**U. S. Department of Energy**
**Carlsbad Field Office**

# Information Management Plan

**DOE/WIPP-12-3429**

**Revision 0**



**May 2012**

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Approved by: _____//Signature on File//_____ Date: 5/18/2012____
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# Table of Contents

# 1    INFORMATION MANAGEMENT

## 1.1    Introduction

The mission of the Carlsbad Field Office (CBFO) is to safely dispose of transuranic (TRU) waste and protect human health and the environment by establishing an effective system for management of TRU waste from generation to disposal.

The government requires an organized system for information control, based on an established set of principles, policies, procedures, standards, and practices.  This document contains requirements for document control and management of records and information technology.

## 1.2    References

Requirements for individual employees and for organizations are fully reflected in a number of Federal laws and regulations relevant to these areas.  An effective information management and control system is achieved through compliance with the law and good business practices. Additional references specific to each of these areas are included in the separate sections, but these are applicable to all areas.

Clinger-Cohen Act of 1996

ASME-NQA-1-1989, *Quality Assurance Program Requirements for Nuclear Facilities*

DOE O 414.1D, *Quality Assurance*

DOE/CBFO 94-1012, *CBFO Quality Assurance Program Document*

## 1.3    Objective

The objective of the CBFO Information Management Plan (IMP) is to provide participants with an effective, coordinated document, records, and information technology management program as required by Federal statutes, Code of Federal Regulations, Department of Energy (DOE) orders and guidelines, and departmentally established or accepted standards and best business practices.  The purpose of this IMP is to ensure that information management practices are consistent, adequate, and secure among participants.

## 1.4    Scope

The CBFO IMP establishes information management requirements for the programs, projects, and activities sponsored by the CBFO.  The CBFO and organizations supporting the CBFO shall implement the applicable requirements of this IMP within their systems for management and control of these activities.  Each of the requirements contained in this plan are building blocks for a successful and effective information management program.

This plan applies to each program participant and each external program document and internal procedure that pertains to or is generated, managed, and processed under authority of the CBFO. Minimum criteria are defined that shall be used by each participant in the preparation, review, approval, revision, control, electronic posting, printing, and distribution of CBFO program

documents, including (but not limited to) official use only, technical, administrative, or reports, to ensure consistency in support of the mission and responsibilities assigned to the CBFO.

DOE/WIPP-12-3429 supersedes CAO-94-1001 and incorporates a third section to address electronic information management.

## 1.5    Information Management Steering Committee

The Information Management Steering Committee consists of the CBFO Chief Information Officer (CIO) and designated participant representatives addressing information management including, but not limited to document generation and control, records management, and information technology management.  Steering committee members shall communicate with participants regarding implementation of this plan.

## 1.6    Procedures

Participants shall implement the requirements identified in this plan through implementing plans and procedures prepared and maintained by their organizations.  Participants shall make these documents available to the CIO upon request.

Information copies of existing CBFO procedures and forms are available on the CBFO intranet site.  These procedures and forms may be used for guidance and compliance by any participant in designing and implementing information management programs.

## 1.7    Training

Personnel will be trained and knowledgeable in a broad range of information management commensurate with their required knowledge base to support the mission, including, but not limited to, document preparation, review, and control practices, records capture, preservation, and management, and how information technology can be used to cost-effectively preserve and protect the data generated in support of the WIPP mission.

Participants should incorporate annual information management awareness in the routine training schedules for each organization.  General Employee Training (GET) meets this requirement, but organizations can offer more information as necessary or desired.

## 1.8    Communication

The timely exchange of information helps to ensure both provider and receiver have a common understanding of the issues and processes at hand.  Communication should facilitate program goals at all levels, along with clearly identified channels of communication through which to exchange information.

## 1.9    Contracts and Agreements

Each participant shall ensure that when contracts or agreements are planned, responsibilities are clearly delineated for the creation, maintenance, distribution, and disposition of documents and records generated as a result of CBFO-funded activities, and that systems put in place to more

efficiently and cost-effectively manage these areas are coordinated to ensure seamless interface for data processing in accordance with this plan and the laws, regulations, and requirements it supports.

## 1.10   Technology Information Management Enterprise (TIME)

The Technology Information Management Enterprise (TIME) is the group within the CBFO responsible for management of the federal network (Fednet) and cyber security, documents, records, Freedom of Information Act (FOIA) requests, and oversight of the contractor in these areas.  TIME personnel will:

A.   Communicate with participants regarding implementation of this plan

B.   Review proposed changes to processes requiring technology support

C.   Ensure adequate reporting of all areas of information and technology management

D.   Act as liaison with the DOE Office of Environmental Management to support certification and accreditation of the Fednet and WIPPnet

## 2   DOCUMENT MANAGEMENT

## 2.1   Introduction

Uniform document preparation and management is a cornerstone of good government. Document management encompasses document planning and development, resource management, the review and revision process, and procedures for proper disposal of documents generated by CBFO and program participants.

## 2.2   References

DOE O 241.1B, Scientific and Technical Information Management

DOE O 251.1C, *Departmental Directives Program*

DOE G 242.1-1, *Forms Management Guide for use with DOE O 200.1, Information Management Program*

ANSI/NISO Z39, 18-1995, *American National Standard of Information Sciences-Scientific and Technical Reports-Organizations, Preparations, and Production*

ANSI/NISO Z39, 23-1990, *American National Standard for Library and Information Sciences and Related Publishing Practices-Standard Technical Report Number (STRN)-Format Creation*

Los Alamos National Laboratory P1022, *Review and Approval of Scientific and Technical Information (STI)*

Sandia National Laboratories SAND2011-7392, *Guide to Preparing SAND Reports and Other Communication Products*

*U.S. Government Printing Office Style Manual*

## 2.3    Objectives

An effective document management program ensures proper tracking, maintenance, and distribution of CBFO documents. This ensures traceability of work, controls cost by avoiding duplication, and helps ensure application of the most current regulatory requirements in support of the mission of the CBFO.

## 2.4    Organizational Responsibilities

### 2.4.1  CBFO

The CBFO requires document management functions, including the following, to be properly planned, budgeted, and managed to support the CBFO mission:

A.    CBFO directors and supervisors provide administrative oversight for document development in their areas and for coordinating document development functions, including resource requirements, within the scope of CBFO activities.

