



ESSENTIAL RECORDS PLAN

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Effective Date: _____

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REVISION LOG

| Rev. No. | Description of Change | Pages | Date |
|----------|--|------------|----------|
| 0 | Initial Release – Infrastructure Support Services Contract DE-EM0003733. | All | 01/29/16 |
| 1 | Reconciled U.S. Department of Energy comments. | 1, 2, 3, 4 | 02/29/16 |
| 2 | Annual review and revisions. Updated plan to include training requirements, additional Senior Records Manager responsibilities, and the Vital Records Inventory. | All | 12/30/16 |
| 3 | Incorporate U.S. Department of Energy comment. | 1 | 01/26/17 |
| 3 | Updated for Deliverable 128 by removing Attachment A, Vital Records Inventory | A-1 | 12/27/17 |
| 3 | Reconciled U.S. Department of Energy comment by replacing “Vital” with “Essential” and adding notation stating Essential Records is previously known as Vital Records. | All | 01/30/18 |
| 4 | Renumbered to new format. Updated to include changes identified in ASMT-2018-049. Response to IM-2018-375, IM-2018-378, and IM-2018-379. Replaced reference to Senior Records Manager with Records Manager throughout. | All | 01/30/19 |

ACRONYMS

| | |
|--------|--------------------------------------|
| CFR | Code of Federal Regulations |
| DOE | U.S. Department of Energy |
| EOC | Emergency Operations Center |
| O | Order |
| O/FM | Organizational or Functional Manager |
| PGDP | Paducah Gaseous Diffusion Plan |
| SST | Swift & Staley Team |
| U.S.C. | United States Code |

EXECUTIVE SUMMARY

Swift & Staley Inc. (hereinafter referred to as Swift & Staley Team [SST]) serves as the Paducah Site Records Custodian and manages all records, regardless of media, generated by or received in the performance of the Paducah Infrastructure Support Services Contract. As Records Custodian, SST is responsible for the compliant management of records obtained from predecessor contractors (historical records maintained on-site and at a Federal Records Center), the U.S. Department of Energy (DOE), and other DOE prime contractors. SST manages records in accordance with 44 United States Code (U.S.C.) 21, *National Archives and Records Administration*; 44 U.S.C. 29, *Records Management by the Archivist of the United States*; 44 U.S.C. 33 *Disposal of Records*; 44 U.S.C. 36, *Management and Promotion of Electronic Government Services*; 36 Code of Federal Regulations (CFR) Chapter 12, Subchapter B, *Records Management*; DOE Order (O) 243.1B, *Records Management Program*; DOE O 150.1A, *Continuity Programs*; and any other DOE requirements as directed by the Contracting Officer.

Essential Records are defined per DOE O 243.1B, *Records Management Program*, as essential agency records that are needed to meet operational responsibilities under security emergency, continuity events, or other emergency conditions (emergency operating and mission essential records) or to protect the legal and financial rights of the Government and those affected by Government activities (legal and financial rights records) (36 CFR 1223.2(b)). This Essential Records Plan establishes the process to identify and manage essential records.

1.0 INTRODUCTION

1.1 SCOPE

This plan applies to Swift & Staley Inc. (hereinafter referred to as Swift & Staley Team [SST]) and all SST organizations who create government-owned records that meet the criteria of essential records for the U.S. Department of Energy (DOE) as described in contract DE-EM0003733, *Infrastructure Support Services Contract*.

This plan is not applicable to SST subcontractors. Subcontractor generated records are maintained by the project lead; subcontractors are not responsible for producing or training on essential records.

1.2 PURPOSE

This purpose of this plan is to define the SST policy, responsibilities, and requirements for an Essential Records Program. The Essential Records Program is conducted to identify and protect essential records. DOE Order (O) 243.1B, *Records Management Program*, defines essential records as essential agency records that are needed to meet operational responsibilities under security emergency, continuity events, or other emergency conditions (emergency operating and mission essential records) or to protect the legal and financial rights of the Government and those affected by Government activities (legal and financial rights records). (36 Code of Federal Regulations [CFR] 1223.2(b)). Essential records are categorized as either emergency operating records, those necessary to the continued functioning or reconstitution of an organization, or legal and financial records, those records critical to carrying out an organization's essential legal and financial functions and vital to the protection of the legal and financial rights of individuals who are directly affected by that organization's activities.

2.0 ROLES AND RESPONSIBILITIES

2.1 RECORDS/DELIVERABLES MANAGER

The Records/Deliverables Manager is responsible for:

- The overall implementation and management of the Records Management Center and Document Control.
- Assigns Essential Records Manager responsibilities to the Records Manager.

