

<b>CP3-RD-0010 FRev. 4B</b>	<b>TITLE:</b> Records Management Process	Page 1 of 34
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<b>SUBJECT MATTER AREA:</b> Records Management		
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<b>REVISION/CHANGE LOG</b>			
<b>Revision/Change Letter</b>	<b>Description of Changes</b>	<b>Pages Affected</b>	<b>Date of Revision/Change</b>
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
FR3	Deleted requirements on record file size (the Infrastructure Support Services Contractor (ISSC) has removed this requirement); refined the definition of migration and information on the electronic records management system (ERMS) requirements to address U.S. Department of Energy (DOE) surveillance finding/observation; incorporated changes due to implementation of new ERMS and digital signature process; forms F01 and F02 have been deleted; and made some minor formatting changes.	All	8/25/2020

<b>REVISION/CHANGE LOG</b>			
<b>Revision/Change Letter</b>	<b>Description of Changes</b>	<b>Pages Affected</b>	<b>Date of Revision/Change</b>
FR3A	Change Technical Surveillance Requirement (TSR) commitment stamp from 5.10.1 to 5.9.1.	Page 9	10/12/2020
FR3B	Updated references, deleted requirement to validate digital signatures when submitting and reviewing records, and added requirements for searching records.	4, 5, 7, 13, 14, 18, 19, 20, 21, and 22	06/28/2022
FR4	Updated references and made changes for implementation of DOE Order (O) 243.1C, the National Archives and Records Administration (NARA) digitization standards from 36 <i>Code of Federal Regulations (CFR)</i> Part 1236, NARA M-23-07, Update to Transition to Electronic Records, and DOE O 471.7. Updated information regarding quality records, temporary storage areas, temporary source documents/records, controlled unclassified information (CUI), and electronic information systems (EISs).	All	1/18/2024
FR4A	Added reference from the NARA digitization standards from 36 <i>CFR</i> Part 1236 Subpart E, and revised information regarding quality records, EISs, and process for routine classified records.	5, 6-12, 14, 15, 19, 21, 25, 27, 29, 34	2/27/2024
FR4B	Added reference to the classification policy, CP1-PM-0005 to address CA-004894. Added language to clarify preflight requirements for born digital records in Step 5.13.	4, 7-10, 14, 16, 21, 23, 27	8/7/2024

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## 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 and 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, electronic systems and their data, etc., that are created by, or in the possession of, any PGDP D&R personnel or subcontractors, or in any of the following circumstances:

- While working on any PGDP D&R business activities,
- While performing activities funded by the DOE,
- While located at any PGDP D&R business location, or
- 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. This procedure also applies to the processing of legacy material identified in facilities maintained by the PGDP D&R Contractor.

Record requirements in this procedure that are solely reliant upon a non-classified network interface (e.g., digital signature requirements) do NOT apply to a classified record.

## 2.0 REFERENCES

### 2.1 Use References

- CP1-PM-0005, *Classification Review Integration Controls for Converter Component Activities and Other Subject Matter Areas*
- CP3-QA-3001, *Issues Management*
- CP3-RD-0014, *Records Identification and File Plan Development*
- PGDP-RM-IN-001, *General User Submitting Records*
- PGDP-RM-IN-002, *Initial Quality Checks on Records*
- PGDP-RM-IN-004, *Processing Email Records*
- PGDP-RM-IN-005, *Photograph Processing*
- PGDP-RM-PR-003, *Digital Signatures*
- PGDP-RM-TD-001, *Search Tools for the ISSC Electronic Records Management System*
- PGDP-RM-TD-002, *Initial Quality Assessment Checklist*
- PGDP-RM-FO-003, *Infrastructure Support Services Contractor Electronic Records Management System Use Policy*

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- PGDP-SS-PL-001, *Paducah Gaseous Diffusion Plant Information Security Plan*
- Site Interface Agreement for the Paducah Gaseous Diffusion Plant Site Disintegrator, issued March 1, 2023

## 2.2 Source References

- 18 U.S.C. 2071, *Concealment, Removal, or Mutilation Generally*
- 44 U.S.C. 3106, *Unlawful Removal, Destruction of Records*
- 44 U.S.C., Public Printing and Documents, Chapter 21, “*National Archives and Records Administration*”
- 44 U.S.C., Public Printing and Documents, Chapter 29, “*Records Management by the Archivist of the United States and by the Administrator of General Services*”
- 44 U.S.C., Public Printing and Documents, Chapter 31, “*Records Management by Federal Agencies*”
- 44 U.S.C., Public Printing and Documents, Chapter 33, “*Disposal of Records*”
- 44 U.S.C., Public Printing and Documents, Chapter 36, “*Management and Promotion of Electronic Government Services*”
- CP2-RD-0001, *Records Management Plan for the Paducah Gaseous Diffusion Plant, Paducah, Kentucky*
- CP2-RD-0002, *Electronic Information System Requirements*
- CP2-RD-0017, *Essential Records Plan and Inventory for the Deactivation and Remediation Contractor, Paducah Gaseous Diffusion Plant, Paducah, Kentucky*
- CP3-EN-0400, *Quality Level Determination*
- CP3-QA-1001, *Graded Approach*
- CP3-RA-4002, *Administrative Record Process*
- PGDP-RM-IN-003, *Creating Digital Signatures in Documents*
- PGDP-RM-PO-001, *Digital Signature Policy*
- PGDP-SS-PL-002, *Paducah Gaseous Diffusion Plant Classification Program Plan*

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## 3.0 COMMITMENTS

- 10 CFR Part 1008, *Records Maintained on Individuals (Privacy Act)*
- 36 CFR, Chapter XII, Subchapter B, *Records Management*
- 36 CFR Part 1236, *Electronic Records Management*
- 36 CFR Part 1236, Subpart E, *Digitizing Permanent Federal Records*
- CP1-NS-3001, *Technical Safety Requirements for the Department of Energy Paducah Site Deactivation and Remediation Project*
- CP2-QA-1000, *Quality Assurance Program Description for the Paducah Gaseous Diffusion Plant, Paducah, Kentucky*

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- CP2-QA-3000, *Contractor Performance Assurance Program Description at the Paducah Gaseous Diffusion Plant, Paducah, Kentucky*
- PGDP-RM-PR-001, *Records Management*
- PGDP-RM-PR-002, *Administrative Records*
- DOE O 243.1C, *Records Management Program*
- DOE O 414.1D, *Quality Assurance*
- DOE O 422.1, *Conduct of Operations*
- DOE O 471.7, *Controlled Unclassified Information*
- American Society of Mechanical Engineers (ASME) NQA-1-2008, *Quality Assurance Requirements for Nuclear Facility Applications, (with Addenda through 2009)*
- NARA M-19-21, *Transition to Electronic Records*
- NARA M-23-07, *Update to Transition to Electronic Records*

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#### 4.0 RESPONSIBILITIES

##### 4.1 Responsible Managers

- A. Assumes responsibility for all records received, created, or transmitted under their supervision.
- B. Designates Records Custodians to ensure organizational records programs are implemented and maintained in compliance with this procedure.
- C. Ensures all PGDP D&R personnel within their organization/department who create, receive, or transmit records are aware of, and comply with, the requirements of this procedure.
- D. Enforces all storage and maintenance requirements defined in Section 6.5 of this procedure for records generated, received, processed, transmitted, maintained, or stored by PGDP D&R activities and operations.
- E. Ensures that terminating or transferring personnel who create and maintain records perform turnover to an appropriate employee, and notify Records Management (RM) by email of the change before leaving.
- F. Discusses with Records Custodian the transition of custodian responsibilities when the custodian transfers or terminates to ensure a new Records Custodian understands what records they are responsible for, where the records are located, and the current status of the records under their custodianship.

