



Update on Integrated Source Management Portfolio

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Background:

- Summer 2007, NRC staff prepared an action plan to respond to recommendations from the following:
 - The U.S. Government Accountability Office (GAO) concerning an investigation (see GAO-07-1038T) conducted in Spring 2007 where it was able to obtain a NRC radioactive materials license using false information
 - An NRC Office of the Inspector General audit report dated March 30, 2007, (OIG-07-A-12) concerning the agency's byproduct material security efforts.
 - A Senate staff report "Dirty Bomb Vulnerabilities" released in conjunction with a July 12, 2007, Senate hearing on the GAO investigation.
- The NRC staff provided its proposed "Action Plan to Respond to Recommendations to Address Security Issues in the Materials Program" (known as the GAO Action Plan) to the NRC Commission in SECY-07-0147.
- The Commission approved the proposed Action Plan on September 18, 2007, including recommendation **S-3** of the GAO Action Plan, stating that the staff should:
 - "Establish a web-based License Verification System to ensure that materials can be obtained only in authorized amounts by legitimate users."
- September 29, 2009 SRM (M090903) included direction to staff to work with OAS and CRCPD to consider greatest challenges to include license info in WBL, what could be done to prepare and report to Commission

WBL Work Group Task 1 – Objectives & Results

OBJECTIVES

- Determine the key items listed on licenses that are needed to provide an effective license verification capability.
- Determine the scope of existing license data in the Agreement States and the extent to which the license information identified above is electronically available nationwide.
- Determine whether any license data is not available electronically (e.g., paper copies, microfiche, etc.) or cannot be exported in a manner that can be transmitted electronically to the NRC.

RESULTS

1. License verification can be accomplished if:
 - Recipient holds a valid license
 - License provided is current
 - License authorizes the receipt of form, type and quantity of material
 - Material will be transferred to location indicated on license
2. Working Group identified minimum set of data required to provide an effective license verification capability

Results Continued

3. Survey of AS (22/37 responded) and discussions at 2008/2009 OAS and CRCPD meetings revealed the following challenges:

- **Format Compatibility of Existing Data**
 - Differences in how licenses are written and maintained – amendments in entirety
 - Formats: databases, word processing, spreadsheets, image files, paper
 - Business processes/current systems
- **Legal Issues – Ability to Share Information**
 - Varying state laws on public release of information
 - Release of e-mails
- **Compatibility and Frequency of Data Updates**
 - Analogous to event reporting with Commission direction to make a required program element for compatibility
 - Frequency may impact resources
- **Resource challenges**
 - Limited resources for data entry
 - Resources for care and feeding of 2 systems
 - IT resources not available
 - Dynamic and quickly changing state budget realities – budget cuts and hiring freezes

Task 1 – Summary of Challenges

- Not all States have the minimum set of data readily available in electronic format
- System of fragmented electronic platforms utilized by Agreement States to store and track license information
- Process and Frequency of Data Updates to ensure integrity of data
- Difficult to design a system that can accommodate the different license formats in use by Agreement States and NRC
- Several States have to retrieve information from paper files
- Process of extraction and data migration is both time and resource intensive
- Potential legal issues around sharing information

Integrated Source Management Portfolio (ISMP)

- Overarching Objectives
 - Source Tracking
 - Counterfeiting
 - Possession Limits
- Contract awarded to Lockheed martin in May 2010
- Integrated Source Management Portfolio Consists of:
 - NSTS- National Source Tracking System
 - LVS- License Verification System
 - WBL- Web-Based Licensing

Integrated Source management Portfolio (ISMP)

- NSTS - The objective of the NSTS is to provide an up to date accounting of all Category I and Category II Sources possessed by all NRC and Agreement State licensees.