2.2 RECORDS MANAGER

The Records Manager or designee is responsible for:

- Serving as the Essential Records Manager;
- Ensuring appropriate personnel receive initial essential records training and annual training thereafter;
- Maintaining the essential records according to contract requirements;

- Annually reviewing essential records, access to the records, and records location(s) to evaluate changing needs and conditions;
- Maintaining an up-to-date Essential Records Inventory;
- Developing and submitting the Essential Records Plan and Inventory to DOE according to contract requirements; and
- Providing up-to-date essential records and inventories to site emergency management personnel.

2.3 ORGANIZATIONAL/FUNCTIONAL MANAGERS

The Organizational/Functional Managers (O/FMs) are responsible for identifying the essential records in their respective organizations to the SST Records Manager.

2.4 ESSENTIAL RECORDS CUSTODIANS

Each custodian of an essential record is responsible for:

- Identifying newly created records that meet the criteria for essential records;
- Notifying the Records Manager when new essential records are identified;
- Reviewing and updating the essential records inventory annually or as requested by the Records Manager; and
- Ensuring the latest revision of an essential record has been submitted to SST Records Management.

3.0 CONTRACT REQUIREMENTS

The SST contract describes the Essential Records Program in Section C.3.6.3.3. The deliverables associated with the Essential Records Program include the Essential Records Plan and the Essential Records Inventory.

4.0 IDENTIFYING AND MAINTAINING ESSENTIAL RECORDS

4.1 ORGANIZATIONAL/FUNCTIONAL MANAGER

The O/FM identifies all records that meet the definition of an essential record for each functional organization.

4.2 RECORDS MANAGER

The Records Manager or designee has established an essential records repository at a separate, secured area at the Paducah Gaseous Diffusion Plant (PGDP) for the hard copy records and the electronic (e.g., network backup tapes) records. Currently, essential records are stored in a locked repository at C-755-T19. Access to the cabinet is limited to the Records Manager or designee, the SST Emergency Management Coordinator (Environment, Safety, and Health Manager), and Alternate Emergency Management Coordinator (Environmental Compliance Specialist). In addition, SST provides a compact disc copy of essential records to the Deactivation Contractor Emergency Management Program Lead for storage at the Emergency Operations Center (EOC) and alternate EOC. This duplicate storage ensures accessibility of essential records to SST EOC members in the event the PGDP site location is impacted by the emergency event.

The essential records, hard copy and/or electronic copy, are stored in a locked repository in accordance with 36 CFR 1228.230, *Disposition of Federal Records (Fire Safety Requirements)*; DOE O 420.1B, *Facility Safety*; and DOE O 471.3, *Identifying and Protecting Official Use Only Information*. Essential records are identified and properly labeled to aid in retrieval when needed for use. The Records Manager maintains a records index at the essential records storage locations indicating the document description, revision, responsible organization, and location. If an essential record is determined to be classified, then SST stores the record in a classified record storage area. A placeholder is kept in the essential records storage to note the location of the classified record.

The Records Manager ensures essential records are maintained (i.e., updated or “cycled”) to ensure current copies of the essential records are available at the time of the emergency. The Records Manager or designee recycles or replaces the essential records weekly as revisions are made to the documents. The Records Manager or designee revises the essential records inventory as needed. Annually, the Records Manager submits the essential records inventory and plan revisions to DOE in accordance with the contract requirements.

5.0 UTILIZATION OF ESSENTIAL RECORDS IN EMERGENCIES

When an emergency situation prevents response personnel from accessing essential records through normal processes, the Records Manager, or designee, will retrieve and provide copies of the essential records and essential records inventory to the appropriate Emergency Management program administrators, Continuity of Operations Coordinator, and the DOE Program Records Officer/Records Management Field Officer. The Records Manager, or designee, will distribute, maintain, and protect essential records used or created during the emergency until normal operations and access to records are re-established.

6.0 QUALITY ASSURANCE OF ESSENTIAL RECORDS

The Records Manager, in conjunction with the Quality Assurance group, conducts an annual self-assessment of the status of essential records in relation to this plan and applicable DOE Directives. This annual self-assessment is included in the SST Integrated Oversight Schedule.

7.0 TRAINING

Training is provided to Records Management personnel, emergency management personnel, O/FMs, and essential records custodians who identify, manage, control, and work with essential records. Training is provided initially upon employment to one of the designated positions, and annually thereafter. Training may be completed as required reading, a briefing, or on-the-job training as deemed appropriate by the Records Manager. Essential records management training is included on the Position Assignment Form for identified personnel.

8.0 DEFINITION OF TERMS

Emergency Operating Records —Records essential to the continued functioning or reconstitution of an organization during and after an emergency. Included are emergency plans and directives, orders of succession, delegations of authority, staffing assignments, selected program records needed to continue the most critical agency operations, as well as related policy or procedural records that assist agency staff in conducting operations under emergency conditions, and for resuming normal operations after an emergency.

