NOTATION VOTE

RESPONSE SHEET

TO:	Annette Vietti-Cook, Secretary
FROM:	Chairman Gregory B. Jaczko
SUBJECT:	SECY-11-0094 – ADVANTAGES AND DISADVANTAGES OF CHANGING THE CURRENT AUTHENTICATION ASSURANCE LEVEL (LEVEL 4) OF THE NATIONAL SOURCE TRACKING SYSTEM
Approved X	Disapproved X Abstain
Not Participating	
COMMENTS:	Below Attached X None
	SIGNATURE DATE

Entered on "STARS" Yes X No ___

Chairman Jaczko's Comments on SECY-11-0094, "Advantages and Disadvantages of Changing the Current Authentication Assurance Level (Level 4) of the National Source Tracking System"

The National Source Tracking System (NSTS) is an important part of the Nation's security framework, allowing for improved accountability of risk-significant radioactive sources. I commend the staff for its steady progress on continually improving the system and increasing on-line usage by licensees, which helps to eliminate errors and decreases the reliance on the help desk for the manual entry of data.

The staff has used processes established by the Office of Management and Budget and the National Institute of Standards and Technology to reevaluate the security categorization and the electronic authentication risk assessment for the NSTS. I appreciate the staff's work in doing so; however, at this time, I do not approve the staff's recommendation to consider the feasibility of implementing a graduated authentication approach concept for the NSTS as described in Option 4 of this SECY paper. Instead, I approve Option 2, in which the NSTS would become a Level 3 system. I agree with Commissioner Ostendorff that this would appear to eliminate many of the significant challenges currently being experienced with on-line use of NSTS, while still maintaining a high level of security for this sensitive information.

Given the sensitivity of the information in the NSTS, the staff should periodically reassess the security levels for the system, including the authentication assurance level, to ensure that the information is properly protected. The staff should also continue to update the Commission offices on a regular basis regarding the NSTS.

Gregory B. Jaczko
