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CP3-RD-0010 FRev. 2	TITLE: Records Management Process	Page 1 of 29

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REVISION/CHANGE LOG

Revision/Change Letter	Description of Changes	Pages Affected	Date of Revision/Change
FR0	Bluesheet	All	9/21/2017
FR1	Removed bluesheet; added information regarding electronic records and contract requirements, and revised or deleted all forms.	All	1/8/2018
FR2	Updated references to plant procedures; added statement about contacting Derivative Classifiers (DCs) for clarification on classifiable subject area information; corrected numbering of step (Issue ID# CA-001453); added definitions for active, inactive, and temporary records, revised Records Transmittal Form and Records Custodian Designation Form and added forms as attachments.	All	10/17/2018

TABLE OF CONTENTS

1.0 PURPOSE AND SCOPE 3
1.1 Purpose 3
1.2 Scope 3
2.0 REFERENCES 3
2.1 Use References 3
2.2 Source References 3
3.0 COMMITMENTS 3
4.0 RESPONSIBILITIES 4
4.1 Functional Area Managers 4
4.2 Contractor Performance Assurance/Quality Assurance Department 4
4.3 Procurement Department 4
4.4 Records Custodians 4
4.5 RM Personnel 5
4.6 Technical Writer 5
4.7 All PGDP D&R Personnel 5
5.0 GENERAL INFORMATION 6
6.0 INSTRUCTIONS 6
6.1 Records Custodian Designation 6
6.2 Record Creation 7
6.3 Transfer of Paper Record to Electronic Media 10
6.4 Record Correction 12
6.5 Storage and Maintenance of Records 13
6.6 Non-Record Material 15
6.7 Contaminated, Damaged or Missing Records 15
6.8 Records Transmittal to RM 16
6.9 Record Receipt, Verification and Indexing 18
6.10 Access and Retrieval from Records Storage Area 19
6.11 Record Transfer to Infrastructure Contractor (IC) 20
7.0 RECORDS 20
7.1 Records Generated 20
7.2 Records Disposition 20
APPENDIX A – ACRONYMS/DEFINITIONS 21
APPENDIX B – IS IT A RECORD? 25
CP3-RD-0010-F01 – RECORDS TRANSMITTAL FORM 26
CP3-RD-0010-F02 – RECORDS REQUEST 27
CP3-RD-0010-F07 – RECORDS CUSTODIAN DESIGNATION 28
CP3-RD-0010-F08 – QA RECORD RECEIPT CONTROL 29

1.0 PURPOSE AND SCOPE

1.1 Purpose

This procedure defines administrative controls for records generated during the course of doing business by Paducah Gaseous Diffusion Plant (PGDP) Deactivation & Remediation (D&R) Contractor personnel and subcontractors.

1.2 Scope

This procedure addresses information of any type and in any form that meets the legal definition of a record, or needs to be addressed to facilitate the identification and management of record information. This includes paper documents, electronic files, email messages, computer systems and their data, etc., that are created by, or in the possession of, any PGDP D&R employee or contract labor resource personnel, or in any of the following circumstances:

- While working on any PGDP D&R business activities.
- While performing activities funded by the U. S. Department of Energy (DOE).
- While located at any PGDP D&R business location.
- At any time while using PGDP D&R equipment or resources, such as offices, computers, etc.

This procedure applies to all personnel who identify, generate, review, approve, store, transmit, receive, retain, or disposition records as a result of doing PGDP D&R business.

2.0 REFERENCES

2.1 Use References

- CP3-QA-3001, *Issues Management*
- CP3-RD-0014, *Record Identification and File Plan Development*
- PGDP-SS-PL-001, *Paducah Gaseous Diffusion Plant Information Security Plan*
- PGDP-SS-PL-002, *PGDP Classification Program Plan*

2.2 Source References

- 18 U.S.C. 2071, *Concealment, Removal, or Mutilation Generally*
- 44 USC 3106, *Unlawful Removal, Destruction of Records*
- CP3-RA-4002, *Administrative Record Process*

3.0 COMMITMENTS

- 36 Code of Federal Regulations (CFR), Chapter XII, Subchapter B, *Records Management*
- CP1-NS-3001, *Technical Safety Requirements (TSR) for the U. S. Department of Energy Paducah Site Deactivation Project*
- CP2-QA-1000, *Quality Assurance (QA) Program Description for the Paducah Gaseous Diffusion Plant, Paducah, Kentucky*
- CP2-QA-3000, *Contractor Performance Assurance Program Description*

- DOE Order (O) 243.1B, *Records Management Program*
- DOE O 422.1, *Conduct of Operations*
- American Society of Mechanical Engineers (ASME) NQA-1-2008, *Quality Assurance Requirements for Nuclear Facility Applications*, (with Addenda through 2009)

4.0 RESPONSIBILITIES

4.1 Functional Area Managers

- Assume responsibility for all records received, created, or transmitted under their supervision.
- Designate Records Custodians to ensure organizational records programs are implemented and maintained in compliance with this procedure.
- Ensure all PGDP D&R personnel within their Functional Area who create, receive, or transmit records are aware of, and comply with, the requirements of this procedure.
- Enforce all maintenance requirements defined in this procedure for records generated, received, processed, transmitted, maintained, or stored by PGDP D&R activities and operations.
- Ensure that terminating or transferring personnel who create and maintain records perform turnover to an appropriate employee, and notify Records Management (RM) by e-mail of the change before leaving.

4.2 Contractor Performance Assurance/Quality Assurance Department

- Provide guidance in identifying Quality Assurance (QA) records and categorizing them as lifetime QA or nonpermanent QA.

