



PRIVACY IMPACT ASSESSMENT: SAVANNAH RIVER NUCLEAR SOLUTIONS (SRNS)  
 Training Records and Information Network (TRAIN)  
 PIA Template Version 3 – May, 2009

E-1074

Department of Energy  
 Privacy Impact Assessment (PIA)

Affects Members Of the Public?	<input checked="" type="checkbox"/>
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Guidance is provided in the template. See DOE Order 206.1, *Department of Energy Privacy Program*, Appendix A, *Privacy Impact Assessments*, for requirements and additional guidance for conducting a PIA: <http://www.directives.doe.gov/pdfs/doe/doetext/neword/206/o2061.pdf>

Please complete electronically: no hand-written submissions will be accepted.

This template may not be modified.

## MODULE I – PRIVACY NEEDS ASSESSMENT

<b>Date</b>	February 24, 2010	
<b>Departmental Element &amp; Site</b>	Office of Environment Management Department of Energy – Savannah River Operations Office	
<b>Name of Information System or IT Project</b>	Savannah River Nuclear Solutions (SRNS) Training Records and Information Network (TRAIN)	
<b>Exhibit Project UID</b>	UPI Code: 019-10-01-15-01-1057-00	
<b>New PIA</b> <input type="checkbox"/>		
<b>Update</b> <input checked="" type="checkbox"/>		
	<b>Name, Title</b>	<b>Contact Information Phone, Email</b>
<b>System Owner</b>	David Miller, Manager, Site Training, Savannah River Nuclear Solutions	(803) 208-0625 david.miller@srs.gov
<b>Local Privacy Act Officer</b>	Pauline Conner, Privacy Act Officer	(803) 952-8134 pauline.conner@srs.gov
<b>Cyber Security Expert reviewing this document (e.g. ISSM, CSSM, ISSO, etc.)</b>	Jannett M. Moran, Cyber Security Manager, Savannah River Nuclear Solutions	(803) 725-6925 jan.moran@srs.gov



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## MODULE I – PRIVACY NEEDS ASSESSMENT

<b>Person Completing this Document</b>	Pauline Conner, Privacy Act Officer	(803) 952-8134 pauline.conner@srs.gov
<b>Purpose of Information System or IT Project</b>	The primary purpose of the TRAIN System is to document planning, completion, funding and effectiveness of employee training and development for federal and contractor personnel. As part of the TRAIN System, the SRNS Asbestos Group License database collects and stores information after a person completes the requisite training for asbestos accreditation, and provides quarterly reports relating to certified Asbestos Workers for the Savannah River Site to the South Carolina Department of Health and Environmental Control (SCDHEC).	
<b>Type of Information Collected or Maintained by the System:</b>	<input checked="" type="checkbox"/> SSN Social Security number <input type="checkbox"/> Medical & Health Information e.g. blood test results <input type="checkbox"/> Financial Information e.g. credit card number <input type="checkbox"/> Clearance Information e.g. "Q" <input type="checkbox"/> Biometric Information e.g. finger print, retinal scan <input type="checkbox"/> Mother's Maiden Name <input type="checkbox"/> DoB, Place of Birth <input type="checkbox"/> Employment Information <input type="checkbox"/> Criminal History <input checked="" type="checkbox"/> Name, Phone, Address (NOTE: TRAIN contains work phone and address) <input type="checkbox"/> Other – Please Specify	
<b>Has there been any attempt to verify PII does not exist on the system?</b>  DOE Order 206.1, <i>Department of Energy Privacy Program</i> , defines PII as any information collected or maintained by the Department about an individual, including but not limited to, education, financial transactions, medical history and criminal or employment history, and information that can be used to distinguish or trace an individual's identity, such as his/her name, Social Security number, date and place of birth, mother's maiden name, biometric	No	



## MODULE I – PRIVACY NEEDS ASSESSMENT

*data, and including any other personal information that is linked or linkable to a specific individual.*

If “Yes,” what method was used to verify the system did not contain PII? (e.g. system scan)

N/A

### Threshold Questions

1. Does system contain (collect and/or maintain), or plan to contain any information about individuals?

Yes

2. Is the information in identifiable form?

Yes

3. Is the information about individual Members of the Public?

Yes

4. Is the information about DOE or contractor employees?

Yes

Federal Employees

Contractor Employees

If the answer to all four (4) Threshold Questions is “No,” you may proceed to the signature page of the PIA. Submit the completed PNA with signature page to the CPO.

