



RECORDS MANAGEMENT OVERSIGHT
INSPECTION REPORT
2013

Department of Energy
National Nuclear Security Administration

Records Management Practices at the
National Laboratories:
Sandia, Lawrence Livermore, and Los Alamos

NATIONAL ARCHIVES *and* RECORDS ADMINISTRATION

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EXECUTIVE SUMMARY

In 2013, the National Archives and Records Administration (NARA) inspected elements of the records management program at the National Nuclear Security Administration (NNSA) National Laboratories. NARA conducted this effort under the authority granted it by 44 United States Code (U.S.C.) 2904(c)(7) and 2906 to inspect records management programs and practices of Federal agencies. This inspection was prompted by NNSA's low score on the 2011 Records Management Self-Assessment (RMSA)¹, NARA's concerns about the agency's implementation of Nuclear Weapons Records Schedule (NWS-3), and the fact that NARA has not received regular transfers of permanent records from the NNSA laboratories. The overall objective of this inspection was to determine if the records management programs at the NNSA national laboratories are in compliance with regulations under 36 Code of Federal Regulations (CFR) Chapter XII, Subchapter B.

NNSA is a separately organized agency established within the Department of Energy (DOE). NNSA relies on contractors to manage day-to-day site operations and to adhere to Department of Energy policies when operating the laboratories, production plants, and other facilities within the complex. While its enterprise spans national laboratories (Sandia National Laboratories (SNL), Lawrence Livermore National Laboratory (LLNL), and Los Alamos National Laboratory (LANL)), naval atomic power laboratories, manufacturing and experimental sites, and NNSA offices in the United States and around the world, this inspection only involved the three national laboratories. The inspection includes unique findings and recommendations for each of the laboratories as well as more general findings and recommendations regarding the records management programs and practices in place that apply to the laboratories as a whole. The general recommendations relate to NNSA's obstacles in implementing its Nuclear Weapons Records Schedule (NWS-3) and to its lack of a clear method for identification and transfer of permanent records to NARA.

The SNL, LLNL, and LANL laboratories are owned by DOE/NNSA but managed and operated by an extensive network of contractors that must adhere to DOE/NNSA policies. Each laboratory is overseen by a supporting NNSA field office: Sandia Field Office (SFO), Livermore Field Office (LFO), and Los Alamos Field Office (LAFO). While the records management practices of the field offices are beyond the scope of this inspection, the inspection does touch on the interaction between field offices and the laboratories when it comes to implementing records management practices.

¹ Records Management Self-Assessment Reports 2009-2012, National Archives and Records Administration, <http://www.archives.gov/records-mgmt/resources/self-assessment.html>. NNSA scores: 2009: did not respond, 2010: 70 out of 100, 2011: 51 out of 100, and 2012: 76 out of 100. We note that NNSA's score improved on the 2012 RMSA. At the time of the inspection, however, the 2012 results of the RMSA had yet to be published.

The relationship between DOE/NNSA and its contractors is a complex one, and this affects records management policy and practice within the laboratories. NNSA laboratories must apply various DOE administrative and programmatic records schedules for Federal records even as the three laboratories also apply respective corporate records schedules for their respective non-Federal, corporate records. Despite the complexity, for records management programs at the NNSA laboratories to be fully effective there needs to be, in addition to compliance with DOE and NNSA internal records management policies, clear performance goals; an understanding of Federal records management statutes and regulations; familiarity with NARA guidance; and knowledge of generally accepted best practices.

This inspection involved site visits to all three NNSA laboratories where NARA received full cooperation from the Federal and contractor records management staff. NARA visited or had briefings from multiple NNSA program offices at the three NNSA national laboratories. The NARA team also met separately with each of the laboratory's supporting NNSA field office as well as the records management staff at NNSA headquarters in Washington, DC. The candid discussions are appreciated.

SANDIA NATIONAL LABORATORIES (SNL)

SNL has a good developing records management program run by a very small staff. They manage a number of Electronic Document Management Systems (EDMS) and electronic information systems that manage and track engineering drawings and related documents, and have implemented records management processes to efficiently manage the laboratory's records. SNL has established a small archival area that contains historically valuable records, some of which may be permanent Federal records. However, the records management staff relies on voluntary participation in the records management program, and many of the records management services are not being used consistently across the laboratory.

SNL also operates an extensive inactive storage program; however, the storage facilities do not meet Federal regulations. The facilities consist of 12 World War II (WWII) era bomb bunkers that do not provide any climate or environmental controls for maintaining long-term and permanent records including microforms, motion picture films, audio and video tapes, and thousands of magnetic tapes. The records in these facilities are subject to excessive fluctuating temperatures, and the facilities have rodent, insect, and snake problems.

LAWRENCE LIVERMORE NATIONAL LABORATORY (LLNL)

LLNL has a comprehensive records management program run by a small staff. The program is implemented within all of the laboratory's operational programs, with full participation including senior management. The program includes records liaisons assigned to all mission areas that meet regularly and generally ensure that the active records in their areas are maintained properly and that the inactive records are shipped to, and stored in, the LLNL records centers. Electronic records are being maintained and tracked in one of the electronic document management systems. These include the Nuclear Weapons Program Document Management System for nuclear weapons records and the Enterprise Configuration Management System for engineering records.

Records management training is part of the organization's new employee training and awareness program. Records management training is mandatory for individuals in positions that are identified as responsible for records and voluntary for all others. The records management program staff is working closely with Information Technology (IT) staff to establish an integrated document management system which will unify administrative records under one content management system. At the time of inspection, the records retention module was not in place, but plans to develop it are included in the overall project plan.

LOS ALAMOS NATIONAL LABORATORY (LANL)

LANL has a solid, comprehensive records management program under control of the Information Resource Management (IRM) Division. Since 2007 LANL has been working to improve how it manages its records as outlined in the Records Management Program Development Timeline on page 7 of this report. The centerpiece of this project has been Information Resource Management's success in centralizing control of records through a program of deploying or embedding records management personnel within all operational programs. LANL implemented a Site-Wide Electronic Document Management System (EDMS) and is working on an Electronic Records Management System (ERMS) project plan to address electronic records management.

LANL maintains a NARA-approved records storage facility. Since 2007 there has been an effort to ensure that inactive records are transferred to the records storage center. Over the years as projects and programs terminated, records were often left in whatever facility they happen to reside in. The LANL Information and Records Management staff has worked with programs to identify these records and transfer them to the records center.

FINDINGS AND RECOMMENDATIONS

This report contains 20 findings and makes 26 recommendations. The main concerns which apply to all three of the laboratories include:

1. Lack of an implementable Nuclear Weapons Records Schedule (NWS-3),
2. Lack of procedures to clearly identify when records are no longer needed across the weapons complex, and
3. Lack of a clear method to identify and transfer permanent records.

A complete list of findings and recommendations is included as Appendix C.

To ensure completion of the recommendations, as part of the inspection process, NNSA will be required to develop a Plan of Corrective Action (PoCA) that specifies how the agency will address each report recommendation, including a timeline for completion of the corrective action(s) for each recommendation. NARA will analyze the proposed remedial actions and work with NNSA to ensure the adequacy of its PoCA. Upon approval of the PoCA, NARA looks forward to continuing a cooperative relationship with NNSA and assisting with the implementation of the recommendations.

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**DEPARTMENT OF ENERGY
NATIONAL NUCLEAR SECURITY ADMINISTRATION
RECORDS MANAGEMENT PRACTICES
AT THE NATIONAL LABORATORIES:
SANDIA, LAWRENCE LIVERMORE, AND LOS ALAMOS**

INSPECTION REPORT

INTRODUCTION

BACKGROUND

The National Nuclear Security Administration was established by Congress in 2000 as a separately organized agency within the U.S. Department of Energy. NNSA is a government-owned/contractor-operated agency with highly visible and historically significant scientific research and development programs. Its main responsibility is the management and security of the nation's nuclear weapons, nuclear nonproliferation and naval reactor programs. The centerpiece of these activities is the nuclear weapons development and nuclear weapons stewardship program. The three national laboratories -- Sandia National Laboratories, Lawrence Livermore National Laboratory, and Los Alamos National Laboratory -- are responsible for the development, management, and stewardship of the nation's nuclear weapons.

In 2002 NNSA reorganized, removing a layer of management by eliminating its regional operations offices in New Mexico, California, and Nevada. Contract and project management oversight responsibility for NNSA's laboratories, plants, and special facilities was given to the site (now field) offices. NNSA headquarters retained responsibility for strategic and program planning, budgeting and oversight of research and development, and nonproliferation activities. NNSA relies on contractors to manage day-to-day site operations who are required to adhere to DOE/NNSA policies when operating the laboratories, production plants, and other facilities within the complex. Together, the facilities implement NNSA's all-encompassing Stockpile Stewardship program that includes operations associated with surveillance, assessment, maintenance, refurbishment, manufacture and dismantlement of the nuclear weapons stockpile, as well as research and development and certification efforts.

