



**Sensitive Unclassified
Non-Safeguards
Information (SUNSI)
February 2, 2006**

**Office of the Executive Director
for Operations
Office of Information Services**

Topics

- **Motivation**
- **Task Force - Management of Sensitive Unclassified Information (SUI)**
- **Task Force - Sensitive Unclassified Non-Safeguards Information (SUNSI) Implementation**
- **Challenges**

Motivation

- **Uncertainty in classification/ marking & inconsistent approach**
- **Task Force chartered 12/2003 to recommend improvements to the management of SUI**
- **Task Force chartered 1/2005 for SUNSI implementation**

SUI Task Force

- **Scope – All internally & externally generated categories of SUI, except Safeguards**
- **Objective – Analyze current population of SUI & develop recommendations to improve and simplify management of SUI**

Findings

- **NRC handles 21 different categories of SUI**
- **Existing guidance is scattered & incomplete**

Findings (cont.)

- **Handling requirements for externally generated SUI have evolved thru work practices**
- **Evolving policy causing confusion**

Findings (cont.)

- **Contrary to agency requirements**
 - **Non-supervisory staff designating info as official use only (OUO) or proprietary**
 - **Information not being properly marked**

Findings (cont.)

- **Procedures for handling SUI in an electronic environment were lacking or not easily accessible**

Recommendations

- **Separate guidance for Safeguards from guidance for SUNSI**
- **Link protections (marking and handling requirements) to “risk of harm that is reasonably foreseeable” if disclosed**

Recommendations (cont.)

- **Establish 7 categories: Allegation, Investigation, Proprietary, Privacy Act, Security Related, Sensitive Internal, and Externally Generated (other agencies)**

Recommendations (cont.)

- **Adopt a policy that document marking is normally sufficient**
 - **Cover sheet should only be used where information is particularly sensitive & marking alone is not sufficient for protection**

Recommendations (cont.)

- Exceptions given for allegations information & investigation information where cover sheets are required**

Recommendations (cont.)

- **Stop linking use of cover sheets to FOIA exemptions**
- **Adopt table that presents 11 major areas of handling requirements**
- **Post table & guidelines on internal web**

Recommendations (cont.)

- **Develop agency policy on providing SUNSI to external government bodies & associated handling requirements**
- **Develop procedures for handling SUNSI in an electronic environment**

SUNSI Implementation Task Force Charter

- **Develop guidance implementing EDO-approved recommendations of the SUI Task Force**

SUNSI Implementation Task Force Charter (cont.)

- **Simplify the categorization, handling, & marking of SUNSI, making it easier to prevent an inadvertent release of SUNSI**

Key Changes

- **Reduced number of types/ categories of SUNSI from 23 to 7**
- **Eliminated cover sheets except for Allegation & Investigation information or if required for externally generated SUNSI**

Key Changes (cont.)

- **Requires marking header and footer of each page of SUNSI document**
- **Eliminated link to FOIA exemption**
- **Clarified that most restrictive requirements apply if more than one category applies**

Key Changes (cont.)

- **Need to know applies**
- **Clarified portion marking not required**
- **Encryption required when SUNSI transmitted electronically**

Challenges

- **No government-wide policy on encryption of SUNSI**
- **Some firewalls block email with attachments encrypted using current tool**
- **Compliance with guidance on disposal of hard copies perceived as an additional burden or cost**