

PMA/PORTS/16-0290/R2

Infrastructure Support Services



Managed by
Portsmouth Mission Alliance, LLC
for the Portsmouth/Paducah Project Office
of the United States Department of Energy

Records Management Plan
for the
Infrastructure Support Services
Contract
at the
Portsmouth Gaseous Diffusion Plant
Piketon, Ohio



This document is approved for public release per review by:
Samuel Eldridge Date: 06/09/2016
PORTS Classification/Information Office



**Records Management Plan
for the
Infrastructure Support Services Contract
at the
Portsmouth Gaseous Diffusion Plant
Piketon, Ohio**

PMA/PORTS-0290/R2

Date Issued-June 2016

Prepared for the
U.S. Department of Energy
Portsmouth/Paducah Project Office

Portsmouth Mission Alliance, LLC
Managing Infrastructure Support Services
At the Portsmouth Gaseous Diffusion Plant
Under contract DE-EM0004062
for the
U.S. DEPARTMENT OF ENERGY

APPROVALS

**Records Management Plan
for the Infrastructure Support Services Contract
at the
Portsmouth Gaseous Diffusion Plant
Piketon, Ohio**

PMA/PORTS-0290R2

Approved by:



Alicia A. Coulson,
Records Manager, Portsmouth Mission Alliance, LLC



Date

Concurred on by:



Damon Detillion,
Project Manager, Portsmouth Mission Alliance, LLC



Date

CONTENTS

| | |
|---|----|
| DEFINITIONS..... | v |
| ACRONYMS..... | x |
| EXECUTIVE SUMMARY | xi |
| 1 PURPOSE | 1 |
| 2 SCOPE | 1 |
| 3 REQUIREMENTS | 2 |
| 4 RESPONSIBILITIES | 3 |
| 4.1 RECORDS MANAGEMENT PROGRAM..... | 3 |
| 4.2 RMDC MANAGER..... | 4 |
| 4.3 RMDC STAFF | 4 |
| 4.4 RMDC AR COORDINATOR | 4 |
| 4.5 CONTRACTOR SALARIED STAFF..... | 4 |
| 5 POLICIES, PROCEDURES AND PRACTICES..... | 4 |
| 5.1 PRACTICES..... | 4 |
| 5.1.1 PMA EQ RM PRO 1401, Record Life Cycle and Retrieval | 4 |
| 5.1.2 PMA EQ RM PRO 1402, Maintaining Privacy Act Records | 5 |
| 5.1.3 PMA EQ RM PRO 1403, Controlled Documents..... | 5 |
| 5.1.4 PMA EQ RM PRO 1404, Records Destruction..... | 5 |
| 5.1.5 PMA EQ RM PRO 1405, Records Management in the X-1000 Building Limited Area Document Storage Area | 6 |
| 5.1.6 PMA EQ RM PRO 1406, Record Transfer | 6 |
| 5.1.7 PMA EQ RM PRO 1407, Vital Records (also known as Essential Records) Program..... | 6 |
| 5.1.8 PMA EQ RM PRO 1408, Administrative Records Program | 6 |
| 5.1.9 PMA EQ RM PRO 1409, Identifying, Filing, and Maintaining Records | 7 |
| 5.1.10 PMA EQ RM PRO 1410, File Plan Creation and Maintenance..... | 7 |
| 5.1.11 PMA EQ RM PRO 1412, Storage and Inspection of Stored Records | 7 |
| 5.1.12 PMA EQ RM PRO 1413, Documentum Record Processing | 7 |
| 5.1.13 PMA EQ RM PRO 1414, Quality Assurance Records | 7 |
| 5.1.14 PMA EQ RM POL 1470, Records Management Policy | 8 |
| 5.1.15 PMA EQ RM POL 1471, E-mail Retention and Storage | 8 |
| 5.1.16 Controlled Documents..... | 8 |
| 5.1.17 File Plan..... | 8 |
| 5.1.18 Electronic Records..... | 9 |
| 5.1.19 E-mail | 10 |
| 5.1.20 Architectural and Cartographic Records..... | 10 |

| | | |
|--------|--|----|
| 5.1.21 | Audiovisual Records | 10 |
| 5.1.22 | Classified Records | 11 |
| 5.1.23 | Records Requests (including FOIA and EEOICPA) | 11 |
| 5.1.24 | DOSE Records | 11 |
| 5.1.25 | Employee Medical Records..... | 11 |
| 5.1.26 | Epidemiological Records..... | 12 |
| 5.1.27 | Contractor-Owned Records..... | 12 |
| 5.1.28 | Records De-Classification..... | 12 |
| 5.1.29 | Contaminated Records | 12 |
| 6 | RECORD DISPOSITION – ARCHIVING AND RETENTION | 12 |
| 6.1 | RECORD DISPOSITION SCHEDULES – FILE PLAN, RETENTION AND “FREEZES” | 12 |
| 6.2 | RECORDS STORAGE | 13 |
| 6.3 | GREAT LAKES FRC | 13 |
| 6.4 | SOFTWARE | 13 |
| 6.5 | RECORDS RETRIEVAL..... | 13 |
| 6.6 | SECURITY GROUPS..... | 14 |
| 6.7 | BACKUP | 14 |