4.3 Procurement Department

- Ensure subcontracts and purchase orders specify the records to be generated, the storage requirements for those records, and the right of authorized site personnel to access those records.
- Ensure subcontracts and purchase order records generated and retained by subcontractors or vendors are accessible by authorized personnel.
- Ensure subcontracts and purchase orders specify that a subcontractor's or vendor's records are not disposed of until the required retention period has expired or regulatory requirements are satisfied.
- Submit records of subcontracts and/or purchase orders or vendor records to RM at least quarterly.

4.4 Records Custodians

- Identify records created and/or received within their organization or functional area as a result of doing business and document according to CP3-RD-0014, *Records Identification and File Plan Development*.
- Organize, maintain, and protect records during custody.
- Maintain a records storage area access list.
- Provide input to RM to establish electronic folders for email records.

- Prepare and transmit records at least quarterly, according to contractual requirements and the organization's file plan.
- Ensure records transmitted to RM meet the minimum standards of this procedure. Only unclassified information will be indexed or filed within the RM database.
- Ensure record file size is approximately 100 MB or less. Files exceeding 100 MB may need to be submitted in segments.
- Ensure electronic records include optical character recognition (OCR).
- Ensure electronic records created by scanning are compared to the original for legibility and complete document is properly scanned and meets quality requirements.

4.5 RM Personnel

- Develops and maintains a RM Program consisting of the following:
  - Organization's file plans and Master File Plan for site records.
  - Vital Records Plan and Inventory.
  - Storage, maintenance, and retrieval of site records.
  - RM awareness through established plant training.
- Ensures access to business-sensitive and classified records is restricted to individuals with an appropriate need-to-know and appropriate access authorization for access in the performance of their job assignments.
- Develops and implements a disaster recovery plan to preserve and retrieve archived records.
- Develops procedures for handling individual records.

4.6 Technical Writer

- Ensures new, changed, or revised procedures specify actions to identify, locate, and submit records to RM.
- Submit document history packages to RM at time of completion or at least quarterly.

4.7 All PGDP D&R Personnel

- Complete training on RM Awareness.
- Distinguish (identify, segregate, and clearly mark) record from non-record material for all media types.
- Generate and maintain records according to this procedure and submit to RM at least quarterly.
- Ensure access to business-sensitive and classified records is restricted to individuals with an appropriate need-to-know and appropriate access authorization for access in the performance of their job assignments.
- Retain records according to approved DOE Records Schedules and protect federal records from unauthorized destruction.
- Capture email records and transfer to RM at least quarterly.

- Ensure records are protected against unlawful, accidental, or premature destruction (unauthorized destruction), removal, defacing, or alteration as mandated by 18 U.S.C. 2071, *Concealment, Removal, or Mutilation Generally*.
- Work with assigned records custodian and RM personnel and ensure records are included in records inventories and file plans according to CP3-RD-0014, *Records Identification and File Plan Development*.
- Identify record-generating electronic information systems on the organization's file plan.
- Ensure electronic data format is acceptable to and compatible with the Infrastructure Contractor's (IC) records storage database.
- Develop a migration plan for electronic data in conjunction with RM and Information Technology (IT).

5.0 GENERAL INFORMATION

5.1 Records from classifiable subject areas must be reviewed by a Derivative Classifier (DC). Due to the plant's dynamic environment, area DCs should be contacted for clarification and direction regarding potential areas of concern.

5.2 In addition to the records requirements listed in this procedure, classified documents are handled according to PGDP-SS-PL-002, *PGDP Classification Program Plan*.

5.3 Administrative Record (AR) files are managed according to CP3-RA-4002, *Administrative Record Process*.

5.4 A QA Record is designated as lifetime or nonpermanent and is specified as such on the organization's file plan. This designation will help determine the appropriate retention period as a quality record. This does NOT negate the NARA requirements, in particular the NARA-approved retention requirements. If doubt exists as to whether or not a record is a QA record, then the Quality Manager should be contacted for guidance.

5.5 Additional information on QA records can be found in CP2-QA-1000, *Quality Assurance Program Description for the Paducah Gaseous Diffusion Plant, Paducah, Kentucky*.

5.6 The Contractor Performance Assurance/Quality Assurance department determines which records will be categorized and handled as quality records and which will be categorized as non-quality records.

5.7 Records must be submitted to RM at least quarterly.

5.8 For this procedure, the term PGDP D&R personnel includes all contractor and subcontractor personnel regardless of company affiliation.

6.0 INSTRUCTIONS

6.1 Records Custodian Designation

<u>Director and/or Functional Area Manager and/or Designee</u>

6.1.1 Assign Records Custodian.

6.1.2 Concur by signing CP3-RD-0010-F07, *Records Custodian Designation*.

RM Personnel

6.1.3 Complete the processing of CP3-RD-0010-F07 as follows:

A. Review form for accuracy and completeness.

B. Return to Director and/or Functional Area Manager (FAM) and/or Designee for correction if necessary.

C. Sign the form **and** return to Director, FAM, or Designee.

6.1.4 Provide the designated Records Custodian name to the PGDP D&R Training organization to assign training modules.

Training

6.1.5 Assign required training, as applicable.

6.2 Record Creation

Director and/or FAM and/or Designee

6.2.1 Work with Records Custodian to ensure records that are generated, supplied, and maintained are listed on the organization's file plan, according to CP3-RD-0014, *Record Identification and File Plan Development*.

PGDP D&R Personnel

6.2.2 Create records that effectively and accurately document an organization's functions, policies, procedures, decisions, essential transactions, correspondence with regulators, and work performed.

