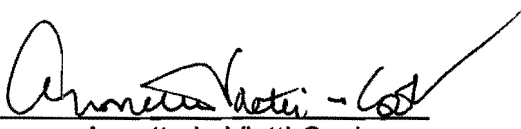September 6, 2011

SECRETARY

COMMISSION VOTING RECORD

DECISION ITEM: SECY-11-0094

TITLE: ADVANTAGES AND DISADVANTAGES OF CHANGING THE CURRENT AUTHENTICATION ASSURANCE LEVEL (LEVEL 4) OF THE NATIONAL SOURCE TRACKING SYSTEM

The Commission (with Chairman Jaczko and Commissioners Svinicki, Apostolakis, and Magwood approving in part and disapproving in part and Commissioner Ostendorff disapproving) acted on the subject paper as recorded in the Staff Requirements Memorandum (SRM) of September 6, 2011.

This Record contains a summary of voting on this matter together with the individual vote sheets, views and comments of the Commission.

Annette L. Vietti-Cook
Secretary of the Commission

Attachments:
1. Voting Summary
2. Commissioner Vote Sheets

cc: Chairman Jaczko
     Commissioner Svinicki
     Commissioner Apostolakis
     Commissioner Magwood
     Commissioner Ostendorff
     OGC
     EDO
     PDR

VOTING SUMMARY - SECY-11-0094

RECORDED VOTES

	APRVD	DISAPRVD	ABSTAIN	NOT PARTICIP	COMMENTS	DATE
CHRM. JACZKO	X	X			X	8/11/11
COMR. SVINICKI	X	X			X	8/18/11
COMR. APOSTOLAKIS	X	X			X	8/16/11
COMR. MAGWOOD	X	X			X	8/17/11
COMR. OSTENDORFF		X			X	8/9/11

NOTATION VOTE

RESPONSE SHEET

TO: Annette Vietti-Cook, Secretary

FROM: Chairman Gregory B. Jaczko

SUBJECT: SECY-11-0094 – ADVANTAGES AND
            DISADVANTAGES OF CHANGING THE CURRENT
            AUTHENTICATION ASSURANCE LEVEL (LEVEL 4) OF
            THE NATIONAL SOURCE TRACKING SYSTEM

Approved __X__   Disapproved __X__   Abstain _____

Not Participating _____

COMMENTS: Below ____ Attached __X__ None ____

_____
SIGNATURE
_____ 8/11/11 _____
DATE

Entered on "STARS" Yes __X__ No ____

**Chairman Jaczko's Comments on SECY-11-0094,
"Advantages and Disadvantages of Changing the Current Authentication
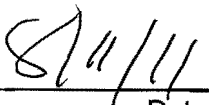Assurance Level (Level 4) of the National Source Tracking System"**

The National Source Tracking System (NSTS) is an important part of the Nation's security framework, allowing for improved accountability of risk-significant radioactive sources. I commend the staff for its steady progress on continually improving the system and increasing on-line usage by licensees, which helps to eliminate errors and decreases the reliance on the help desk for the manual entry of data.

The staff has used processes established by the Office of Management and Budget and the National Institute of Standards and Technology to reevaluate the security categorization and the electronic authentication risk assessment for the NSTS. I appreciate the staff's work in doing so; however, at this time, I do not approve the staff's recommendation to consider the feasibility of implementing a graduated authentication approach concept for the NSTS as described in Option 4 of this SECY paper. Instead, I approve Option 2, in which the NSTS would become a Level 3 system. I agree with Commissioner Ostendorff that this would appear to eliminate many of the significant challenges currently being experienced with on-line use of NSTS, while still maintaining a high level of security for this sensitive information.

Given the sensitivity of the information in the NSTS, the staff should periodically reassess the security levels for the system, including the authentication assurance level, to ensure that the information is properly protected. The staff should also continue to update the Commission offices on a regular basis regarding the NSTS.