B.    The CBFO CIO is responsible for planning, implementing, and assessing the document management program and for providing oversight and coordination of document management functions, requirements, and resources.

C.    CBFO staff is responsible for complying with requirements in existing procedures related to document management.

### 2.4.2  Management and Operating Contractor

The WIPP management and operating (M&O) contractor provides a group responsible for tracking, maintaining, and distributing documents required in support of the CBFO mission.  The M&O staff also assists in categorizing documents, reviewing and maintaining documents, assigning unique identification numbers, printing and distributing paper documents, and providing change control for CBFO documents as required.

The WIPP M&O contractor provides electronic posting of documents in public or controlled access areas residing on the WIPP electronic communication network (WIPPnet), the electronic information exchange vehicle.

### 2.4.3  Participant Management

Participant management is responsible for ensuring that the CBFO document management program is properly implemented within their organizations.  Participant management is responsible for:

A.    Developing plans and procedures to ensure that CBFO program documents created or received by their organizations are managed in accordance with this plan

B.    Ensuring that adequate staffing, resources, and training are provided to meet requirements and properly implement this plan

C.      Ensuring that adequate equipment and facilities are provided to manage and protect CBFO program documents

## 2.5    Requirements

CBFO document management and control requires documents to be planned, generated, maintained, stored, and disposed of in accordance with procedures developed by each participant in support of this plan.

## 2.6    Procedures

The CBFO and its participants shall implement the requirements through implementing plans and procedures prepared and maintained by their organizations. Participants shall send an index of applicable document management and control procedures and revisions to the CBFO CIO.

## 2.7    Training

Training is the process by which staff develops the necessary skills and knowledge to do their jobs. As a minimum, participants will train their staff in the overall document management and control processes, including justification, generation, distribution, and control of documents generated in support of the CBFO mission.

Document numbers will be maintained by the WIPP Document Services department and provided as requested by personnel creating documents. The numbers shall conform to the established system unless there is an exemption.

## 2.8    Document Types

As described in the following subsections, CBFO documents have been divided into two categories: program documents and internal documents.

### 2.8.1  Program Documents

Program documents give guidance or provide information to CBFO staff and are also distributed among affected participants for direction and use. These documents contain information derived from activities managed and supported in whole or in part by the CBFO. Program documents are included in the document hierarchy and are subject to the document control system. CBFO-developed documents include reports (status, final, summary, or topical), journal articles, conference papers, theses, specifications, and CBFO planning-level documents such as the *Quality Assurance Program Document* (QAPD) and the *Information Management Plan.*

Program documents also represent CBFO programs to the scientific and technical community, and to the general public. Such documents must be distributed for review and comment to affected participants and oversight organizations as dictated by program requirements or agreements.

Upon CBFO approval, certain scientific and technically oriented materials do not require review and approval outside the originating organization (e.g., Sandia National Laboratories (SNL) SAND reports). These documents are, however, considered program documents.
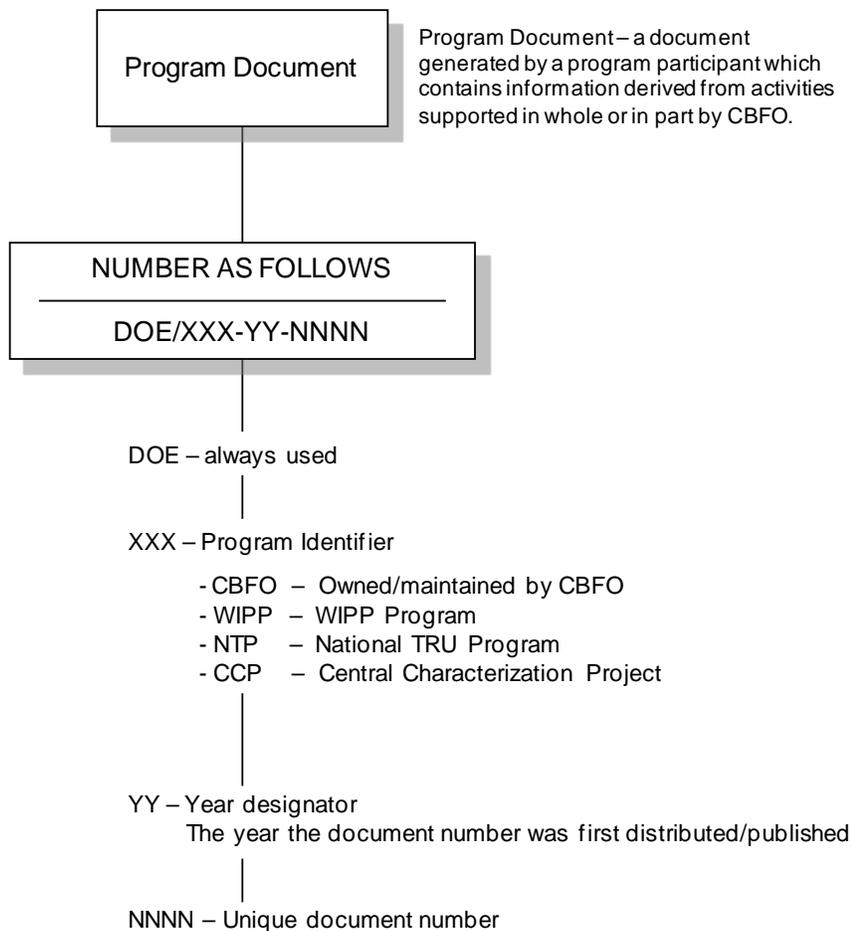
### 2.8.2 Internal Documents

Internal documents are written, reviewed, approved, printed, distributed, and controlled within the participant's organization. Such documents include plans, procedures, policies, charters, and instructions. These documents are not distributed or implemented across functional boundaries of other program participants. Each participant organization is responsible for providing an appropriate document control system for its internal documents.

### 2.8.3 Document Numbering

The CBFO document numbering system follows the requirements set forth in DOE orders and the American National Standards Institute (ANSI) standard for report numbering. The system takes into account the different types of documents and their intended uses. The figure below describes the document numbering system for CBFO documents. Documents prepared for CBFO by any participant must have a document number assigned by Document Services in accordance with this plan.

