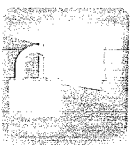


Privacy Impact Assessment Radiation Safety Management System

Technology, Planning, Architecture, & E-Government

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Privacy Impact Assessment for the Radiation Safety Management System

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Abstract

Radiation Safety Management System (RSMS) is an application for managing data on radioactive materials across U.S. (and possibly outside U.S.) that are used by and in support of USDA employees. The RSMS is an on-line, web-based database management system that is used by the USDA employees and the Radiation Safety Division (RSD) to manage information required by the Nuclear Regulatory Commission. Key information includes the following:

- Responsible organization: Radiation Safety Division (RSD)
- System name or title: Radiation Safety Management System (RSMS)
- System category: Major Application
- Operational status: Operational
- System environment or special conditions: Located in the USDA South Building between 12th and 14th Streets on Independence Ave, SW, Washington, DC. The RSMS servers are located on the Departmental Administration (DA) General Support System (GSS).

A Privacy Impact assessment is being conducted because information in RSMS may be considered PII.

Overview

RSMS developed by the Radiation Safety Division, a component of USDA Departmental Management, as a tool for the management of U.S. Department of Agriculture (USDA) radiation safety information and records. The RSMS is an on-line, web-based database management system that is used by the USDA employees and the Radiation Safety Division (RSD) to manage information required by the Nuclear Regulatory Commission. Development of the RSMS system started in 2000 with delivery of the RSMS system to the Radiation Safety Division in 2003.

The internal users of the RSMS system consist of the Radiation Safety Division, Location Radiation Protection Officers, Permit Holders, Associate Users and Radiation Safety Committee which are all employees of the USDA. The internal users use the system to manage the data needed to meet NRC regulations. There are no external users of the system, however, Area Managers, NRC, vendors, and suppliers benefit from information contained in RSMS. RSMS assists USDA employees by collecting data, that data is used to create reports that are sent to Area Managers and the NRC by the USDA employee. The vendors provide product information to assist Users in making purchase order decisions.

NRC requires that USDA track radioactive materials from acquisition to disposal. Only Radiation Safety permit holders that have the requisite training are allowed to acquire, store, use and manage these materials. The information within RSMS is requested by the USDA's Radiation Safety Committee to evaluate an individual's qualifications incident to the approval to obtain and use radioactive materials or x-ray producing equipment. Information may be disclosed to appropriate investigative agencies in the event of a radiation accident. Furnishing this information is voluntary. However, if withheld, Committee approval to procure and use radioactive material, radiation emitting sources or x-ray producing equipment may be denied.

The information requested in this system is required under Sections 81 and 161b of the Atomic Energy Act of 1954, as amended. Information is retrieved by use of a unique user identifier created by an application administrator.

Section 1.0 Characterization of the Information

The following questions are intended to define the scope of the information requested and/or collected as well as reasons for its collection as part of the program, system, rule, or technology being developed.

1.1 What information is collected, used, disseminated, or maintained in the system?

User Name	User ID	Security ID
Agency	Facility	Work Address
Level of Education	Email Address	Work Number
Fax Number	Gender	Major Field of Study
Level of Education	Other Education	Dosimetry Badge No.
Added Dates	Added User ID	Billable

1.2 What are the sources of the information in the system?

USDA employs who are Radiation Safety permit holders who provide their information in their permit application.

1.3 Why is the information being collected, used, disseminated, or maintained?

USDA uses radioactive materials in several capacities in support of its mission and must report accountability for these materials to NRC under Sections 81 and 161b of the Atomic Energy Act of 1954, as amended. The NRC has long participated in

efforts to address radioactive source protection and security. However, the terrorist attacks of September 11, 2001, heightened concerns about the use of risk-significant radioactive materials in a malevolent act. Such an attack is of particular concern because of the widespread use of radioactive materials in the United States by industrial, medical, and academic institutions. The theft or diversion of risk-significant quantities of radioactive materials could lead to their use in a radiological dispersal device (RDD) or a radiological exposure device (RED).

The NRC's current regulations provide requirements for the safe use, transit, and control of licensed material. Any loss of control of risk-significant radioactive material, whether inadvertent or through a deliberate act, could result in significant adverse impacts that could reasonably constitute a threat to the public health and safety or the common defense and security of the United States. In the changed threat environment after the attacks of September 11, 2001, the Commission determined that certain licensed material should be subject to enhanced security requirements and safeguarded during transport, and that individuals with unescorted access to risk-significant quantities of radioactive material should be subject to background investigations. In compliance with NRC's oversight authority the USDA's Radiation Safety Division must report and track radioactive material and USDA license holders for accountability purposes.