Module II must be completed for all systems if the answer to any of the four (4) threshold questions is “Yes.” All questions must be completed. If appropriate, an answer of N/A may be entered.

The goal of the threshold questions is to legitimately and efficiently determine whether additional assessment is necessary. If there is doubt, it is in the System Owner’s best interest to complete Module II.

PIAs affecting Members of the Public are posted on the DOE Privacy website. For this reason, PIAs affecting Members of the Public should be written in plain language and at a high level so they are easily understandable and do not disclose sensitive information.

## END OF PRIVACY NEEDS ASSESSMENT



## MODULE II – PII SYSTEMS & PROJECTS

### AUTHORITY, IMPACT & NOTICE

<p><b>1. AUTHORITY</b></p> <p><b>What specific authorities authorize this system or project, and the associated collection, use, and/or retention of personal information?</b></p>	<p>42 U.S.C. [United States Code] 7101 <i>et seq.</i>; 50 U.S.C. 2401 <i>et seq.</i>; Nuclear Waste Policy Act of 1982 (Pub. L. 97-425); Nuclear Waste Policy Amendment Act of 1987 (Pub. L. 100-203); Government Employees Training Act of 1958; and 5 CFR Parts 410 and 412</p> <p>As provided in DOE O 206.1, "The Privacy Act allows an agency to maintain information about an individual that is relevant and necessary to the purpose of the agency as required by statute or by Executive Order of the President."</p>
<p><b>2. CONSENT</b></p> <p><b>What opportunities do individuals have to decline to provide information (e.g. where providing information is voluntary) or to consent only to particular uses of the information (other than required or authorized uses)?</b></p>	<p>Collection of the information in the SRNS TRAIN system and Asbestos Group License database is required to document planning, completion, funding and effectiveness of employee training and development. If the employees do not provide the information, SRNS will not be able to document planning, completion, funding and effectiveness of their training and development, as well as provide the requisite training for asbestos accreditation and provide quarterly reports to the SCDHEC.</p>
<p><b>3. CONTRACTS</b></p> <p><b>Are contractors involved with the design, development and maintenance of the system? If yes, was the Privacy Order CRD or Privacy Act clauses included in their contracts?</b></p>	<p>Yes. Contractors are involved in the configuration, implementation, and maintenance of the system. Personal information may be disclosed to these contractors and their officers and employees in performance of their contracts. Those individuals provided this type of information is subject to the same limitations applicable to DOE officers and employees under the Privacy Act, 5 U.S.C. 552a.</p> <p>Pertinent contract language states that data covered by the Privacy Act may be disclosed to contractors and their officers and employees. Any information that is obtained or viewed shall be on a need-to-know basis. Contractors are required to safeguard all information that they may obtain in accordance with the provisions of the Privacy Act and the requirements of the DOE. The contractor shall ensure that all DOE documents and software processed, and the information contained therein, are protected from unauthorized use and mishandling by assigned personnel.</p>