Essential Records (previously known as Vital Records) — essential agency records that are needed to meet operational responsibilities under security emergency, continuity events, or other emergency conditions (emergency operating and mission essential records) or to protect the legal and financial rights of the Government and those affected by Government activities (legal and financial rights records) (36 CFR 1223.2(b)).

Legal and Financial Rights Records — Records essential to protect the legal and financial rights of the U.S. Government and the individuals directly affected by its activities (also known as rights and interests records). Examples include accounts receivable records, social security records, payroll records, retirement records, and insurance records.

Quality Record (American Society of Mechanical Engineers *Quality Assurance Requirements for Nuclear Applications NQA-1*) — Those records that are prepared, received, and maintained in conjunction with the design, manufacture, construction, installation, test, and operation of equipment, structures, plants, and systems associated with a nuclear site, and also records that would be of significant value in demonstrating capability for safe operations.

Record (44 United States Code Chapter 33 § 3301) — “Includes all recorded information, regardless of form or characteristics, made or received by a Federal agency 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 U.S. Government or because of the informational value of data in them; and does not include library and museum material made or acquired and preserved solely for reference or exhibition purposes; or duplicate copies of records preserved only for convenience. The term recorded information includes all traditional forms of records, regardless of physical form or characteristics, including information created, manipulated, communicated, or stored in digital or electronic form.”

ENCLOSURE 2

Calendar Year 2019 Essential Records Inventory

**Swift & Staley Records Management Center
Calendar Year 2019 Essential Records Inventory**

| Record Series Title | Dept. | Custodian | SST Records | Medium | Location | Field Operating Record | Essential Record 1=Emergency Operating 2=Legal/Financial | Quality Records Nonpermanent* or Lifetime | Quality Record Item, Facility, or Activity | Contractor Owned | Official Use Only (OUO) Information |
|---|-------|----------------------------|---|--------------------|---------------------|------------------------|---|---|--|------------------|---|
| Financial Management and Reporting Records | BUS | Business Manager | Vendor Information/Contact List | Electronic | S:Drive | | 1 | | | | |
| Financial Management and Reporting Records | BUS | Business Manager | Contract DE-EM0003733 - Paducah Infrastructure Support Services Consulting Agreements, Lease Agreements, Subcontracts, Work Authorizations | Paper & Electronic | S:Drive & C-755 T20 | BUS-001 | 2 | | | X | May contain Exemption 4, Commercial/Proprietary and 6, Personal Privacy |
| Architectural Drawings of Temporary Structures and Buildings or of Buildings Not Critical to the Departmental Mission | E&A | Eng. & Assets Manager | Building/Facility Blueprints | Electronic | S:Drive | | 1 | | | | |
| Facility, Equipment, Vehicle, Property, and Supply Records | E&A | Eng. & Assets Manager | Utility Locations | Electronic | S:Drive | | 1 | | | | |
| Facility, Equipment, Vehicle, Property, and Supply Records | E&A | Eng. & Assets Manager | PAD-P2S-15-GIS-0001, PGDP Site Operational Responsibilities (Site Map) | Electronic | S:Drive | | 1 | | | | |
| Radiation Contamination Control Program Records | ES&H | ES&H Manager | ISSC-RAD-PR-002, Radiological Accidents and Emergencies | Electronic | S:Drive | | 1 | Nonpermanent | Program Procedures | | |
| Emergency Planning Program Correspondence | ES&H | Env. Compliance Specialist | SST Emergency Response Organization Roster ISSC-ESH-PL-003, Emergency Management Integration Plan ISSC-EAP-720M, Emergency Action Plan for C-720-M Trailers ISSC-EAP-755, Emergency Action Plan for SST Facilities in C-755 ISSC-EAP-750, Emergency Action Plan for C-750 Garage ISSC-PM-TD-002, Protocol for Infrastructure Services During Off-Normal Plant Conditions 03.08.01, Emergency Operations Center Activities | Electronic | S:Drive | | 1 | | | | |
| Safety and Health Records Other Safety Analyses | ES&H | ES&H Manager | ISSC-ESH-PR-008, Accident/Incident Reporting | Electronic | S:Drive | | 1 | Nonpermanent | Program Procedure | | |
| Waste/Chemical Inventory Files | ES&H | ES&H Manager | Source Inventory Log | Electronic | S:Drive | | 1 | Lifetime | Sitewide | | |
| Contractor Personnel Office Records | HR | Human Resource Manager | ISSC-HR-TD-002, Employee Contact Benefit Information | Electronic | S:Drive | | 2 | | | | |
| Directories/Phone Listing | HR | Human Resource Manager | ISSC-HR-TD-001, SST Active Employee Contact List | Electronic | S:Drive | | 1 | | | | May contain Exemption 6, Personal Privacy |
| Computer Information Protection Plan/Contingency Plan | IT | CTCS Manager | PGDP-IT-PR-011, Contingency Plan for Information Systems | Electronic | S:Drive | | 1 | | | | |
| Information Technology Operations and Maintenance Records | IT | CTCS Manager | PGDP-IT-PL-001, Restoration Priority Plan | Electronic | S:Drive | | 2 | | | | |
| Information Technology Oversight and Compliance Records | IT | CTCS Manager | PGDP-IT-PR-006, Information Systems Incident Response & Recovery | Electronic | S:Drive | | 2 | | | | |

Essential records are cycled as revisions occur; inventory is updated as needed.