1.4 How is the information collected?

The information is collected from the individual in the applicant process. The informed consent of the subject individual is required.

1.5 How will the information be checked for accuracy?

A New Permit Holder/User manually fills out several application forms which they send to the RSMS staff for input the data into RSMS. The RSMS staff manually checks for accuracy before the User is given a radiation use permit. After they become permit holders they have access to RSMS and can make changes

1.6 What specific legal authorities, arrangements, and/or agreements defined the collection of information?

It is required under Sections 81 and 161b of the Atomic Energy Act of 1954, as amended.

1.7 Privacy Impact Analysis: Given the amount and type of data collected, discuss the privacy risks identified and how they were mitigated.

The amount of data collected affects approximately 200 individuals. The type of data is Name, birth date, work email address, work location and work telephone number. The risk to the individual; is very low. One of the risks is the exposure of this personal information. Another risk is the exposure of locations containing radioactive material.

The exposure is mitigated by employing role and privilege based access to RSMS. The system limits the access that any user has. There are only able to see their data. Elevated privileges are restricted to the two administrators. The data is physically protected in a secure data center. The Radiation Safety Division will be responsible for protecting the privacy rights of all users. Several initiatives are in place to ensure this: annual privacy training, encryption of data; and user IDs and passwords are only issued after confirmation is made by RSD that the requestor is a USDA employee that has a need for radioactive material and is a valid permit holder who has passes the trustworthiness review.

Section 2.0 Uses of the Information

The following questions are intended to delineate clearly the use of information and the accuracy of the data being used.

2.1 Describe all the uses of information.

The data is used to evaluate an individual's qualification to obtain and use radioactive materials. It is also used to track the materials for the life of the material pursuant to NRC regulations.

2.2 What types of tools are used to analyze data and what type of data may be produced?

There is no requirement for data analysis. The data can report what radioactive materials are under an individuals control and where those materials are located.

2.3 If the system uses commercial or publicly available data please explain why and how it is used.

N/A

2.4 Privacy Impact Analysis: Describe any types of controls that may be in place to ensure that information is handled in accordance with the above described uses.

Only authorized individuals have access to the system. The system is role and privileges based. The information entered is voluntary and the information is only used for regulatory required reporting

Section 3.0 Retention

The following questions are intended to outline how long information will be retained after the initial collection.

3.1 How long is information retained?

The retention period of paper copies are mandated by NRC and varies depending on the data type, for ex: survey records are archived after 3 years. The retention period for various data elements in paper form differs:

Lab Surveys: 3 years

Leak Tests: 5 years

Records of the Disposal of Radioactive Material: Indefinite

The governing authority for the records maintained by RSD is the Atomic Energy Act of 1954 as amended which empowers NRC to regulate radioactive materials. NRC retention periods supersede NARA. Due to the low volume of records, the paper records are retained in on-site permanent storage. The storage containers are lockable and they are located in a storage room that has controlled access with proximity card readers and the storage room is located in the Radiation Safety area with controlled access with proximity card readers.

3.2 Has the retention period been approved by the component records officer and the National Archives and Records Administration (NARA)?

The retention period has been approved by the Radiation Safety Division's records officer and is in compliance with NRC records requirements. The governing authority is the Atomic Energy Act of 1954 as amended which empowers NRC to regulate radioactive materials. NRC retention periods supersede NARA retention periods.

3.3 Privacy Impact Analysis: Please discuss the risks associated with the length of time data is retained and how those risks are mitigated.

The risk to the individual is very low. The primary purpose of RSMS is to track radioactive materials. The long term storage requirements are related to the disposition of the radioactive materials and not the personal information. Personal information is excluded from the long term storage.

Section 4.0 Internal Sharing and Disclosure

The following questions are intended to define the scope of sharing within the United States Department of Agriculture.

4.1 With which internal organization(s) is the information shared, what information is shared and for what purpose?

Information is not shared across organizations. If management of an organization request information concerning permit holders or radioactive materials within their organization, then a RSMS administrator will generate the report. The information is used to identify the radioactive materials under and individual's control and where the materials are located. The contributing organizations are AMS, APHIS, ARS, FS, FSIS, NRCS, OO.

4.2 How is the information transmitted or disclosed?

Information is not shared across organizations. When information is shared within an organization it is done by way of a report created by a RSMS administrator. The administrator transmits paper copies or email copies using standard encryption tools.