TSR 5.10.1

6.2.3 Ensure the following records are retained.

- Records and logs of facility operation
- Records and logs of principal maintenance activities, inspections, repairs, and replacements of principal equipment items related to nuclear safety
- All reportable events/occurrences
- Records of surveillance activities, inspections, and calibrations required by TSRs
- Records of changes made to procedures
- Records and drawing changes reflecting facility design modifications made to systems and equipment described in the Documented Safety Analysis (DSA)
- Records of radiation exposure for all individuals entering radiologically controlled areas
- Records of training and qualification for current members of the facility operations staff
- Records of Unreviewed Safety Question (USQ) reviews performed for changes made to procedures or equipment

6.2.4 Ensure records are:

A. Accurate, legible, reproducible, and complete.

B. Developed according to requirements listed in this procedure.

C. Capable of producing a legible copy reflecting original quality when reproduced or printed from electronic media.

NOTE:

RM shall be contacted for guidance on permanent record scanning. Permanent records must be scanned using lossless compression.

6.2.5 **If** image-scanning processes create electronic records, **then** utilize error prevention techniques such as legibility check and page count verification to ensure the complete document is captured. Use extra care when scanning involves 2-sided originals. Scan records at a minimum of:

- 300 ppi for non-quality records,
- 400 ppi for quality records, and
- 600 ppi for documents of inferior legibility.

6.2.6 Ensure records meet the following requirements:

A. Add record number, if applicable.

B. Title records to identify the item or activity that created the record. For example, *Deliverable No. 102 - Fire Protection Plan* rather than *correspondence* or *Canberra Gamma Spectrometry Log Book, June 1995 through September 1995*, rather than *lab notebook*. Define any acronyms used in the title and provide additional information as needed to further identify the record.

C. Group records in folders labelled with a descriptive title.

D. Maintain event driven records together to ensure proper disposition.

E. Identify project name, as applicable, to aid in future retrieval of the records.

F. Ensure forms have not been altered, and/or information has not been *whited out* to create a copy of an approved form.

NOTE: Dark, non-fluorescent highlighters which tend to obscure information should not be used.

G. Minimize notes or comments of non-record information on records. Use routing slips or other devices that can be attached without defacing the record material for non-record information.

H. Review and evaluate record and information it contains to determine if from a classifiable subject area.

I. **If** record is from a classifiable subject area, **then** ensure review by a DC.

J. **If** DC determines record contains classified information, **then** contact RM personnel for processing requirements and exit this procedure.

K. Ensure all records containing Unclassified Controlled Information (UCI) are marked according to PGDP-SS-PL-001, *Paducah Gaseous Diffusion Plant Information Security Plan*.

L. Ensure data is entered, and signatures and dates are completed with black or blue ink. In cases where other than dark ink has been used, such as pencil or light colored ink, ensure readability of entries by photocopying or similar methods.

6.2.7 **If** records are QA records, **then**

A. Ensure records are traceable to systems, processes, components, or activities involved.

B. Ensure records are initialed or signed and dated by authorized personnel for authentication prior to forwarding to records custodian and RM.

C. **When** transferring a quality record, maintain receipt control with each transfer.

1. Use CP3-RD-0010-F08, QA Record Receipt Control, or any other documentation that includes the following at a minimum:

- Record title
- Record and/or Document identifier/number
- Document change or revision, if applicable
- Record date
- Page count
- Printed name and signature or initials of originator/generator and date
- Printed name and signature or initials of recipient and date

2. **If** the record is transferred more times than the number of signature blocks contained on the form, **then** start another form.

D. Ensure Quality records are authenticated and complete. **If** a line designated for a signature does **NOT** require a signature, **then** ensure 'N/A' is placed on the line.

6.2.8 **If** creating records in an electronic information system, **then**

A. Identify electronic information system on the organization's file plan.

B. Ensure electronic data format is acceptable to and compatible with the Infrastructure Contractor's (IC) records storage database.

C. Develop a migration plan for the electronic data in conjunction with RM and IT.

6.2.9 Ensure corrections, if any, are made according to Section **6.4** before submitting to the appropriate records custodian or RM.

6.3 Transfer of Paper Record to Electronic Media

PGDP D&R Personnel

6.3.1 Remove duplicate and non-record material then transfer paper records to Records Custodian or designee in accordance with an organization's process.

Records Custodian and/or Designee and/or PGDP D&R Personnel

6.3.2 Receive paper records to be scanned and converted to electronic media.

NOTE:

It is important to keep in mind double-sided pages and odd-sized pages. RM shall be contacted for guidance on permanent record scanning. Permanent records as identified on the organization's file plan must be scanned using lossless compression.

6.3.3 Scan paper files into electronic media. The following scanning requirements apply:

A. Output media must be neutral portable document format (pdf) file.

B. Scanning must be performed at a minimum of

- 300 ppi for non-quality records,
- 400 ppi for quality records, and
- 600 ppi for documents of inferior legibility.

C. **If** scanning a permanent record, **then** use a lossless compression technique.

D. Scanning should include OCR. **If** scanning does **NOT** include OCR, **then** perform OCR on document in Adobe once scanned.

E. All pages of original paper-record must be scanned.

6.3.4 **If** records contain UCI, **then** mark according to PGDP-SS-PL-001, *Paducah Gaseous Diffusion Plant Information Security Plan*.

6.3.5 Store files in designated electronic folder.

6.3.6 Perform a quality check of the files by comparing the paper records to the pending electronic files. The quality check must include:

- Optical character recognition process
- Verification of scanning resolution using pre-flight profile or other method
- Clear and legible text and markings
- Illegible text should be marked as "poor quality original"
- Pages rotated correctly
- Appropriate classification and markings
- Removal of security settings and passwords
- Lossless file compression technique **if** permanent records (**NOT** lossy)
- Page count verification
- File size is approximately 100 MB or less **or** submitted in multiple files, if applicable

6.3.7 Complete workflow for each file after quality check is complete by importing files into designated record folders.

6.3.8 Maintain records according to Section **6.5 and** transmit to RM, at least quarterly, according to Section **6.8**.