DEFINITIONS

| | |
|-----------------------------|--|
| Administrative Records (AR) | The official body of documents that forms the basis of the selection of a particular response action as required by Section 113 of Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (CERCLA). |
| AR Files | The files containing documents collected throughout the investigative and decision-making process (including public and classified information). The documents collected are based on established criteria and are expected to constitute the AR upon selection of a response action. |
| AR Coordinator | The individual designated to handle all documentation associated with the AR Program. |
| Business Sensitive Records | Unclassified, sensitive information that requires protection because of statutory or regulatory restrictions (e.g., personal or private data relating to an individual) or programs or information for which there is a need for protection because of the magnitude of the loss or harm that would result because of inadvertent or deliberate disclosure, alteration, or destruction. Included in this category are records for Official Use Only (OUO), a term used in conjunction with unclassified information of a privileged nature, which is not disseminated to the public. Unclassified Controlled Nuclear Information and a variety of other sensitive information, on which organizations place controls, are also included. |
| Classified Information | Information that is classified as Restricted Data or Formerly Restricted Data under the Atomic Energy Act of 1954, or information determined to require protection against unauthorized disclosure under Executive Order 12958, <i>Classified National Security Information</i> , as amended, or prior executive orders, which is identified as National Security Information. For the security requirements and procedures affecting classified records, see U.S. Department of Energy (DOE) M 470.4-4A, <i>Information Security Manual</i> . See also PMA EQ RM PRO 1405, <i>Records Management within the X-1000 Building Limited Area Document Storage Area</i> . |
| Controlled Documents | Any record for which revision, distribution, and status are to be kept current by the generator/issuer to ensure that authorized users/holders have available the most up-to-date version |

| | |
|--|--|
| Destruction | Eliminate from a system a group of records in compliance with the appropriate records retention schedule so the records cannot be accessed, retrieved, or recovered. |
| Disposition | Those actions taken regarding records that are no longer needed for the conduct of the regular current business of the holder. These actions include transfer to storage facilities or records centers, transfer of physical and/or legal custody to National Archives and Records Administration (NARA), and destruction. |
| Energy Employees Occupational Illness Compensation Program Act (EEOICPA) | Law enacted by Congress to provide compensation and medical benefits to employees who worked at certain DOE facilities, including contractors and subcontractors at those locations and certain vendors. This act provides compensation to persons who have become ill because of work at atomic weapon facilities. The law became effective July 1, 2001. |
| Environmental Information Center (EIC) | The facility that houses the off-site, public copy of the AR, AR Files, Post Decision Files, and Information Repository. |
| Electronic Records | Records that are stored in a form that only a computer can process. Electronic records may be the products of office automation or larger transactional automated applications. As with all records systems, systems containing electronic records must be designed so that adequate maintenance and disposition procedures are planned during the systems design phase. |
| Epidemiological Records | Records that contain information useful in determining the magnitude of exposures or health impacts (radiological or chemical) to workers or the public. This information can be related to the equipment, materials, and processes used on-site, and include measurements of contaminants in the workplace, at release points, or the environment, work and medical histories of workers, and meteorological and other information helpful in determining the fate of contaminants released into the environment. |
| File Plan | A file plan is a comprehensive outline that defines the records series, file organization, active file locations, file transfer instructions, file retention and disposition instructions, and other specific instructions that provide guidance for effective management of records. |
| Field Operating Records (FOR) | Records that are compiled, revised, or made complete over time or are required by permit or procedure to be located at a designated work area. |

| | |
|---|--|
| Freedom of Information Act (FOIA) | The FOIA (United States Code [U.S.C.] Title 5 Section [§] 552a [5 U.S.C. § 552a], as amended), generally provides any person with the statutory right to obtain access to Government information in executive branch agency records. This right of access is limited to the extent information is protected from disclosure by one of FOIA's nine statutory exemptions. This right of access is enforceable in court and is supported at the administrative agency level by transparency and open government initiatives mandated by the President of the United States. |
| Inactive Records | Records for which a meaningful day-to-day business function has ceased to exist but which must be retained according to the Records Inventory and Disposition Schedule. |
| Master Copy | See On-Site Copy. |
| National Archives and Records Administration (NARA) | An independent government agency responsible for establishing policies and procedures for managing the records of the federal government. NARA exercises final authority for approving the disposition of government records. |
| Non-record Material | U.S. Government-owned documentary materials excluded from the legal definition of records, either by failing to meet the general conditions of record status already described, or by falling under one of three specific categories: Extra copies of documents preserved only for convenience of reference, stocks of publications, and processed documents or library or museum material made or acquired and preserved solely for reference or exhibition purposes. |
| NQA-1 | Nuclear Quality Assurance (NQA) records prepared, received, and maintained in conjunction with the design, manufacture, construction, installation, test, and operation of nuclear facilities equipment, structures, plants, and systems (American National Standards Institute/American Society of Mechanical Engineers (ASME) NQA-1-1994 Edition). This includes records which would be of significant value in demonstrating capability for safe operation; in maintaining, reworking, repairing, replacing, or modifying the item; determining the cause of an accident or malfunction of the item; and those which provide baseline data for in service inspection. |
| Official Use Only (OUO) | Certain unclassified information that may be exempt from release under the FOIA. Detailed identification and protection requirements are contained in DOE O 471.3, <i>Identifying and Protecting Official Use Only Information</i> , dated 4-9-03 (Requirement 4.1.9), and DOE M 471.3-1, <i>Manual for Identifying and Protecting Official Use Only Information</i> , dated 4-9-03 (Reference 4.2.3). |

| | |
|--------------------------------------|---|
| Off-Site Copy | The copy of the AR, AR Files, or Post Decision Files that is maintained and made available for the public. No unclassified sensitive or classified materials are housed at this facility. |
| On-Site Copy | The master AR, AR Files, or Post Decision Files located at the federal facility. The on-site copy is stored in locked, fireproof filing cabinets, or at an off-site NARA Federal Records Facility. These files have a provision for storage of privileged and/or confidential information. |
| Post Decision Files | The files that contain documents generated or received after the signing of the Decision Document. |
| Privacy Act of 1974, 5 U.S.C. § 552a | Establishes a code of fair information practice that governs the collection, maintenance, use, and dissemination of personally identifiable information about individuals that is maintained in systems of records by federal agencies. A system of records is a group of records under the control of an agency from which information is retrieved by the name of the individual or by some identifier assigned to the individual. The Privacy Act requires that agencies give the public notice of their systems of records by publication in the Federal Register. The Privacy Act prohibits the disclosure of information from a system of records absent the written consent of the subject individual, unless the disclosure is pursuant to one of twelve statutory exceptions. The Act also provides individuals with a means by which to seek access to an amendment of their records, and sets forth various agency recordkeeping requirements. |
| Privacy Act Records | Records that fall under the jurisdiction of 10 Code of Federal Regulations (CFR) § 1008, <i>Records Maintained on Individuals (Privacy Act)</i> , which may include the following types of records: personnel and employment records; supervisor maintained personnel records; appraisal and development records; applications for employment; payroll and leave records; reports of financial interest; accounts payable and receivable; domestic travel records; foreign travel records; personnel medical records; employee assistance records; personnel exposure records; occupational and industrial accident records; equal opportunity complaint files; labor standards complaints and grievances; legal files; personnel security files; security investigations; employee and visitor access control records, and security education and infraction report records. |
| Public Copy | See Off-Site Copy. |