## MODULE II – PII SYSTEMS & PROJECTS

<p><b>4. IMPACT ANALYSIS:</b></p> <p>How does this project or information system impact privacy?</p>	<p>The potential impact is MODERATE. The loss of confidentiality, integrity, or availability could be expected to have a serious adverse effect on organizational operations, organizational assets, or individuals. Adverse effects on individuals may include, but are not limited to, loss of the privacy to which individual are entitled under law.</p> <p>Security Plan, Version 0, dated May 30, 2007</p> <p>Date of Accreditation: June 8, 2007</p>
<p><b>5. SORNs</b></p> <p>How will the data be retrieved? Can PII be retrieved by an identifier (e.g. name, unique number or symbol)?</p> <p>If yes, explain, and list the identifiers that will be used to retrieve information on the individual.</p>	<p>Yes. The TRAIN system and Asbestos Group License database can retrieve data by using name, Social Security number, or the site's computer-generated alternate ID (Comp_Alt_ID).</p>
<p><b>6. SORNs</b></p> <p>Has a Privacy Act System of Records Notice (SORN) been published in the <i>Federal Register</i>?</p> <p>If "Yes," provide name of SORN and location in the <i>Federal Register</i>.</p>	<p>Yes. DOE-28, "General Training Records"</p> <p>Federal Register Vol. 74, No. 6/Friday, January 9, 2009 (pages 1029-1030)</p>
<p><b>7. SORNs</b></p> <p>If the information system is being modified, will the SORN(s) require amendment or revision?</p>	<p>N/A</p>

### DATA SOURCES



## MODULE II – PII SYSTEMS & PROJECTS

<p><b>8. What are the sources of information about individuals in the information system or project?</b></p>	<p>The TRAIN system and Asbestos Group License database collect data from various sources. The TRAIN system and Asbestos Group License database collect information provided by the individual to whom it pertains. Examples include, but are not limited to, name, assigned number, organization, and Social Security number. In addition, it collects training requests and authorizations; education completed; course name; justification for attending the course; direct and indirect costs of training; and coded information dealing with purpose, type, and source of training. The TRAIN system and Asbestos Group License database also collect training attendance records and quarterly training report.</p>
<p><b>9. Will the information system derive new or meta data about an individual from the information collected?</b></p>	<p>No</p>
<p><b>10. Are the data elements described in detail and documented?</b></p>	<p>Yes. The vendor's database describes and documents the data elements.</p>
<p><b>DATA USE</b></p>	
<p><b>11. How will the PII be used?</b></p>	<p>The authorized user will use the PII contained in the TRAIN System and Asbestos Group License database to document planning, completion, funding and effectiveness of employee training, as well as provide quarterly reports relating to certified Asbestos Workers for the Savannah River Site to the SCDHEC.</p>
<p><b>12. If the system derives meta data, how will the new or meta data be used?</b></p> <p><b>Will the new or meta data be part of an individual's record?</b></p>	<p>N/A</p>
<p><b>13. With what other agencies or entities will an individual's information be shared?</b></p>	<p>No other agencies or entities will share the individual's information.</p>

**Reports**



## MODULE II – PII SYSTEMS & PROJECTS

<p><b>14. What kinds of reports are produced about individuals or contain an individual's data?</b></p>	<p>The authorized user will use the PII contained in the TRAIN System and Asbestos Group License database to generate a variety of reports for use by the Federal agencies, including the Office of Personnel Management, to determine eligibility or suitability for training and as source documents for training reports. Furthermore, the user can generate a report for use by the state and local government, the Nuclear Regulatory Commission, SCDHEC and other federal agencies that conduct research, investigations, or audits to determine whether DOE and contractor personnel satisfy quality assurance requirements activities. These activities include research and development, site characterization, transportation, waste packaging, handling, design, maintenance, performance confirmation, inspection, fabrication, and development and production of repository waste forms.</p>
<p><b>15. What will be the use of these reports?</b></p>	<p>The use of the data is relevant and necessary for SRNS to document planning, completion, funding and effectiveness of employee training, as well as provide quarterly reports relating to certified Asbestos Workers for the Savannah River Site to the SCDHEC</p>
<p><b>16. Who will have access to these reports?</b></p>	<p>Only authorized individuals will have access to the information based on need-to-know and the principle of least privilege. Furthermore, the appropriate local, state and federal agencies may have access to the records maintained in the TRAIN system and Asbestos Group License database to ensure Departmental compliance with other regulatory requirements.</p>
<p><b>Monitoring</b></p>	
<p><b>17. Will this information system provide the capability to identify, locate, and monitor individuals?</b></p>	<p>No. The TRAIN system and Asbestos Group License database do not have the capability to identify, locate, and monitor individuals.</p>
<p><b>18. What kinds of information are collected as a function of the monitoring of individuals?</b></p>	<p>N/A</p>
<p><b>19. Are controls implemented to prevent unauthorized monitoring of individuals?</b></p>	<p>N/A</p>