**NOTE**: SAND reports and Los Alamos Unrestricted Release (LAUR) documents are exempt from this requirement.

```
┌──────────────────────┐
│                      │      Program Document – a document
│  Program Document    │      generated by a program participant which
│                      │      contains information derived from activities
└──────────────────────┘      supported in whole or in part by CBFO.
           │
┌──────────────────────┐
│  NUMBER AS FOLLOWS    │
│  ─────────────────    │
│  DOE/XXX-YY-NNNN      │
└──────────────────────┘
           │
    DOE – always used
           │
    XXX – Program Identifier

        - CBFO  –  Owned/maintained by CBFO
        - WIPP  –  WIPP Program
        - NTP   –  National TRU Program
        - CCP   –  Central Characterization Project

           │
    YY – Year designator
        The year the document number was first distributed/published
           │
    NNNN – Unique document number
```

## 2.9    Document Preparation

Program participants should have or comply with an existing document preparation process that includes the following:

A.    Identify the need for the document

B.    Identify the responsible organization (owner) and preparer

C.    Define scope, content, and outline of the document

D.    Establish review/approval authority

E.    Determine audience and method of distribution

F.    Define use of legal disclaimers

G.    Describe placement of acknowledgments

## 2.10   Document Review

Any document review process must ensure the capture and resolution of comments and preservation of those comments through all revisions so that a document's evolution can be understood.  Processes must be clear for:

A.    Internal Documents

B.    External Documents/Reviews

C.    Comment Resolution

D.    Editorial Review

E.    External Oversight Review

F.    Electronic Document Review

G.    Change Control

1.    Minor Change
2.    Major Change
3.    Superseded Documents
4.    Document Deactivation/Cancellation
5.    Change Notification

H.    Electronic Document Management

1.    Process Control
2.    Distribution
3.    Preservation
4.    Disposition

## 2.11 Transmittal of Documents to the Office of Scientific and Technical Information

Most technical documents produced for the CBFO require submission to the Office of Scientific and Technical Information (OSTI) in accordance with DOE Guide G 241.1A.  Each document submitted must contain the following statement on the inside front cover:

"This document has been submitted as required to:
U.S. Department of Energy
Office of Scientific and Technical Information
P.O. Box 62
Oak Ridge, TN 37831
(865) 576-8401

Additional information about this document may be obtained by calling 1-800-336-9477.

Unlimited, publicly available full-text scientific and technical reports produced since 1991 are available online at Information Bridge (www.osti.gov/bridge).

U.S. Department of Energy and its contractors may obtain full-text reports produced prior to 1991 in paper form, for a processing fee, from:

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Office of Scientific and Technical Information
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Oak Ridge, TN 37831-0062
Phone: (865) 576-8401
Fax: (865) 576-5728
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Available for sale to the public from:

U.S. Department of Commerce
National Technical Information Service
5301 Shawnee Rd
Alexandra, VA  22312
Phone: (800) 553-6847 or (703) 605-6000
Fax: (703) 605-6900
Email: info@ntis.gov"

Document Services will provide these copies to OSTI as required.  No document will be accepted for printing or electronic publication without the above statement and the completed announcement form DOE F 241.1, which is submitted by Document Services when a document is approved as final.

## 2.12 Use of Legal Disclaimers

The use of a standard legal disclaimer is not appropriate for most documents (i.e., environmental technical reports, permit applications, and documents submitted to state and federal agencies in compliance with regulations, consent orders, or compliance agreements).  It is the responsibility of each participant organization to determine if a disclaimer is appropriate for the publications it generates.  Use of a standard legal disclaimer requires written approval from the CBFO Manager and should be coordinated with the appropriate participant legal counsel and the CBFO CIO and Legal Counsel. .

## 3 RECORDS MANAGEMENT

### 3.1 Introduction

Good government requires good record keeping. The requirements for both individual employees and organizations are fully reflected in a number of federal laws and regulations. Both compliance with the law and good business practices are achieved through records management – the organized set of principles, policies, procedures, standards, and techniques for the life-cycle management of the records generated in support of the CBFO mission.

### 3.2 References

Clinger-Cohen Act of 1996

Privacy Act of 1974, as implemented by Office of Management and Budget Circular A-130

44 USC, Chapter 21, National Archives and Records Administration
Chapter 31, Records Management by Federal Agencies
Chapter 33, Disposal of Records
36 CFR Chapter 12, National Archives and Records Administration
Federal Information Processing Standard (FIPS) 186-3, *Digital Signature Algorithm Validation System*
DOE Order 243.1A, *Records Management Program*
DOE O 243.2, *Vital Records*

### 3.3 Objectives

3.3.1 The CBFO records management program has two objectives. The first is to provide for the organization, maintenance, use, and disposition of records, and to do so in a manner based on economy and efficiency. This objective is achieved through the application of records management standards and techniques designed to:

A. Assure uniformity and simplicity in maintaining and using records

B. Provide adequate controls over the creation of files and prevent accumulation of unnecessary files

C. Facilitate the classification, filing, retrieval, charge out, and refiling of records

D. Provide for the systematic cutoff and periodic destruction or retirement of files in accordance with approved records disposition schedules

E. Assure the preservation of those records having sufficient continuing value to warrant their permanent retention

3.3.2 The second objective of the CBFO records management program is to ensure that records are carefully preserved when they may have future value for researchers, scientists, and historians.

3.3.3 These objectives can be verified as achieved when CBFO has the information it needs to carry out its mandated responsibilities in an efficient and effective manner, when it is able to provide the necessary documentation required by special circumstances such as audits or

litigation without incurring large costs, and when administrative continuity is protected as necessary records remain accessible.

3.3.4   The CBFO records management program, as part of the IMP, establishes records management requirements for programs, projects, and activities sponsored by the CBFO.  The CBFO and each organization supporting the CBFO shall implement the applicable requirements of this records management plan within their systems for management and control of these activities.  Each element and related requirement in this plan is a building block for a successful records management program.

## 3.4     Organizational Responsibilities

### 3.4.1  CBFO

The CBFO requires records management functions to be properly planned, budgeted, and managed to support the CBFO mission.  This includes:

- A.    CBFO directors and supervisors provide administrative oversight for coordinating records management functions, including resource requirements, within the scope of CBFO activities.

- B.    The CBFO CIO is responsible for planning, implementing, and assessing the records management program and for providing oversight and coordination of records management functions, requirements, and resources.