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##### 4.2 Quality Assurance Department

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

##### 4.3 Procurement Department

- A. Ensures 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.
- B. Ensures subcontracts and purchase order records generated and retained by subcontractors or vendors are accessible by authorized personnel.

- C. Ensures 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.
- D. Submits records of subcontracts and/or purchase orders or vendor records to RM at least quarterly, 90 days from generation or 30 days after the quarter.

#### **4.4 Information Technology**

- A. Ensures RM electronic system capabilities are included in all new systems and technical lifecycle refresh for existing systems.
- B. Ensures Information Technology (IT) system inventories are conducted annually and provided to RM.

#### **4.5 Records Custodians**

- A. Completes required training.
- B. Identifies records created and/or received within their organization/department as a result of doing business and documents in the organization/department file plan according to CP3-RD-0014, *Records Identification and File Plan Development*.
- C. Organizes, maintains, and protects records during custody.
- D. Maintains a records storage area access list.
- E. Stores records in a manner that ensures ease of access, retrieval, and control. Storage systems must allow for access according to 36 *CFR* Part 1236.
- F. Transfers email records to RM.
- G. Prepares and submit records at least quarterly, preferred monthly, to the ERMS according to contractual requirements and/or the organization/department file plan to the ERMS.
- H. Ensures records submitted to the ERMS meet the minimum standards of NARA-acceptable electronic formats only. Additional information on NARA-acceptable formats can be found in the ISSC's PGDP-RM-PR-001, *Records Management*.
- I. Discusses with Responsible Manager the transition of custodian responsibilities when transferring or terminating to ensure a new Records Custodian understands what records they are responsible for, where the records are located, and the current status of the records under their custodianship.

#### **4.6 RM Personnel**

- A. Develops and maintains a RM Program consisting of the following:
  - 1. Organization's/department's file plans and Master File Plan for site records.
  - 2. Essential Records Plan and Inventory.
  - 3. Storage in the ERMS.
  - 4. RM awareness through established plant training.
- B. Ensures access to CUI 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 (see [CP1-PM-0005](#), [PGDP-SS-PL-001](#), and [PGDP-SS-PL-002](#) for details).
- C. Develops and implements a disaster recovery procedure to preserve records.
- D. Develops procedures or desktop instructions for handling individual records.

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- E. Conducts RM Program evaluations at least every two years through surveillance or assessment.
- F. Ensures essential records inventories are included in the continuity of operations plan, as required by DOE O 243.1C.
- G. Provides programmatic support to Records Custodians and Records Generators/Originators/Submitters.

**4.7 Technical Writer**

- A. Ensures new or revised procedures specify actions to identify, locate, and submit records to RM.
- B. Submits document history packages to RM at time of completion or at least quarterly, or on a frequency specified by the organization/department file plan.

**4.8 Records Generator/Originator/Submitter and All PGDP D&R Personnel**

- A. Completes training on RM Awareness.
- B. Distinguishes (identifies, segregates, and clearly marks) record from nonrecord material for all media types.
- C. Generates and maintains records according to this procedure and submits to RM at least quarterly, or on a frequency specified by the organization/department file plan.
- D. Ensures access to CUI records is restricted to individuals with an appropriate need-to-know and appropriate access authorization for access in the performance of their job assignments per the CUI type/category (see PGDP-SS-PL-001 for details).
- E. Ensures access to 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 (see CP1-PM-0005, PGDP-SS-PL-001, and PGDP-SS-PL-002 for details).
- F. Retains records according to approved DOE Records Schedules.
- G. Captures email records and transfers to RM at least quarterly.
- H. Ensures 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*.
- I. Ensures records are **NOT** stored on a personal drive or IT service area that is dependent on an individual account for access.
- J. Works with assigned Records Custodian and RM personnel and ensures records are included in the organization/department file plans according to CP3-RD-0014, *Records Identification and File Plan Development*.
- K. Ensures electronic data format is acceptable to and compatible with the ISSC records storage database and NARA.
- L. Identifies record-generating EISs on the organization/department file plan.
- M. Manages EISs according to CP2-RD-0002, *Electronic Information System Requirements*.
- N. Develops a migration plan that describes the process of exporting electronic data from the existing software system or EISs to the ERMS in conjunction with RM and IT.
- O. Uses digital signatures correctly and appropriately.

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P. Ensures original source documents that were scanned are provided to the appropriate Records Custodian for maintaining until the record is accepted in the ERMS. This is required to confirm that digitization requirements under [36 CFR § 1236.34, Validating Digitization](#), have been met.

Q. Authenticates QA Records once complete.

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## 5.0 GENERAL INFORMATION

5.1 Records from classifiable subject areas must be reviewed by a DC. Due to the plant's dynamic environment, area DCs should be contacted for clarification and direction regarding potential areas of concern and how to generate a non-classified record. A list of DCs can be found on the PGDP D&R Contractor Intranet.

5.2 If the record must be generated as classified, **then** approved classified information systems and trained authorized personnel must be used. In addition to the records requirements listed in this procedure, classified documents and records are handled according to CP1-PM-0005, *Classification Review Integration Controls for Converter Component Activities and Other Subject Matter Areas*; PGDP-SS-PL-001, *Paducah Gaseous Diffusion Plant Information Security Plan*; and PGDP-SS-PL-002, *Paducah Gaseous Diffusion Plant Classification Program Plan* to ensure that all classified matter protection and control requirements are met.

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5.3 It is the Records Custodian's or Records Generator/Originator/Submitter's responsibility to ensure that a classified record is not submitted in the ERMS. **If** the record is confirmed as classified, **then** contact RM prior to submittal. RM will contact the ISSC to determine the process to handle classified records.

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

5.5 QA records are maintained to furnish documentary evidence that activities or items meet specified quality requirements in Nuclear Quality Assurance-1 (NQA-1). A QA record is designated as lifetime or nonpermanent and is specified on the organization/department file plan. This designation will help determine the appropriate retention period as a quality record. This does **NOT** negate the NARA-approved retention requirements. **If** doubt exists as to whether or **NOT** a record is a QA record, **then** the QA Department should be contacted for guidance. The QA Department provides guidance as to which records will be categorized and handled as quality records and which will be categorized as non-quality records.