| | |
|---|--|
| Quality Record | A completed document that furnishes evidence of the quality of nuclear facilities items and/or activities affecting quality. Types of record media may include paper, electronic (magnetic or optical), or specially processed media such as radiographs, photographs, negatives, and microforms. The term <i>record</i> , as used throughout the Standard, is to be interpreted as a quality assurance (QA) record (ASME NQA-1-2008). |
| Record Series | A group of related files kept together as a unit because they relate to a particular subject or function, result from the same activity, document a specific kind of transaction, take a particular physical form, or have a relationship arising from their creation, receipt, or use. |
| Records | H.R. 1233, Presidential and Federal Records Act Amendments of 2014, became law November 26, 2014. It was codified as Public Law 113-187 on November 26, 2014. One of the more significant points includes a revised “records” definition covering all recorded information, which is further defined as “all traditional forms of records, regardless of physical form or characteristics, including information created, manipulated, communicated, or stored in digital or electronic form”. It also now provides that the Archivist of the United States’ determination of whether recorded information is a record is now binding on all Federal agencies. Also, it clarifies the prohibition of creating or sending a record using a non-official electronic messaging account unless the message is originally copied to or forwarded to an official electronic messaging account, with the latter setting a 20-day deadline. It should be noted that electronic messaging tools are not limited to just e-mail. To encourage and promote the seriousness and the need for compliance, the law provides for disciplinary action for intentional violations. It remains to be seen how DOE and other Federal agencies working with human capital and legal counsel organizations may elect to implement such disciplinary action. |
| Responsible Managers | Managers who maintain possession of Privacy Act records in their organizations. |
| Records Management Field Officer (RMFO) | DOE field liaison for Records Management and Document Control (RMDC) support and approval. |
| Temporary Records | Records approved by NARA for destruction, either immediately or after a specified retention period. |
| Unauthorized Disposal | The improper removal of records from agency, custody, or the willful or unlawful destruction of records without regard to a NARA approved records schedule (see 18 U.S.C., Chapter 101, § 2071 for penalties). |

ACRONYMS

| | |
|---------|---|
| ACP | American Centrifuge Plant |
| AR | Administrative Records |
| ASME | American Society of Mechanical Engineers |
| CERCLA | Comprehensive Environmental Response, Compensation, and Liability Act of 1980 |
| CFR | Code of Federal Regulations |
| CMPC | Classified Matter Protection and Control |
| CO | Contracting Officer |
| COOP | Continuity of Operations |
| CSB | Cold Standby |
| D&D | Decontamination and Decommissioning |
| DEAR | U.S. Department of Energy Acquisition Regulation |
| DoD | U.S. Department of Defense |
| DOE | U.S. Department of Energy |
| EEOICPA | Energy Employees Occupational Illness Compensation Program Act |
| EIC | Environmental Information Center |
| EM | Environmental Management |
| EPACT92 | The Energy Policy Act of 1992 |
| FOIA | Freedom of Information Act |
| FOR | Field Operating Records |
| FRC | Federal Records Center |
| ISS | Infrastructure Support Services |
| IT | Information Technology |
| NARA | National Archives and Records Administration |
| NQA-1 | Nuclear Quality Assurance |
| O | Order |
| OUO | Official Use Only |
| PDF | Portable Document Format |
| PMA | Portsmouth Mission Alliance, LLC |
| PORTS | Portsmouth Gaseous Diffusion Plant |
| QA | Quality Assurance |
| RCRA | Resource Conservation and Recovery Act of 1976 |
| RMDC | Records Management and Document Control |
| RMFO | Records Management Field Officer |
| RMP | Records Management Plan |
| ROF | Return of Facility |
| STD | Standard |
| UCI | Unclassified Controlled Information |
| U.S.C. | United States Code |
| USEC | United States Enrichment Corporation |

EXECUTIVE SUMMARY

The Portsmouth Gaseous Diffusion Plant (PORTS) was an operating Gaseous Diffusion Plant constructed in the early 1950s by the U.S. Atomic Energy Commission. The Plant supplied both highly enriched uranium and low enriched uranium for defense purposes and commercial nuclear fuel sales. The Energy Policy Act of 1992 (EPACT92) transferred responsibility for uranium enrichment from the U.S. Department of Energy (DOE) to the United States Enrichment Corporation (USEC), a newly created wholly owned Government Corporation. According to the EPACT92, the USEC assumed full responsibility on July 1, 1993, for uranium enrichment operations at PORTS as well as the lease for the associated PORTS facilities from the DOE. The USEC became a publicly held company in 1998, which completed the privatization process. In May 2000, the USEC announced that enrichment operations at PORTS would cease in 2001.

The DOE determined that a portion of the plant and process should be maintained and available for restart as a strategic plan in case of potential difficulties in the international enriched uranium market. This strategy was implemented under an agreement between the DOE and the USEC referred to as Cold Standby (CSB). DOE reassessed the market and proceeded to terminate the CSB program and transition to Cold Shutdown at the start of Fiscal Year 2005. The current mission at PORTS is transitioning to long-term surveillance and maintenance, and decontamination and decommissioning (D&D).

Property and activities at PORTS must be protected from theft, diversion and unauthorized access, compromise, and other acts that may have an adverse effect or pose significant danger to the health, safety, and security of the DOE federal and contractor employees or the public.