- C.    CBFO staff is responsible for complying with requirements in existing procedures related to records management.

### 3.4.2  Management and Operating Contractor

The M&O contractor shares responsibility for management of the integrated records management system with the CBFO Records Management contractor.  The M&O contractor is responsible for the following CBFO records activities:

- A.    Assists in the development and maintenance of policies, plans, manuals, and program-level procedures necessary for CBFO to manage an effective and compliant records management program

- B.    Assists participants in the creation and revision of RIDS as requested

- C.    Develops and updates a site-specific RIDS with input and support from all participants

- D.    Provides records management training and qualification programs to project participants

- E.    Provides records management awareness programs to participant organizations

- F.    Provides records litigation support

- G.    Identifies those records needed to support the compliance documents

- H.    Maintains an electronic retrieval system, including document scanning, indexing, and retrieval

### 3.4.3 Records Management Contractor

The Records Management contractor to CBFO will ensure that a management official knowledgeable in records management policies, procedures, and practices is designated as the CBFO records management liaison for administration and technical content of CBFO records for which they are responsible. The point of contact must be identified in writing to the CBFO CIO. This participant is responsible for the following records management activities:

A.    Provides storage and maintenance for designated project records (permanent, nonpermanent, and unscheduled) for controlled storage before final disposition

B.    Coordinates the conversion of original source documents to electronic images by scanning, digitizing, or microfilming designated project records including quality assurance (QA), permanent, and selected nonpermanent records, and by performing image verification and inspection of the electronic images and archival microfilm backups in accordance with approved plans and procedures

C.    Provides for the retrieval of stored records for participants upon request

D.    Provides for proper disposition of permanent records by transfer to a records storage facility approved by the National Archives and Records Administration (NARA), and the authorized disposal of nonpermanent records by shredding, recycling, burning, pulping, or other suitable means

### 3.4.4 Participant Management

Participant management is responsible for ensuring that the CBFO records management program is properly implemented within their respective organizations.

## 3.5    Requirements

CBFO records management requires records to be generated, maintained, stored, and disposed of in accordance with procedures developed by each participant in support of this plan.

## 3.6    Procedures

The CBFO and its participants shall implement the requirements through implementing plans and procedures prepared and maintained by their organizations. Participants shall send an index of applicable records management procedures and revisions to the CBFO CIO.

## 3.7    Training

3.7.1   Training is the process by which staff develops the necessary skills and knowledge to do their jobs. As a minimum, participants will train their staff in general records management, including how to identify, separate, and protect records, nonrecords, personal papers, and working papers.

3.7.2   Participants will provide training to records personnel who are responsible for receipt, inventory, RIDS preparation and maintenance, and transfer of CBFO records. The training will ensure that records personnel have the skills and knowledge required to perform these functions in compliance with NARA requirements.

3.7.3  Records will be accepted at the WIPP Records Archive only from qualified records coordinators.

## 3.8    Communication

Information exchange must be timely and accomplished in such a manner that both provider and receiver have a common understanding of the information being shared.  Communication should facilitate understanding at all levels, and information exchange should take place along clearly identified channels.  It is the responsibility of the CBFO CIO to ensure records management issues are clearly communicated to the appropriate level of management.

## 3.9    Contract Language

Each contract, regardless of type, shall clearly establish the ownership of information created and used by contractors while performing work for the government.  Contract language will specifically define requirements documents, interfaces, deliverables, and records turnover.

## 3.10   Records Generation

A successful records management program begins with the establishment of information management practices at the creation of a record and using those practices throughout the life cycle of that record.  This is critical because the manner in which information is collected and records are created impacts upon their maintenance, use, and disposition.  Each record generated shall be accurate and adequate to document the necessary activity.

A.    Participants shall ensure that records are segregated from nonrecords and personal papers, and are clearly labeled.

B.    The original record shall be maintained as the "record copy" whenever possible.  If the original is unavailable or has been damaged in some way that makes it unacceptable, then a reproducible photocopy will be accepted.

C.    A record must be legible and reproducible.  If a record can be copied and still produce a clear and legible copy, the record is considered reproducible.

D.    Black ink is preferred in creating records because it provides the maximum contrast and reproducibility.  If a record contains other colored ink but will pass the "copy a copy" guideline, the record is still acceptable.

E.    Records with pencil notations shall be photocopied, causing the notations to be permanent and unalterable.  Then the original record with the pencil notations shall be destroyed.

F.    The use of highlighters on record copies is discouraged as the text beneath it may not be visible if the record is photocopied, scanned or microfilmed.

1.    If an older existing record has highlighter on it, try to obtain a clean copy of the record.

2.    If a clean copy is unavailable, assure the record will copy with the highlighted text remaining legible; if so, it is considered legible and may be considered a record copy.

3.    If the highlighted text will not copy legibly, write a statement to that effect, for example: "The highlighted line of text reads "[TEXT]." This text is obliterated when copied."

4.    If there is adequate room, that statement should be located directly on the affected page.

5.    If necessary, use a separate piece of paper and ensure the statement clearly defines exactly the record to which it applies. The statement must be signed and dated.

6.    Stamps or other marks must not obscure or obliterate text or images on a record.

G.    Errors should be corrected by the originating organization by drawing a single line through the incorrect information, entering the correct information, and dating and initialing the correction. The incorrect information must remain legible.

H.    The use of correction fluid (white out) or correction tape is not acceptable.

I.    Records must be complete and traceable.

J.    Attachments must be included with the individual record, unless identified as being nonrecord material.

## 3.11   File Management and Indexing

3.11.1 An economical and efficient filing system will be in place to maintain, use, and dispose of records in any media. Participants shall index records prior to storage to ensure retrievability. A detailed description of the file system (series, case, alphabetical, numerical) should be included on the index.

3.11.2 A RIDS shall be used for all records. No records may be transferred to the WIPP Records Archive or to a federal records center without an approved RIDS.

3.11.3 Approved schedules (NARA general records schedules, DOE records schedules, and WIPP site records schedules) will be used to complete and revise the RIDS.

3.11.4 Records not meeting the description of any approved scheduled series must be submitted to the CBFO CIO by the originating office with a proposed retention period and disposition on a NARA SF115 form within 180 days of determination that the record is unscheduled. Unscheduled records are noted as such on the RIDS.