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

5.7 Each organization/department is responsible for the receipt control of QA records (i.e., electronic/digital records and hard copy records) within their organization/department. Each organization/department has a Records Custodian who is responsible for receiving QA records within their organization/department. The Records Generator/Originator/Submitter is responsible for controlling a QA record while generating and finalizing a record in the field or office, until it is transferred to the appropriate Records Custodian. The Records Generator/Originator/Submitter is responsible for authenticating a record when finalized, prior to transferring to the appropriate Records Custodian. The Records Custodian is responsible for facilitating the receipt and inspection of authenticated records received from the Records Generator/Originator/Submitter for both electronic/digital records and hard copy records. The Records Custodian is responsible for organizing and implementing receipt control for permanent and temporary storage of QA records within their organization/department. Upon receiving the QA records, the Records Custodian maintains control of the record until it is placed in the ERMS, transferring the record to RM. RM is responsible to manage the record in the ERMS until it is transferred to the ISSC, which is the submittal of the record to storage.

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- 5.8 Records must be submitted to RM at least quarterly, or on a frequency specified by the organization/department file plan. A good practice would be to provide records on a monthly basis upon completion or scanning of the record. This will provide a better flow of records within the organization.
- 5.9 For this procedure, the term PGDP D&R personnel includes all contractor and subcontractor personnel regardless of company affiliation.
- 5.10 Records are generated and maintained according to 36 *CFR*, Chapter XII, Subchapter B, which requires the preservation of recorded information which is evidence of the organization, functions, policies, decisions, procedures, operations, or other activities of value.
- 5.11 The ISSC accepts born digital and digitized electronic records.
- 5.12 Digitization of permanent records, which is covered under [36 CFR Part§ 1236, Subpart E—Digitizing Permanent Federal Records](#), will be implemented according to ISSC procedures.
- 5.13 Records Generators/Originators/Submitters and Records Custodians must create a record that is searchable, meets preflight requirements, and complies with PGDP-RM-TD-002, *Initial Quality Assessment Checklist*.
- 5.14 For records that are born digital, utilize the digitally-created version, if possible, rather than digitizing (scanning) a paper copy of the record.
- 5.15 Ensure electronic forms are designed using software for screen fillable data entry, making them electronically fillable.
- 5.16 Promote fully digital workflows by signing documents with digital signatures rather than wet signatures. Wet signatures must **NOT** be used on records that are born digital. Records that are born digital must be maintained as such through the generation process.
- 5.17 If digital signatures are used within the record, **then** ensure signatures meet requirements found in PGDP-RM-PR-003, *Digital Signatures*, or if requirements are **NOT** met, **then** obtain new signatures.

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## 6.0 INSTRUCTIONS

### 6.1 Records Custodian Designation

#### Director and/or Responsible Manager and/or Designee

- 6.1.1 Assign a Records Custodian for managing organizational/departmental records.
- 6.1.2 Concur by signing CP3-RD-0010-F07, *Records Custodian Designation*.
- 6.1.3 Return the signed form to RM.
- 6.1.4 If the employee who is assigned as a Records Custodian terminates or transfers, **then** complete CP3-RD-0010-F07, identifying a new Records Custodian, and provide to RM.

#### Records Custodian

- 6.1.5 If terminating or transferring, **then** discuss with Responsible Manager the transition of custodian responsibilities.

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- 6.1.6 If terminating or transferring, **then** transfer custodian responsibilities to new Records Custodian appointed by Responsible Manager.

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### RM Personnel

- 6.1.7 Complete the processing of CP3-RD-0010-F07 as follows:
- A. Review form for accuracy and completeness.
  - B. Return to Director and/or Responsible Manager and/or Designee for correction, if necessary.
  - C. Sign the form and return to Director, Responsible Manager, or Designee.
- 6.1.8 Update the Records Custodians email distribution and the organization/department file plans.
- 6.1.9 Provide the designated Records Custodian name to the Training department to assign training modules.
- 6.1.10 Ensure new Records Custodian and the assigning manager know/understand what records they are responsible for, where the records are located, and the current status of the records under custodianship.
- 6.1.11 Perform quarterly comparison of Records Custodian list against the organizational chart to confirm all organizations have a designated Records Custodian, and the custodian has **NOT** taken a different position or been reassigned to ensure coverage for organization's records.
- A. Ensure designation forms are complete.
  - B. Ensure training is assigned and complete.
  - C. Update the Records Custodians email distribution, training assignments, and the organization/department file plans, as necessary.
  - D. **If** a custodian has been reassigned, moved to another position, left organization, and a new custodian has **NOT** been appointed, then RM will request the appropriate Responsible Manager to appoint a replacement by using CP3-RD-0010-F07.

### **Records and Document Administration Manager**

- 6.1.12 Obtain report from Training on the percentage of completed annual RM training.
- 6.1.13 Report a status on training annually to the DOE Records Management Field Office.

### Training

- 6.1.14 **If** training is required, **then** assign required training.

### **6.2 Record Creation**

#### Director and/or Responsible Manager and/or Designee

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

**6.2.2** If legacy materials are identified in facilities maintained by the PGDP D&R Contractor, **then** contact Four Rivers Nuclear Partnership, LLC, RM.

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**RM Personnel**

**6.2.3** Upon the Records and Document Administration Manager requesting and receiving direction from DOE to address legacy records, as required, process the materials according to the appropriate desktop instruction(s).

**PGDP D&R Personnel**

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

**6.2.5** Ensure that to the fullest extent possible all newly-generated records are born digital and remain digital and are text searchable (i.e., OCR). Rescanning or re-digitizing of records that are born digital shall be avoided, if possible.

**6.2.6** Ensure records that are digitized to an acceptable electronic NARA format meet the standards set forth in 36 *CFR* § 1236.32.

- A.** Capture all information contained in the original source records.
- B.** Include all the pages or parts from the original source records.
- C.** Ensure the agency can use the digitized versions for all the purposes the original source records serve, including the ability to attest to transactions and activities.
- D.** Protect against unauthorized deletions, additions, or alterations to the digitized versions.

**6.2.7** Ensure validation of digitized records.

- A.** Ensure digitized version meets 36 *CFR* § 1236.32 standards.
- B.** Upload record into the ERMS to ensure proper access controls.
- C.** Document validation by choosing the appropriate ERMS properties.
- D.** Maintain original source documents/records until acceptance in the ERMS.
- E.** Dispose of temporary source documents/records according to Section **6.13**.

**NOTE:**

Temporary source documents of original source records that are under a litigation hold **CANNOT** be destroyed.

Source documents of permanent records **CANNOT** be destroyed. Disposition/destruction of hard copy permanent records after digitization is considered an unauthorized destruction.