## DATA MANAGEMENT & MAINTENANCE



## MODULE II – PII SYSTEMS & PROJECTS

<p><b>20. How will records about individuals be kept current and verified for accuracy, relevance and completeness? Include PII data collected from sources other than DOE records.</b></p>	<p>The TRAIN system and Asbestos Group License database do not verify the accuracy, relevance, and completeness of the data related to the public. The TRAIN system and Asbestos Group License database collect basic data directly from the individual to whom it pertains. Therefore, it is determined that the information is accurate, timely and complete at the time it was provided.</p>
<p><b>21. If the information system is operated in more than one site, how will consistent use of the information be ensured at all sites?</b></p>	<p>The system is licensed by and operated for the U.S. Department of Energy Savannah River Operations Office.</p>
<p><b>Retention &amp; Disposition</b></p>	
<p><b>22. What are the retention periods of data in the information system?</b></p>	<p>Retention periods are in accordance with National Archives and Records Administration (NARA) and DOE records schedules. Information can be obtained at <a href="http://cio.energy.gov/records-management/adminrs.htm">http://cio.energy.gov/records-management/adminrs.htm</a>.</p>
<p><b>23. What are the procedures for disposition of the data at the end of the retention period?</b></p>	<p>Procedures for disposition are documented in applicable NARA and DOE records schedule. Information can be obtained at <a href="http://cio.energy.gov/records-management/adminrs.htm">http://cio.energy.gov/records-management/adminrs.htm</a>.</p>
<p><b>ACCESS, SAFEGUARDS &amp; SECURITY</b></p>	
<p><b>24. What controls are in place to protect the data from unauthorized access, modification or use?</b></p>	<p>Technical and administrative controls are in place to prevent the misuse of data by individuals with access. The administrative controls include annual training emphasizing that it is the individual's responsibility to protect data that they have access to, and that misuse of that data will not be tolerated. The technical controls include restricted access via user-id and password based on user responsibility and job function.</p>
<p><b>25. Who will have access to PII data?</b></p>	<p>Only authorized individuals will have access to the information based on need-to-know and the principle of least privilege. Furthermore, the appropriate local, and state and federal agencies may have access to certain records maintained in the TRAIN System to ensure Departmental compliance with other regulatory requirements.</p>
<p><b>26. How is access to PII data determined?</b></p>	<p>The system owner determines who has access. Access to data is on a need-to-know basis in accordance with the job roles and responsibilities of individuals.</p>





## MODULE II – PII SYSTEMS & PROJECTS

**27. Do other information systems share data or have access to the data in the system? If yes, explain.**

No

**28. For connecting information systems, is there an Interconnection Security Agreement (ISA) or other agreement between System Owners to ensure the privacy of individuals is protected?**

There are no connecting information systems.

**29. Who is responsible for ensuring the authorized use of personal information?**

The system owner for other systems to have access to data within the TRAIN system application and Asbestos Group License database must grant permission. Once provided, it is the responsibility of the other system owners to protect the data provided by TRAIN system and Asbestos Group License database.

## END OF MODULE II

**SIGNATURE PAGE**

	Signature	Date
<b>PIA Approval Signatures</b>	<b>Original Copy Signed and On File with the DOE Privacy Office</b>	7 MAY 2010