## 3.12   Records Transfer

Records transferred to the WIPP Records Archive or a federal records center must meet the acceptance criteria of the organization managing the target facility.

### 3.13   Records Receipt

The records transmittal and index and the records transfer checklist forms shall be reviewed by the M&O contractor or delegated organization to ensure the forms are complete and meet records acceptance criteria. The M&O contractor will notify the sender of any discrepancies or deficiencies.

### 3.14   Records Storage

In accordance with 36 CFR 1234, records must be stored and preserved in adequate storage facilities in accordance with approved implementing procedures to preclude loss or damage due to moisture, temperature, rodent or insect infestation, excessive light, electromagnetic fields, or stacking, as appropriate for the type of record being stored.

### 3.15   Information Access and Retrieval

3.15.1 A records management program shall contain access controls to protect information and records against loss, destruction, or alteration, and to ensure security requirements are met. Access controls both limit the people who may obtain the information or record, and ensure that the people who have rights to such information are allowed access.  Site procedures are followed for access control, including those required for QA records.

3.15.2 Records stored in the WIPP Records Archive shall be available for participant use as requested, unless the records are otherwise designated by the records source as requiring release approval.

3.15.3 Requests for records from outside entities (any individual or organization other than a participant) shall be processed through the Freedom of Information Act (FOIA) by submitting a written request in accordance with established participant procedures.

### 3.16   Disposition and Destruction

NARA regulations require the disposal of nonpermanent records when their authorized retention periods expire.  It is important that records be destroyed at the end of their retention periods to avoid the expense of unnecessary maintenance.  Records may be recycled or destroyed by burning, pulping, shredding, or other suitable means of destruction, in accordance with approved site and participant procedures.

### 3.17   Litigation Support

3.17.1 Litigation support records may be grouped into two categories.  The first category is composed of those records generated during the normal course of business and part of the general files, which are determined at some point in time to be relevant to a particular legal action.  Every record generated has the potential to fall into this category.  Litigation support records shall be identified when directed by participant legal counsel and shall be managed as follows:

A.   Participants shall retrieve litigation support records that are identified by DOE and/or participant legal counsel and segregate them within the records system.

B.   A moratorium or "Records Hold" is placed on their destruction as long as the records are needed to support any legal process as directed by counsel.

C.   At the direction of legal counsel, the temporary retrieval, handling, and storage of such records will be accomplished in a manner that facilitates their use and ensures their protection from loss, damage, and unauthorized access. The records falling within this category usually retain that status during the course of the legal action and counsel approves their return to the normal administrative processes associated with records lifecycle management.

3.17.2 The second category comprises those records that are protected from forced disclosure through the attorney/client and/or work product privileges. Such records shall be treated as confidential, privileged records from the time of their origination.

A.   These records shall be maintained in a sequestered, controlled-access area, segregated from the routine files, under the direct supervision of the CBFO Legal Counsel.

B.   Restrictions shall be placed on their reproduction and distribution, as detailed in procedures and protocols concerning privileged documents.

C.   These records shall not be destroyed or removed from their sequestered location except by the express authorization of the CBFO Legal Counsel.

## 3.18   Quality Assurance

3.18.1 CBFO records may be designated as quality assurance (QA) records, which means that in addition to the retention period required by the schedules approved for DOE by the National Archives, additional protection will be required for a period of time while the document is retained as a QA record based on permit or nuclear safety requirements.  Once the QA period has expired, the record can revert to a non-QA record that doesn't require the extra protection of dual storage, limited access, and fire-rated file cabinets.

3.18.2 CBFO QA records must be identified as such on the RIDS.  In addition to the authorized NARA retention, CBFO QA records must be designated as lifetime, nonpermanent, or post-closure.  QA records will be generated, maintained, stored, and disposed of according to DOE/CBFO 94-1012, *CBFO Quality Assurance Program Document* (QAPD).  All QA records sent for long-term storage to the WIPP Records Archive must meet the requirements in the CBFO QAPD.

## 3.19   Audiovisual Records

Guidance for capture, scheduling, cataloging, and storage of audiovisual records (pictures, sounds, and graphic visual representations) is available in 36 CFR 1237.

## 3.20   Electronic Records

3.20.1 Proper management of electronic information is required in order to ensure that electronic records and nonrecords are protected and retained in accordance with approved records retention and disposition schedules, irrespective of media.  A storage solution and electronic repository for these records shall be developed by the participant records management contractor and approved by CBFO.  At a minimum, the system will ensure the capture and preservation of:

      A.     E-mail

      B.     Databases

      C.     Web pages

3.20.2 Each of these is on the DOE Records Management Schedules to be dispositioned according to the subject of the data contained therein.

## 3.21   Digital Signature

Digital signatures may be used when they would improve the efficiency of a process without increasing the risk of loss of integrity.  Any software purchased to provide digital signatures must be approved by the CBFO CIO and the M&O contractor configuration management group, and meet the standards in FIPS 186-3, *Digital Signature Algorithm Validation System.*

## 3.22   Micrographics Management

3.22.1 Microfilm copies of selected records that have been made in compliance with regulations shall have the same effect as the originals and shall be treated as originals.

3.22.3 A migration plan for transferring microfilm records to digital images should be prepared and implemented to reduce the risk of technological obsolescence.  Verification is required before nonpermanent hardcopy paper records can be destroyed or microfilmed permanent records can be transferred to a federal records center or the National Archives.

## 3.23   Disaster Preparedness and Recovery

Potential disasters drive the need for CBFO to prepare for operation under emergency conditions. Identification and protection of vital or other important records are essential for a successful disaster preparedness and recovery program.  Policies, plans, and procedures shall be in place to protect and to reconstruct records in the event of an emergency.

## 3.24   Program Assessment

A successful records management program periodically monitors and revises its records management practices and procedures to ensure compliance with appropriate policies and regulations and good business practices.  Participants will perform an annual self-assessment on some segment of their records management program.

## 4 INFORMATION TECHNOLOGY

### 4.1 Introduction

The overarching mission of DOE is to advance the national, economic, and energy security of the United States and promote scientific and technological innovation. This mission, as well as the mission of the CBFO, relies on information and those systems used to gather, protect, and preserve it in support of these missions. It is the responsibility of the head of each agency to design and implement a process for maximizing the value and assessing and managing the risks of information technology (IT) acquisitions, including information architecture, cyber security, portfolio planning, and performance monitoring and reporting.