TSR  
5.9.1

**6.2.8** Ensure the following records are retained:

- A.** Records and logs of facility operation
- B.** Records and logs of principal maintenance activities, inspections, repairs, and replacements of principal equipment items related to nuclear safety

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- C. All reportable events/occurrences
- D. Records of surveillance activities, inspections, and calibrations required by TSRs
- E. Records of changes made to procedures
- F. Records and drawing changes reflecting facility design modifications made to systems and equipment described in the Documented Safety Analysis
- G. Records of radiation exposure for all individuals entering radiologically controlled areas
- H. Records of training and qualification for current members of the facility operations staff
- I. Records of Unreviewed Safety Question reviews performed for changes made to procedures or equipment

**6.2.9** In addition to records required to be retained by the TSR, 36 *CFR*, Chapter XII, Subchapter B, requires the preservation of recorded information which is evidence of the organization, functions, policies, decisions, procedures, operations, or other activities of value. Examples include, but are **NOT** limited to, the following:

- A. Correspondence
- B. Routine inspections and maintenance activities including work packages
- C. Characterization data
- D. Sample data packages
- E. Videos
- F. Software quality assurance (SQA) information/forms
- G. Databases or EISs
- H. Photographs
- I. Emails

**6.2.10** Ensure records meet the following requirements:

- A. Accurate, legible, reproducible, and complete.
- B. Capable of producing a legible copy reflecting original quality when reproduced or printed from electronic media.
- C. Contain an identifying number (i.e., document identification number), if applicable.
- D. 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.
- E. For electronic records that have been digitized (i.e., scanned).
  - 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.

- Minimize notes or comments of nonrecord information on records. Use routing slips or other devices that can be attached without defacing the record material for nonrecord information.
  - Ensure data is entered, and signatures and dates are completed with indelible 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.
- F. Review **and** evaluate record and information it contains to determine if from a classifiable subject area.
- G. If record is from a classifiable subject area, then ensure review by a DC.

NOTE:

A DC review is **NOT** required for documents that do **NOT** contain information in a classifiable subject area. It is the record submitter's responsibility to ensure that a classified record is **NOT** submitted in the ERMS. If a DC determines record contains classified information, **then** RM personnel must be contacted for processing requirements **and** this procedure exited. CP1-PM-0005, *Classification Review Integration Controls for Converter Component Activities and Other Subject Matter Areas* contains additional information.

- H. Mark records containing CUI according to PGDP-SS-PL-001, *Paducah Gaseous Diffusion Plant Information Security Plan*.
- I. If a DC review has been documented on PGDP-SS-FO-001, *Paducah Site Derivative Classifier Review Request Form*, **then** include this with the record.
- J. Ensure that records are complete and approved.
- K. Ensure digital signatures are retained in the record, either live or flat, and have **NOT** been removed during processing as required in PGDP-RM-PR-003, *Digital Signatures*. Records containing digital signatures can be flattened by printing to a PDF, allowing the signature to be easily retained in the record when combined with other records.

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NOTE:

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

- 6.2.11 If records are QA records, **then** perform the following:
- A. Ensure records are traceable to systems, processes, components, or activities involved.
  - B. Ensure records are authenticated—initialed or signed and dated by Records Generator/Originator/Submitter prior to forwarding to Records Custodian and RM. If a line designated for a signature does **NOT** require a signature or a section on the QA record is blank, **then** place “N/A” on the signature line or place a “Z” line and initials across the blank section.

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**Records Custodian and/or Designee**

- C. Receive QA records from the Records Generator/Originator/Submitter.

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- D. Inspect and ensure QA records are authenticated and complete. **If** a line designated for a signature does **NOT** require a signature or a section on the QA record is blank, **then** ensure “N/A” is placed on the line by the Records Generator/Originator/Submitter or ensure a “Z” line and initials of the Records Generator/Originator/Submitter, respectively.

**PGDP D&R Personnel**

**6.2.12** If creating or maintaining records in an EIS, **then** perform the following:

- A. Identify the record from the EIS on the organization/department file plan.
- B. Ensure electronic data format is acceptable to and compatible with the ISSC records storage database and NARA.

**6.2.13** Export records from the EIS and submit to the Records Custodian for processing.

**If** records (reports or electronic forms) are **NOT** being exported from the EIS and submitted to RM, **then** develop a migration plan that describes the process of exporting electronic data from the existing software system or EISs to the ERMS in conjunction with RM and IT.

**6.2.14** 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 pages, blank pages, and nonrecord material then transfer paper records to Records Custodian or designee according to 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:  
The Records Generator/Originator/Submitter of the record must verify that the electronic scan of paper files is representative of the original. 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/department file plan must be scanned using lossless compression.

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

- A. Output media must be neutral portable document format (pdf) file.
- B. Digitizing must be performed at a minimum of:
  1. 300 dots per inch (dpi) at a minimum,
  2. 400 dpi for documents of inferior legibility, or
  3. 600 dpi for black and white of inferior quality.

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- C. If scanning a permanent record, **then** use a lossless compression technique.
  - D. Ensure digitized electronic records include OCR. If scanning does **NOT** include OCR, **then** perform OCR on document in Adobe once scanned.
    - 1. All pages of original paper-record must be scanned.
    - 2. Global scan can be used to perform OCR and is available on most networked copiers or at \\drmGSNX001\Scans. A desktop instruction on global scan can be obtained from RM.
    - 3. An [Uploading Records Checklist](#) is also available to use to assist with digitizing.
- 6.3.4 If records contain CUI, **then** properly mark according to PGDP-SS-PL-001, *Paducah Gaseous Diffusion Plant Information Security Plan*.
- 6.3.5 Store files in designated electronic folder that is **NOT** on a personal drive or IT service area that is dependent on an individual account for access.
- 6.3.6 Perform a quality check of the files by comparing the paper records to the pending electronic files. The quality check must comply with PGDP-RM-TD-002, *Initial Quality Assessment Checklist* and includes the following:
- A. OCR process
  - B. Verification of scanning resolution using preflight or other method
  - C. Clear and legible text and markings
  - D. Illegible text should be marked as “poor quality original” in the top right corner or as close as possible avoiding covering text
  - E. If text is overlapping or covered in some way and **CANNOT** be corrected using the edit feature, **then** when importing add this note: “TEXT OVERLAPPING ON MULTIPLE PAGES” to the Notes section of the record properties
  - F. Pages rotated correctly
  - G. Appropriate classification and markings
  - H. Removal of security settings and passwords
  - I. Lossless file compression technique **if** permanent records (**NOT** lossy)
  - J. Page count verification ensuring all pages, including both sides of 2-sided originals, are scanned
- 6.3.7 Maintain records according to Section 6.5 and submit the digitized record to RM, at least quarterly, or on a frequency specified by the organization/department file plan, according to Section 6.8.
- 6.3.8 Maintain paper source records until notified by the ISSC that the record has been accepted and provide original source documents to RM, upon request.



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- 6.3.9 Dispose of original source documents according to Section 6.13, once the records have been accepted by ISSC RM.

## 6.4 Record Correction

### PGDP D&R Personnel

#### NOTES:

For making corrections to a record, the Records Generator/Originator/Submitter should make the corrections to the record copy. In the event the Records Generator/Originator/Submitter is **NOT** reasonably available, the record may be corrected by personnel knowledgeable of the activity.

