obligations with regard to that document, and a copy does not need to be retained for potential derivative discovery. The Records Processing Center staff will review all submitted documents and forward copies as appropriate to the ALS Contractor for inclusion in LSN.

3j. Organizational Responsibilities – Records Belonging to Former Employees

Q. Is the organizational LSN Responsible Manager responsible for reviewing the archived personal records of people no longer employed by the Responsible Manager's organization to identify, segregate, and ship potentially LSN-Relevant documents?

A. Assuming such archived records have not already been reviewed for LSN-Relevance, the organization's LSN Responsible Manager is obligated to ensure that appropriately trained personnel review the documents and submit those that are potentially LSN-Relevant.

4. DRAFT AND FINAL DOCUMENTS

4a. Draft Documents

Q. Are draft documents required to be submitted for inclusion in the LSN?

A. With one exception, draft documents are **NOT** required to be submitted for inclusion in the LSN. Only final versions are required to be submitted. The one exception is the “circulated draft” of a report or study. A “circulated draft” is defined at [10 CFR 2.1001](#) as “a nonfinal document circulated for supervisory concurrence or signature in which the original author or others in the concurrence process have non-concurred.” As defined by the NRC, this definition refers to reports and studies that have received an official non-concurrence in a process similar to DOE’s formal concurrence procedure.

NOTE: The only documents that can potentially be a “circulated draft” under the LSN regulations are reports and studies. Drafts of other kinds of documents (e.g., memoranda, letters) cannot qualify as a “circulated draft.”

NOTE: Although drafts are excluded from the LSN, drafts of documents that are likely to qualify as LSN-Relevant when finalized should be segregated and retained.

4b. Final Documents

Q. When does a document become a “final document?”

A. A document becomes a “final document” when all work on that document by the authoring organization is completed. A document may be a “final document” regardless of whether it is published or issued for distribution by the authoring organization.

4c. Nonconcurring Comments

Q. If pen-and-ink comments on a document clearly state “won’t concur for X reason,” should that document be considered a “circulated draft”?

A. Such a draft does not qualify as a “circulated draft” unless the document is (1) a report or study; and (2) the non-concurrence was part of a formalized process, and (3) the decision-making process on the document is completed.

4d. Comments on Draft Documents

Q. Do pen and ink mark-up comments on preliminary draft documents potentially relevant to the Yucca Mountain licensing proceeding need to be submitted?

A. No. If such comments appear as a physical mark-up on the draft document, the document remains a preliminary draft and does not need to be submitted. If the document or comments are potentially relevant to licensing, they should be segregated and retained.

4e. Comments Provided Separately from a Document

Q. Do comments submitted separately from the document being commented upon (e.g., a list of comments transmitted in an email) need to be submitted?

A. A document providing stand-alone comments (as opposed to interlinear or handwritten comments on the draft itself) is regarded as a final document and must be categorized as LSN-Relevant if such comments are substantive and potentially contain Non-Supporting Information.

4f. Comments on Final Documents

Q. Do documents that provide comments on final documents potentially relevant to the Yucca Mountain licensing proceeding need to be submitted?

A. Such comments must be submitted if the substance of the comments contains potentially Non-Supporting Information.

5. DOCUMENTS FROM SPECIFIC SOURCES

5a. Documents in RIS

Q. Do copies of documents in the possession of DOE offices, contractors, or laboratories, which are known to be in the OCRWM Records Information System (RIS or RISWEB) or are slated under project procedures to be submitted to those databases, need to be submitted to the ALS Contractor?

A. No. The ALS Contractor will obtain those documents from the Records Processing Center.

5b. Archived Documents

Q. Do potentially LSN-Relevant documents stored in archives need to be reviewed and submitted for inclusion in the LSN?

A. Yes, unless they already have been reviewed in connection with prior document collection activities for the LSN. This includes documents in off-site storage or records centers. The indices of what is stored in archives may be helpful in identifying potentially relevant documents.

5c. Contractor-Prepared Reports

Q. Are reports prepared by a contractor pursuant to a contract Statement of Work final documents?

A. If the report is produced and made available to DOE as the final deliverable product under a contract, that report is a final document.