The nuclear weapons complex includes: Sandia National Laboratories, Lawrence Livermore National Laboratory, Los Alamos National Laboratory, Pantex Plant, Kansas City Plant, Y-12 National Security Complex, Savannah River Site, and Nevada National Security Site (Nevada Test Site), and the supporting NNSA field offices. This inspection only involved: Sandia National Laboratories, Lawrence Livermore National Laboratory, and Los Alamos National Laboratory.

The scientific research conducted by NNSA national laboratories is uniquely valuable in the development and maintenance of nuclear capabilities. The records of this research also serve to document the history of such subjects as the Manhattan Engineer District (Manhattan Project), stockpile stewardship, and nuclear weapons testing. The scientific research value of these records

has increased in recent years for two reasons: advancements in technologies that have enhanced what can be derived from older nuclear testing data and the test ban treaties that have eliminated NNSA's ability to conduct further underground testing, so scientists are heavily reliant upon the data from past tests. In fact, NNSA has a perpetual business need for much of its nuclear weapons program data. The historic accomplishments at each of the laboratories also make their records of vital importance in documenting the national experience, and laboratory records are of considerable interest to historians, journalists, and others.

The management of these important records is somewhat complicated by the management structure of the laboratories. In addition to compliance with DOE and NNSA internal records management policies and performance goals, there needs to be an understanding of Federal records management statutes and regulations, familiarity with NARA guidance, and knowledge of generally accepted best practices. NNSA laboratories use a sub-set of the Department of Energy's records schedules. Additionally, for non-federal records each of the three laboratories must follow retention policies of their contracting corporations. The relationship between DOE/NNSA and its contractors is complex, and because of this complexity, records management programs at the laboratories, while individually good, have not been fully effective for NNSA as a whole.

Generally, all three laboratories have established strong records management programs as required by Federal regulations and the terms of their operating contracts. The records management programs at the laboratories are for the most part successfully managing and protecting Federal records. The field offices for LLNL and LANL include the strength and effectiveness of records management as metrics in contract performance. SNL does not have records management metrics in its contract performance. All three locations have records management training programs, storage facilities for active and inactive records, methods of safeguarding and protecting classified and sensitive information, and approaches for electronic records management. Most of the recommendations in this report are made in the spirit of making what are good records management programs better.

INSPECTION OBJECTIVE

In the winter of 2013, NARA inspected elements of the records management program at the NNSA national laboratories. NARA conducted this effort under the authority granted it by 44 U.S.C. 2904(c)(7) and 2906 to inspect records management programs and practices of Federal agencies. The overall objective of this inspection was to determine if the records management programs at the NNSA national laboratories are in compliance with regulations under 36 CFR Chapter XII, Subchapter B. Of particular concern to the inspection team was NNSA's implementation of its Nuclear Weapons Records Schedule (NWS-3) as well as its maintenance, scheduling, and transfer of permanent records.

During the course of the inspection, NARA visited or had briefings from multiple NNSA program offices at the three NNSA national laboratories. The NARA team also met separately with each of the laboratory's supporting NNSA field office as well as the records management

staff at NNSA headquarters in Washington, DC. In addition, NARA collected many supporting documents from NNSA and the laboratories. The records management staff at all the laboratories were forthcoming throughout the process and provided excellent support and access to relevant information and staff. In this report, NARA presents its finding from the inspection, positive and negative, and recommendations for developing corrective actions to address areas of concern.

SCOPE AND PURPOSE

The general purpose of this inspection was to verify that the records management programs at the NNSA national laboratories have sufficient policies, processes, and procedures for: managing active records; ensuring that the storage of inactive records at the laboratories meet regulatory standards; and ensuring that temporary and permanent records are being handled according to their approved retention schedules.

NARA chose to inspect NNSA because of the importance of the agency's permanent records in documenting the national experience and NNSA's low score on the 2011 Records Management Self-Assessment (RMSA), which considers records management practices throughout an agency. The NARA inspection team was interested in examining the reasons for the lack of permanent records being transferred to NARA from the NNSA national laboratories, understanding the obstacles to the implementation of NNSA's Nuclear Weapons Records Schedule (NWS-3), and reviewing the ways in which offices provide oversight to the laboratory records management programs.

METHODOLOGY

To meet the objective of assessing whether the NNSA national laboratories are managing their records appropriately, we examined NNSA's records management activities in light of applicable records management sections of the 36 CFR Chapter XII, Subchapter B. To ensure that our inquiries into NNSA's records management practices were systematic and grounded in regulation, the NARA inspection team relied on an internally produced set of records management questions that correlate directly to the CFR. These standardized questions are a subset of NARA's Office of Records Management Oversight's "Compliance Guidance Documents" and can be found in Appendix E of this report. Each of the laboratories was given a chance to respond to the questions, provide documentation, and to demonstrate various aspects of their records management programs.

As part of the pre-inspection process, the NARA inspection team conducted its own background research. Additionally, NNSA provided documentation for various elements of its records management practices and procedures. The records management program staff at all three of the laboratories, supporting field offices, and NNSA headquarters provided the NARA inspection team with a wide variety of documentation. Many of the documents provided were useful to the inspection team as background information. Others were more central in documenting and supporting the findings and recommendations of this inspection. A list of the pre-inspection

documents that the NARA team considered most relevant for the purposes of this inspection can be found in Appendix A.

STRUCTURE OF THE REPORT

The findings and recommendations of this report are broken down into five topical areas: Section 1, Managing Active Records; Section 2, Records in Storage; Section 3, Records Disposition; Section 4, Permanent Records; and Section 5, Agency Program Records Official and Records Management Field Officers (RMFO). Individual laboratories might have one or more, or perhaps no recommendations within a given topical area.

In accordance with 36 CFR 1239 this report contains:

- (1) An executive summary;
- (2) Background and purpose of inspection;
- (3) Inspection methodology, including offices visited;
- (4) Findings;
- (5) Corrective actions needed and other recommendations; and
- (6) Any necessary appendices, such as summaries of each site visit or the inspection instrument.

FINDINGS AND RECOMMENDATIONS

SECTION 1: MANAGING ACTIVE RECORDS

The effective management of active records is essential for each program to ensure that as records are created they are appropriately scheduled. 36 CFR 1222 delineates the requirements for managing active records. Additional guidance is provided in 36 CFR 1236 – Electronic Records Management, 36 CFR 1237 – Audiovisual, Cartographic, and Related Records Management, and 36 CFR 1238 – Microforms Records Management for managing the records in these media. SNL, LLNL, and LANL are managing active records within their records management programs. Each of the laboratories has a program of Records Liaison Officers (Office Administrative Assistants at SNL) to assist in coordinating active records management within their respective programs.

1.1 Finding: The records management programs at the three laboratories vary greatly in staffing, methodology, and oversight.

Each of the laboratories' records management programs have strengths (best practices) that the other laboratories could learn from and emulate.

Given constraints of funding, SNL records management staff has established a good records management program based on best practices and NARA regulations. Evidence of SNL's conscientious efforts to manage records includes vigorous use of electronic document management systems like EIMS FileNet, Web FileShare, and CSandia. SNL utilizes their other electronic information management systems as well such as the Imaging Management System (IMS) for managing, tracking, and controlling the release of engineering drawings and related documents and the Nuclear Safety Information Center (NSIC) which covers records related to nuclear stockpile accidents/incidents. However, because the SNL records management staff relies on voluntary participation by the laboratory programs and offices, many of the laboratory's programs are not using the records management services, and as a result, the records management staff do not always know where records are being created and/or maintained.

The SNL records management program provides records management assistance to the laboratory's programs via Office Administrative Assistants (OAA). Programs designate their own OAAs. These OAAs perform some records liaison officer duties and receive quarterly training. However, SNL only has OAAs in those programs that have volunteered to participate with the records management program.

The Sandia Field Office (SFO) Records Management Field Officer (RMFO) is relatively new to the program and has responsibility for both records management and information technology oversight. At the time of this inspection, the SFO RMFO had fairly little contact with the SNL Records Manager and staff.