4.3 Privacy Impact Analysis: Considering the extent of internal information sharing, discuss the privacy risks associated with the sharing and how they were mitigated.

RSMS only shares the information with the organizations that entered the information. The risk to the individual is very low. The potential exposure is to no more than 200 USDA employees. Other than name and birth date, all the information captured by RSMS is work related. The exposure is mitigated by employing role and privileges based access to RSMS.

Section 5.0 External Sharing and Disclosure

The following questions are intended to define the content, scope, and authority for information sharing external to USDA which includes Federal, state and local government, and the private sector.

5.1 With which external organization(s) is the information shared, what information is shared, and for what purpose?

RSMS is required to provide reports regularly to NRC on the status of all radioactive materials under the agency's control. Information pertaining to permit holders is not reported. Nuclear Regulatory Commission (NRC) is required under Sections 81 and 161b of the Atomic Energy Act of 1954, as to regulate radioactive material. The NRC's current regulations provide requirements for the safe use, transit, and control of licensed material. Any loss of control of risk-significant radioactive material, whether inadvertent or through a deliberate act, could result in significant adverse impacts that could reasonably constitute a threat to the public health and safety or the common defense and security of the United States.

5.2 Is the sharing of personally identifiable information outside the Department compatible with the original collection? If so, is it covered by an appropriate routine use in a SORN? If so, please describe. If not, please describe under what legal mechanism the program or system is allowed to share the personally identifiable information outside of USDA.

Although personal identifying information is contained in RSMS for USDA permit holding information it is not shared externally. NRC requires information pertaining to locations, location addresses, types of radioactive materials at each location and leak tests/room surveys. There is no PII shared outside of the Radiation Safety Division. A POA&M for a SORN has been created.

5.3 How is the information shared outside the Department and what security measures safeguard its transmission?

A USDA authorized individual receives a request for the information, that individual generated a report and delivers the report to the NRC representative.

5.4 Privacy Impact Analysis: Given the external sharing, explain the privacy risks identified and describe how they were mitigated.

The information is only shared with NRC which has the regulatory responsibility to track radioactive materials. NRC issues permit to individuals to obtain and use these materials. Pursuant to obtaining the permit the individual authorizes the Government monitor the radio active materials under their control.

Section 6.0 Notice

The following questions are directed at notice to the individual of the scope of information collected, the right to consent to uses of said information, and the right to decline to provide information.

6.1 Was notice provided to the individual prior to collection of information?

The Logon warning banner includes the following text:

*****WARNING*****

- You are accessing a U.S. Government information system, which includes (1) this computer, (2) this computer network, (3) all computers connected to this network, and (4) all devices and storage media attached to this network or to a computer on this network. This information system is provided for U.S. Government-authorized use only.
- Unauthorized or improper use of this system may result in disciplinary action, as well as civil and criminal penalties.
- By using this information system, you understand and consent to the following:
 - You have no reasonable expectation of privacy regarding any communications or data transiting or stored on this information system. At any time, the government may for any lawful government purpose monitor, intercept, search and seize any communication or data transiting or stored on this information system.
 - Any communications or data transiting or stored on this information system may be disclosed or used for any lawful government purpose.

Your consent is final and irrevocable. You may not rely on any statements or informal policies purporting to provide you with any expectation of privacy regarding communications on this system, whether oral or written, by your supervisor or any other official, except USDA's Chief Information Officer.

*****WARNING*****

6.2 Do individuals have the opportunity and/or right to decline to provide information?

Yes

6.3 Do individuals have the right to consent to particular uses of the information? If so, how does the individual exercise the right?

The user has complete control over the information, providing as little or as much as they wish. The individual change their information on the web page.

6.4 Privacy Impact Analysis: Describe how notice is provided to individuals, and how the risks associated with individuals being unaware of the collection are mitigated.

A notice is displayed each time the individual logs on to RSMS. The risk that the individual is unaware of the collection is extremely low because the individual enters the data.

Section 7.0 Access, Redress and Correction

The following questions are directed at an individual's ability to ensure the accuracy of the information collected about them.

7.1 What are the procedures that allow individuals to gain access to their information?

An individual may gain access to their data by logging into the RSMS system. Once access has been achieved the user's information is displayed by default.

7.2 What are the procedures for correcting inaccurate or erroneous information?

The user may update their information on the web page.