5d. Other Contractor-Prepared Documents

Q. Are other contractor-prepared documents required to be submitted?

A. Yes, if LSN-Relevant. Any contractor-prepared documents that are final documents potentially relevant to the licensing of Yucca Mountain and that fall within the definition of "documentary material" in the NRC regulations at [10 CFR 2.1003](#) are required to be submitted.

5e. Documents From External Organizations

Q. Are documents in DOE's possession from other Federal agencies, State and local governments, and Indian tribes required to be submitted for inclusion in LSN?

A. Yes, if the documents are LSN-Relevant.

5f. Congressional Correspondence

Q. Should Congressional correspondence about Yucca Mountain be submitted?

A. No. Correspondence between DOE and the Congress of the United States (including congressional staff personnel) is excluded by [10 CFR 2.1005\(i\)](#).

5g. Expert, Peer Review, or Advisory Panels or Boards

Q. Should documentary material created by expert, peer review, and advisory panels or boards, (e.g., the Igneous Consequences Peer Review Panel) be submitted for inclusion in LSN?

A. Yes, to the extent they create final documents with LSN-Relevant content.

5h. Official Notice Material Originating Outside OCRWM

Q. Should official notice material be submitted for inclusion in LSN?

A. No. Official notice material is excludable from the LSN pursuant to the general exclusion criteria contained in [10 CFR 2.1005](#). Examples of official notice material are:

- Federal Register notices
- Government-wide guidance documents, such as OMB circulars
- DOE Orders
- DOE-wide guidance documents, such as DOE Standards, the Radiological Control Manual, etc.
- DOE-wide distribution of draft Orders or proposed revisions to Orders for comment
- Other Federal agency regulations, guidance, or proposed rules such as those from EPA and OSHA
- Congressional Record excerpts

5i. Records of Court Proceedings and Hearings

Q. Should official transcripts and exhibits of court proceedings or agency hearings and any related depositions be submitted for inclusion in LSN?

A. No.

6. DOCUMENTARY MATERIAL FORMATS

6a. Presentation Materials

Q. Should presentation materials (e.g., viewgraphs, slides, charts, etc.) be submitted for inclusion in the LSN?

A. Yes, if the content of those materials is LSN-Relevant. Whether a document is LSN-Relevant depends on its content, not its form.

6b. Photographs and Videos

Q. Should photographs and videos be submitted for inclusion in LSN?

A. Yes, if the content of the photographs and videos is LSN-Relevant.

6c. Personal Notes

Q. Are personal notes required to be submitted for inclusion in LSN?

A. No. However, electronic and paper notes that contain substantive content that reasonably could be construed as Non-Supporting Information must be segregated and retained by the author for future derivative discovery purposes.

Personal notes that do not contain substantive content or cannot otherwise be reasonably construed as Non-Supporting Information do not need to be retained for purposes of the Yucca Mountain licensing proceeding. For example, the following types of personal notes do **NOT** contain Non-Supporting Information and do **NOT** need to be kept for purposes of the Yucca Mountain licensing proceeding:

- Notes that are merely to-do lists or other types of action item lists
- Schedules or calendars, or notes that merely recite the date and topics of meetings
- Notes that solely concern administrative or personal matters
- Notes that merely list attendees and topics discussed in a meeting, with no substantive information
- Notes that are reminders to call someone.

7. DOCUMENT TOPICS: SCIENTIFIC, TECHNICAL, AND REGULATORY ACTIVITIES

7a. Quality Assurance – Software Validation

Q. Are documents related to validation and verification of software used in support of the Total System Performance Assessment required to be submitted for inclusion in LSN?

A. Yes. Such documents are part of DOE's Quality Assurance program and are required by [10 CFR 63](#), Subpart G--Quality Assurance. See also Supplement I to DOE's Quality Assurance Requirements and Description ([QARD](#)) DOE/RW-0333P.

7b. Research and Development – Science and Technology Program

Q. Is the OCRWM Science and Technology Program exempt from LSN requirements?

A. No. Final documents created by the program that contain content that qualifies them as LSN-Relevant must be submitted.

7c. Reviews – Expert, Peer Review, or Advisory Panels or Boards

Q. Are documents related to expert elicitation and peer review required to be submitted for inclusion in LSN?

A. Yes, if they are final versions of documents and contain content that qualifies them as documentary material. Documents concerning the administration of such processes are not LSN-Relevant.