LLNL has a comprehensive records management program run by a small staff. The program encompasses all laboratory programs, with full participation including senior management. The

program includes records liaisons assigned to all mission areas which meet regularly and which generally ensure that records in their areas are maintained properly, shipped to the records centers, and stored appropriately in a document management system. Records management training is part of the organization's employee training and awareness program. Training is mandatory for individuals in positions that are identified as responsible for records and voluntary for all others. DOE Administrative and Environmental retention schedules are implemented appropriately. All existing moratoriums on records dispositions are in place and properly adhered to. Exit briefings and procedures are conducted to ensure records of departing employees are appropriately secured and managed as part of laboratory employee separation processes.

The records management program staff at LLNL is working closely with IT staff to establish an integrated document management system (Oracle 11G Unified Content Management - UCM), which will unify administrative records under one content management system. The records retention module at the time of this inspection was not in place, but plans to incorporate it are included in the overall project plan. The engineering and weapons records, both hard and soft copy, are managed appropriately. The Livermore Field Office (LFO) Records Management Field Officer (RMFO) works closely with the LLNL Technical Information Department Head to ensure that established performance measures are met. Quarterly meetings enable clear communication and identification of challenges and solutions.

LANL has a comprehensive and extensive centralized records management program as documented in its Records Management Program Development Timeline (see chart on page 7). Since 2007 LANL has been working to make considerable improvements in the management of its records. The centerpiece of this project is Information Resource Management's (IRM) centralization of control of records by deploying or embedding records management personnel within all operation programs. LANL also has implemented a site-wide EDMS and is working on an EDMS/ERMS to address electronic records management.

All programs at LANL have implemented records management, including completing inventories and file plans. When it comes to nuclear weapons records, LANL has centralized the management of these within the approved records storage facility in the National Security Sciences Building (NSSB) with certain satellite vaults for active records serving programs such as the Plutonium Science and Manufacturing Directorate within Technical Area (TA) 55, and electronically in two weapons databases called PDMLink and XLAN. They use Project Administrative Model to manage all major projects, including records management and document control.

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Beginning in 2009, LANL instituted Performance Based Initiatives (PBI), helping to improve the laboratory's records management by bringing higher level management's attention to it. The Los Alamos Field Office (LAFO) Records Management Field Officer (RMFO) has been working closely with the LANL records management program staff, monitoring their progress through a series of PBIs.

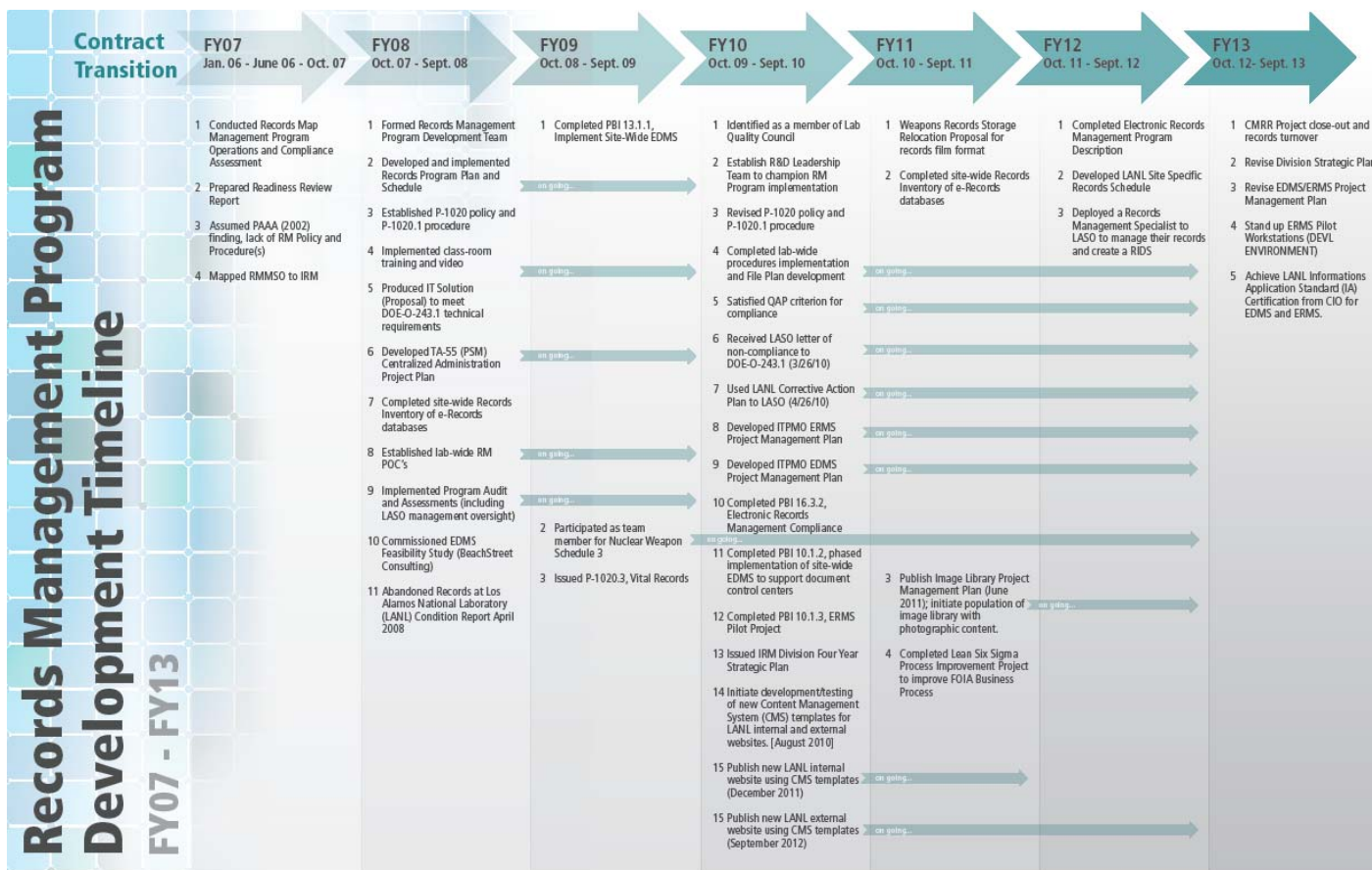


Figure 1: Los Alamos National Laboratory Records Managements Improvement

(An enlarged version of this chart is included as the last page of this report)

1.1 Recommendation: NNSA should establish a more extensive and comprehensive communications network to share questions, concerns, and solutions to records management issues.

1.2 Finding: At the time of the inspection, LLNL records management policy, program description, and records management procedures documents were in draft form pending approval.

LLNL records management policy, program description, and procedures documents are well written and will provide the Records Management Program with the foundational documents to continue to fully integrate records management into the standard policies and procedures for the laboratory.

1.2 Recommendation: LLNL management should approve records management policy, program description, and records management procedures documents, moving them from draft to effective status. NARA should be notified when this has been done. (36 CFR 1220.32 and 36 CFR 1220.34)

1.3 Finding: Although it is included in the overall project plan, at the time of inspection, the records management module (Oracle URM) of LLNL's Oracle UCM system had not yet been implemented.

The records management program staff at LLNL is working closely with IT staff to establish an integrated document management system which will unify administrative records under one content management system. At the time of inspection, the records retention module (Oracle URM) of the Oracle UCM content management system was not in place, but plans to incorporate it are included in the overall project plan.

1.3 Recommendation: LLNL should implement plans to incorporate the records management module into its new Oracle UCM system thereby providing records management functionality including the scheduling and disposition of records. NARA should be notified when this effort is completed. (36 CFR 1236)

1.4 Finding: The reach of the SNL records management program is currently limited to those offices that voluntarily participate in the active records management program.

In 2009, SNL established Corporate Procedures IM100.2.1: Control Documents and IM200.2.2: Control Records (updated December 2012-January 2013). These procedures indicate that they apply to all organizations, management elements, sites, and members of the workforce. However, the records management staff indicated that they only work with parts of the organization that ask for records management services or volunteer to use the document management systems, central storage, or inactive programs.

1.4.1 Recommendation: SNL senior leadership and the records management staff must develop policies, directives, and practices to ensure that all SNL program offices comply with the requirements prescribed by 36 CFR Chapter XII, Subchapter B.

1.4.2 Recommendation: SNL senior leadership should support the establishment of a more robust network of records liaisons and custodians throughout the laboratory with responsibility to ensure the implementation of records management policies and procedures in all programs.

1.5 Finding: At SNL, neither the laboratory records management program nor the SFO RMFO has set performance measures and goals to assess or evaluate the active records management program.

While NARA recognizes that at the time of our site visit to SNL, the SFO RMFO was new and had not had much of an opportunity to develop performance measures and goals, we recommend that they be put into place as soon as possible. Performance measures are a way of reporting on a program's progress, particularly towards pre-established goals. They help an agency determine if a program is operating efficiently and effectively.

