

Records Management

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HISTORY OF REVISIONS

Document Number, Rev	Issue Date	Action	Description
EP-DIR-AP-10003, R0	6/8/11	Major revisions	New document number assigned; Supersedes EP-DIR-SOP-4004, Revision 3
EP-DIR-AP-10003, R1	02/23/12	Major revisions	Changes reflect current record submittal process; Added Copyright Guidance as Attachment 6.
EP-DIR-AP-10003, R2	03/06/12	Minor revision	Corrected metric type on page 14 of document and on briefing Slide 11, Bullet 4; Corrected e-mail address on briefing Slide 11, Bullet 4; Added footers to Attachments 2, 4, and 6.
EP-DIR-AP-10003, R3	6/13/12	Major revision	Remove hardcopy Records Transmittal Form (RTF) and replace with standard Electronic Transmittal Form (E-Trans) for record submittals.
EP-DIR-AP-10003, R4	2/6/13	Major revision	Added language to include new Transmittal Level records process and update Attachment Screen shots.
EP-AP-10003, R0	9/28/15	Major Revision	Complete rewrite.
EP-AP-10003, R1	9/29/16	Major Revision	Updated to meet LANL and NQA-1 Requirements.

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1. PURPOSE

This procedure defines the roles, responsibilities, and process for managing Environmental Management Directorate (ADEM) and Environment Waste Management Operations (EWMO) records. The process includes identification, generation, authentication, maintenance, and disposition of records.

Records management is the process of identifying, creating, receiving, maintaining and dispositioning records. Records management is required by law and defines “records” to include all books, papers, maps, machine-readable materials, e-mail, or other documentary material of informative value, regardless of physical form or characteristics received or created as evidence of the organization, function, policies, decisions, procedures, or operations.

Requirements for records are specified in applicable statements of work, procedures, and memorandums of understanding.

This procedure implements records management requirements in accordance with SD330, *Los Alamos National Laboratory Quality Assurance Program*; PD1020, *Document Control and Records Management*; P1020-1, *Laboratory Records Management*; and EP-DIR-QAP-0001, *Quality Assurance Plan for the Environmental Programs Directorate*.

2. SCOPE

This procedure governs the administrative process for identification, generation, authentication, maintenance, and disposition of records generated in support of the Environmental Management work scope, including records generated by subcontractors in support of Environmental Management scope in accordance with contract requirements.

3. RESPONSIBILITIES

3.1 Responsible Line Manager (RLM)

- Ensures Records Custodians are designated and trained in accordance with P1020-1
- Notifies Document Control/Records Management (DCRM) of changes to Records Custodians
- Ensures record file rooms/stations are established to protect, maintain, and store the organization’s records
- Ensures records are submitted to DCRM in an acceptable form and timely manner
- Conducts a records disposition for departing or transferring individuals
- Approves Form 1704, *Certificate of Records Destruction (Unclassified and Classified)*
- Approves access to records containing Controlled Unclassified Information (CUI) in accordance with P204-1, *Controlled Unclassified Information*

3.2 Document Control and Records Management Team (DCRM)

- Ensures records are complete, readable, legible, and original (when attainable)
- Ensures records received are in acceptable form
- Ensures records accepted are adequately indexed and filed
- Ensures records are retrievable
- Ensures records are protected
- Determines appropriate retention period for records; classifies as lifetime or nonpermanent in records retention schedule
- Monitors adep-dcrm@lanl.gov mailbox for incoming email records or changes to Records Custodians
- Transfers records to the Los Alamos National Laboratory (LANL) Records Center

3.3 Records Source/Custodian (RS/C)

- Ensures records are complete, readable, legible, and original (when attainable)
- Ensures records are created as specified in applicable ADEM Procedures
- Identifies records; consults with DCRM as needed
- Protects in-process documents/records from loss or damage during their creation and use
- Ensures working documents/records are appropriately protected
- Authorizes changes/additions to records as required
- Ensures records are submitted to DCRM in an acceptable form and timely manner

4. REQUIREMENTS

4.1 Records Identification

Records that are generated by or for ADEM are frequently identified in requirements documents, such as procedures, statements of work, and contracts. Records not called out in requirements documents, such as correspondence or email, must also be retained and are identified in the ADEM records inventory and disposition schedules.

4.2 Records Creation

Records generated, supplied, or maintained by and for ADEM shall be:

- Readable when printed or scanned and completed as required by the work accomplished;
- Originals whenever possible, though a reproduced copy may be substituted if the original record is unavailable;
- Traceable to associated items and activities;
- Accurate and reflect the work accomplished or the information required;
- Considered as valid records only when dated and stamped, initialed, or signed by authorized personnel or otherwise authenticated and accepted by the DCRM Team;
- Protected from damage and/or loss until the records are submitted to the DCRM Team; and
- Reviewed for classification by a Derivative Classifier (DC) or Reviewing Official (RO), as necessary.