*Records are maintained as active QA records until inactive (cutoff of retention is based on the DOE Records Disposition Schedules).

**Swift & Staley Records Management Center
Calendar Year 2019 Essential Records Inventory**

| Record Series Title | Dept. | Custodian | SST Records | Medium | Location | Field Operating Record | Essential Record 1=Emergency Operating 2=Legal/Financial | Quality Records Nonpermanent* or Lifetime | Quality Record Item, Facility, or Activity | Contractor Owned | Official Use Only (OUO) Information |
|---|-------|-------------------------------|---|------------|---------------------------|------------------------|--|--|---|------------------|--|
| Systems and Data Security Records | IT | CTCS Manager | SST.IT-0028, Security Controls for the Information Systems Plan SSI.IT-0048, Mission Impact Analysis for Information Systems | Electronic | S:Drive | | 2 | | | | |
| Systems and Data Security Records | IT | CTCS Manager | ISSC-IT-TD-002, Paducah General Support System Resource Recovery Priorities | Electronic | S:Drive | | 1 | | | | |
| System Backups and Tape Library Records | IT | CTCS Manager | SST Network Backup Tapes (Weekly & Monthly Full Backup) | Electronic | C-100 On-Site Server Room | IT-001 | 1 | | | | |
| Equipment Utilization Report Files | O&M | O&M Manager | Emergency Assets (Equipment/Machinery Inventory List) | Electronic | S:Drive | | 1 | | | | |
| Safety and Health Records Other Safety Analyses | O&M | O&M Manager | ISSC-PM-PR-003, Work Planning and Control | Electronic | S:Drive | | 2 | Nonpermanent | Program Procedure | | |
| Safety and Health Records Other Safety Analyses | O&M | O&M Manager | ISSC-OM-PR-001, Public Address System Maintenance ISSC-OM-PR-002, Public Warning System Maintenance ISSC-OM-PR-006, Routine Maintenance of PBX Battery Banks | Electronic | S:Drive | | 1 | Lifetime | Systems of Public Address/Warning and Uninterruptable Power | | |
| Continuity and Emergency Planning Records | PM | Project Support | Accountability Call List | Electronic | S:Drive | | 1 | | | | |
| Records that Verify the Performance of Safe Operations | QA | Quality Assurance Manager | SST.QA-0016, Qualified Supplier List | Electronic | S:Drive | | 1 | | | | |
| Records Management Files | RMC | Records Manager | ISSC-RM-PL-002, Records Disaster Recovery Plan | Electronic | S:Drive | | 1 | | | | |
| Records Management Files | RMC | Records Manager | Swift & Staley Records Management Inventory and File Plan PGDP-RM-PR-001, Records Management | Electronic | S:Drive | | 2 | | | | |
| Records Management Files | RMC | Records Manager | ISSC-RM-PL-004, Essential Records Plan Essential Records Inventory | Electronic | S:Drive | | 1 | | | | |
| Classified Documents Administrative Correspondence Files | SEC | Classification Office Manager | PGDP-SS-PL-001, PGDP Information Security Plan PGDP-SS-PL-002, PGDP Classification Program Plan | Electronic | S:Drive | | 2 | | | | |
| Security Clearance/Access Authorization Files/Policy | SEC | Personnel Security Manager | PGDP-SS-PL-004, PGDP Personnel Security Plan | Electronic | S:Drive | | 2 | | | | |
| Master Safeguards and Security Agreements/ Security Plans | SEC | Security Manager | PGDP-SS-PL-007, Site Security Plan PGDP PGDP-SS-PL-009, Security Conditions Response Plan PGDP-SS-PL-013, Transportation Security Plan(s) PGDP-SS-PL-014, Demonstration/Protest Plan | Electronic | S:Drive | | 1 | | | | |
| Physical Security Files | SEC | Physical Security Manager | PGDP-SS-PL-015, PGDP Physical Security Plan | Electronic | S:Drive | | 1 | | | | May contain Exemption 5, Privileged Information & Exemption 7, Law Enforcement |

Essential records are cycled as revisions occur; inventory is updated as needed.

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