For their part, both LLNL and LANL have performance measures and goals designed and agreed upon by the field office, laboratory records management, and laboratory senior management. These goals and measurements assist the records programs in ensuring compliance with Federal regulations and with the guidelines of their contracts.

1.5 Recommendation: SNL Records Manager in coordination with the SFO RMFO must set performance measures and goals for assessing the effectiveness of records management within various laboratory programs. (36 CFR 1220.34)

1.6 Finding: At SNL, neither the laboratory Records Manager nor the SFO RMFO routinely inspects or evaluates how offices handle records.

Although Federal regulations require that agencies “conduct formal evaluations to measure the effectiveness of the records management programs and practices...” (36 CFR 1220.34), SNL is not currently conducting office-by-office evaluations of records management practices. Periodic assessments of how individual programs are interpreting and implementing records management initiatives, policies, and procedures are instrumental in maintaining a solid, viable records management program.

Writing up these assessments provides documentation of how well various offices comply with DOE's records schedules and other aspects of records management. The results of such assessments provide opportunities to identify areas that need improvement, as well as areas that are working well and could serve as models to other parts of the laboratory. In conducting such assessments, the SNL records management program can increase its visibility within the laboratory, building opportunities for briefings, training, and additional dissemination of records management information.

In contrast to SNL, LLNL and LANL conduct routine office-by-office inspections and evaluations of how records are being managed. LANL has the most comprehensive methodology, embedding or deploying records management staff within laboratory programs. At LLNL and LANL, the field office RMFO either reviews the results of the evaluations or participates directly in them.

1.6 Recommendation: Sandia Field Office RMFO (or field office management) and SNL Records Manager should establish a program of routine inspections or evaluations of the handling of records within various laboratory offices. (36 CFR 1220.34)

SECTION 2: RECORDS IN STORAGE

SNL, LLNL, and LANL all maintain various records vaults and storage areas. The short term and active records at all three laboratories are functional, secure, and accessible. However, there are concerns regarding the storage of inactive, long-term temporary and potentially permanent records. Inactive records storage guidance is provided in 36 CFR 1232, 1233, and 1234. Additional guidance is provided in 36 CFR 1236 – Electronic Records Management, 36 CFR 1237 – Audiovisual, Cartographic, and Related Records Management, and 36 CFR 1238 – Microforms Records Management for storing the records in these media. Compliance with the requirements in 36 CFR helps ensure the long-term preservation of records and assists agencies in retrieving inactive records when needed.

2.1 Finding: At SNL, permanent and long-term temporary inactive records are stored in vastly inappropriate space that is not in compliance with Federal regulations as enumerated in 36 CFR 1234.

SNL is storing records in a series of underground bunkers six miles from the records management offices in a remote location of Kirtland Air Force Base. The 12 World War II era bunkers have conditions unsuitable for the storage of records. The walls and fixtures are leaking creosote on and into the boxes containing permanent records. There are no temperature controls and no fire suppression systems. Occasionally, there is no electricity. Retrieval becomes impossible during power outages because of safety concerns. There is no reliable means of communication and no water at the bunkers. The inactive records program has standard procedures for storage and retrieval of the records stored in the location and insufficient intellectual control over box contents.

While the National Archives' main focus is on management and maintenance of records, we cannot ignore what appear to be health and safety issues at the current storage facilities. These include rodent infestation, snakes, poisonous spiders, and other vermin. The Records Management (RM) Program staff makes a concerted effort to minimize damage due to mice and mice droppings, and other hazards. However, the myriad of issues with the current storage location makes it impossible for these efforts to be effective.

2.1 Recommendation: SNL must move its inactive records from the 12 former weapons storage bunkers on Kirtland Air Force Base into space compliant with 36 CFR 1234.

2.2 Finding: At SNL, due to the poor environment in the bunkers, permanent and long-term temporary records on motion picture film and other fragile media are deteriorating and already may be unusable. Other records may be irretrievable because machines capable of extracting the data are no longer in existence.

The bunkers contain approximately 2,000 motion picture reels and a significant amount of silver microfilm. The poor environmental conditions within the bunkers have caused at least some of these records to deteriorate beyond the point of being usable. Records in other multimedia formats may also no longer be accessible because the machines required to read them are no longer available. Many of these are long-term temporary records that have not met their full retention period. Others are permanent records that are, or will soon be, eligible for transfer to NARA.

2.2.1 Recommendation: SNL must move the records in all formats to appropriate climate-controlled space that meets the requirements of 36 CFR 1232, 1234, 1236, 1237, and 1238.

2.2.2 Recommendation: SNL must identify records in all formats stored in the bunkers that have deteriorated beyond the point of preservation and work with NARA to verify that the records are not retrievable in order to receive permission for disposal. (36 CFR 1222, 1236, 1237, and 1238)

2.2.3 Recommendation: SNL must identify those records in all formats stored in the bunkers that are deteriorating but can still be salvaged and take corrective measures to ensure that further deterioration is mitigated. (36 CFR 1222, 1236, 1237, and 1238)

2.2.4 Recommendation: For all records, particularly the motion picture films and microfilm that are decaying in the bunkers, SNL should work with LLNL and LANL to identify if other copies are available. If it is determined that SNL has the only copy, NNSA must mitigate the deterioration, if possible, or work with NARA to verify that the records are not retrievable in order to receive permission for disposal. (36 CFR 1237 and 1238)

2.3 Finding: The SNL records management program does not have adequate intellectual control over the records being stored in the bunkers.

SNL is storing approximately 48,000 boxes containing hard copy, original, single-source records, magnetic media, motion picture films, microfilm, and other multimedia. While these records are termed “inactive” there is a need to retrieve them on a regular basis. SNL has a comprehensive program to manage its inactive records, including a tracking system built with

Versatile™ Inactive Records Tracking (IRT) software for space management and for intellectual control over records at a high level. Full container listings are not required. At times, this has made records retrieval expensive and time consuming. In some cases, the SNL records management staff do not know what the boxes contain as the IRT documents are inaccurate or incomplete.

2.3 Recommendation: SNL records management staff in conjunction with the respective program offices must conduct a comprehensive inventory of the inactive records stored in the bunkers and create appropriate container listings and apply the retention schedule as appropriate. (36 CFR 1222)

2.4 Finding: At LANL, the records storage area known as SM 39 is inadequate as it lacks proper climate and temperature controls for the multimedia records being stored in this facility.

LANL has established a relocation plan for the mission-critical records currently stored in SM 39. The records are in a variety of formats including electronic media, motion picture film, photographic negative, weapons radiograph, video tape, as well as paper and microfilm. Almost all of the records at SM-39 are irreplaceable. The majority of the records are long-term temporary and potentially permanent. Many of these records have been transferred to LANL from closed NNSA facilities without proper indexing, so LANL does not have good intellectual control over them, making requests for information difficult and time consuming.

2.4 Recommendation: LANL must transfer the permanent records stored in SM 39 to appropriate climate-controlled space that meets the requirements of 36 CFR 1234, 1236, 1237, and 1238.

2.5 Finding: LANL does not have good intellectual control over many of the records stored in SM 39, particularly those transferred to LANL, without proper indexing, from closed NNSA facilities.

LANL must conduct a comprehensive inventory of the records transferred from closed NNSA facilities. It is important that LANL staff properly identify, schedule, and apply the authorized disposition to these records now in its custody. (See 2.4)

2.5 Recommendation: LANL records management staff in conjunction with the respective program offices should conduct a comprehensive inventory of the inactive records stored in SM 39, create appropriate container listings, and apply the retention schedule as appropriate. (36 CFR 1234, 1236, 1237, and 1238)

2.6 Finding: LANL is currently using over 3,000 World War II surplus filing cabinets stacked on top of each other to store records. Aside from the potential safety issues that arise from stacking four-door filing cabinets in this manner, it is an inefficient use of space that could otherwise be used for the relocation of records stored in the noncompliant area known as SM 39.

LANL has efficient records center and vault storage areas. However, a large body of highly valuable and permanent records is currently stored in surplus, four-door, filing cabinets stacked on top of each other to form “shelves.” While providing adequate access to the records, the amount of floor space utilized by the cabinets is significant, reducing the overall capacity of the records storage area. Storing records in this manner may also be a safety hazard, although the staff interviewed for this inspection did not indicate any accidents or incidents. Replacing these obsolete file cabinets will make space for more useful high density storage, and provide storage space for many of the records stored in SM 39.

2.6 Recommendation: LANL should implement the proposed plan described at the time of the inspection to phase out the use of World War II surplus filing cabinets and replace them with appropriate shelving. Notify NARA when the plan has been implemented.