As part of that goal, the Portsmouth Mission Alliance, LLC (PMA), Infrastructure Support Services (ISS) Prime Contract DE-EM0004062, Records Management and Document Control (RMDC) Function will maintain the records for the contractors and subcontractors of the DOE at PORTS. It will function in accordance with the DOE, the National Archives and Records Administration (NARA) federal laws, regulations, orders and guidelines, and serve as the information resource for the Return of Facility (ROF) process.

1 PURPOSE

This plan is based on managing the life cycle of a record: the creation, maintenance, use, and disposal of a record. The various activities performed at PORTS have resulted in the generation of records that document the basis for work. This Records Management Plan (RMP) was prepared to formalize the requirements, responsibilities, and procedures for managing these records.

Records are defined in various statutes, including the Freedom of Information Act (FOIA). The definition that follows is from the latest federal requirements that govern agencies' records management responsibilities.

H.R. 1233, Presidential and Federal Records Act Amendments of 2014, became law on November 26, 2014. It was codified as Public Law 113-187 on November 26, 2014. One of the more significant points includes a revised "records" definition covering all recorded information, which is further defined as "all traditional forms of records, regardless of physical form or characteristics, including information created, manipulated, communicated, or stored in digital or electronic form." It also now provides that the Archivist of the United States' determination of whether recorded information is a record is now binding on all Federal agencies. Also, it clarifies the prohibition of creating or sending a record using a non-official electronic messaging account unless the message is originally copied to or forwarded to an official electronic messaging account, with the latter setting a 20-day deadline. It should be noted that electronic messaging tools are not limited to just e-mail. To encourage and promote the seriousness and the need for compliance, the law provides for disciplinary action for intentional violations. It remains to be seen how the DOE and other Federal agencies working with human capital and legal counsel organizations may elect to implement such disciplinary action.

2 SCOPE

The PMA RMDC maintains the inactive records for itself, and the contractors and subcontractors of DOE at PORTS. PMA RMDC functions in accordance with DOE and NARA requirements, and serves as the information resource for the ROF process.

PMA RMDC serves as the Portsmouth Site-wide Records Custodian and manages all records (regardless of media) generated/received in the performance of the ISS Contract. These records include those generated by PMA in fulfillment of ISS operations, and obtained from predecessor contractors (historical records maintained on-site and at Federal Records Centers [FRCs]), and the current D&D contractor in accordance with U.S. Code [U.S.C.] Title 44 Chapters 21, 29, 31, 33, and 36; 36 Code of Federal Regulations [CFR] Chapter XII, Subchapter B, *Records Management*; DOE Order [O] 243.1B, *Records Management Program*, and any other DOE requirements as directed by the Contracting Officer [CO].

All records subject to the management of PMA (e.g., records in support of its and others operations), are to be inventoried, scheduled, and dispositioned in accordance with Federal laws, regulations, DOE Directives, and an approved RMP.

PMA RMDC also provides RMDC services to the American Centrifuge Plant (ACP) as detailed in the DOE work authorization (No. 813749, RMDC support for ACP). PMA prepares invoicing to support the DOE in full cost recovery of services to ACP.

3 REQUIREMENTS

DOE O 243.1B, *Records Management Program*, includes a Contractor Requirements Document that applies to "contractors who create, use, maintain, receive, disseminate, or dispose of DOE records in connection with the performance of DOE-funded tasks or activities."

As such, all records created or received by DOE Contractors and subcontractors are owned by the United States government, with the exception of those determined by the DOE to be exempt as listed in the Contract. (See access to and ownership of records and Privacy Action systems of records clauses.) The PMA records management program is mandatory, and consistent with all applicable laws and DOE requirements.

The documents listed below were reviewed and considered in the preparation of this Plan. Documents not specifically identified in the PMA Prime Contract (DE-EM0004062) were only used as guidance in the preparation of this Plan.

- PMA/DOE Contract No. DE-EM0004062
- PMA Performance Documents (e.g., Policies, Procedures):
 - PMA EQ RM PRO1401, *Record Life Cycle and Retrieval*
 - PMA EQ ROM PRO 1402, *Maintaining Privacy Act Records*
 - PMA EQ RM, PRO 1403, *Controlled Documents*
 - PMA EQ ROM PRO 1404, *Records Destruction*
 - PMA EQ RM PRO 1405, *Records Management within the X-1000 Building Limited Area Document Storage Area*
 - PMA EQ RM PRO 1406, *Records Transfer*
 - PMA EQ RM PRO 1407, *Vital Records*
 - PMA EQ RM PRO 1408, *Administrative Records (AR) Program*
 - PMA EQ RM PRO 1409, *Identifying, Filing and Maintaining Records*
 - PMAEQ RM PRO 1410, *File Plan Creation and Maintenance*
 - PMA EQ RM PRO 1411, *Decontamination and Decommissioning (D&D) Drawing Revision Control*

-
- PMA EQ RM PRO 1412, *Storage and Inspection of Stored Records*
 - PMA EQ RM PRO 1413, *Documentum Record Processing*
 - PMA EQ RM PRO 1414, *Quality Assurance (QA) Records*
 - PMA/PORTS-0319, *PMA Disaster Prevention Mitigation and Recovery Plan*
 - PMA EQ RM POL 1470, *Records Management Policy*
 - PMA EQ RM POL 1471, *E-mail Retention and Storage*
 - PMA/PORTS-16-0755 Ports File Plan
 - DOE O 243.1B, *Records Management Program*
 - *DOE Records Schedules*
 - DOE O 200.1A, *Information Management Systems*
 - DOE/EH-231-010/1191, *The Administrative Record (Comprehensive Environmental Response, Compensation, and Liability Act of 1980 [CERCLA]/Resource Conservation and Recovery Act of 1976 [RCRA] [CERCLA/RCRA] Information Brief)*
 - *DOE Records Management Handbook*
 - DOE O 206.1, *Department of Energy Privacy Program*
 - *The Privacy Act of 1974 (Publication of Compilation of Privacy Act Systems of Records)*
 - Title 48 – Federal Acquisition Regulations System 970.5204-3, *Access to and Ownership of Records*
 - U.S.C. Title 44 Chapters 21, 29, 31, 33 and 36
 - 36 CFR Chapter XII, Subchapter B, *Records Management*
 - Presidential Directive M-12-18