Integrated Source Management Portfolio (ISMP)

- LVS - The objectives of the LVS initiative are:
 - To enable authorized licensees nationwide to confirm the validity of a licensee seeking to obtain radioactive material and for Category I and Category II licensees to confirm that possession limits are not exceeded
 - To enable authorized government authorities to view specific information on Supplier and Receiver licensees as necessary to verify transfers to radioactive materials
 - To provide the potential users of the system with convenient, robust and secure access to the system via the web

Integrated Source Management Portfolio (ISMP)

- WBL - The objectives of the WBL are:
 - Provide web-based license system for NRC Licensees
 - Provide an up to date repository of all licenses nationwide
 - Provide an avenue for Agreement States to use the same licensing and information platform as the NRC

Moving Forward

- Working Group to examine viability of an image based approach to license verification
- Technical meetings with NRC contractor
- Develop schedule for entire project
- Commission Policy paper on ultimate vision and challenges to success

Summary of Key Challenges For LVS

- Resource intensive project for both NRC and AS
 - Initial efforts
 - Maintenance of license integrity/currency
- Computer Security
- Any one protocol will not satisfy all stakeholders

Conclusion

- Need full Agreement State support and cooperation to successfully achieve National License Verification and meet ISMP objectives

Required Fields

- Licensee Name
- Licensee Mailing Address
- Licensee Authorized Physical Location of Use address
- Licensee Temporary Job Site Authorization
- License Number
- Amendment Number
- License/Amendment Issuance Date
- Radioactive Material(s)/Radionuclide(s) Authorization
- Physical or Chemical Form(s) Authorization
- Possession Limit for each Radionuclide
- License Status

Integrated Source Management Portfolio Fact Sheet

Integrated Source Management Portfolio Consists of:

NSTS- National Source Tracking System
LVS- License Verification System
WBL- Web-Based Licensing

NSTS- The objective of the NSTS is to provide an up to date accounting of all Category 1 and Category 2 Sources possessed by all NRC and Agreement State licensees.

WBL- The objectives of the WBL are:

- Provide web-based license system for NRC Licensees
- Provide an up to date repository of all licenses nationwide
- Provide an avenue for Agreement States to use the same licensing and information platform as the NRC.

LVS- The objectives of the LVS initiative are:

- To enable authorized licensees nationwide to confirm the validity of a licensee seeking to obtain radioactive material and for category 1 and Category 2 licensees to confirm that possession limits are not exceeded.
- To enable authorized government authorities to view specific information on Supplier and Receiver licensees as necessary to verify transfers of radioactive materials.
- To provide the potential users of the system with convenient, robust and secure access to the system via the web.

What ISMP will be able to achieve:

- Provide a method to validate both possession limits and current inventory for Category 1 and Category 2 Sources.
- Provide a method to view or know possession limits for all other Categories of material.
- Provide protection against the ability to counterfeit licenses for all licensee categories if used.
- Provide a platform via WBL for NRC licensees to perform license operation activities.
- Provide a platform for Agreement States to adopt as their online licensing system.
- Support compliance with Part 30 requirements for transfer.
- Supports compliance with proposed Part 37 requirements for category 1 and 2 materials.

What ISMP will not achieve for us:

- Ensure counterfeiting issue is addressed unless it s use is required.
- Ensure that licensees do not exceed possession limits for below Categories 2 material.
- Provide a uniformed set of data for LVS to be automated without fundamental changes in the licensing programs performed both in the NRC regions and A/S.

Challenges:

- Keeping information up to date.
- Can't make A/S adopt WBL as their licensing system
- Information security requirements
- Budget/Resource constraints in the states.

LTS 2.0 will be enhanced and ultimately made that system external facing and web-based (e.g. turn LTS 2.0 into WBL) so NRC licensees may use it to apply for licenses, check license status, request amendments, etc. We would continue to work toward ensuring that if A/S wanted to use WBL for licensing they would be able to do so. We would also stand up a National License Warehouse (NLW) that would receive license images from all the States and from WBL for NRC licenses. The key fields identified for use in license verification by the working group for Category 1 and 2 licenses would be extracted from WBL for NRC and from the NLW for States. The License Verification System (LVS) would be used by licensees (e.g. suppliers) and regulators to check the official license image to ensure it is authentic (i.e. address counterfeiting) and it will query the inventory in NSTS and compare it against the key fields extracted from these licenses to address shopping around. Licensees and regulators will also be able to use LVS to ensure a license is authentic for all licenses and system alerts will be built in to look for suspicious activity within the system (e.g. querying the same license repeatedly in a short period of time).