SECTION 3: RECORDS DISPOSITION

36 CFR 1225 and 1226 prescribe the requirements for implementing records disposition. The requirements include disposing of inactive temporary records when retention periods have expired and transferring permanent records to the National Archives when retention periods have been met. Effective disposition of records requires having usable records retention schedules. These include the DOE Administrative Records Schedule and several DOE programmatic records schedules including the Environmental Records Schedule, Research and Development Records Schedule, Work for Others and CRADAs (Cooperative Research and Development Agreements), and the Nuclear Weapons Records Schedule (NWS-3). The laboratories have effectively implemented these schedules except for NWS-3. The inability to implement NWS-3 at the laboratories has been a long-standing issue and it is important that NNSA implement a usable nuclear weapons records schedule to provide for the efficient management and disposition of nuclear weapons records.

3.1 Finding: The DOE/NNSA records schedule covering nuclear weapons records needs to be rewritten with clearly implementable instructions for the long-term preservation of long-term temporary and permanent records as well as records for which NNSA has a perpetual business need.

The current version of the Nuclear Weapons Records Schedule contains disposition instructions that are not implementable. NWS-3 was initially approved by NARA in 1996. There were considerable problems with its implementation, so much so that, even though the schedule was approved, NNSA placed a moratorium on its use on September 29, 1998. Several attempts have

been made since 1998 to rewrite the schedule. As of the date of this inspection, the schedule is still not implementable. The main issue is the difficulty in determining an effective cutoff and when NNSA no longer has a business need for a particular body of records.

After discussions with records management and program staff at all three national laboratories, it is evident that difficulties surrounding the establishment of an event where records can be cut off and declared inactive prevents this schedule from being implemented or rewritten. (There are no significant disagreements over which records are short-term temporary, long-term temporary, or permanent.) The difficulties in establishing clear cutoffs are exacerbated by the development of new technologies which often make older data useful again to NNSA's scientists and engineers and by test ban treaties which have ended the testing of nuclear weapons. To complicate the issue further, there are concerns at all three laboratories that a group of records that one NNSA entity deems no longer useful, could hold value for another entity. This is particularly true for the differences between the needs of organizations focused on design and those focused on manufacture, production, assembly, or disassembly.

In addition to the issues surrounding the establishment of a cutoff of weapons records, the laboratories would like to develop a schedule that embodies the simplicity of the big bucket approach and provides clearly implementable instructions for the long-term preservation of permanent records as well as records for which NNSA has a perpetual business need. While the current nuclear weapons records schedule appears to be acceptable to the NNSA plant sites (Production Agencies), it is considered by the laboratory sites (Design Agencies), particularly LLNL and LANL, to be overly complex and not readily implementable for non-production activities. Moreover, the laboratories, particularly LLNL and LANL, have indicated that their responsibility for Stockpile Stewardship requires their use of records far beyond many of the retention periods in NWS-3 and that this need should determine the retention periods for nuclear weapons records throughout NNSA.

3.1 Recommendation: NNSA should establish a working group to rewrite and submit to NARA a records retention schedule for the Nuclear Weapons program.

3.2 Finding: NNSA is at risk of destroying records prematurely, maintaining records longer than necessary, and failing to transfer permanent records to the National Archives when appropriate.

NNSA does not currently have a consolidated records inventory that includes information about where records are physically located. There is also no consistent procedure for each NNSA entity to identify records that it no longer needs but may be of interest to another part of NNSA. There are instances when one NNSA entity offers its records to another NNSA entity, but this is done in an *ad hoc* fashion.

3.2.1 Recommendation: NNSA should establish policies, procedures, and methodologies, consistent with its records retention schedules and information security practices, to identify records that may be needed by one or more NNSA entities beyond the needs of the creating entity.

3.2.2 Recommendation: NNSA should establish a working group for determining when records can be declared inactive across the complex and when records are truly no longer needed by NNSA as a whole so that the records retention schedule can be properly implemented.

3.3 Finding: At SNL existing DOE/NNSA records retention policies are not consistently enforced. Retention periods are changed from the NARA-approved retention to “Life of Sandia.”

SNL consistently changes NARA-approved DOE records retention wording from “Permanent” to “Life of Sandia.” This wording change is also applied to records that are unscheduled or are scheduled as long-term temporary. “Life of Sandia” is not a NARA-authorized retention period and so may not be applied to any group of Federal records at Sandia.

3.3 Recommendation: SNL must use NARA-approved records retention schedules when managing Federal records and apply retention periods as they appear on the appropriate records retention schedule. (36 CFR 1225 and the NARA Disposition of Federal Records: A Records Management Handbook)

SECTION 4: PERMANENT RECORDS

All three laboratories have permanent records that document the important history of NNSA. Other than the storage issues already noted, most of these records are protected. However, there is not a routine procedure in place to identify and transfer these historic records to the National Archives. 36 CFR 1235.12 states that “permanent records must be transferred to the National Archives of the United States when: (a) The records are eligible for transfer based on the transfer date specified in a NARA-approved records schedule, or (b) The records have been in existence for more than 30 years.” Furthermore, the CFR states that agencies can only retain records after they are eligible for transfer upon “written approval from NARA.” (36 CFR 1235.14)

4.1 Finding: While most Manhattan Engineer District (MED) project records have been transferred to NARA, LANL has retained 72 cubic feet of original MED project records even though reference use copies have been made.

Discussions with LANL staff indicate that a portion of the MED records may still have continuing value for LANL scientists and engineers. However, it was also indicated that some of the records were being maintained in order to control research access and to use for exhibit purposes. NARA recognizes that a portion of this collection is made up of technical data that only NNSA personnel have the equipment or the expertise to use and analyze, but this is likely not the case for all of the MED records remaining at LANL.

4.1.1 Recommendation: LANL should inventory remaining MED project records in its possession and report to NARA via the NNSA Program Records Official which records are still needed for research purposes and why copies cannot be used in lieu of the original records, and which ones can be transferred to NARA.

4.1.2 Recommendation: LANL must transfer to NARA all remaining original MED project records not needed for ongoing research. (36 CFR 1226 and 1235)

4.2 Finding: SNL Corporate Archives contains Federal records that either are or will be eligible in the near future for transfer to the National Archives, including approximately 24,000 negatives documenting the activities from the Nevada National Security Site dating from the 1950s to the 1990s.

SNL has a small collection of historical materials containing a mixture of contractor corporate records, personal papers collected from former contractors and/or employees, and Federal records that either are or will be eligible soon for transfer to the National Archives. The inspection team was informed that SNL will transfer 24,000 negatives from the Nevada National Security Site (formerly called the Nevada Test Site) to the Still Pictures Branch of the National Archives once their digitization has been completed. The Corporate Archives has a very good process for digital imaging and indexing when funding is available. Digital images are 300 dpi resolution TIFF files. Indexing includes dates, location of photographs, subject matter, and other associated metadata.

4.2 Recommendation: SNL must identify permanent records that are eligible for transfer to NARA and work with NARA to transfer these records. (36 CFR 1226 and 1235)

SECTION 5: AGENCY PROGRAM RECORDS OFFICIAL AND RMFOS

The records management programs at SNL, LLNL, and LANL are governed by DOE Order 243.1B and the Contract Requirements Directive (CRD). DOE Order 243.1B states that “departmental records will be managed in accordance with all prescribed laws, regulations, directives, and processes to ensure adequate and proper documentation of DOE’s organizations, missions, functions, policies, and decisions.” The order cites specifically 44 U.S.C. Chapters 21, 29, 31, 33, and 35; 36 CFR Chapter XII, Subchapter B, *Records Management*; and all applicable NARA mandated guidance.

The national laboratories are operated under site specific contracts. Federal oversight of the contract is provided by field offices (formerly known as site offices). The field offices oversee all activities delineated in the operating contract(s). Adherence to Federal statutes and regulations regarding records management is included along with specific DOE orders. The relationships between field offices and individual laboratory records management program staff ranges from fully cooperative and integrated to being under-developed. Each field office has different performance measures and goals that, while similar, do have differences. The field offices could benefit from comparing approaches and ideas. The field office RMFO overseeing records management programs at SNL, for example, while very knowledgeable, is new to NNSA and could benefit from the exchange of ideas with his counterparts at LLNL and LANL.

5.1 Finding: The NNSA Program Records Official does not have an effective working relationship with the field office RMFOs and the Federal contract oversight managers in the field to coordinate the inspection and evaluation of the records management programs at each location.

During the course of the inspection, NARA found that communication between the NNSA RO and the field office RMFOs was lacking. It is important to establish open lines of communication at all levels. This allows for efficient dissemination of policies, procedures, and directives to the laboratories and open feedback to the NNSA records management program. This will provide a means for the NNSA RO to coordinate the oversight of the records management program at each location.