4 RESPONSIBILITIES

4.1 RECORDS MANAGEMENT PROGRAM

PMA RMDC serves as the Portsmouth Site-wide Records Custodian and manages all records (regardless of media) generated/received in the performance of the ISS Contract. These records include those generated by PMA in fulfillment of ISS operations, and records obtained from predecessor contractors, historical records maintained on site and at FRCs. These

records also include the current D&D contractor in accordance with U.S.C. Title 44 Chapters 21, 29, 31, 33 and 36; 36 CFR Chapter XII, Subchapter B, *Records Management*; DOE O 243.1B, *Records Management Program*, and any other DOE requirements as directed by the CO.

4.2 RMDC MANAGER

The PMA RMDC Manager will work according to performance and other applicable documents, and is responsible for assuring that the requirements for RMDC records set forth in this plan and applicable records management regulations are implemented.

4.3 RMDC STAFF

The PMA RMDC staff supports the RMDC Manager in ensuring that the requirements set forth in this plan are implemented. RMDC staff will work according to performance and other applicable documents, and receive applicable training to perform their duties.

4.4 RMDC AR COORDINATOR

The PMA RMDC AR Coordinator will handle all documentation associated with the AR Program. This is the official body of documents that forms the basis of the selection of a particular response action as required by Section 113 of CERCLA.

4.5 CONTRACTOR SALARIED STAFF

PMA and other contractors' salaried staff will receive basic records awareness training.

5 POLICIES, PROCEDURES AND PRACTICES

5.1 PRACTICES

The PMA RMDC is in the process of constant change, adapting to the moving target of electronic records, e-mail, and other evolutions driven by technology. The RMDC has incorporated the Vital Records Program and Record Inventory including creating File Plans for each Department as part of the overall Records Management Program.

PMA performance documents (e.g., policies, procedures) that help to guide the RMDC, as well as RMDC practices include, but are not limited to, those shown in the following sections.

5.1.1 PMA EQ RM PRO 1401, Record Life Cycle and Retrieval

The general management of records is covered by this procedure. This procedure applies to all organizations that create, process, distribute, use, control, or manage records for the DOE

Environmental Management (EM) Program at PORTS. PMA is responsible for all records generated, received, or sponsored by or for PMA in support of the ISS contract.

This procedure covers creating and identifying records for, and requesting items from, the RMDC. The records disposition, inventory, and scheduling processes are also covered by this procedure, as well as cautions against the improper removal of records from agency custody or the willful or unlawful destruction of records without regard to a NARA-approved schedule.

Classified documents are handled according to the following manuals and procedures: PMA SS CL MAN 2056, *Classified Matter Protection and Control (CMPC) Program Manual for the Portsmouth Gaseous Diffusion Plant Piketon, Ohio*; PMA SS PE MAN 4109, *Unclassified Controlled Information (UCI) Manual for the Formerly Operating Portsmouth Gaseous Diffusion Plant, Piketon, Ohio*; PMA SS CL PRO 2000, *Handling and Control of Classified Matter*, and PMA EQ RM PRO 1405, *Records Management within the X-1000 Building Limited Storage Area*. Included in these manuals are the plans for classified marking, accountability records, reproduction, storage, destruction, and provisions for the handling of Accountable Classified Removable Electronic Media and UCI.

5.1.2 PMA EQ RM PRO 1402, Maintaining Privacy Act Records

This procedure establishes the process for protecting the privacy of individuals whose records are maintained in a Privacy Act System of Records for the DOE. It is designed to prevent the unwarranted disclosure of such records, and for release or disclosure of such records or information consistent with provisions of the Privacy Act, DOE orders and regulations, and Privacy Act provisions of the PMA/DOE contract.

The RMDC is actively involved in protecting Privacy Act records by limiting access and determining a need to know when requests are made. The RMDC stores these records with access control to prevent unauthorized use, disclosure, theft, or destruction, and marks them accordingly.

5.1.3 PMA EQ RM PRO 1403, Controlled Documents

This procedure details the process in place for controlled document creation and distribution. This procedure controls documents and versioning to specific users at the direction of the document owner.

5.1.4 PMA EQ RM PRO 1404, Records Destruction

The purpose of this procedure is to establish responsibilities and provide detailed instructions for the destruction of temporary records that have met their authorized retention period for the DOE and PMA. Failure to dispose of records according to the DOE Records Disposition Schedules puts the company and the DOE at risk. This procedure also provides information and defines responsibilities to familiarize PMA site employees with program requirements for destruction of temporary records. DOE approval, including the RMFO and Legal, is required prior to performing record destructions. Record destruction is the final phase in the record life cycle – the creation, maintenance, use, and disposal of records.

5.1.5 PMA EQ RM PRO 1405, Records Management in the X-1000 Building Limited Area Document Storage Area

This policy covers information system performance, records management compliance, and enabling efficient discovery of Electronically Stored Information. PMA has established this policy to define the limits on e-mail storage and archiving within the PMA network see section 5.1.19 E-mail for details on current process for capturing, and managing retention of e-mail records.

5.1.6 PMA EQ RM PRO 1406, Record Transfer

This procedure provides instruction for the transfer of Active and Inactive records to the RMDC for storage and disposition. It details the process for form completion and delivery of items to the RMDC and what actions are required prior to record transfer to FRC. DOE approval, including the RMFO and Legal, is required prior to performing record transfers.