6.3.9 Maintain paper record until notified by RM that they have received and verified the electronic record.

NOTE:

The originator should make the corrections to the record copy. In the event the originator is not reasonably available, the record may be corrected by another member of the functional area that is knowledgeable of the activity.

6.4 Record Correction

PGDP D&R Personnel

NOTE:

Correction tape or whiteout fluid shall **NOT** be used to correct in-process documents.

6.4.1 **If** record is in-process, **then**

A. Draw a single line through the incorrect information, initial **and** date each correction.

B. Enter the correct information adjacent to the originally entered information.

C. **If** correction impacts Nuclear Criticality Safety (NCS) or Technical Safety Requirements (TSR) systems, **then** add a comment explaining the reason for the correction, sign, and date the comment.

6.4.2 **If** record was previously submitted to RM, **then**

A. Request a record copy (RC) from RM.

B. Draw a single line through the incorrect information, insert correct information, initial **and** date each correction.

C. **If** correction impacts NCS or TSR systems, **then** add a comment explaining the reason for the correction, sign, and date the comment.

D. Complete CP3-RD-0010-F01, *Records Transmittal Form*.

E. In the comments field of CP3-RD-0010-F01, indicate this is a corrected record and reference the original record.

F. Submit the corrected record and records transmittal form (RTF) to RM for processing.

6.5 Storage and Maintenance of Records

Director and/or FAMs

NOTE:

Due regard should be used for the risk of loss associated with the content of the record. The time and effort needed to reconstruct these are important considerations when determining what steps to take in maintaining and protecting the record.

Reference and/or convenience copies cannot be maintained longer than the original records. RM shall be contacted for guidance.

6.5.1 Approve records storage locations for all of your organization's on-going project records. Consider the following:

- Potential for a catastrophic event at the storage location.
- Potential for damage from rodents or other pests.
- Ability, or lack thereof, to reproduce or replace lost or damaged records (one-of-a-kind).
- Potential impact of lost or damaged records (safety, operations, cost, schedule, legal, license, permits, etc.).
- Potential damage from heat, cold, humidity, or mold.
- Use of standard metal file cabinets for storage of records in rooms and/or facilities equipped with fire-suppression systems.

PGDP D&R Personnel

6.5.2 Protect all completed records by providing the following minimum storage requirements:

- Separate personal papers and non-record items from documents designated to become records and ensure records are clearly marked as records.
- Collect **and** organize records as they are completed, **and** ensure the applicable file plan is updated and maintained to expedite retrieval.
- Store records in a manner to prevent damage and/or loss due to moisture, temperature, and pressure. Other examples of hazards to be considered are light and electrical power fluctuations.
- Store records containing UCI according to PGDP-SS-PL-001, *Paducah Gaseous Diffusion Plant Information Security Plan*.
- Place in locked or controlled access area.
- Maintain an Access Control List of personnel authorized to access records for each records storage area. Personnel **NOT** on the list shall obtain permission from the records custodian to access files.
- Use checkout cards or logs when removing records from records storage area.

6.5.3 **If** information is subject to a moratorium on destruction or legal hold, **then** protect the information in accordance with the specific instructions included in the direction concerning the moratorium on destruction or legal hold.

NOTE: Privacy Act records are Official Use Only (OUO) and may be in any media.

6.5.4 **If** records meet the definition of Privacy Act records, **then**

A. Ensure records are marked as OUO according to PGDP-SS-PL-001, *Paducah Gaseous Diffusion Plant Information Security Plan*.

B. Maintain proper access control.

1. Protect electronic files with passwords.

2. Store paper Privacy Act records in a locked drawer, file cabinet, or in a locked room.

3. Determine the *need-to-know* of persons requesting access to the information.

C. Designate as Privacy Act records on CP3-RD-0010-F01, *Records Transmittal Form*.

6.5.5 **If** records are QA records, **then** store using **one** of the following requirements:

- Use two-hour fire-rated cabinet, plus adequate smoke detection or fire suppression systems;
- Maintain duplicate hard copy records in identified storage area in a separate location; duplicate records storage areas must be removed sufficiently from one another to eliminate circumstances where a single adverse event can damage records held at both locations;
- Maintain a duplicate of the information in another record media that is stored in a separate location. Access controls continue to apply to the electronically stored record.

RM Personnel

6.5.6 Store records within the D&R cabinet of Documentum or other approved electronic records management system.

6.5.7 In conjunction with IT, maintain documentation on the electronic records management system that is adequate to:

- Specify technical characteristics necessary for reading and processing records contained in the system
- Identify all inputs and outputs
- Define the contents of the files and records
- Determine restrictions on access and use
- Understand the purposes and functions of the system
- Describe update cycles or conditions and rules for adding, changing, or deleting information in the system
- Ensure the timely, authorized disposition of the records.

6.5.8 Ensure electronic records management system and temporary storage drives are backed up as needed to ensure continuity of operations.

6.6 Non-Record Material

PGDP D&R Personnel

6.6.1 Consider documents or materials that do **NOT** meet the definition of record as non-record material.

6.6.2 Maintain non-record material as needed in working files **and** ensure records and non-records are **NOT** intermingled.

6.6.3 Dispose of unneeded non-record material promptly and in accordance with content sensitivity and any guidance from the Security and/or Legal Organizations.

6.7 Contaminated, Damaged, or Missing Records

PGDP D&R Personnel

NOTE:

Hardcopy records are considered damaged whenever pages are mutilated or print is degraded or obscured to the extent that information is not legible. Electronic records are considered damaged when files cannot be opened or retrieved.

6.7.1 **If** records are known or suspected to be contaminated with radiological or hazardous material, **then:**

A. Contact the RM Manager to assess status of records.

B. **If** records have met retention requirements **and** are eligible for destruction, **then** work with RM to obtain destruction approval and authorization from DOE.