### 4.2 References

Clinger-Cohen Act of 1996

E-Government Act of 2002

Federal Information Security Management Act (FISMA) of 2002

NIST Special Publication 800-53A, *Information Security*

FIPS 186-3, *Digital Signature Algorithm Validation System*

OMB Circular No. A-11, Part 7, Planning, Budgeting, Acquisition, and Management of Capital Assets

OMB Circular No. A-130, Management of Federal Information Resources, Appendix III

DOE Order 200.1, *Information Technology Management*

DOE Order 200.2, *Information Collection Management Program*

DOE Order 203.1, *Limited Personal Use of Government Office Equipment Including Information Technology*

DOE O 205.1B, *Department of Energy Cyber Security Program*

### 4.3 Objectives

Information technology must be designed, implemented, maintained, and managed to ensure confidentiality, integrity, and availability of the data generated by and used to support the mission of the CBFO.

### 4.4 Organizational Responsibilities

#### 4.4.1 CBFO

The CBFO requires IT functions to be properly planned, budgeted, and managed to support the CBFO mission. This includes:

A.    The CBFO Manager has delegated to the directors and supervisors responsibility to provide administrative oversight for coordinating IT functions, including resource requirements, within the scope of CBFO activities.

B.    The CBFO CIO is responsible for planning, implementing, and assessing the IT program and for providing oversight and coordination of IT functions, requirements, and resources.

C.    Operations Security (OPSEC) is responsible for ensuring a cyber security system is maintained commensurate with the requirements of the WIPPnet boundaries.

D.    CBFO staff will comply with requirements in existing procedures related to network use.  This includes annual cyber security training and signature compliance with the Rules of Behavior (ROB) for network account holders.

### 4.4.2  Management and Operating Contractor

The M&O contractor manages the WIPPnet and all associated systems for the CBFO, including maintenance, hard/software upgrades, user training, remote interfaces, and limited TRANSportation Tracking and COMmunication (TRANSCOM) network support.

### 4.4.3  Participant Management

Participant management is responsible for ensuring that the CBFO IT program is properly implemented within their respective organizations.  Participant management will assure that a management official knowledgeable in IT policies, procedures, and practices is available to participate on the WIPPnet Information Technology Configuration Management Board (ITCMB).

## 4.5    Requirements

CBFO information technology management requires electronic systems to be planned, reviewed, integrated, generated, maintained, and disposed of in accordance with procedures developed by each participant in support of this plan.

## 4.6    Procedures

The CBFO and its participants shall implement the requirements through implementing plans and procedures prepared and maintained by their organizations.  Participants shall send an index of applicable information technology management procedures and revisions to the CBFO CIO.

## 4.7    Training

Training programs should emphasize the need for secure, efficient, and effective use of IT components and resources.  Training should be provided at least annually, or as new or anticipated threats become known.

## 4.8    Cyber Security

4.8.1    Cyber security must be designed, implemented, maintained, and managed to ensure compliance with governing documents, as well as to ensure the security of the data used to support the mission of the CBFO.

4.8.2    Each participant should develop a "Rules of Behavior" (ROB) document as a training requirement for each employee having an account on the network.  A ROB shall provide a detailed list of user privileges and responsibilities when using the government-funded networks for communication or Internet access.  A sample ROB is included as Appendix B to this document.

4.8.3    Processes for posting of documents, images, or other official information on WIPPnet should be implemented by all participants unless they agree to comply with the processes and procedures put in place by the WIPP M&O contractor.

4.8.4    Web-based applications can pose particular threats from cyber criminals and should be designed and implemented with adequate security to ensure the integrity of the information contained on the site.

4.8.5    Sharing information is necessary in order to execute the mission and ensure deadlines and commitments are met.  Processes should be designed and implemented to ensure that information is kept secure and integrity is maintained, but that information is available to authorized personnel who need it to support the mission.

4.8.6    Information should be reviewed for privacy and special handling (Official Use Only, Sensitive Unclassified Information, Personnel, or Personally Identifiable Information [Pii]) and processes should be designed and implemented to ensure the protection of data meeting this description.

## 4.9    Digital Signature

FIPS 186-3, *Digital Signature Algorithm Validation System,* provides a robust standard for public key-based digital signature systems and may be used by participants when designing a process involving digital signatures.  Such a feature may be used when it would improve the efficiency of a process without increasing the risk of loss of integrity.  Any software purchased to provide digital signatures must be approved by the CBFO CIO and the M&O contractor configuration management group.

## 4.10    Capital Planning

The Clinger-Cohen Act of 1996 requires that all information technology work will be assessed, planned, and managed to produce the best value to the government.  DOE EM uses the Office of Management and Budget (OMB) electronic Capital Planning and Inventory Control (e-CPIC) process to monitor all technology costs across the complex.  The CBFO maintains an inventory of reportable projects.  All participants must comply with the requirements of this process to ensure accurate reports are submitted to OMB.  Participants should have processes in place to

support complete and accurate reporting of automated systems, including status changes over the life of each identified component.

## 4.11   Efficient Spending

4.11.1 Efficient spending is an area of intense focus throughout the government.  This includes the areas of use and maintenance of personal printers and issuing multiple technology devices to employees; i.e., integrated copy/scan/print/fax units.

4.11.2 Each organization should determine a baseline of how much equipment is supporting each employee and how best to ensure completion of the mission with the least cost to the government.  Networked printers are more cost effective than stand-alone printers, and using leased copiers as multi-function systems is preferred.

# Appendix A: Definitions

**Accreditation –** The official management decision given by a senior Agency official to authorize operation of an information system and to explicitly accept the risk to Agency operation (including mission, functions, image, or reputation), Agency assets, or individuals, based on the implementation of an agreed-upon set of security controls.

**Attorney/Client Privilege –** Any record deemed as attorney/client privilege by the CBFO legal counsel or a participant legal counsel.

**Certification –** A comprehensive assessment of the management, operational, and technical security controls in an information system, made in support of security accereditation, to determine the extent to which the controls are implemented correctly, operating as intended, and producing the desired outcome with respect to meeting the security requirements for the system.