5.1.7 PMA EQ RM PRO 1407, Vital Records (also known as Essential Records) Program

This procedure anticipates the additional rigor needed for the turnover of facilities. It establishes a process for identifying and protecting records necessary for PMA to continue its key functions and activities before, during, and after an emergency or disaster. This procedure is intended to ensure that the Agency's critical records are identified and protected so that there will not be a loss of critical information after an emergency or disaster. The Vital Records Program also serves as part of the Continuity of Operations (COOP) plan.

5.1.8 PMA EQ RM PRO 1408, Administrative Records Program

The purpose of this procedure is to establish requirements for initiating, compiling, and maintaining the on-site and off-site AR Files and for transmitting information and materials to the off-site public AR Files. This procedure also establishes the requirements for creating ARs and for establishing, compiling, and maintaining Portable Document Format (PDF) Files. The off-site public files are housed at the Environmental Information Center, located at the Ohio State University Endeavor Center on Shyville Road.

The RMDC AR Coordinator is responsible for the AR program under the direction of the RMDC Manager. PORTS is designated as a RCRA and CERCLA site. In regards to the RCRA activities, the AR requirements for PORTS are established as part of the Administrative Consent Order, U.S. Environmental Protection Agency Administrative Docket No. OH7 890 008 983. The PORTS AR Program activities adhere to guidelines as established under Section 113 of CERCLA for the American Recovery and Reinvestment Act, and Director's Final Findings and Orders activities.

These collections are comprised of AR Files. These files containing documents collected throughout the investigative and decision-making process (including public and classified information). The AR program has two purposes: to make the information available to the public and limit the judicial review concerning the adequacy of response actions. The documents collected are based on established criteria and are expected to constitute the AR upon selection of a response action.

PMA will develop, manage, and maintain the DOE EIC Online Document Repository. PMA will maintain transfer of records to a searchable electronic system, which shall be accessible on the internet by the general public.

5.1.9 PMA EQ RM PRO 1409, Identifying, Filing, and Maintaining Records

The purpose of this procedure is to establish a process for identifying, filing, and maintaining records generated and received by the EM Program at PORTS. This procedure applies to all organizations that create, process, distribute, use, control, or manage records for the DOE EM Program at PORTS. PMA EM records include all records generated, received, or sponsored by or for PMA in support of the PMA contract.

5.1.10 PMA EQ RM PRO 1410, File Plan Creation and Maintenance

The purpose of this procedure is to define how the PMA will develop, implement, and maintain a file plan that describes all categories of records created, received, and maintained by each organizational unit.

This procedure applies to DOE [including the Environmental and Technical Support contractor], and PMA employees, and their lower tier subcontractors.

This procedure is based on the management of records using the theory that records pass through three stages: creation, receipt, maintenance/use, and disposition. This procedure, along with PMA-1311, *Identifying, Filing, and Maintaining Records*, covers the first two stages of the records lifecycle (creation/receipt and maintenance/use).

5.1.11 PMA EQ RM PRO 1412, Storage and Inspection of Stored Records

The purpose of this procedure is to establish the requirements and process for inspection and storage of hard copy and silver-gelatin microform and legacy records.

5.1.12 PMA EQ RM PRO 1413, Documentum Record Processing

The purpose of the Documentum Record Processing procedure is to provide a mechanism for the RMDC to accept active and inactive records for storage and disposition. This procedure also identifies RMDC requirements to utilize the Image Statistical Sampling Plan when importing electronic records into Documentum.

5.1.13 PMA EQ RM PRO 1414, Quality Assurance Records

The purpose of this procedure is to ensure PMA and other contractors personnel understand their NQA-1 defined quality records roles, responsibilities, and the requirements for identification, authentication, receipt control, maintenance and turnover of these records. These requirements pertain to records important to nuclear safety. PMA ISS operations will generally not generate NQA-1 quality records, but PMA RMDC will manage NQA-1 quality records received from other contractors.

5.1.14 PMA EQ RM POL 1470, Records Management Policy

The intent of this policy is to provide the framework for specific guidance and detailed implementing procedures governing records management organization and implementation. This policy has a two-fold purpose. First, it is intended to assist PMA employees in complying with Federal and DOE requirements governing the creation and maintenance of records. Second, future procedures implementing this policy will promote best practices that provide for the efficient, economical, and effective controls over all PMA records through a comprehensive system of integrated procedures for true life-cycle management of records from their creation to their ultimate disposition.

5.1.15 PMA EQ RM POL 1471, E-mail Retention and Storage

This policy covers information system performance, records management compliance, and enabling efficient discovery of Electronically Stored Information. PMA has established this policy to define the limits on e-mail storage and archiving within the PMA network see section 5.1.19 E-mail for details on current process for capturing, and managing retention of e-mail records.

5.1.16 Controlled Documents

The RMDC will prepare, distribute, and control copies of documents under the specific direction of PMA and other DOE contractors at PORTS. It will maintain the master copy and control the distribution and manage the revision process of these documents.

The Controlled Document process maintains the integrity of documents designated for a higher level of rigor. It allows the document owner the ability to make changes with confidence knowing that those on the distribution list receive prescribed updates.

5.1.17 File Plan

File plans specify how records are to be organized once they have been created or received, provide a "roadmap" to the records created and maintained by an organizational unit, and facilitate dispositioning the records. The file plan provides a standardized records classification scheme that improves filing, enhances access and retrieval, and supports the use of records disposition schedules. It is detailed in PMA EQ RM PRO-1410, *File Plan Creation and Maintenance*.

A file plan lists the records in the office, and describes how they are organized and maintained. A good file plan is one of the essential components of a recordkeeping system, and a key to a successful records management program. It will help to:

- Document your activities effectively;
- Identify records consistently;
- Retrieve records quickly;
- Disposition records no longer needed; and
- Meet statutory and regulatory requirements.

The file structure is the framework of the file plan. The PMA file plan is arranged based on DOE record control schedules. A comprehensive file plan provides a "location" for each record in an

electronic or paper filing system. Understanding the file plan helps users know where to file their records and helps others know where to find the records needed to complete their tasks.