C. **If** records need to be retained, **then,** based on the type of contamination, request Radiological Control and/or Industrial Hygiene, to survey records and provide direction for handling.

6.7.2 **If** a record has been damaged while in the custody of the organization, **then**:

A. Notify management of damaged record and request guidance on restoration or reconstruction.

B. Restore and/or reconstruct the record as follows:

1. Notify the organization responsible for generation or receipt of the damaged record **and** review related records to determine if the information is available from other data.

2. Review related records to determine if record can be reconstructed from other existing records.

3. **If** needed, contact RM for assistance with restoration or reconstruction

C. **If** the damaged record is electronic, **then** contact Information Technology (IT) to see if the record can be opened or retrieved

D. **If** a record has been reconstructed or restored, **then** ensure replaced or recreated records contain adequate annotation to explain the circumstances of loss or damage and the efforts to replace the lost or damaged record.

6.7.3 **If** a record cannot be located, **then** perform the following:

A. Check the designated file location and other likely areas to see if the record was misfiled or recently removed and **NOT** returned.

B. **If** the record cannot be located, **then** if appropriate, initiate CP3-QA-3001-F02, *Issue Identification Form*, according to CP3-QA-3001, *Issues Management*, **and** create a record that describes the situation that led to the loss or destruction of the record **and** describe the actions taken to try to replace the record.

C. File the explanatory document in place of the record that cannot be replaced.

6.8 Records Transmittal to RM

NOTE:

All records sent to RM shall be in electronic format unless otherwise approved by the RM manager. Records of mixed disposition will **NOT** be accepted.

Additional information regarding email records can be obtained by contacting RM directly.

PGDP D&R Personnel

6.8.1 Segregate and submit records to RM, at least quarterly, according to the organization's file plan, which specifies record type and file transfer instructions.

6.8.2 **If** transmitting email records, **then**

A. Remove any passwords or Entrust certificates.

B. Expand any distribution lists so that all recipients' names are visible.

C. Transfer to the appropriate email records folder established for your organization.

6.8.3 Prepare the records for transmittal as follows:

A. Restore, reconstruct, **or** provide substitutes for damaged or missing records where possible.

B. **If** document is damaged or incomplete, **then** mark as "poor quality original," and note such on CP3-RD-0010-F01, *Records Transmittal Form*.

C. Review record and information it contains to determine if from a classifiable subject area.

D. **If** record is from a classifiable subject area, **then** ensure review by a DC.

E. **If** DC determines record contains classified information, **then** contact RM personnel for processing requirements and exit this procedure.

F. Remove passwords from protected record files.

NOTE:

PGDP D&R personnel are expected to know how QA records are maintained, completed, and authenticated within their organization. Upon transmittal to RM, submitter is declaring records to be authenticated and complete according to applicable requirements.

6.8.4 **If** records being transmitted are identified as QA records, **then** ensure compliance with the requirements listed in Step **6.2.7**.

6.8.5 Complete CP3-RD-0010-F01, *Records Transmittal Form.*

NOTE:

Upon completion of the records transmittal, the records custodian is attesting that the records are complete, have been authenticated as applicable, and the requirements of this procedure have been met. Records not transmitted in compliance with this procedure will **NOT** be accepted.

6.8.6 Ensure all information requested on the RTF is complete and accurate.

6.8.7 **If** necessary, contact RM for assistance with completing CP3-RD-0010-F01, *Records Transmittal Form*.

6.8.8 Ensure the completed RTF is the first page of the records file for transmittal to RM and include in the total page count.

6.8.9 Save the PDF file in the appropriate Records Transmittal folder on the shared drive designated by RM.

6.8.10 Send an email to FRNPRecordsManagement@pad.pppo.gov to notify RM personnel of the transmittal.

6.8.11 Maintain the record media until RM verifies acceptance of the records and notifies the Records Custodian or Submitter.

6.9 Record Receipt, Verification and Indexing

RM Personnel

6.9.1 Review the CP3-RD-0010-F01, *Records Transmittal Form*, and the submitted record files **and** ensure the following:

- Information on the RTF is complete and accurate.
- Records are being transferred according to transfer instructions listed on the organization's file plan.
- The file when reproduced will produce a legible copy reflecting original quality.
- Records presented in scanned files are in good repair without torn pages or missing pages and have the same records schedule and disposition date.
- Record title is identified and acronyms used in title are defined.
- Corrections made prior to submitting to RM are made with a single line, initialed, and dated, and **NO** correction tape or whiteout fluid has been used.
- Forms have **NOT** been altered, and/or information has **NOT** been "whited-out" to create a copy of an approved form.
- Records identified as containing UCI are marked according to PGDP-SS-PL-001, *Paducah Gaseous Diffusion Plant Information Security Plan*.
- Scanning requirements are met.

6.9.2 Ensure the RTF is filed as the first page of the record file and included in the total page count.

6.9.3 **If** there is a discrepancy **or** quality concern with the record, **then** contact the records custodian for remediation and correction.

A. **If** correcting and/or modifying the record is **NOT** possible, **then** request records custodian to appropriately mark the record.

Records Custodian and/or PGDP D&R Personnel

B. Mark the record as "poor quality original," or similar wording as applicable.

RM Personnel

C. Document resolution on the RTF and/or in Documentum when loaded.

6.9.4 Import the appropriate file into Documentum.

A. Enter and/or update the required information for the record in the Properties field for the file(s).

B. Include the approved record retention period as specified in DOE records schedules and if records are QA records, then also as specified in NQA-1 requirements.

C. **If** record is a case file **or** event driven record, **then** maintain as a collection and file in the properly labelled folder within Documentum.