Correction tape or whiteout fluid shall **NOT** be used to correct in-process documents. **NO** one should make corrections to a record unless authorized by the Records Generator/Originator/Submitter of the document/record.

Corrections to documents will occur as revisions to the document and must use the document process as required under CP3-OP-0025 for controlled documents or CP3-EM-1015 for documents or reports submitted to outside agencies or issued for internally use.

#### 6.4.1 If a document/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 TSR systems, **then** add a comment explaining the reason for the correction, sign, and date the comment.

#### 6.4.2 If document/record was previously submitted to RM, **then**

- A. Request a record copy 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. Upon submission to RM, indicate this is a revised record and reference the original record.

## 6.5 Storage and Maintenance of Records

### Director and/or Responsible Managers

#### NOTES:

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 the organization's on-going project records. Consider the following:

- A. Potential for a catastrophic event at the storage location
- B. Potential for damage from rodents or other pests
- C. Ability, or lack thereof, to reproduce or replace lost or damaged records (one-of-a-kind)
- D. Potential impact of lost or damaged records (safety, operations, cost, schedule, legal, license, permits, etc.
- E. Potential damage from heat, cold, humidity, or mold
- F. 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:

- A. Separate personal papers and nonrecord items from documents designated to become records and ensure records are clearly marked as records.
- B. Ensure federal records are **NOT** stored on a personal drive or IT service area dependent on an individual account for access.
- C. Collect and organize records as they are completed, and ensure the applicable organization/department file plan is updated and maintained to expedite retrieval.
- D. 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.
- E. Store/secure records containing CUI according to PGDP-SS-PL-001, *Paducah Gaseous Diffusion Plant Information Security Plan*.
- F. Place in locked or controlled access area.
- G. Establish access control of records to prevent unauthorized use, disclosure, theft, or destruction.
- H. Post 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.

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

NOTE:

Privacy Act records are CUI and may be in any media.

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

- A. Ensure records are marked as CUI by designating as Privacy Act records according to PGDP-SS-PL-001, *Paducah Gaseous Diffusion Plant Information Security Plan*.
- B. Maintain proper access control.

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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.

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

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**NOTE:**

PGDP D&R Contractor does **NOT** have on-site record storage facilities that meet NQA-1 single facility storage requirements (e.g., 2-hour fire rated storage containers). PGDP D&R Contractor has one-hour fire-rated cabinets.

- Use two-hour fire-rated cabinet, plus adequate smoke detection or fire suppression systems.
- OR
- Maintain duplicate information on other media and store in a separate location or the network in an area that contains the same access controls as the paper and is backed-up daily. Access controls continue to apply to the electronically stored record.
- Text Deleted
- For temporary storage, store records in a one-hour rated cabinet, plus adequate smoke detection or fire suppression systems and reasonable safeguards against theft, water damage, rodent or insect infiltration, or floods.

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**RM Personnel**

- 6.5.6** Store records within the approved ERMS.
- 6.5.7** Confirm the ERMS and temporary storage drives are backed up by the ISSC as needed to ensure continuity of operations.

**6.6 Nonrecord Material**

**PGDP D&R Personnel**

- 6.6.1** Consider documents or materials that do **NOT** meet the definition of record as nonrecord material.
- 6.6.2** Maintain nonrecord material as needed in working files **and** ensure records and nonrecords are **NOT** intermingled.
- 6.6.3** Ensure copies of records are marked appropriately as convenience copies.
- 6.6.4** Dispose of unneeded nonrecord material promptly and according to content sensitivity and in a manner appropriate for its sensitivity.

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## 6.7 Contaminated, Damaged, or Missing Records

### PGDP D&R Personnel

**NOTE:**

Hard copy 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** perform the following:
- A.** Based on the type of contamination, request Radiation Protection and/or Industrial Hygiene, to survey records and provide direction for handling.
  - B.** If record is contaminated and assistance is needed to process, **then** contact the Records and Document Administration Manager.
- 6.7.2** If a record has been damaged while in the custody of the organization, **then** perform the following:
- 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, **then** contact RM for assistance with restoration or reconstruction.
  - C.** If the damaged record is electronic, **then** contact IT to see if the record can be opened or retrieved (e.g., from backup tapes).
  - 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*, 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 Submittal to RM**

NOTES:

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

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

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

- 6.8.1 Segregate and submit records to RM, at least quarterly, or according to the organization/department file plan, which specifies record type and file transfer instructions.
- 6.8.2 **If** submitting email records, **then**
  - A. Remove any passwords or Entrust certificates.
  - B. Expand any distribution lists so that all recipients' names are visible.
  - C. Transfer email records to the appropriate organizational folder at [S:\FRNP Records Transmittals](#).

**RM Personnel**

- 6.8.3 Upload email records according to PGDP-RM-IN-004, *Processing Email Records*.

**Records Custodian**

NOTE:

Upon submittal of the records into the ERMS, the Records Custodian is attesting that the records are complete, have been authenticated as applicable, and the requirements of this procedure have been met.

- 6.8.4 Ensure record being submitted to the ERMS meets the requirements listed in PGDP-RM-TD-002, *Initial Quality Assessment Checklist*.
- 6.8.5 Submit record to ERMS according to PGDP-RM-IN-001, *General User Submitting Records*, and PGDP-RM-IN-005, *Photograph Processing*, and if necessary, contact RM for assistance processing the record into the ERMS.

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NOTE:

**If** the content type and item selection chosen do **NOT** match the records submittal reference sheet, **then** the record will **NOT** load to the correct DOE Records Schedule. Do **NOT** choose anything different than what is presented on the records submittal reference sheet for the record being submitted from your organization. Other content types and items selections are available, but they **WILL NOT** work for records from your organization or they will result in incorrect retentions, properties, and dispositions. The records submittal reference sheet contains choices for loading records for the D&R Contractor as well as other DOE contractors. Selecting a choice **NOT** on the D&R Contractor's records submittal reference sheet will cause a failure of the record to load.

- A. Utilize the records submittal reference sheet to select the content type and item selection for each record type.
- B. Complete properties for each record correctly and accurately utilizing PGDP-RM-TD-003, *Property Dictionary for SharePoint/Gimmel Compliance Suite*.

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- C. Designate QA records as either lifetime QA (i.e., QL) or nonpermanent QA (i.e., QN) as specified on the organization/department file plan.
- D. Ensure records consisting of both born digital and digitized follow a 50% rule in determining record digital status. Exemptions from this requirement must have approval from the ISSC Director of Records Management and Document Control.

- 1. Less than 50% digitized, mark ERMS properties as born digital.
- 2. More than 50% digitized, mark ERMS properties as digitized.

**6.8.6** At the request of RM, perform corrections to submitted records within one week of the request.

**6.8.7** Maintain the record media until ISSC verifies acceptance of the records and notifies the Records Custodian or Records Generator/Originator/Submitter.