Creating the file plan requires an inventory of all work and storage spaces. The final product will be a complete listing of all records maintained by the organizational unit. The file plan is created by detailing the file series of the records in the organizational unit, as well as information about how they are managed and by whom.

When creating the file plan, keep in mind that someone else may need to use it in the future.

5.1.18 Electronic Records

NARA (36 CFR Chapter XII, Subchapter B) and DOE (DOE O 243.1B) allow for the electronic management of records in place of paper originals, if they are managed in Documentum, an electronic records management application that meets the requirements of U.S. Department of Defense (DoD) Standard 5015.2 [*DoD 5015.2-STD*] (see also Section 7). Therefore, PMA began managing records electronically in lieu of paper in July 2009.

RMDC has performed actions to obtain record inventory in the field and identify and train Records Custodians to NARA guidelines to enhance records management. Each Department has a Record Custodian that is responsible to manage department record inventory. Each Department has a File Plan. When inactive and provided to RMDC, records will be imported into Documentum, which affords the ability to properly manage these records throughout the record life cycle.

The lack of storage space has caused PMA to make a business decision to scan frequently requested records because more than 60% of the existing records do not have disposition data. Each record series file folder in Documentum will have correct record life cycle applied through the implementation of the Records Retention Policy Services module for Documentum. The implementation of this module will ensure records are managed according to the life cycle.

Since 1995, the RMDC contractor has utilized Documentum as the software platform for the storage and retrieval of electronic information about the records under the scope of this RMP. Electronically formatted records are maintained in an approved electronic records management application meeting the requirements of *DoD 5015.2-STD "Electronic Records Management Software Applications Design Criteria Standard."* Documentum is the Electronic Record Management System (ERMS) that PMA will utilize to collect, organize, and categorize records, and facilitate the preservation, retrieval, use, and disposition of records in a way that saves time over the previous manual methods. In conjunction with Documentum, the RMDC has utilized an imaging platform and process to create PDF documents from paper records to enable rapid access to the information in the original record. Below is a summary of the systems that are in use in the RMDC. RMDC will manage all electronic records according to NARA guidelines.

PMA receives records from DOE contractors in all formats on a daily basis. When electronic records are received, RMDC will perform a quality check. In lieu of a 100% quality check, DOE has indicated that a statistically-based approach is acceptable to reduce the time and effort to perform the quality checks prior to accepting the records into the PMA ERMS, Documentum. PMA/PORTS/16-0750, *Image Quality Statistical Sampling Plan (IQSSP)*, has been developed based on American National Standard Institute/American Society for Quality (ANSI/ASQ) Z1.4 -

2003, *Sampling Procedures and Tables for Inspection by Attributes*. PMA is committed to maintaining an efficient and economical Records Management Program.

This IQSSP applies to all records received in or converted to an electronic format for storage in the PMA ERMS. The records are generated or converted to a format that meets DOE and National Archives and Records Administration (NARA) requirements. Prior to final acceptance and destruction of the hard copy of any record, PMA conducts quality checks to ensure the electronic file meets acceptance criteria. Records Management staff members are to perform image quality statistical sampling on records transferred to RMDC in accordance with the DOE approved plan and NARA requirements.

5.1.19 E-mail

The current process for capturing, retaining and disposition of e-mail records was implemented prior to PMA contract. Once the Record Generator/Record Custodian identifies inactive e-mail records, the Record Custodian transfers the e-mail records to the identified shared drive as required by, PMA EQ RM PRO 1406, *Records Transfer*. Once identified and transferred to RMDC e-mail records are maintained in Documentum. If a larger volume of e-mail records is to be transferred to RMDC, Information Technology (IT) will perform the data relocation to the PMA RMDC e-mail exchange box for RMDC review for final disposition.

Given the volume of e-mail records anticipated, RMDC and IT are working to implement an automated approach with a classification feature as a solution to improve the process of capturing, retaining, and disposition of e-mail records.

5.1.20 Architectural and Cartographic Records

Architectural and cartographic records include documents such as maps, charts, aerial photographs, architectural drawings, patents, and plans. The ROF turnover engineering drawing collection is currently maintained in the RMDC and is being entered into Documentum when RMDC time permits. A portion of this collection consists of Mylar drawing copies.

5.1.21 Audiovisual Records

The RMDC currently possesses 25 cabinets of historical photographs. These historic records need to be captioned, inventoried, scheduled, indexed, and dispositioned to ensure preservation of historical plant information. These photographs are a record of the plant's history.

PMA implements records management requirements for the creation, maintenance, and storage of audiovisual records in accordance with 36 CFR § 1237 and 36 CFR § 1235/42 and any updated NARA requirements/guidance.

During remediation, PMA will create and manage additional digital images and photographs. Photographs and/or other audiovisual records will be captioned, scheduled, indexed, and dispositioned in accordance with NARA and DOE requirements for audiovisual records.

5.1.22 Classified Records

PMA protects and handles classified information and critical information in accordance with applicable laws, regulations, policies, and directives. Classified documents are processed electronically using computer systems that meet all classified security requirements. Until the required computer systems are available to copy, log, process, transmit, and/or store classified documents, they are processed as hard copy.

These documents will be handled on a need-to-know basis according to the CMPC Manual.

5.1.23 Records Requests (including FOIA and EEOICPA)

FOIA, and Energy Employees Occupational Illness Compensation Program Act (EEOICPA) requests will be processed by the RMDC in accordance with all DOE and NARA regulations. The RMDC is responsible for providing DOE with worker and facility records and data for EEOICPA claims requests, which will be provided to the Department of Labor to help in their decision-making and in support of the administration of the EEOICPA; search results and costs estimates on FOIA requests; searches, responses, and cost estimates on FOIA requests, and search results on Privacy Act requests. The RMDC will work closely with the DOE to insure all requests are handled in a timely manner.