6.9.5 **When** requested by the IC, provide records for image quality statistical sampling according to the IC's sampling plan. The image quality assessment includes:

- Optical character recognition process performed
- All text and markings are clear and legible
- All pages are legible or marked as "poor quality original"
- Pages are rotated correctly
- Classification markings are clear and legible
- No security settings
- Lossless file compression technique used for permanent records, if compression is needed
- Preferred format of PDF used

6.9.6 **When** processing the record **and** periodic IC QA checks are complete, notify the Records Custodian or Submitter that the record has been accepted and any copies should be disposed of or marked as non-records.

6.10 Access and Retrieval from Records Storage Area

RM Personnel

6.10.1 Maintain a list of organization's records storage areas and custodians.

Contractor or Vendors

6.10.2 **If** maintaining records under this program at the vendor facility or other location, **then** make records available to appropriate Contract Technical Representative.

PGDP D&R Personnel

NOTE: A request may be made by emailing FRNPRecordsManagement@pad.pppo.gov and including the information as indicated on the CP3-RD-0010-F02, *Records Request*.

6.10.3 Request records using form CP3-RD-0010-F02, *Records Request*, including as much information about the requested record as possible **or** by emailing the applicable information to FRNPRecordsManagement@pad.pppo.gov.

RM Personnel

6.10.4 Review the requests to ensure all customer information is completed, **and** ensure there is sufficient information to retrieve the record.

6.10.5 **If** the information is **NOT** sufficient, **then** contact the requestor to obtain additional information.

6.10.6 **If** the request involves classified or UCI records, **then** verify the requestor has authorization by checking the appropriate access authorization and need-to-know.

6.10.7 Forward record to requestor.

6.10.8 Indicate the date the request was completed in the *Date Completed* block on the form, if applicable.

6.10.9 File the original request.

6.10.10 **If** the record is requested for legal purposes, **then** document such on the transmittal or electronic file attributes, as applicable.

6.11 Record Transfer to Infrastructure Contractor (IC)

RM Personnel

6.11.1 **When** records are to be transferred to the IC for disposition, **then** transfer using the appropriate method agreed to by management. This transfer will occur at least quarterly.

6.11.2 Notify IC Records team by email that records have been transferred.

7.0 RECORDS

7.1 Records Generated

The following records may be generated by this procedure:

- CP3-RD-0010-F01, *Records Transmittal Form*
- CP3-RD-0010-F02, *Records Request*
- CP3-RD-0010-F07, *Records Custodian Designation*
- CP3-RD-0010-F08, *QA Record Receipt Control*

7.2 Records Disposition

The records are to be maintained in accordance with CP3-RD-0010, *Records Management Process*.

Appendix A – Acronyms/Definitions

ACRONYMS

AR – Administrative Record

ASME – American Society of Mechanical Engineers

CERCLA – Comprehensive, Environmental Response, Compensation, and Liability Act of 1980

CFR – Code of Federal Regulations

D&R – Deactivation and Remediation

DC – Derivative Classifier

DSA – Documented Safety Analysis

FAM – Functional Area Manager

FRNP – Four Rivers Nuclear Partnership, LLC

IC – Infrastructure Contractor

IT – Information Technology

NARA – National Archives and Records Administration

NCS – Nuclear Criticality Safety

NQA-1 – Nuclear Quality Assurance-1

OCR – Optical Character Recognition

OUO – Official Use Only

PDF – Portable Document Format

PGDP – Paducah Gaseous Diffusion Plant

PPI – Pixels Per Inch

QA – Quality Assurance

RC – Record Copy

RM – Records Management

TSR – Technical Safety Requirements

UCI – Unclassified Controlled Information

USQ – Unreviewed Safety Question

Appendix A – Acronyms/Definitions (continued)

DEFINITIONS

Active Record – A record that is being generated or added to; it is not considered a completed record.

Administrative Record (AR) – The official body of documents that forms the basis of the selection of a particular response action (i.e., documents considered or relied upon in selecting a remedy) as required by the Comprehensive, Environmental Response, Compensation, and Liability Act (CERCLA) of 1980.

Approval – The process of attesting to the authenticity and accuracy of a document.

Authentication – The act of attesting that the information contained within a document is accurate, complete, and appropriate to the work accomplished. Authentication is accomplished by one of the following methods: 1) A stamped, initialed, logged, or signed and dated document; 2) A written statement by the responsible individual or organization; or 3) Issuing a document which is clearly identified as a statement by the reporting individual or organization.

Classifiable Subject Area – Information related to but not limited to gaseous diffusion technology, production processes, or Safeguards and Security.

Discrepancy – A deviation between the statement of contents of a record as described on the transmittal and those records that actually exist in the record package.

Disposition – Those actions taken regarding records no longer needed for the conduct of the regular current business of the creator. 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.

Electronic Record – Any information that is recorded in a form that only a computer can process and that satisfies the definition of a Federal record under the Federal Records Act. The term includes both record content and associated metadata that the agency determines is required to meet agency business needs.

File Plan – Comprehensive outline that includes the file code, 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, including vital/essential records.

In-Process Document – A document designated to become a record that has not been submitted to the appropriate records custodian or RM. The record may not have all signatures or be a complete package.

Inactive Record – A record that is no longer needed to carry out an organization's day-to-day business.

Inventory – A descriptive listing of each record series together with an indication of location and other pertinent data.

Lifetime (In Regard to QA Records) – Are those that meet one or more of the following criteria: (a) those that would be of significant value in demonstrating capability for safe operation; (b) those that would be of significant value in maintaining, reworking, repairing, replacing, or modifying an item; (c) those that would be of significant value in determining the cause of an accident or malfunction of an item; or (d) those that provide required baseline data for in service inspections. Lifetime records are required to be maintained by or for the Owner for the life of the particular item while it is installed in the plant or stored for future use. Therefore, lifetime QA records are those associated with "items."