4.3 Records Protection

Personnel generating and/or handling working records or records not yet submitted to the DCRM Team shall provide reasonable protection for the records in process from damage and/or loss until the records are submitted to the DCRM Team.

Reasonable protection includes restricting access to records and protection from any potential loss, damage or destruction by fire, floods, water leaks, and wind and environmental conditions, such as extreme temperatures and humidity. Records shall be stored off the floor, out of direct sunlight, and free from rodents. In-process records that cannot be easily re-created, such as inspections or waste processing records that are created in the field, shall be protected from loss due to fire by storage in minimum of one hour fire rated cabinets.

The DCRM Team shall ensure records are stored and maintained in a manner that minimizes loss, damage, or destruction from: natural disaster, environmental conditions, infestation, dust, harmful conditions, and/or detrimental activities.

4.3 Records Protection (continued)

ADEM records that are identified as quality-affecting records will be protected by implementing dual storage (simultaneous storage of duplicate records) or by storing in a fire-rated safe or cabinet. These requirements also apply to in-process records identified as quality-affecting records.

- Electronic records are stored in the Electronic Document Management System (EDMS). EDMS servers are maintained, backed up, and protected in accordance with institutional security and computing requirements by the Business Innovation Directorate and the Chief Information Officer.
- Access to the ADEM EDMS is controlled by Access Control List (ACL).
 - General users can view and export records; they cannot add or delete records.
 - Document Control and Records Management personnel can add, delete, or modify records; changes are captured in the history of the document.
- Hardcopy records are staged at TA-00-1237-109 until submitted to the LANL Records Center; quality affecting records that have not been scanned and stored as electronic records 1-hour minimum fire rated cabinets.
- Hardcopy records that are no longer active but that have not met their retention period are stored at the LANL Records Center, TA-03-1400. The LANL Records Center is a National Archives and Records Administration approved repository. Laboratory records are maintained, protected and stored according to PD1020, *Document Control and Records Management*.

5. PERFORMANCE

5.1 Records Authentication

Records Generator/Source

- [1] **VERIFY** that the record is:
 - complete,
 - legible,
 - readable (either hard copy original or when printed from an electronic version),
 - original, unless unattainable,
 - traceable to associated items and activities, and
 - accurate and reflects the work accomplished or the information required.
- [2] **AUTHENTICATE** the record by:
 - stamping, initialing, or signing and dating the record or media either in hardcopy or digitally or
 - providing a statement of authenticity which clearly identifies all records being authenticated and which is authenticated by a method in the previous bullet.

5.2 Records Submittal – Hardcopy

Records should be submitted to DCRM in a timely manner; generally records should be submitted to DCRM within 6 months of creation.

Records Generator/Source

- [1] **PREPARE** records for submittal:
 - Remove staples, but keep records separated by clipping or adding colored paper.
 - Ensure pages are intact, not torn or frayed.
 - Remove duplicates and/or unnecessary blank pages.
 - Ensure records are complete and contain all pages, including all attachments/enclosures, authentication and dates.
- [2] **COMPLETE** the E-Trans form for each individual record or records package; if the record(s) supplements a previously submitted records package, indicate that on the E-Trans form.

NOTE *Ensure the subject/title provided on the E-Trans form is sufficient to enable retrieval of the record.*

- [3] **CLICK** submit on the E-Trans form when all records have been entered.
- [4] **PRINT** a copy of the E-Trans form to include with your hardcopy submission.
- [5] **DELIVER** the hardcopy records with a copy of the E-Trans form to the DCRM Team at TA-00-1237-109.

5.3 Records Submittal - Electronic

Records that are generated and maintained electronically should not be printed and should be submitted electronically.

Records Generator/Submitter

[1] **COMPLETE** the E-Trans or EPRR E-Trans form for each individual record or records package; if the record(s) supplements a previously submitted records package, indicate that on the E-Trans form.

[2] **ATTACH** the record(s) to be submitted.

NOTE 1 *Verify electronic records are not corrupt or password protected.*

NOTE 2 *For files larger than 25 MB use the LANL FTP site to transfer the records.*

[3] **CLICK** submit.

5.4 Records Submittal - Email

Email records can be submitted to the DCRM Team via the team email: adep-dcrm@lanl.gov; an E-Trans form does not need to be submitted.

The DCRM Team can be copied on the original email or it can be forwarded after the fact.

5.5 Records Processing

DCRM Team

[1] **REVIEW** the E-Trans form for completeness as applicable.

[2] **IF** any fields on the E-Trans form are left blank,
THEN consult with the Records Generator/Source, as necessary, to complete the form.