PMA responds to internal records management data calls by NARA and the DOE as requested and process internal record requests, requests for FOIA, the Privacy Act, the former worker medical screening program, the Chronic Beryllium Disease Prevention Program, congressional inquiries, legal discoveries and other record requests (e.g., training, personnel, exposure, project, incident reports, visitor logs).

5.1.24 DOSE Records

The D&D contractor Radiological Control Department maintains the dose records for this project but turns over the records to PMA when the records become inactive for final disposition.

5.1.25 Employee Medical Records

During the course of site remediation, medical records may be generated on PMA employees. Southern Ohio Medical Center Medical maintains the records and turns over the records to RMDC at the time of employee termination. These records will be dispositioned to the FRC. Former employees may request their records from the PMA Human Resources Department. Records held off-site at the FRC will be retrieved if needed. All requests for personnel records will be treated as Privacy Act requests.

Medical records for PMA subcontractors are on file at SOMC if PMA requested a physical for that individual. If a physical was not requested, then the subcontractor's medical would be on file with the sub contractor's medical provider. All PMA employees' medical records are on file with SOMC.

5.1.26 Epidemiological Records

At the present time, PMA maintains responsibility for the health-related information contained in epidemiological records aimed at discovering relationships among the various factors determining the frequency and distribution of diseases, if any, related to occupational or environmental hazards. Currently, the DOE is re-evaluating the retention periods for the various records specified as epidemiological records. Appropriate retention periods will be determined for the various categories. The information and data in the records is required for epidemiological or other health studies. DOE has a freeze of epidemiological records; thus, these records are not eligible for destruction and as such, PMA will ensure their preservation.

5.1.27 Contractor-Owned Records

Contractor-owned records are maintained in accordance with Department of Energy Acquisition Regulation (DEAR) Part 970 Number 5204 Title 3 (DEAR 970.5204-3) *Access to and Ownership of Records* clause and the Privacy Act Systems of Records. In accordance with DEAR 970.5204-3 and DOE Records Disposition Schedules, PMA will maintain contractor-owned records. RMDC will work with Contracts Manager to identify the contractor-owned records in PMA File Plan.

5.1.28 Records De-Classification

PMA Security currently provides Records De-Classification services.

5.1.29 Contaminated Records

PMA RMDC with support of D&D Contractor Radiological Protection Program will develop a plan to incorporate the processing of newly generated and historical records from potentially contaminated areas and those stored in the records vault to retain a record copy for final disposition and destruction of the contaminated copy.

6 RECORD DISPOSITION – ARCHIVING AND RETENTION

Inactive records will be transferred for archiving to the PMA RMDC. The records are required to be boxed and accompanied by a records inventory. The inventory should list all records contained and the record retention schedule for each. RMDC requires records from the same category, or series, along with same retention schedules to be boxed together. Specific instructions for the transfer of records for archiving can be found in PMA EQ RM PRO 1406, *Records Transfer*.

Specific instructions for destruction of records can be found in PMA EQ RM PRO 1404, *Records Destruction*.

6.1 RECORD DISPOSITION SCHEDULES – FILE PLAN, RETENTION AND “FREEZES”

For complete coverage of the disposition of all its records, each agency must independently develop schedules for its remaining records. PMA will adhere to DOE Record Retention

Schedules and NARA regulations. All DOE records schedules are also approved by the Archivist of the United States.

PMA maintains a file plan, which is built on the record disposition schedules created by the DOE. The file plan is a "living" document that should reflect changes to the office (e.g., re-organization, departing employees, office moves).

NARA regulations require the disposal of temporary records when their authorized retention periods expire.

Records eligible for destruction should not be maintained beyond their disposition date. However, special circumstances may require continued retention. These circumstances include both "holds" due to a business need, epidemiological, litigation, audit or FOIA request, and changes to the records retention period that are in process or have yet to be forwarded to the FRC.

Records that are to be held longer than required will be communicated to RMFO in order to obtain DOE/NARA approval. This action is documented in PMA EQ RM PRO 1404 Records Destruction.

In these circumstances, normal disposition activities for all records, regardless of media, must be suspended until the action is complete and offices have been notified that disposition may be resumed.

6.2 RECORDS STORAGE

All active Field Operating Records will be maintained in a central location(s) in the X-700, X-751, and X-1000. All inactive records are maintained in the X-720 records storage.

6.3 GREAT LAKES FRC

Records transferred from PORTS will go to the Dayton, Ohio (Great Lakes), and Suitland, Maryland, FRCs. Unlike permanent records, records stored at the FRCs remain in the custody of the DOE; records access, retrieval, storage costs, and activity charges are still the responsibility of the DOE.

6.4 SOFTWARE

For the Electronic Information System, Documentum® 7.1 is utilized to manage the coordination of documents and metadata. Documentum Webtop® is utilized as the web-based retrieval and input system by authorized staff members.

6.5 RECORDS RETRIEVAL

Utilizing Documentum Webtop®, authorized users can perform searches for single documents or groups of documents based on any of the metadata entered during document import as well

as other automatically generated metadata provided by Documentum. Once identified in the electronic information system, the information about records retrieved can be exported into Excel or specific documents can be read, metadata updated, documents exported, printed, checked out (under control), checked in, and deleted. All electronic records managed by RMDC, except the AR, are maintained and retrieved through Documentum.

6.6 SECURITY GROUPS

The RMDC Documentum repository (database) has multiple security groups for use in providing levels of access to the RMDC metadata and documents. This process ensures the “need-to-know” access concept. Security levels are determined by “need-to-know” and programmatic needs.

As use of the application expands, PMA has identified the need to restrict access on Official Use Only, Personal Identity Information, and Business Sensitive records. RMDC will work with IT to develop processes and practices to ensure the security of these documents.

6.7 BACKUP

The RMDC electronic information system is backed up on a regular basis to safeguard against the loss of information due to equipment malfunctions or human error. It provides for the recovery of the records that have been copied during the backup. Backup tapes are managed in accordance with the applicable DOE Records Disposition schedule and PMA IT IT PRO 5000, *Information Technology Back Up Policy*.