5.1 Recommendation: The NNSA RO should establish a more effective working relationship with the field office RMFOs and the Federal contract oversight managers to leverage their abilities to inspect and evaluate the records management program at each location.

5.2 Finding: Coordination and communication between the DOE Records Officer and the NNSA Program Records Official is limited.

The NNSA Program Records Official oversees one of the most complex records management programs within DOE. For the NNSA Program Records Official to provide effective guidance and leadership to the NNSA records management staff at all locations, it is important that the DOE and NNSA ROs have open and continual communications.

5.2 Recommendation: The DOE Records Officer and the NNSA Program Records Official should coordinate and share information relevant to the agency's records management programs.

5.3 Finding: The NNSA field office RMFOs and staff responsible for oversight of the records management programs at the laboratories do not share information, performance goals for records management programs, evaluation strategies, or other information across NNSA locations.

Each of the field office RMFOs and staff has developed methods and procedures, performance measures, and strategies for reviewing the effectiveness of records management programs at the laboratories. This knowledge is useful for all NNSA programs and should be shared across the enterprise.

5.3 Recommendation: The field office RMFOs and staff at all three of NNSA's laboratories should establish a working relationship to share oversight methods, successes, and challenges in order to help NNSA establish consistent records management programs in all locations.

APPENDIX A: RELEVANT PRE-INSPECTION DOCUMENTS

NARA Records Management Self-Assessments 2011 and 2012²

President's Foreign Intelligence Advisory Board Report on Security Problems at the U.S. Department of Energy, June 1999

DOE/IG Report 0838, *Follow-up Audit on Retention and Management of the Department of Energy's Electronic Records*, September 2010

DOE/IG Report 0685, *The Retention and Management of the Department's Records*, April 2005

DOE O 234.1, *Records Management Program*, November 2011

DOE O 243.2, *Vital Records*, February 2006

DOE Nuclear Weapons Records Schedule 3 (NWS-3), Approved 1996

DOE Research and Development Records Schedule, Approved 1998

DOE Environmental Records Schedule, Approved 1996 and 2007

DOE Administrative Records Schedule, Approved - Various

DOE Work for Others and CRADAs, Approved 1995

SNL, LLNL and LANL Organizational Charts

² Records Management Self-Assessment Reports 2009-2012, National Archives and Records Administration, <http://www.archives.gov/records-mgmt/resources/self-assessment.html>. NNSA scores: 2009: did not respond, 2010: 70 out of 100, 2011: 51 out of 100, and 2012: 76 out of 100. We note that NNSA's score improved on the 2012 RMSA. At the time of the inspection, however, the 2012 results of the RMSA had yet to be published.

APPENDIX B: AUTHORITIES AND FOLLOW-UP ACTIONS

AUTHORITIES

- 44 U.S.C. Chapter 29
- 36 CFR Chapter XII, Subchapter B
- 36 CFR 1239, Program Assistance and Inspections

FOLLOW-UP ACTIONS

- ACTION PLAN

NNSA will submit to NARA a Plan of Corrective Action (PoCA) that specifies how the agency will address each inspection report recommendation, including a timeline for completion and proposed progress reporting dates.

The plan must be submitted within 60 days after the date of transmittal of the final report to the head of the agency.

- PROGRESS REPORTS

NNSA will submit to NARA progress reports on the implementation of the action plan until all actions are completed.

- NARA REVIEW

NARA will analyze the adequacy of NNSA's action plan, provide comments to NNSA on the plan within 60 calendar days of receipt, assist NNSA in implementing recommendations, and inform NNSA when progress reports are no longer needed.

APPENDIX C: COMPLETE LIST OF FINDINGS AND RECOMMENDATIONS

1.1 Finding: The records management programs at the three laboratories vary greatly in staffing, methodology, and oversight.

1.1 Recommendation: NNSA should establish a more extensive and comprehensive communications network to share questions, concerns, and solutions to records management issues.

1.2 Finding: At the time of the inspection, LLNL records management policy, program description, and records management procedures documents were in draft form pending approval.

1.2 Recommendation: LLNL management should approve records management policy, program description, and records management procedures documents, moving them from draft to effective status. NARA should be notified when this has been done. (36 CFR 1220.32 and 36 CFR 1220.34)

1.3 Finding: Although it is included in the overall project plan, at the time of inspection, the records management module (Oracle URM) of LLNL's Oracle UCM system had not yet been implemented.

1.3 Recommendation: LLNL should implement plans to incorporate the records management module into its new Oracle UCM system thereby providing records management functionality including the scheduling and disposition of records. NARA should be notified when this effort is completed. (36 CFR 1236)

1.4 Finding: The reach of the SNL records management program is currently limited to those offices that voluntarily participate in the active records management program.

1.4.1 Recommendation: SNL senior leadership and the records management staff must develop policies, directives, and practices to ensure that all SNL program offices comply with the requirements prescribed by 36 CFR Chapter XII, Subchapter B.

1.4.2 Recommendation: SNL senior leadership should support the establishment of a more robust network of records liaisons and custodians throughout the laboratory with responsibility to ensure the implementation of records management policies and procedures in all programs.

1.5 Finding: At SNL, neither the laboratory records management program nor the SFO RMFO has set performance measures and goals to assess or evaluate the active records management program.

1.5 Recommendation: SNL Records Manager in coordination with the SFO RMFO must set performance measures and goals for assessing the effectiveness of records management within various laboratory programs. (36 CFR 1220.34)

1.6 Finding: At SNL, neither the laboratory records manager nor the SFO RMFO routinely inspects or evaluates how offices handle records.

1.6 Recommendation: Sandia Field Office RMFO (or Field Office Management) and SNL Records Manager should establish a program of routine inspections or evaluations of the handling of records within various laboratory offices. (36 CFR 1220.34)

2.1 Finding: At SNL, permanent and long-term temporary inactive records are stored in inappropriate space that is not in compliance with Federal regulations as enumerated in 36 CFR 1234.

2.1 Recommendation: SNL must move its inactive records from the 12 former weapons storage bunkers on Kirtland Air Force Base into space compliant with 36 CFR 1234.

2.2 Finding: At SNL, due to the poor environment in the bunkers, permanent and long-term temporary records on motion picture film and other fragile media are deteriorating and already may be unusable. Other records may be irretrievable because machines capable of extracting the data are no longer in existence.

2.2.1 Recommendation: SNL must move the records in all formats to appropriate climate-controlled space that meets the requirements of 36 CFR 1232, 1234, 1236, 1237, and 1238.

2.2.2 Recommendation: SNL must identify records in all formats stored in the bunkers that have deteriorated beyond the point of preservation and work with NARA to verify that the records are not retrievable in order to receive permission for disposal. (36 CFR 1222, 1236, 1237, and 1238)

2.2.3 Recommendation: SNL must identify those records in all formats stored in the bunkers that are deteriorating but can still be salvaged and take corrective measures to ensure that further deterioration is mitigated. (36 CFR 1222, 1236, 1237, and 1238)

2.2.4 Recommendation: For all records, particularly the motion picture films and microfilm that are decaying in the bunkers, SNL should work with LLNL and LANL to identify if other copies are available. If it is determined that SNL has the only copy, NNSA must mitigate the deterioration, if possible, or work with NARA to verify that the records are not retrievable in order to receive permission for disposal. (36 CFR 1237 and 1238)

2.3 Finding: The SNL records management program does not have adequate intellectual control over the records being stored in the bunkers.

2.3 Recommendation: The SNL records management staff in conjunction with the respective program offices must conduct a comprehensive inventory of the inactive records stored in the bunkers and create appropriate container listings and apply the retention schedule as appropriate. (36 CFR 1222)

2.4 Finding: At LANL, the records storage area known as SM 39 is inadequate as it lacks proper climate and temperature controls for the multimedia records being stored in this facility.

2.4 Recommendation: LANL must transfer the permanent records stored in SM 39 to appropriate climate-controlled space that meets the requirements of 36 CFR 1234, 1236, 1237, and 1238.

2.5 Finding: LANL does not have good intellectual control over many of the records stored in SM 39, particularly those transferred to LANL, without proper indexing, from closed NNSA facilities.

2.5 Recommendation: LANL records management staff in conjunction with the respective program offices should conduct a comprehensive inventory of the inactive records stored in SM 39, create appropriate container listings, and apply the retention schedule as appropriate. (36 CFR 1234, 1236, 1237, and 1238)

2.6 Finding: LANL is currently using over 3,000 World War II surplus filing cabinets stacked on top of each other to store records. Aside from the potential safety issues that arise from stacking four-door filing cabinets in this manner, it is an inefficient use of space that could otherwise be used for the relocation of records stored in the noncompliant area known as SM 39.