## **6.9 Electronic Information Systems**

### **PGDP D&R Personnel**

- 6.9.1** Ensure new and retired EISs are reported to RM, IT, and SQA.
- 6.9.2** Ensure records generated by an EIS **NOT** identified on the organization/department file plan are reported to RM, IT and SQA.
- 6.9.3** Ensure newly generated spreadsheets utilized to track information are reported to RM, IT, and SQA.
- 6.9.4** Complete CP2-RD-0002-F01 and associated forms when notified of new EISs.

### **RM Personnel**

- 6.9.5** Update the organization/department file plan if the EIS changes affect record status.

## **6.10 Record Receipt, Verification, and Indexing**

### **RM Personnel**

- 6.10.1** Make assignments and process work flows as required under PGDP-RM-IN-002, *Performing Initial Quality Checks on Records*.
- 6.10.2** Review the submitted record file **and** ensure the following:
  - A.** The content type and item selection is selected correctly.
  - B.** Properties entered for the record correctly and accurately describe the record.
  - C.** Records are being transferred according to transfer instructions listed on the organization/department file plan.
  - D.** The file when reproduced will produce a legible copy reflecting original quality.
  - E.** Records presented in scanned files are in good repair without torn pages or missing pages and have the same DOE Records Schedule and disposition date.
  - F.** Record title is identified and acronyms used in the properties are defined.
  - G.** 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.

- H. Forms have **NOT** been altered, and/or information has **NOT** been “whited-out” to create a copy of an approved form.
- I. Records identified as containing CUI are marked according to PGDP-SS-PL-001, *Paducah Gaseous Diffusion Plant Information Security Plan*.
- J. Scanning requirements are met. (Born digital records do **NOT** have to be checked for preflight.)
- K. Ensure digital signatures are retained in the record, either live or flat, and have **NOT** been removed during processing as required in PGDP-RM-PR-003, *Digital Signatures*.

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**6.10.3** If there is a discrepancy **or** quality concern with the record that **CANNOT** be corrected by RM personnel, **then** contact the Records Custodian, provide detailed instructions on the discrepancy or concern, **and** return the record to the Records Custodian for correction according to PGDP-RM-IN-001, *General User Submitting Records*.

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

**6.10.4** Make any necessary corrections to the record, and if corrections are unable to be made, adequately document the reason for the discrepancy (for example, mark the record as “poor quality original,” or similar wording, as applicable).

**RM Personnel**

**6.10.5** Ensure reason for discrepancy is adequately noted in the ERMS.

**6.10.6** Complete record review for quality requirements and accurate record description. **After** conditions are met, **then** approve record.

**NOTE:**

Each record is transferred automatically to the ISSC for statistical sampling following RM approval of the record in the ERMS.

- 6.10.7** Before the end of the month, perform a quality check (Step **6.10.2**) of select records prior to automatic transfer of the record to the ISSC.
- 6.10.8** At the end of the month, notify the ISSC of the number of records being transferred.
- 6.10.9** On an annual basis, review event-driven records according to the desktop instruction to ensure project end dates, permit expiration dates, status updates, etc., have been provided so the records can be dispositioned according to the assigned DOE Records Schedule and provide this information to the ISSC.
  - A. Maintain event-driven records together to ensure proper disposition.
  - B. Identify project name, as applicable, to aid in future retrieval of the records.

**RM Custodian**

**6.10.10** **When** requested by ISSC, **then** provide original source documents for image quality statistical sampling according to ISSC’s sampling plan. The assessment consists of those checks identified in Step **6.3.6** or **6.10.2**.

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### RM Personnel

- 6.10.11 Assist the ISSC with the quality statistical sampling according to the ISSC's sample plan.

## 6.11 Access and Retrieval from Records Storage Area and the Electronic Records Management System

### RM Personnel

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

### Contractor or Vendors

- 6.11.2 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

- 6.11.3 Request records from the ERMS from RM by emailing [FRNPRRecordsManagement@pad.pppo.gov](mailto:FRNPRRecordsManagement@pad.pppo.gov).
- 6.11.4 Request records from the ERMS from the ISSC by completing ISSC form PGDP-RM-FO-002, *Records Request Form*, including as much information about the requested record as possible **and** emailing the applicable information to [pad.rmc@pad.pppo.gov](mailto:pad.rmc@pad.pppo.gov).
- 6.11.5 Request access to search for records by completing ISSC form PGDP-RM-FO-003, *Infrastructure Support Services Contractor Electronic Records Management System Use Policy*. Once approval for access to the ERMS is received, perform searches for records according to PGDP-RM-TD-001, *Search Tools for the ISSC Electronic Records Management System*.

## 6.12 Disposition of Records Past Retention

### NOTE:

Disposition authority is designated to the ISSC. The D&R Contractor does **NOT** have authority to disposition or destroy records.

### RM Personnel

- 6.12.1 If submitted record is determined to be past record's retention time, **then** initiate ISSC form PGDP-RM-FO-001, *Records Destruction Authorization-Certificate*, submit the completed form to the ISSC, **and** coordinate its disposition with ISSC.
- 6.12.2 If record was imported into the ERMS, **then** document on deletion log and remove from ERMS.

## 6.13 Process for Shredding Material through ISSC Disintegration (Shred) Request

- 6.13.1 Determine if material to be destroyed is nonrecord or temporary source documents. Permanent source documents **CANNOT** be destroyed.
- 6.13.2 Determine if a litigation hold applies to any temporary source documents. **If YES, then** documents **CANNOT** be destroyed.
- 6.13.3 Arrange for Radiation Protection to make a determination regarding potential contamination if material is from potentially contaminated areas or if unsure of potential contamination.



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**6.13.4** Complete ISSC form PGDP-RM-FO-010, *Paducah Gaseous Diffusion Plant Site Disintegration (Shred) Request*, and email to [pad.rmc@pad.pppo.gov](mailto:pad.rmc@pad.pppo.gov).

**6.13.5** **If** a radiological survey was performed, **then** attach documentation to ISSC form PGDP-RM-FO-010 prior to sending.

**6.13.6** **After** ISSC RM approval and confirmation date and time received, **then** take material to the C-106 Disintegrator Facility.

## **7.0 RECORDS**

### **7.1 Records Generated**

The following records may be generated by this procedure:

- CP3-RD-0010-F07, *Records Custodian Designation*
- Text Deleted
- PGDP-RM-FO-001, *Records Destruction Authorization-Certificate*

### **7.2 Records Disposition**

The records are to be maintained according to this procedure.

