

Department of Energy
Privacy Impact Assessment (PIA)

Name of Project: Health Physics Records System (Dosimetry)
Bureau: U. S. Department of Energy (DOE), Carlsbad Field Office
Project Unique ID: 019-10-02-00-02-5000-04-404-139
Date: May 1, 2007

A. CONTACT INFORMATION

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B. SYSTEM APPLICATION/GENERAL INFORMATION

1. Does this system contain any information about individuals?

Yes.

a. Is this information identifiable to the individual?¹

Yes.

b. Is the information about individual members of the public?

Yes. Very Important People (VIP) visitors are provided escorted access to areas not open to the general public on tours, and thermoluminescent dosimeters (TLDs) are required as part of this access. The information collected is the same as that collected for federal or contract personnel assigned to the Waste Isolation Pilot Plant (WIPP). This data includes name, date of birth, social security number, business address, home address and current year occupational radiation dose.

c. Is the information about employees?

Yes. The system consists chiefly of dosimetry information on both Department of Energy (DOE) and contractor employees.

¹ "Identifiable Form" – According to the OMB Memo M-03-22, this means information in an IT system or online collections: (i) that directly identifies an individual (e.g., name, address, social security number or other identifying number or code, telephone number, email address, etc.) or (ii) by which an agency intends to identify specific individuals in conjunction with other data elements, i.e., indirect identification (These data elements may include a combination of gender, race, birth date, geographic indicator, and other descriptions).

2. What is the purpose of the system/application?
The primary purpose is to monitor and record personnel radiation exposure rates for the DOE, Carlsbad Field Office.
3. What legal authority authorizes the purchase or development of this system/application?
42 United States Code (U.S.C.) 7101 et seq., 50 U.S.C. 2401 et seq., Title 10, Code of Federal Regulations (CFR), Part 835, and 68 CFR 38796.

C. DATA IN THE SYSTEM

1. What categories of individuals are covered in the system?
DOE employees, including National Nuclear Security Administration employees, contractor employees, and any other persons having access to the WIPP facilities.
2. What are the sources of information in the system?
 - a. Is the source of the information from the individual or is it taken from another source?
The information is obtained from the individual to whom it pertains.
 - b. What Federal agencies are providing data for use in the system?
None.
 - c. What tribal, state, and local agencies are providing data for use in the system?
None.
 - d. From what other third party sources will data be collected?
None.
 - e. What information will be collected from the individual and the public?
The system collects name, social security number, birth date, mailing address, employer, and radiation exposure history.

3. Accuracy, Timeliness, and Reliability

- a. How will data collected from sources other than DOE records be verified for accuracy?

Since the data in the system is provided by the individual to whom it pertains, it is determined that the information is accurate at the time it is provided.

- b. How will data be checked for completeness?

The data in the system is provided by the individual to whom it pertains. It is determined that the information is complete at the time it is provided.

- c. Is the data current? What steps or procedures are taken to ensure the data are current and not out-of-date?

Yes. Annually, reports are sent to each person monitored for radiological exposure at the WIPP with personal data obtained the previous calendar year. If there is a discrepancy in the data that is reported, that individual is responsible for notifying the Carlsbad Field Office safety officer.

- d. Are the data elements described in detail and documented?

Yes. The elements of the Carlsbad Field Office system are stored in the Health Physics Record System (HPRS) database schema. In this schema, a list of all tables, views, stored procedures, index, and synonyms are located. These items are standard Oracle database components.

D. ATTRIBUTES OF THE DATA

1. Is the use of the data both relevant and necessary to the purpose for which the system is being designed?

Yes. Data in the system monitors and records levels of radiation exposure dosage to individuals working or visiting Department of Energy facilities.

2. Will the system derive new data or create previously unavailable data about an individual through aggregation from the information collected, and how will this be maintained and filed?

No.

3. Will the new data be placed in the individual's record?

N/A.

4. Can the system make determinations about employees/the public that would not be possible without the new data?
N/A.
5. How will the new data be verified for relevance and accuracy?
N/A
6. If the data is being consolidated, what controls are in place to protect the data from unauthorized access or use?
Data is not being consolidated.
7. If processes are being consolidated, do the proper controls remain in place to protect the data and prevent unauthorized access?
N/A
8. How will data be retrieved? Does a personal identifier retrieve the data? If yes, explain, and list the identifiers that will be used to retrieve information on the individual.
Yes. Data is retrieved by name, social security number, badge number, or the TLD dosimeter number.
9. What kinds of reports can be produced on individuals? What will be the use of these reports? Who will have access to them?
Occupational Radiation Dose Reports. Reports may be used for minimizing and reporting radiation dose received by an individual and for compliance with the applied regulations and DOE Orders. Access to the system will be restricted to project employees based on their job responsibilities and functions.
10. 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)?
None. The personal information stored in the system about members of the public is required in order for DOE to protect the individuals' health and welfare in accordance with 10 CFR 835.801.