Appendix A – Acronyms/Definitions (continued)

Lossless Compression – Data-file size reduction technique which employs compression algorithms that do not cause any data loss in the compression-decompression process. Commonly used in compression of text files, it does not generally provide very high compression ratios but the decompressed file is identical in every way to the original file.

Non-Permanent (In Regard to QA Records) – QA Records required to show evidence that an activity was performed in accordance with applicable requirements, but the records do not need to be retained for the life of the item because they do not meet the criteria for lifetime records. Nonpermanent records shall be maintained for the identified retention period. Therefore, non-permanent QA records are those associated with "activities."

Non-Record Material – Informational material excluded from the legal definition for record material which includes extra copies of documents retained for the convenience of reference, publications stocks and processed documents, and library or museum materials intended solely for reference or exhibition.

Originator – A person who is responsible for maintaining records within his/her personal workspace. The originator may be multiple individuals since a record is usually generated by more than one person during the creation process. All records in the possession of an originator are administratively managed by a Records custodian.

Permanent Record – Any federal record that has been determined by NARA to have sufficient value to warrant its preservation in the National Archives of the United States, even while it remains in agency custody. Permanent records are those for which the disposition is permanent on SF 115, *Request for Records Disposition Authority*, approved by NARA on or after May 14, 1973. The term also includes all records accessioned by NARA into the National Archives of the United States.

Privacy Act Records – Records that fall under the jurisdiction of 10 *CFR* 1008, *Records Maintained on Individuals (Privacy Act)*, 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.

Quality Assurance (QA) Record – Federal record that is a completed document, furnishing evidence of the quality of items and/or activities affecting quality. QA Records are designated on the organization's file plan.

Record – "…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 United States Government or because of the information value of the data in them" (44 U.S.C. 3301, Definition of Records).

Records Control Schedule – Provides mandatory instructions for the disposition of the records (including the transfer of permanent records and disposal of temporary records) when they are no longer needed by the agency.

Record Copy (RC) – The official copy of a record that is retained for legal, operational, or historical purposes.

Appendix A – Acronyms/Definitions (continued)

Records custodian – Person appointed to maintain an organization's unit records and to ensure that information is managed in accordance with Records Management procedures. They are responsible to administratively control the records of all assigned personnel within the organization unit.

Record Package – A collection of documents supporting one topic files and processed as a single record (for example, work package, project files, etc.). The package will be held by the originating organization until the activity is complete.

Records Management – The planning, controlling, directing, organizing, training, promoting, and other managerial activities related to the creation, maintenance and use, and disposition of records to achieve adequate and proper documentation of Federal policies and transactions and effective and economical management of agency operations.

Record Number – A numeric or alphanumeric set of characters assigned to a record.

Retention Period – The length of time a record must be kept before it can be destroyed and is based on the Records Control Schedule.

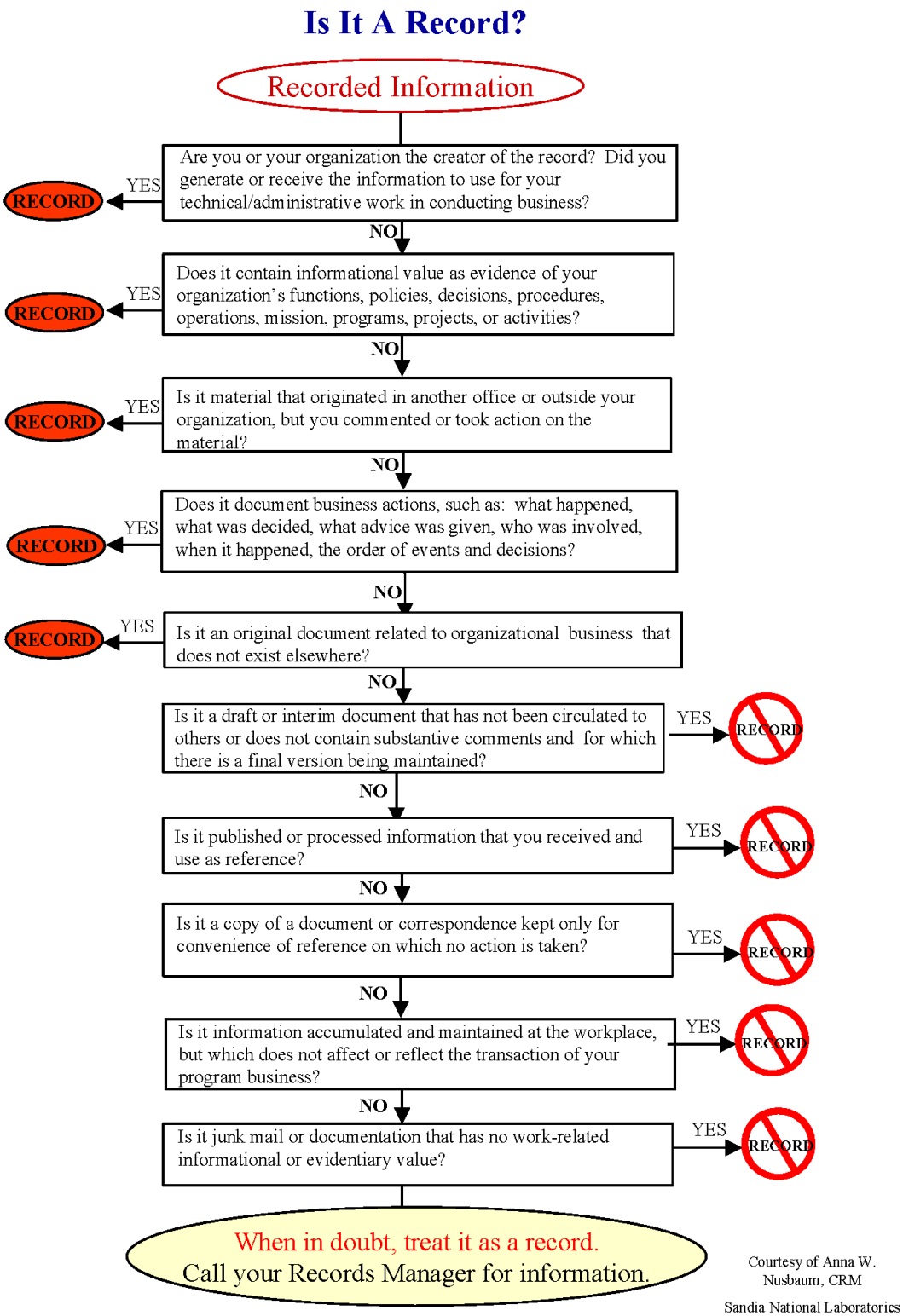
Temporary Record – Records retained for a specific amount of time to support the agency's work. They are approved by NARA for destruction either immediately or after a specified retention period.