**Change Control –** The administrative process used to supersede, cancel, or revise an approved document.

**Carlsbad Field Office** (CBFO) **–** The Department of Energy Field Office, located in Carlsbad, New Mexico, with responsibility and authority to manage the DOE programs located in this area; chiefly these are the WIPP program and the Office of the National Transuranic Waste Management Program, but also include underground sciences and Neutrino research.

**Controlled Document –** A document identified as subject to the administrative processes described by a document control system.

**Destruction –** The physical destruction of records by shredding, incineration, or other permanent means.

**Disposition –** An action taken regarding records no longer needed for current government business. These actions may include disposal of temporary records or transfer to local records holding areas, Federal Records Centers, or to the National Archives for permanent retention.

**Document –** Recorded material conveying information, regardless of physical form or characteristics. Within the context of this plan, correspondence is specifically excluded.

**Documentation –** Records of final draft review, approvals, and the original camera-ready copy of the document.

**Document Control –** The use of an administrative control system which describes and controls document preparation, review, approval and release, administration of changes and revisions, printing, distribution, filing, and disposition of selected documents. See definition of controlled document above.

**Document Hierarchy –** A representation of CBFO program documents and their interrelationships.

**Document Services** – The group within the Management and Operating (M&O) contractor organization responsible for maintaining the review/approval matrix, master document index, and document hierarchy; categorizing documents; reviewing and maintaining documentation; assigning unique identification numbers; printing; distributing; and providing change control as required.

**DOE Records Schedule** (DOERS) – A NARA-approved disposition authorization unique to DOE records.

**Draft** – A designation applied to a document that has been designated by the author as ready for review.  For compliance with the Land Withdrawal Act [Public Law 102-579, Section 17] in the described Environment, Safety and Health area, final draft documents are considered "preliminary" documents.

**Electronic Records** – Any information that is recorded in a form that only a computer can process and that satisfies the definition of a record.

**Federal Records Center** (FRC) – A records storage facility operated by the National Archives and Records Administration (NARA) for storage and servicing noncurrent records.

**Filing Series** – A series of identical or equivalent file items characterized by a consistent method of assembly and handling, a common arrangement of the component items, and uniform as to subject, type of information recorded, or kinds of transactions reflected. A filing series may also include related elements physically separated from the filing series, such as finding aids or bulky material.

**General Records Schedules** (GRS) – Schedules issued by NARA that govern the mandatory disposition of specified recurring filing series common to several or all federal agencies.

**Index** – A listing of records and cross-reference information.

**Integrated Records Management Team** (IRMT) – A steering group led by the CBFO CIO, that provides technical records management guidance and interface with subject matter experts as needed.  The IRMT will communicate with participants regarding implementation of this plan.

**Internal Document** – Information qualifying as proprietary, or which is not prepared for distribution beyond the originating organization (e.g., internally controlled procedures, policies, charters, manuals, and instructions that do not cross participant boundaries).

**Issue Date** – The date that an approved document is authorized for release.

**Master Document Index** – A comprehensive list of program documents/publications and pertinent information (identification number, title, author, issue date, changes, etc.), maintained by Document Services.

**Microfilming** – A photographic process used to record images of records on a fine grain, high resolution film in sizes greatly reduced from the original. In general, formats used are 16mm

rolls, 16mm microfiche, and 35mm aperture cards. Microform is a generic term for all microfilm formats. Microfilming has been discontinued for CBFO and its activities, but records already preserved in this media will continue to be accessible and searchable.

**National Archives and Records Administration** (NARA) – An independent agency responsible for establishing policies and procedures for managing the records of the Federal Government. It exercises final authority for approving the disposition of records.

**Nonrecord Materials** – Nonrecord materials are those federally owned informational materials that do not meet the definition of a record, or that have been excluded from coverage by the definition. Excluded materials are extra copies of documents kept only for reference, stocks of publications and processed documents, and library or museum materials intended solely for reference or exhibit.

**Oversight Organizations** – Organizations external to the DOE that have the responsibility for providing independent reviews, approvals, and/or inspections of specific program activities (e.g., Nuclear Regulatory Commission [NRC], Environmental Protection Agency [EPA], New Mexico Environment Department [NMED], National Academy of Sciences [NAS], Environmental Evaluation Group [EEG], etc.).

**Participant** – Any DOE site, waste generator site, or contractor organization that participates in a CBFO program. Subcontractor's documents are the responsibility of the participant with whom the subcontract is in effect. Participants required to comply with the Information Management Plan include the CBFO, the management and operating contractor, the CBFO technical assistance contractor, and any subcontractors for these groups.

**Permanent Records** – Any Federal records that have been determined by NARA to have historical or other value warranting permanent preservation. Such determinations are reflected in the authorized disposition columns of the DOERS and GRS, as appropriate.

**Program Document** – A document generated by a program participant that contains information derived from activities supported in whole or in part by the CBFO. Program documents include but are not limited to reports, plans, and requirements.

**Quality Assurance (QA) Records** – Authenticated records (regardless of medium) that furnish evidence of the quality of items and/or activities affecting safety or waste isolation. There are three types of QA records used to support CBFO activities:

- Lifetime: Records required to be maintained for the useful life of the items to which they pertain while the items are installed in the plant or facility (life of the item), or for the lifetime of the equipment, facilities, or programs to which the records apply.

- Non-permanent: Records required to show evidence that an activity was performed in accordance with the applicable requirements but need not be retained for the life of the item because they do not meet the criteria for lifetime records.

- Post-closure: QA records required to be maintained beyond the operating life of the WIPP repository, for periods of several hundreds of years, and in a manner that would

permit future generations to maintain them longer, if desired, using present reasonably available technology.

**Records –** Those classes of documentary materials which may be disposed of only after the archival authority is obtained.  The statutory definition of "records" (44 USC 3301) is ". . . books, papers, maps, photographs, machine-readable materials or other documentary materials, regardless of physical form or characteristics, made or received by an agency of the United States government under federal law or in connection with the transaction of public business and preserved or appropriate for preservation by that agency or its legitimate successor as evidence of the organization, functions, policies, decisions, procedures, operations or other activities of the government or because of the informational value of the data in them."  This definition applies to all departmental records including those created, received, and maintained by contractors pursuant to their contracts.  Virtually all recorded information in the custody of the government (including information held by contractors which is considered by contract to be government information) regardless of its media (hard copy, machine-readable, microform), is considered "government records."  For the CBFO programs, information meeting the above criteria is considered to be a record, unless it can be clearly identified as a nonrecord.