## **Appendix A – Acronyms/Definitions**

### **ACRONYMS**

**AR** – Administrative Record

**ASME** – American Society of Mechanical Engineers

**CFR** – *Code of Federal Regulations*

**CUI** – Controlled Unclassified Information

**D&R** – Deactivation and Remediation

**DC** – Derivative Classifier

**dpi** – dots per inch

**EIS** – electronic information system

**ERMS** – electronic records management system

**ISSC** – Infrastructure Support Services Contractor

**IT** – Information Technology

**NARA** – National Archives and Records Administration

**NCS** – Nuclear Criticality Safety

**NQA-1** – Nuclear Quality Assurance-1

**OCR** – Optical Character Recognition

**PDF** – Portable Document Format

**PGDP** – Paducah Gaseous Diffusion Plant

**QA** – Quality Assurance

**RM** – Records Management

**SQA** – Software Quality Assurance

**TSR** – Technical Safety Requirements

**U.S.C.** – *United States Code*

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## Appendix A – Acronyms/Definitions (Continued)

### DEFINITIONS

**Active Records** – Records that continue to be used with sufficient frequency to justify keeping them in the office of creation; current records. A record (both hardcopy and electronic) which is still actively being used by the Records Generator/Originator/Submitter (taken from NARA Records Management Key Terms and Acronyms).

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**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 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.

**Born Digital Record** – Records originated in digital form, rather than being converted from analog or scanned from print.

**Classifiable Subject Area** – A subject area for which classification guidance is issued. [See CP1-PM-0005 and PGDP-SS-PL-002 for additional information]. Information related, but **NOT** limited to, gaseous diffusion technology, production processes, or Safeguards and Security.

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**Controlled Unclassified Information (CUI)** – Information the Government creates or possesses or that an entity creates or possesses for or on behalf of the Government, that laws, regulations, or Government-wide policies requires or permits an agency to handle using safeguarding or dissemination controls. CUI does **NOT** include classified information or information a non-executive branch entity possesses and maintains in its own systems that did **NOT** come from, or was **NOT** created or possessed by or for, an executive branch agency or an entity acting for an agency. CUI categories are approved by NARA and are published in the CUI Registry. For information to be identified as CUI, it must be designated as either of the two types of CUI: CUI Basic or CUI Specified. Document types commonly used as CUI Specified include Unclassified Controlled Nuclear Information (e.g., UCNI), Privacy Information, Export Controlled Information, and Unclassified Naval Nuclear Propulsion Information.

**Correction** – An additional record entry to rectify erroneous recorded information. For making corrections to a record, the Records Generator/Originator/Submitter makes corrections to the record copy. Corrections to documents will occur as revisions to the document and must use the document process as required under CP3-OP-0025 for controlled documents or CP3-EM-1015 for documents or reports submitted to outside agencies or issued for internally use.

**Digital Signatures** – A digital signature is a mathematical scheme for verifying the authenticity of digital messages or documents. A valid digital signature, where the prerequisites are satisfied, gives a recipient very strong reason to believe that the message was created by a known sender (authentication), and that the message was **NOT** altered in transit (integrity). See also **Electronic Signatures**.

**Digitized Record** – A record that has been converted or scanned into a digital form that can be processed by a computer.

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## Appendix A – Acronyms/Definitions (Continued)

**Discrepancy** – A deviation between the statement of contents of a record as described 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 NARA, and destruction.

**Electronic Information System (EIS)** – An information system that contains and provides access to computerized federal records and other information (36 *CFR* § 1236.2). This definition includes databases, applications, and systems.

**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.

**Electronic Signatures** – The terms ‘electronic signature’ and ‘digital signature’ are often used interchangeably, but they are in fact different. An electronic signature is an electronic symbol (image) attached to a contract or other electronic record, used by a person with an intent to sign. In contrast, digital signatures guarantee that an electronic record is authentic. When a document is signed with a digital signature, the signature links a ‘fingerprint’ of the document with the signee's identity. The ‘fingerprint’ is permanently embedded into the document, and the document will detect any changes made to it after it has been digitally signed.

**Essential Records (Previously called Vital/Essential)** – 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). The preferred terminology by DOE is essential records.

**Emergency-Operating Records** – 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** – 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.

**Event-Driven or Event-Based Record** – A record that requires an event to occur to “start the retention clock.” Once the clock starts, it is possible to calculate the record’s eligible disposition date. Examples of PGDP D&R Contractor event-driven or event-based records include, but are **NOT** limited to, equipment records, permit records, project records, procedures, plans, and documents. Such records may be event-driven by revision, deletion, or replacement (e.g., procedures, plans, policies, and safety analyses). These records primarily are generated and maintained in electronic format only. Once the event occurs (i.e., or are superseded by another record), the PGDP D&R Contractor will notify the ISSC to apply the appropriate cutoff and disposition dates to the record.

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### Appendix A – Acronyms/Definitions (Continued)

**File Plan** – Comprehensive outline that includes the file code (which is the DOE Records Schedule), file organization, active file locations, file arrangement, file transfer instructions, and other specific instructions that provide guidance for effective management of records, including essential records, within an organization/department. The Master File Plan includes this information as well as file retention and disposition instructions.

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**In-Process Document/Record** – A document/record 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 Records** – Records that are **NO** longer used in the day-to-day course of business, but that may be preserved and occasionally used for legal, historical, or operational purposes; therefore, inactive records are dispositioned according to an approved DOE Records Schedule and stored for authorized retention periods. Records are cutoff and segregated from active to inactive according to the Master File Plan. Many times, records become inactive when they reach their cutoff dates as defined on a DOE Records Schedule.

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

**Lifetime QA Records** – Records that meet one or more of the following criteria: (a) significant value in demonstrating capability for safe operation; (b) significant value in maintaining, reworking, repairing, replacing, or modifying an item; (c) significant value in determining the cause of an accident or malfunction of an item; or (d) provides required baseline data for in service inspections. Lifetime QA records are required to be maintained for the life of the item. These are denoted on the file plan as “QL.”

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**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.

**Lossy Compression** – Data compressed using a file compression technique (lossy) results in the loss of information. The decompressed data will **NOT** be identical to the original uncompressed data.

**Non-Permanent QA Records** – QA Records required to show evidence that an activity was performed according to 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 QA records shall be maintained for the identified retention period. These are denoted on the file plan as “QN.”

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**Nonrecord Material** – Informational material excluded from the legal definition for record material which includes extra copies of documents retained for the convenience of reference (i.e., convenience copies), publications stocks and processed documents, and library or museum materials intended solely for reference or exhibition.

**Permanent Record** – Records that document for posterity the rights of American citizens, the actions of federal officials, and the national experience. Some examples of permanent records include hazardous waste handling records, and landfill operation records, and radiation protection records, organizational charts and formal minutes of meetings (as determined by the DOE Records Schedules), legal opinions and comments on legislation, formal directives, public affairs speeches, certain photographs and film recordings, news releases, selected project files for precedent-setting events and policies, unique happenings, and events/things that have widespread coverage in the press. All records that are **NOT** yet scheduled must be handled as if they were permanent.

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### Appendix A – Acronyms/Definitions (Continued)

**Privacy Act Records** – Records that fall under the jurisdiction of 10 *CFR* Part 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/department file plan and are classified as either “Lifetime” or “Nonpermanent.”

**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 Schedule or File Code** – 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** – The official copy of a record that is retained for legal, operational, or historical purposes.