2.6 Recommendation: LANL should implement the proposed plan described at the time of the inspection to phase out the use of World War II surplus filing cabinets and replace them with appropriate shelving. Notify NARA when the plan has been implemented.

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3.1 Recommendation: NNSA should establish a working group to rewrite and submit to NARA a records retention schedule for the Nuclear Weapons program.

3.2 Finding: *NNSA is at risk of destroying records prematurely, maintaining records longer than necessary, and failing to transfer permanent records to the National Archives when appropriate.*

3.2.1 Recommendation: NNSA should establish policies, procedures, and methodologies, consistent with its records retention schedules and information security practices, to identify records that may be needed by one or more NNSA entities beyond the needs of the creating entity.

3.2.2 Recommendation: NNSA should establish a working group for determining when records can be declared inactive across the complex and when records are truly no longer needed by NNSA as a whole so that the records retention schedule can be properly implemented.

3.3 Finding: *At SNL existing DOE records retention policies are not consistently enforced. Retention periods are changed from the NARA-approved retention to “Life of Sandia.”*

3.3 Recommendation: SNL must use NARA-approved records retention schedules when managing Federal records and apply retention periods as they appear on the appropriate records retention schedule. (36 CFR 1225 and the NARA Disposition of Federal Records: A Records Management Handbook)

4.1 Finding: *While most Manhattan Engineer District (MED) project records have been transferred to NARA, LANL has retained 72 cubic feet of original MED project records even though reference use copies have been made.*

4.1.1 Recommendation: LANL should inventory remaining MED project records in its possession and report to NARA via the NNSA Program Records Official which records

are still needed for research purposes and why copies cannot be used in lieu of the original records, and which ones can be transferred to NARA.

4.1.2 Recommendation: LANL must transfer to NARA all remaining original MED project records not needed for ongoing research. (36 CFR 1226 and 1235)

4.2 Finding: SNL Corporate Archives contains Federal records that either are or will be eligible in the near future for transfer to the National Archives, including approximately 24,000 negatives documenting the activities from the Nevada National Security Site dating from the 1950s to the 1990s.

4.2 Recommendation: SNL must identify permanent records that are eligible for transfer to NARA and work with NARA to transfer these records. (36 CFR 1226 and 1235)

5.1 Finding: The NNSA Program Records Official does not have an effective working relationship with the field office RMFOs and the Federal contract oversight managers in the field to coordinate the inspection and evaluation of the records management program at each location.

5.1 Recommendation: The NNSA Program Records Official should establish a more effective working relationship with the field office RMFOs and the Federal contract oversight managers to leverage their abilities to inspect and evaluate the records management program at each location.

5.2 Finding: Coordination and communication between the DOE Records Officer and the NNSA Program Records Official is limited.

5.2 Recommendation: The DOE Records Officer and the NNSA Program Records Official should coordinate and share information relevant to the agency's records management programs.

5.3 Finding: The NNSA Field Office RMFOs and staff responsible for oversight of the records management program at the laboratories do not share information, performance goals for records management programs, evaluation strategies, or other information across NNSA locations.

5.3 Recommendation: The field office RMFOs and staff at all three of NNSA's laboratories should establish a working relationship to share oversight methods, successes, and challenges in order to help NNSA establish consistent records management programs in all locations.

APPENDIX D: NNSA OFFICES VISITED DURING INSPECTION

Inspection overview with all laboratory sites via teleconference and on-site at Albuquerque Complex Office, Albuquerque, New Mexico – January 14, 2013

Sandia National Laboratories, Albuquerque, New Mexico – January 15-17, 2013

- Customer Funded Records Area
- Inactive Records Storage
- Corporate Archives
- Records Management Field Officer
- Sandia Field Office

Lawrence Livermore National Laboratory, Livermore, California – February 11-14, 2013

- Records Management Office
- Records Storage Facilities
- Supercomputer Center
- Weapons and Complex Integration Organization
- Engineering Records Center
- High Explosive Application Facility
- Lawrence Livermore Field Office

Los Alamos National Laboratory, Los Alamos, New Mexico – March 12-14, 2013

- Information Resource Management (IRM) Offices
- IRM Vault
- TA 55 Radiological Laboratory/Utility Office Building (RLUOB)
- RLUOB Records Center
- TA 63 Service Center
- Pueblo Complex – Environmental Programs, ADEP
- IRM Offices – Los Alamos Field Office RMFO/Program Manager
- SM 39 Records Storage Area

Review of NNSA Program Records Official's Policies and Procedures – April 16, 2013

- NNSA Program Records Official and contractor via teleconference

APPENDIX E: SELECTED COMPLIANCE QUESTIONS

The following is a list of questions based on the CFR and other NARA guidance used to gather information during the course of this inspection. The questions are divided into specific records management topics.

Program Requirements

Records Management Roles and Responsibilities/Competencies

Does NNSA charge each laboratory with responsibility for implementing and operating an effective records management program?

Who at the laboratories are formally assigned responsibility for the development and implementation of laboratory-wide programs to identify, develop, issue, and monitor recordkeeping requirements for the laboratory (Name and Title)?

Does the laboratory Records Manager:

- approve laboratory file plans?
- approve and review laboratory SF 135s?
- mandate records management training for all laboratory staff, covering especially employees' responsibility to identify and manage the Federal records in their control?
- conduct audits, reviews, and/or evaluations?
- have authority to work with laboratory IT to ensure records management functionality is incorporated into systems?

Where do the laboratory Records Managers and Records Liaisons Officers (RLOs) fit into the laboratory organizational structure?

Is the records management program at the laboratory placed appropriately (not simply in the facilities or administrative function)?

Is the records management program adequately represented within senior management at the laboratory?

Are there RLOs in each laboratory office or program?

Does the Records Manager have a clear line of communication with the laboratory RLOs and with other levels of management?

Do they have core competencies, including familiarity with 36 CFR and Federal recordkeeping requirements, and knowledge of basic records management terms, definitions, and concepts, consistent with their duties?

Do they have training and other opportunities for professional development to maintain core competencies?

From whom do they receive this training and how often? Is the training adequate to meet their needs?

Were they chosen to specifically perform records management duties, or have these duties become “other tasks as assigned?” If “other tasks as assigned,” how much of their time is devoted to performing records management duties? Is it adequate?

Directives and Other Policy Issuances

NNSA will provide NARA with copies of:

- all current NNSA and each laboratory’s records management directives, orders, bulletins, and similar authoritative issuances;
- copies of each lab’s current master file plan;
- copies of any current guidance/memoranda formally assigning this responsibility for development and implementation of laboratory-wide guidance on the management of electronic media; and
- copies of any current Electronic Document Management Systems and/or Records Management Applications technical requirements documents.

Recordkeeping Requirements

Records Management Guidance

Does NNSA have specific recordkeeping requirements that address records created, processed, or in possession of a contractor or a non-Federal entity? (See 36 CFR 1222.32)

Does the laboratory have policies and procedures readily accessible on the laboratory’s intranet? How are updates to policies and procedures disseminated to staff?

Are records management responsibilities for laboratory records management staff defined in the guidance?

Does the laboratory have a records management orientation for new employees, and are employees informed that they are responsible and accountable for keeping accurate and complete records of their activities? Are exit briefings conducted for departing laboratory employees and senior officials?

Does the laboratory records management staff meet regularly to discuss observations of problems and challenges in their respective program areas? Does the NNSA RO attend these meetings?

Controls and Oversight

Does the site office for the laboratory have written procedures for oversight activities to ensure the proper management of contract records?

Does the site office and/or laboratory conduct surveys of the operation of the records management program at all organizational levels? Does this include an inventory of business processes and existing records to identify any unscheduled records?

Creation, Maintenance, Storage, and Disposition Requirements

Adequate Documentation through Recordkeeping Requirements

Does the laboratory have written guidance for handling information that is restricted from release under the Privacy Act or for records containing other information exempt from disclosure under the Freedom of Information Act (FOIA)?

Does the laboratory have written guidance for handling classified records and information and for ensuring segregation from unclassified records and information?

Does the laboratory have written procedures that address records management controls in alternate work site locations? What records issues have been identified and addressed?

Do the laboratory procedures, directives, and other issuances cover the record status of working papers/files and drafts?

Files Maintenance

Do the NNSA records schedules cover all records in all media, and are the schedules fully implemented by the laboratories?

Does laboratory guidance specify a well-defined filing structure through specified file labels for records, including a designated hierarchy of electronic file headers and sub-folders, to be used on file folders?