Unclassified Controlled Information (UCI) – Information that is unclassified, but is explicitly controlled by statute, DOE Order, other DOE requirements, or by company requirements. Examples are listed in PGDP-SS-PL-001, *Paducah Gaseous Diffusion Plant Information Security Plan*. Markings commonly used include Company Sensitive, Law Enforcement, OUO, PII, Privacy Act, Proprietary, and UCNI.

Vital/Essential 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).

- **Emergency-Operating Records –** That type of vital records essential to the continued functioning or reconstitution of an organization during and after an emergency. Included are emergency plans and directive(s), orders of succession, delegations of authority, staffing assignments, and 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.
- **Legal-And-Financial Rights Records** – Vital records essential to protect the legal and financial rights of the Government and of the individuals directly affected by its activities. Examples include accounts receivable records, social security records, payroll records, retirement records, and insurance records. These records were formerly defined as "rights-and-interests" records. Records that have the properties of both emergency-operating and legal and financial rights records are treated as emergency-operating records.

Appendix B – Is It A Record?



Courtesy of Anna W. Nusbaum, CRM

Sandia National Laboratories

CP3-RD-0010-F01 – RECORDS TRANSMITTAL FORM

Record Title: (Define acronyms, if used.)		Record Date: (MM/DD/YYYY)	Page Count:
Record Number/Document ID:	Electronic Path:		Contract:
Project:		Contractor:	
Facility/Bldg:	Author (if applicable):	Quality Record: ☐ Yes ☐ No **If YES, check one:** ☐ Lifetime **or** ☐ Nonpermanent	
Unclassified Controlled Information (UCI): ☐ Yes ☐ No Markings Applied: ☐ Yes ☐ ECI ☐ UCNI ☐ OUO (OUO Exemption _____)			Vital/Essential Record: ☐ Yes ☐ No
Comments:			

The record has been authenticated and a quality check has been conducted on the attached electronic record, and the record meets the requirements of procedure CP3-RD-0010, *Records Management Process*.

Relinquished/Submitted By:

Print Name Sign Name

***Organization*:**	***Phone:***	***Date:***

THIS RECORD DOES NOT CONTAIN CLASSIFIABLE SUBJECT AREA INFORMATION

Print Name Sign Name Date

If record is from a classifiable subject area, obtain a DC review/signature, before submitting to RM.

TO BE COMPLETED BY CLASSIFICATION OFFICE/DERIVATIVE CLASSIFIER ONLY

Classified ☐ Yes ☐ No **ECI** ☐ Yes ☐ No **UCNI** ☐ Yes ☐ No ☐ **OUO** ☐ Yes ☐ No

Classified *(level & category)* _____ (OUO Exemption_____)

Reviewed for Classification *(DC Name/Initials)*: _____ Date: _____

TO BE COMPLETED BY RM STAFF

File Code/Schedule:	Cutoff Date:	Disposition Date:
Notes:		
*Received/Indexed by:		Date:
Verified by:		Date:
Record Cabinet Number:		

* Accepted as receipt control transfer signature for Quality records.

CP3-RD-0010-F02 – Records Request

Requestor:	**Phone #:**
Badge #: **Clearance Level:** ☐ Uncleared ☐ L ☐ Q	**Organization:**
Request Date:	**Required Date:**
Purpose of Request:	

Record/Document Number & Revision	Record Description	Record Date	Author/Submitter

Additional Information:

TO BE COMPLETED BY RECORDS MANAGEMENT STAFF	
Request Completed by:	**Date Completed:**

CP3-RD-0010-F07 – Records Custodian Designation

☐	**Initial Records Custodian Designation**
	Name of Records Custodian:
	Location of Records Custodian:
	Organization:
☐	**New Records Custodian Designation**
	Current Records Custodian:
	New Records Custodian:
	Location of New Designated Records Custodian:
	Organization:
☐	**Removal of Records Custodian**
	Name of Records Custodian:
	Organization:

Manager Approval: _____ Date: _____

Records Management Acknowledgement: _____ Date: _____

CP3-RD-0010-F08 – QA Record Receipt Control

Page ____ of ____

Record Title:			
Record Identifier:	Rev. #:	Record Date:	Page Count:
Authenticated By:			
Print Name	Signature		Date

Relinquished By – Print Name	Signature	Date
Received By – Print Name	Signature	Date
Relinquished By – Print Name	Signature	Date
Received By – Print Name	Signature	Date
Relinquished By – Print Name	Signature	Date
Received By – Print Name	Signature	Date
Relinquished By – Print Name	Signature	Date
Received By – Print Name	Signature	Date
Relinquished By – Print Name	Signature	Date
Received By – Print Name	Signature	Date
Relinquished By – Print Name	Signature	Date
Received By – Print Name	Signature	Date

If additional transfers and signatures are needed, start another page.