E. Maintenance and Administrative Controls

1. If the system is operated in more than one site, how will consistent use of the system and data be maintained in all sites?
The system is only operated at the WIPP site, which is under the responsibility of the Carlsbad Field Office.

2. What are the retention periods of data in the system?

The retention periods are in accordance with **DOE Administrative Schedule 1, Personnel, subsection 21.4 Individual Employee Health Hazard Case Files.** (NC1-430-76-9 item 4) *[In-depth descriptions are discussed in “a” through “e.” This information is available at <http://cio.energy.gov/documents/ADM1.web.pdf>.]*

Destruction of the records may occur 75 years after the records are transferred by the agency to a records holding facility. (NC1-430-76-9)

3. What are the procedures for disposition of the data at the end of the retention period? How long will the reports produced be kept?

The reports will be retained at the WIPP Records Holding Facility for the designated period, at which time the records will be reviewed for destruction.

4. Is the system using technologies in ways that DOE has not previously employed (e.g., monitoring software, Smart Cards, Caller-ID)?

No.

5. How does the use of this technology affect public/employee privacy?

N/A

6. Will this system provide the capability to identify, locate, and monitor individuals?

No.

7. What kinds of information are collected as a function of the monitoring of individuals?

N/A

8. What controls will be used to prevent unauthorized monitoring?

N/A

9. Under which PA system of records notice does the system operate?

The system operates in accordance with DOE-35, “Personnel Radiation Exposure Records System of Records.”

10. If the system is being modified, will the PA system of records notice require amendment or revision?

No. The system is not being modified, therefore, a Privacy Act system of records amendment notice is not required.

F. ACCESS TO DATA

1. Who will have access to the data in the system?

DOE and contractor personnel including system administrators, developers, and dosimetry personnel. Access to personal data in the system will be strictly controlled based on job responsibility and function.

2. How is access to the data by a user determined?

Access to data is determined by evaluation of job responsibilities and organization. Based on the evaluation, the user is assigned permissions that are applied using system access control. User accounts are reviewed monthly to identify and remove users who have left the organization or whose duties no longer require access to the system.

3. Will users have access to all data on the system or will the user's access be restricted?

Access will be restricted by job roles and responsibilities.

4. What controls are in place to prevent the misuse (e.g., unauthorized browsing) of data by those having access?

Technical and administrative controls are in place to prevent the misuse of data by individuals with access. The administrative controls include restricted access via user ID and password based on user responsibility and job function.

5. Are contractors involved with the design and development of the system and will they be involved with the maintenance of the system? If yes, were PA contract clauses included in their contracts and other regulatory measures addressed?

Yes. Personal information from DOE-35 "Personnel Radiation Exposure Records" may be disclosed to these contractors and their officers and employees in performance of their contract. Individuals provided this type of information are subject to the same limitations applicable to Department of Energy officers and employees under the Privacy Act, 5 U.S.C. 552a.

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 Department of Energy Carlsbad Field Office. The contractor shall ensure that all Department of Energy Carlsbad Field Office documents and software processed, and the information contained therein, are protected from unauthorized use and mishandling by assigned personnel.

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

No other systems share data or have access to the data in the system.

7. Who will be responsible for protecting the privacy rights of the public and employees affected by the interface?

Mr. Richard Farrell, Safety Officer
U. S. Department of Energy, Carlsbad Field Office

8. Will other agencies share data or have access to the data in this system?

No.

9. How will the data be used by the other agency?

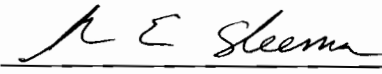
N/A

10. Who is responsible for assuring proper use of the data?

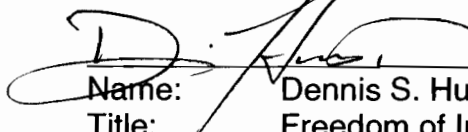
Mr. Richard Farrell, Safety Officer
U. S. Department of Energy, Carlsbad Field Office

The following officials have approved this document:

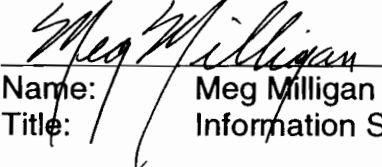
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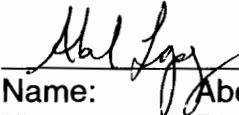
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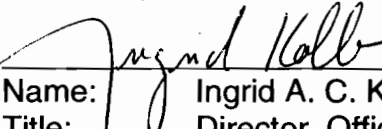
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