_____   8/11/11
Gregory B. Jaczko   Date

NOTATION VOTE

RESPONSE SHEET

TO: Annette Vietti-Cook, Secretary

FROM: COMMISSIONER OSTENDORFF

SUBJECT: SECY-11-0094 – ADVANTAGES AND DISADVANTAGES OF CHANGING THE CURRENT AUTHENTICATION ASSURANCE LEVEL (LEVEL 4) OF THE NATIONAL SOURCE TRACKING SYSTEM

Approved _____   Disapproved __X__ Abstain _____

Not Participating _____

COMMENTS: Below ___ Attached _X_ None ___

_____
SIGNATURE

_____8/9/11_____
DATE

Entered on "STARS" Yes _X_ No ___

Commissioner Ostendorff's Comments on SECY-11-0094, "Advantages and Disadvantages of Changing the Current Authentication Assurance Level (Level 4) of the National Source Tracking System"

I disapprove the staff's recommendation to pursue a graduated implementation approach to authentication assurance levels for the National Source Tracking System (NSTS). Instead, I recommend that the staff implement Option 2, which would reduce the authentication assurance level of NSTS to Level 3.

I appreciate the staff's very thorough analysis of the security categorization of the NSTS. I believe that it was appropriate to reevaluate the security level of the system given the significant security enhancements that have been implemented since the staff's 2006 review. Since the staff's updated assessment demonstrated that the category of the NSTS should be "moderate" rather than "high", I support a reduction in the authentication assurance level from Level 4 to Level 3.

I understand that the staff's categorization review demonstrated that the authentication level for some users with limited access to the system's information could be reduced to Level 2, but that additional feasibility analysis would be necessary to move to such a graduated system. A reduction to a Level 3 authentication appears to eliminate the majority of challenges that NSTS users have experienced without the feasibility analysis and potential additional costs associated with such a graduated approach. In addition, the significance of the source information in the NSTS necessitates that the agency take measured steps to reduce the authentication level of the NSTS system. As such, the staff should first reduce the authentication level of the system to a Level 3, consistent with Option 2.

I would note that the initial reason for reevaluating the authentication level of NSTS was to reduce the difficulties of accessing the system. With this in mind, the staff should implement the change in authentication level in a manner that ensures minimal additional burden to NSTS users. The staff should keep the Commission informed of the status and challenges in implementation of Option 2 through periodic Commissioner Assistant's briefings. The staff should continue to evaluate the feasibility of a graduated approach during the periodic NSTS security categorization reviews.

NOTATION VOTE

RESPONSE SHEET

TO: Annette Vietti-Cook, Secretary

FROM: Commissioner Apostolakis

SUBJECT: SECY-11-0094 – ADVANTAGES AND
          DISADVANTAGES OF CHANGING THE CURRENT
          AUTHENTICATION ASSURANCE LEVEL (LEVEL 4) OF
          THE NATIONAL SOURCE TRACKING SYSTEM

Approved __X__   Disapproved __X__   Abstain _____

Not Participating _____

COMMENTS: Below _X_   Attached ___ None ___

I disapprove staff's use of a graduated approach by which the Nation Source Tracking System
(NSTS) employs Level 3 authentications of users having a system-wide access and/or
administrative rights to the system and level 2 authentications for users granted only limited
access. I approve staff's Option 2, NSTS becomes a Level 3 authentication.

_____
SIGNATURE

_____
DATE 9/7/11

Entered on "STARS" Yes _X_ No ___

NOTATION VOTE

RESPONSE SHEET

TO: Annette Vietti-Cook, Secretary

FROM: COMMISSIONER MAGWOOD

SUBJECT: SECY-11-0094 – ADVANTAGES AND
          DISADVANTAGES OF CHANGING THE CURRENT
          AUTHENTICATION ASSURANCE LEVEL (LEVEL 4) OF
          THE NATIONAL SOURCE TRACKING SYSTEM

Approved __X__   Disapproved _X___   Abstain _____

Not Participating _____

COMMENTS: Below ___ Attached _X_ None ___

_____
SIGNATURE

_17 August 2011_____
DATE

Entered on "STARS" Yes _X_ No ___

Commissioner Magwood's Comment on SECY-11-0094
Advantages and Disadvantages of Changing the
Current Authentication Assurance Level
(Level 4) of the National Source Tracking System (NSTS)