8. PRIVILEGED, CLASSIFIED, AND CONTROLLED DOCUMENTS

8a. Classified Documents

Q. Should classified documents be submitted for inclusion in LSN?

A. No. Classified material (restricted data and national security information) is excluded from the LSN under [10 CFR 2](#) Subpart I. Do not submit documents containing classified information even if they are LSN-Relevant. Contact your organization's LSN POC to receive instructions.

8b. OUO Documents

Q. Do potentially LSN-Relevant "official use only" (OUO) documents need to be submitted?

A. Yes. LSN-Relevant OUO documents are one category of privileged documents and will be handled according to the public disclosure exemptions appropriate for such documents. Such documents should be submitted to the ALS Contractor segregated from other potentially LSN-Relevant documents. Both the boxes and the documents should be clearly labeled as privileged.

8c. Privileged Information on LSN

Q. How will privileged documents be presented in the LSN?

A. For documents with privileged information, an electronic bibliographic header will appear on the LSN, and the text of the document will either be excluded altogether or available in redacted form with the privileged information removed.

8d. Privileged Information

Q. What information is considered privileged, and how should it be handled?

A. In its Second Case Management Order, the NRC Pre-license Application Presiding Officer (PAPO) Board defined "primary privilege" as (1) the attorney-client privilege, (2) the litigation work product privilege, and (3) the deliberative process privilege. Secondary privileges include exceptions from disclosure for such things as (4) privacy, (5) proprietary information, (6) law enforcement, and (7) archaeological protection concerns. Each category of privileged information has specific requirements that must be met in order to claim the privilege.

When submitting a document to the Records Processing Center, the submitting organization's Records Coordinator must note on the transmittal form whether the document is believed to be privileged. The document itself should also be marked as privileged. For documents submitted to an organization's LSN POC rather than to the Records Processing Center, each document should be accompanied by the LSN

Document Shipment Form (included as an attachment to the [OGC LSN Guidance](#)), which requires the submitter to identify any applicable privileges.

8e. Safeguards Information

Q. How should LSN-Relevant documents containing safeguards information be handled?

A. Safeguards information is information that is authorized by Section 147 of the [Atomic Energy Act of 1954](#), as amended, to be protected from inadvertent release and unauthorized disclosure, and is further governed by [10 CFR Part 73](#). If you plan to submit to your organization's LSN Point of Contact an LSN-Relevant document that contains safeguards information, you must notify your LSN Point of Contact in advance so that special arrangements can be made.

8f. Protected Personal Identifying Information

Q. What is Protected personally identifiable information (PII) and how should it be handled?

A. Protected PII is information that can be used to distinguish, or trace, an individual's identity, such as their SSN, date and place of birth, mother's maiden name, personal financial information, biometric records, medical history, and any other personal information that is linked, or linkable, to an individual (or that could be used for identity theft).

As a rule, Protected PII should not be included in the LSN. If you plan to submit LSN-Relevant documents containing Protected PII, you must identify those documents to your organization's LSN Point of Contact in advance so that special arrangements can be made.

8g. Removing Personal Identifying Information

Q. If Protected PII is already in the LSN, can it be removed?

A: If you are aware that PII has been submitted for inclusion in DOE's LSN collection, call (800) 225-6972 to identify the document and request removal or redaction.

Questions? Comments?

Contact Ms. Martha Crosland ((202) 586-5793) or Ms. Angela Kordyak ((202) 586-4301) of the DOE OGC; or Dong Kim, LSN Project Manager ((202) 586-

1223).

NOTE:

Though current when inserted in this document, the links below are not live-linked to the project's Controlled Document Information System, and may not contain the most current revision of the linked document. It is your responsibility to ensure you are using the most current revision of project procedures prior to conducting activities governed by the procedure.

[Quality Assurance Requirements and Description](#) (DOE/RW-0333P)



QARD.pdf (762 KB)

[Records Management](#) (AP-17.1Q)



AP17-1Q R4
ICN4.pdf (534 KB)

[Managing Electronic Mail Records](#) (AP-17.3Q)



AP17-3Q R0
ICN3.pdf (313 KB)

[Department of Energy Office of General Counsel License Support Network Guidance](#)



OGC LSN
uidance.pdf (599 KE)