**Records Inventory and Disposition Schedule** (RIDS) **–** The form used to document the inventory of records and indicate their appropriate authorized retention period and instructions regarding their preservation and disposition.

**Records Management –** Refers to the planning, budgeting, organizing, directing, training, and managing the life-cycle of records in any medium. This life-cycle encompasses the interrelated and interdependent phases of records creation or collection, records maintenance and use, and records disposition.

**Temporary Records –** Records having value for a specific, limited time and authorized by NARA (via DOERS, GRS, or specific authority) to be destroyed after the designated time period identified in the DOERS or GRS.

**WIPP Records Archive** (formerly **Records Holding Facility** [RHF]) **–** The designated facility which is used for interim storage of permanent, nonpermanent, and unscheduled records which have been transferred from the WIPP site or project participants.  The M&O contractor shares responsibility for operation of the Archive facility.

**Appendix B:  Sample Department of Energy Carlsbad Field Office
Employee Rules of Behavior for Computer Users**

# DEPARTMENT OF ENERGY
# CARLSBAD FIELD OFFICE
# EMPLOYEE RULES OF BEHAVIOR FOR COMPUTER USERS

In compliance with the requirements of OMB Circular A-130, Appendix III, as required by law under the Clinger-Cohen Act, you, as a user of a Government computer system, must be apprised of the rules that govern the appropriate use of such data processing resources. This applies to the computer that has been issued to you and any computer you use to access the network.

This Rules of Behavior document applies to all Carlsbad Field Office (CBFO)/Federal government staff who use CBFO systems or have access to CBFO computing resources or information ("systems"). To ensure compliance with regulations in this regard, the following conditions of use apply. These conditions form the Rules of Behavior that shall establish evidence of such compliance on an individual basis. Your signature on this document signifies that you understand and agree to the Rules of Behavior as a condition to access the network.

1. I have no expectation of privacy on any information entered, stored, or transferred through Department of Energy (DOE) computers, host systems or networks.

2. DOE computers and computer systems are provided for the processing of official U.S. Government information. Accessing Government work files to which I have been given access permission, whether by issued computer or privately owned computer, requires that I abide by these Rules of Behavior.

3. Use of DOE computers, host systems and networks is restricted to authorized users and I am responsible for all actions taken under my user account or identity.

4. I will use the DOE computer, host system and network only as authorized. I understand that I am permitted to use this system for limited personal use as described in the appropriate use policy elements that I have reviewed. Users are permitted limited use of CBFO equipment or resources for personal needs when such use: involves minimal additional expense to the government; is performed on the employee's non-work time; does not violate the Standards of Ethical Conduct; does not result in personal gain; and does not interfere with the mission or operations of DOE activities.

5. I understand that my supervisor may instruct me to reduce my level of personal use based on monitoring reports of such activity.

6. I certify that I will follow all requirements for the protection of sensitive data including but not limited to personally identifiable information, sensitive agency information, source selections information, or official use only information.

7. I will not use the DOE computer, host system and network to conduct inappropriate and prohibited activities such as conducting private and/or personal business activities; amusement/entertainment purposes or organizing non-DOE sanctioned social events; sending non-business related email; broadcasting email to a distribution list for purposes other than DOE business; or viewing, downloading, installing, copying, accessing, sending, or posting illegal, derogatory, defamatory, sexist, sexually explicit, obscene, racist, harassing, abusive, offensive, disrespectful, or otherwise objectionable or inappropriate content.

8. I will use Internet access for government work-related use only, except as explicitly allowed by these Rules of Behavior. I will not access personal email accounts or employ instant messaging services, peer-to-peer sharing programs, blogs, social networking, Internet groups, or online meeting sites unless approved in writing by my supervisor and the Information Technology Team.

9.      I understand that DOE email communications are not encrypted by default. I am responsible for the content of all text, audio, or images I place on the Internet or send via email. I will not distribute government email addresses for personal and non-work-related communications. I will not transmit copyrighted materials without legal permission. I will not use email to transmit non-work-related material (photos, jokes, chain letters, illegal, derogatory, defamatory, sexual, racist, harassing, abusive, offensive, disrespectful or otherwise objectionable content). If received, I will make a reasonable effort to request the sender to stop. All communications will have my name attached.

10.      Under no circumstances will I ever enter classified data into an unclassified system or permit anyone to do so. If I do so accidentally, or otherwise receive by email or acquire such information unexpectedly from anyone, I will immediately notify my supervisor.

11.      If I observe anything that indicates inadequate security, misuse of this system, or virus infection, I will immediately notify my supervisor and IT cyber security.

12.      I will follow office security procedures, official regulations, and policies applicable to computer systems operation, to include applicable password policy.

13.      I will not use any DOE computer and/or the host system to gain unauthorized access, or attempt to gain unauthorized access, to other computers or computer systems. Further, I will not use any DOE computer and/or the host system to launch or attempt to launch denial of service or attacks against other computers or computer systems.

14.      I understand that the host system and network are monitored to ensure information security and system integrity, and to ensure use is limited to official purposes. By using the host system and network, I expressly consent to such monitoring and agree that any and all information derived from such monitoring, including connection logs between computers and my subscriber information, may be used as a basis for administrative, disciplinary, or criminal proceedings.

15.      I consent to the opening by my supervisor, chain of command, or any individual duly authorized under color of law of any file and/or electronic mail that may be stored under my account either on the host system or on any DOE computer workstation. If such information has been encrypted by me, I shall freely provide the means of decryption to provide such access.

16.      I expressly authorize the system administrator to provide my supervisors and law enforcement personnel with any and all information pertaining to my alleged misuse and abuse of any DOE computer and/or the host system and/or network.

17.      I certify that I am not a Foreign National without the proper credentials to legally reside in this country and that my nationality is not from a country listed on the sensitive countries list maintained by the Department of Energy.

18.      I have been provided a copy of this Agreement and understand that the system administrator will maintain the original.

Levels of Access:
Access Authorized for General Use, as defined by the General Use Access Protocol.

User Signature: _____      Date: _____

Printed Name: _____

Organization: _____