7.3 How are individuals notified of the procedures for correcting their information?

On screen user guides at <http://www.rss.usda.gov/rsms.htm> instructs the user on how to update their record.

7.4 If no formal redress is provided, what alternatives are available to the individual?

The information is at the user's discretion

7.5 Privacy Impact Analysis: Please discuss the privacy risks associated with the redress available to individuals and how those risks are mitigated.

The Radiation Safety Division will be responsible for protecting the privacy rights of customers and employees. Several initiatives are in place to ensure this: annual privacy training, encryption of data; and user ids and passwords are only issued after

confirmation is made by RSD that the requestor is a USDA employee that has a need for radioactive material.

Section 8.0 Technical Access and Security

The following questions are intended to describe technical safeguards and security measures.

8.1 What procedures are in place to determine which users may access the system and are they documented?

On screen assistance is provided at <http://www.rss.usda.gov/index.html> under the "I want To..." heading provides instructions on how to request a permit which is required before granting a account or access to the system.

8.2 Will Department contractors have access to the system?

Yes, however, only approved administrators that have been properly vetted will have access.

8.3 Describe what privacy training is provided to users either generally or specifically relevant to the program or system?

All USDA users must complete Computer Security Training. There is a logon screen that stresses privacy information security which must be acknowledged before the user is granted access to the environment

8.4 Has Certification & Accreditation been completed for the system or systems supporting the program?

Certification expires – 9/30/2013

8.5 What auditing measures and technical safeguards are in place to prevent misuse of data?

Standard Security Training and Awareness Program

8.6 Privacy Impact Analysis: Given the sensitivity and scope of the information collected, as well as any information sharing conducted on the system, what privacy risks were identified and how do the security controls mitigate them?

Due the small number of personal data elements collected and the limited sharing of the data the privacy risk is very low. Additionally, because of role and privileges

based access, and only approximately 200 USDA employees have access to the data, the risk to the individual of data sharing is very low.

Section 9.0 Technology

The following questions are directed at critically analyzing the selection process for any technologies utilized by the system, including system hardware and other technology.

9.1 What type of project is the program or system?

It is a mandated system that is in operational status

9.2 Does the project employ technology which may raise privacy concerns? If so please discuss their implementation.

No

Section 10.0 Third Party Websites/Applications

The following questions are directed at critically analyzing the privacy impact of using third party websites and/or applications.

10.1 Has the System Owner (SO) and/or Information Systems Security Program Manager (ISSPM) reviewed Office of Management and Budget (OMB) memorandums M-10-22 "Guidance for Online Use of Web Measurement and Customization Technology" and M-10-23 "Guidance for Agency Use of Third-Party Websites and Applications"?

Yes

10.2 What is the specific purpose of the agency's use of 3rd party websites and/or applications?

Third party websites are not being used. N/A

10.3 What personally identifiable information (PII) will become available through the agency's use of 3rd party websites and/or applications.

Third party websites are not being used. N/A

10.4 How will the PII that becomes available through the agency's use of 3rd party websites and/or applications be used?

Third party websites are not being used. N/A

10.5 How will the PII that becomes available through the agency's use of 3rd party websites and/or applications be maintained and secured?

Third party websites are not being used. N/A

10.6 Is the PII that becomes available through the agency's use of 3rd party websites and/or applications purged periodically?

Third party websites are not being used. N/A

10.7 Who will have access to PII that becomes available through the agency's use of 3rd party websites and/or applications?

Third party websites are not being used. N/A

10.8 With whom will the PII that becomes available through the agency's use of 3rd party websites and/or applications be shared - either internally or externally?

Third party websites are not being used. N/A

10.9 Will the activities involving the PII that becomes available through the agency's use of 3rd party websites and/or applications require either the creation or modification of a system of records notice (SORN)?

Third party websites are not being used. N/A

10.10 Does the system use web measurement and customization technology?

Web measurement and customization technology is not being used. N/A

10.11 Does the system allow users to either decline to opt-in or decide to opt-out of all uses of web measurement and customization technology?

Web measurement and customization technology is not being used. N/A

10.12 Privacy Impact Analysis: Given the amount and type of PII that becomes available through the agency's use of 3rd party websites and/or applications, discuss the privacy risks identified and how they were mitigated.

Web measurement and customization technology is not being used. N/A



Responsible Officials

Michael McGuire
Departmental Management
United States Department of Agriculture

Approval Signature

<i>Position of Signatory</i>	<i>Name of Signatory</i>	<i>Date Signed</i>	<i>Signature</i>
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