Does the laboratory file plan include disposition instructions and citations to records schedules?

Does laboratory guidance specify well-defined file structures, naming conventions, and taxonomies for electronic records? Does it ensure that these file structures, naming conventions, and taxonomies are used by staff when establishing and implementing electronic recordkeeping systems?

Does the laboratory have procedures in place to ensure that permanent records are identified and filed separately from temporary records?

Inactive Records Storage

Is the laboratory storing permanent or unscheduled records at a commercial or agency storage facility, and has the laboratory created documentation sufficient to identify and locate files?

Is the laboratory storing records under the appropriate conditions based on the retention period of the records and in compliance with 36 CFR 1232.12?

Are non-textual records being stored in environmentally appropriate space?

Before transferring records to a records storage facility has the laboratory created documentation sufficient to identify and locate files?

Records Disposition

Which records management staff at the laboratory are responsible for the activities related to the disposition of records?

Who approves destructions/removals of records? Are records authorized for disposal only as provided in agency record schedules?

Has the laboratory issued a handbook, guidance, or a directive that contains records disposition policies and procedures as well as the NARA-approved records schedules?

Are permanent records transferred to NARA according to the NARA-approved schedules?

Are temporary records destroyed when NARA-approved retention periods expire?

What controls does the laboratory have in place to prevent unauthorized removal or alienation of records?

What controls exist to ensure that records are not destroyed prior to their approved retention period or while they are covered by litigation hold or freeze?

Are unauthorized destructions/dispositions reported to NARA?

Preservation and Storage

Does the laboratory maintain temporary and permanent audiovisual and engineering records separately?

Are responsible staff familiar with preservation standards as outlined in 36 CFR 1237 and other guidance?

Does the laboratory conduct regular preservation assessments of its audiovisual and engineering records?

Does the laboratory conduct regular reviews of environmental controls in storage areas that contain audiovisual and engineering records?

Electronic Records Management Requirements (Not Including E-mail)

General

Has the laboratory assigned responsibility for development and implementation of laboratory-wide guidance on the management of all records created, received, maintained, used, or stored on electronic media?

Has the laboratory integrated the management of electronic records with other records and information resources management programs of the lab?

Does the laboratory ensure that records management functionalities are incorporated into the design, development, and implementation of its electronic information systems?

Does the laboratory have procedures in place to ensure that records management requirements, including recordkeeping requirements and disposition, are addressed before approving new electronic information systems or enhancements to existing systems?

Does the records management staff work with information technology staff and does records management staff participate in the design, development, and implementation of new electronic information systems?

Migration

Does the laboratory have migration strategies for electronic records and information and associated metadata?

Shared Drives and Unstructured Data

Does the laboratory have policies and procedures that address records and information stored on shared drives? If yes, do the policies and procedures cover permissions, access controls, and acceptable formats for long-term records and information?

Does the record management staff work with information technology staff to ensure the integrity of the shared drives?

Are employees trained in the appropriate use of the shared drive to file records and information and their responsibilities for retention?

ERMS/RMA

Does the laboratory or any office/component unit within the agency currently have a fully functioning Electronic Records Management System (ERMS) or a Records Management Application (RMA) for maintaining and preserving electronic records?

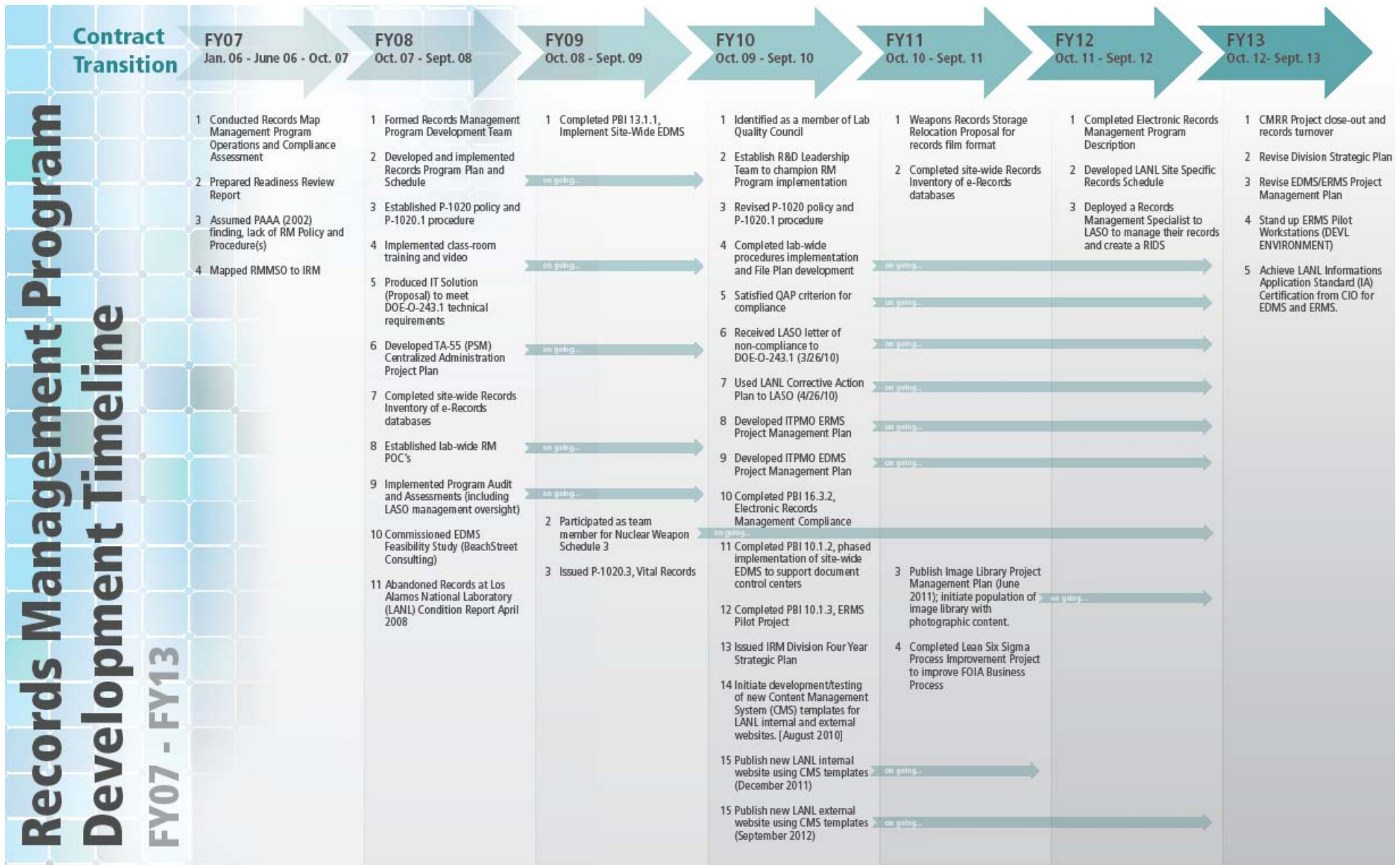
Training

Has the laboratory developed and implemented an internal training program for records management staff covering their roles and responsibilities pertaining to records creation, maintenance, and disposition activities including the application of agency records management guidance?

APPENDIX F: ACRONYMS AND ABBREVIATIONS

CRADAs	Cooperative Research and Development Agreements
CFR	Code of Federal Regulations
EDMS	Electronic Document Management System
ERKS	Electronic Recordkeeping System
ERMS	Electronic Records Management System
FOIA	Freedom of Information Act
IRM	Information Resource Management (LANL)
IRT	Inactive Records Tracking (SNL)
IT	Information Technology
LAFO	Los Alamos Field Office
LANL	Los Alamos National Laboratory
LFO	Livermore Field Office
LLNL	Lawrence Livermore National Laboratory
MED	Manhattan Engineer District
NSSB	National Security Sciences Building (LANL)
NWS-3	Nuclear Weapons Schedule 3
OAA	Office Administrative Assistant (SNL)
PoCA	Plan of Corrective Action
RLO	Records Liaison Officer
RM	Records Management
RMA	Records Management Application
RMFO	Records Management Field Officer
RMSA	Records Management Self-Assessment
RO	Records Officer
RLUOB	Radiological Laboratory/Utility Office Building
SFO	Sandia Field Office
SNL	Sandia National Laboratories
TA	Technical Area (Tech Area)
UCM	Unified Content Management (LLNL)
USC	United States Code

Enlarged Figure 1 from page 7





NATIONAL
ARCHIVES

NATIONAL ARCHIVES *and*
RECORDS ADMINISTRATION