I commend the staff for providing the Commission with a thorough analysis of the re-evaluation of the NSTS's security categorization (SecCat) and the Electronic authentication (E-Auth) risk assessment to determine the appropriate sensitivity of the source information in the NSTS. It is apparent that the current application of Level 4 security requirements to online NSTS access serves as a significant barrier to expanded adoption of the NSTS due to the increased difficulty some licensees experience with the associated credentialing system. The barriers presented by the Level 4 authentication strategy have clearly reduced the willingness of users to engage the online system to the detriment of the efficiency, accuracy, and cost of NSTS.

Staff has recommended that a feasibility analysis be performed to consider whether a graded approach might be employed that would set Level 3 authentication for some users and Level 2 for others (those requiring only limited access to the system). I appreciate staff's creative approach, but note that most licensees with current access to NSTS have completed stringent identity (proving) requirements, limiting the potential benefits of instituting a Level 2 authentication option. Also, it seems likely that Level 2 authentication would prove more costly and less efficient than Level 3. Nevertheless, as part of the requirement under NIST SP-800-60 to routinely revisit security categorization, staff is required to evaluate changes authentication technology and consider how these might be used to beneficial effect. In that context, and with the costs in mind, I encourage staff's proposed feasibility analysis to proceed as resources are available. A graded approach may make considerable sense and it is appropriate that staff return to the Commission should the recommended analysis establish a basis for such a strategy.

However, I believe that there is, at this time, sufficient cause to proceed now to apply Level 3 authentication for online NSTS access and I therefore approve option 2 of SECY 11-0094. Moving to Level 3 will significantly reduce the current credentialing challenges faced by users and improve the overall effectiveness of the NSTS.

William D. Magwood, IV 8/17/1

William D. Magwood, IV   Date

NOTATION VOTE

RESPONSE SHEET

TO: Annette Vietti-Cook, Secretary

FROM: COMMISSIONER SVINICKI

SUBJECT: SECY-11-0094 – ADVANTAGES AND
           DISADVANTAGES OF CHANGING THE CURRENT
           AUTHENTICATION ASSURANCE LEVEL (LEVEL 4) OF
           THE NATIONAL SOURCE TRACKING SYSTEM

Approved __XX__   Disapproved __XX__ Abstain _____

Not Participating _____

COMMENTS: Below ___ Attached __XX__ None ___

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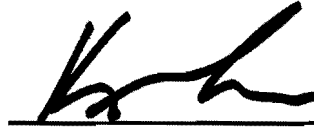SIGNATURE

_____08/18/11_____
DATE

Entered on "STARS" Yes √ No ___

Commissioner Svinicki's Comments on SECY-11-0094
Advantages and Disadvantages of Changing the Current Authentication Assurance Level (Level 4) of the National Source Tracking System

I disapprove the staff's recommendation (Option 4) to reduce the National Source Tracking System (NSTS) authentication level on a graduated approach to Level 3 (for users having system-wide access and/or administrative rights to the system) and to Level 2 (for other users). Instead, I approve Option 2, under which the NSTS would require Level 3 authentication for all users.

Staff has performed an updated assessment of the appropriate security categorization for the NSTS, which has resulted in a revised categorization of "moderate" for the system. This determination is based on multiple factors; among them, the security categorization levels of government systems protecting similarly sensitive information. Based on this change in security categorization, a reduction in authentication to Level 3 from Level 4 appears to be justified. As I understand the requirements associated with Level 3, they are akin to the controls on the CITRIX system (digital certificates and passwords) used by most NRC employees to check their email and work on other NRC computer systems. I do not support further reducing any category of NSTS user to an authentication level lower than Level 3, which would seem to require fewer controls than used by most of us in our day to day computer work. If the NRC's Designated Approving Authority should feel a lower level of authentication for NSTS is justified in the future, this change should be subject to the Commission's review and approval before being instituted.

Kristine L. Svinicki   08/18/11