**Records Custodian** – Person appointed to maintain an organization’s unit records and to ensure that information is managed according to RM procedures. They are responsible to administratively control the records of all assigned personnel within the organization unit.

**Records Generator/Originator/Submitter** – A person who is responsible for maintaining records within his/her personal workspace. The Records Generator/Originator/Submitter may be multiple personnel since a record is usually generated by more than one person during the creation process. All records in the possession of a Records Generator/Originator/Submitter are administratively managed by a Records Custodian. Anyone in the organization who completes a record either digitally by creating an electronic file or completing a fillable form; or manually using pen and paper and digitizing/scanning the files. A Record Generator/Originator/Submitter of classified documents must, in all cases, have appropriate access authorization and need to know of the information.

**Record Package** – A collection of documents supporting one activity or subject 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 (RM)** – 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.

**Records Schedule or File Code** – The 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.

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### **Appendix A – Acronyms/Definitions (Continued)**

**Records Storage Area** – Location or repository approved to store records.

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

**Separate** – For dual facility NQA-1 record storage, this refers to sufficient remoteness from each storage area to eliminate the chance exposure of a simultaneous damaging hazard (e.g., earthquake, fire, or tornado) for probable occurrence.

**Source Document/Record** – Also known as “Original Source Record.” The hard copy record that has been digitized, submitted, and accepted into the ERMS. Temporary source documents/records may be destroyed after acceptance into the ERMS if there is **NO** litigation hold applied. Permanent source documents/records **CANNOT** be destroyed.

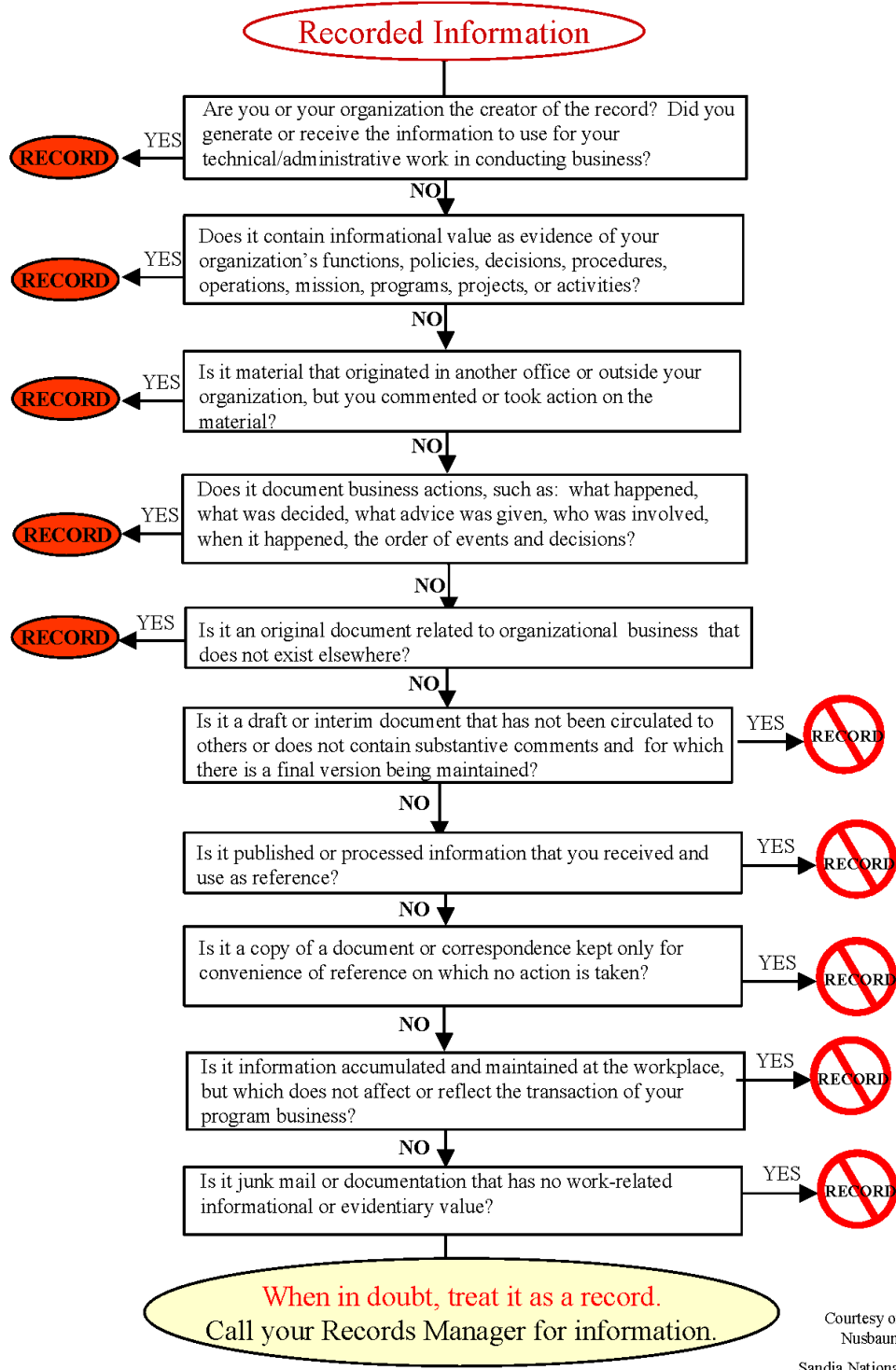
**Temporary Records** – Records retained for a specific amount of time to support the agency’s work. They are approved by NARA for destruction either immediately or after a specified retention period.

**Temporary Records Storage Area (On-Site)** – The process of maintaining records for processing, review, or use. Refer to Appendix C of CP2-RD-0001 for on-site records storage media requirements for temporary storage of records on-site.

**Volume** – The amount of space occupied by the records is expressed in cubic feet rather than in linear feet or any other measurement, except electronic which are measured by megabyte (MB), gigabyte (GB), etc.

### Appendix B – Is It A Record?

## Is It A Record?



Note: For a graphic on “Is it a Quality Record,” refer to CP2-RD-0001, *Records Management Plan for the Paducah Gaseous Diffusion Plant, Paducah, Kentucky*, Appendix B.



**CP3-RD-0010-F07 – Records Custodian Designation**

<input type="checkbox"/>	<b>New Records Custodian</b>
<i>Name:</i>	
<i>Organization/Department:</i>	
<i>Location:</i>	
<i>Phone:</i>	
<b>Removal of Records Custodian</b> <i>If removing Records Custodian and no Backup Records Custodian is listed on the organization/department file plan, provide the replacing Record Custodian information above.</i>	
<input type="checkbox"/>	<i>Remove Records Custodian</i> <i>Name:</i>
Comments/Notes:	

<b>Approvals</b>	
Records Custodian:  <hr/> Print Name	<hr/> Signature and Date
Manager:  <hr/> Print Name	<hr/> Signature and Date
Records Management Acknowledgement:  <hr/> Print Name	<hr/> Signature and Date

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