[3] **REVIEW** the records for:

- completeness,
- legibility,
- readability,
- consistency with information on the E-Trans Form, as applicable, and
- authentication.

5.5 Records Processing (continued)

- [4] **INDEX** the records in the EDMS. Standard metadata entered into EDMS for records includes:
- Title
 - Name (Unique Number/Identifier)
 - Document Status as “Record”
 - Date on Document
 - Document Type Description
 - Additional metadata required or provided by the Records Source
- [5] **FILE** records electronically or hard copy, depending on media submitted.

ADEM provides **temporary** storage of hardcopy records; records intended for long-term storage are transferred to the Laboratory Records Center in accordance with P1020-1, *Laboratory Records Management*

ADEM utilizes 1-hour minimum fire-rated containers for storage of hardcopy records until the dual storage requirement can be met; dual storage is realized once hardcopy records have been scanned and uploaded into EDMS.

5.6 Records Corrections

Requestor

- [1] **SUBMIT** a request to correct records via adep-dcrm@lanl.gov.

DCRM Team

- [2] **RETRIEVE** the requested records.

Requestor

- [3] **CORRECT** the records:
- Draw a single line through the incorrect information and enter the correct information.
 - Initial and date each change.
 - Do not destroy the old/incorrect information; it must remain legible (i.e., whiteout or correction tape is not permitted).
- [4] **IF** the original record required review and approval,
THEN route the correction for the same level of review and approval.

DCRM Team

- [5] **UPLOAD** corrected records into EDMS.

5.7 Records Retrieval

Records are available to personnel who support the ADEM mission. Records may be available in either electronic or in hardcopy format. Personnel can view electronic records in EDMS or they can request copies of hardcopy records from DCRM Team personnel at adep-dcrm@lanl.gov.

Retrieval times for records will vary based on the record type or content, location, and file size. Generally, records retrieval requests will be completed within 48 hours of the request. It may take up to 5 days to receive records stored at Federal Records Centers.

Records requested by agencies outside the Department of Energy (DOE) or LANL must be requested in accordance with the Freedom of Information Act.

5.8 Records Check-Out

Personnel requiring a review of hardcopy records are encouraged to do so in the DCRM Team office or to make copies, if practical. Requests to remove records from storage must be approved by DCRM Team personnel and will be based on the requestor's association with ADEM and identified need (e.g., assessment, records review, research, etc.) to access records.

Records checked out must be protected in a manner consistent with this procedure; must remain complete, legible and unaltered; must remain on-site, within LANL property; and must have a due date for their return.

5.9 Records Disposition

The DCRM Team will identify and maintain an inventory of ADEM records in accordance with P1020-1 and approved by group or high-level RLM; records will be categorized and maintained in accordance with ADEM Records Inventory & Disposition Schedule (RIDS).

The transfer or destruction of ADEM records will be carried out in accordance with P1020-1, *Laboratory Records Management*.

6. REFERENCES

SD330, *Los Alamos National Laboratory Quality Assurance Program*

P204-1, *Controlled Unclassified Information*

PD1020, *Document Control and Records Management*

P1020-1, *Laboratory Records Management*

EP-DIR-QAP-0001, *Quality Assurance Program (QAP) Implementation Plan*

**ATTACHMENT 1
Electronic Transmittal Form for
General Use**

LANL Environmental Programs (EP) Directorate, Records Transmittal Form

Transmittal Date: Office of Record:

Hardcopy Submittal? Subcontractor:

OUO / UCNI / PII: Subcontract #

Storm Water Submittal?

Transmitter Z-Number: *Required

RPF Use Only:
Transmittal #: New Record Package #:

Not part of a Record Package

Constitute a new Record Package
Title:

Supplement an Existing Record Package

Record Package # of Package being supplemented: View [Record Packages list](#) to determine correct Pkg. No. to select

Number of records in this transmittal:

Do not discard your copy of the attached record(s) prior to receiving the email notification that your transmittal has been Accepted.

Record Title	Record Date	Record Originators	Document #(s)	Wells	Record	ERID # (RPF Use Only)
					Click here to attach a file	

Insert item

Remarks: _____

**ATTACHMENT 1
Electronic Transmittal Form for
Electronic Public Reading Room**

LANL Environmental Programs (EP) Directorate, Records Transmittal Form

Transmittal Date: 1/18/2013 Office of Record:

Hardcopy Submittal? Subcontractor: NA

OUO / UCNI / PII: Subcontract #: NA

Storm Water Submittal?

Transmitter Z-Number: Required

RPF Use Only:
Transmittal #: New Record Package #:

Not part of a Record Package

Constitute a new Record Package
Title:

Supplement an Existing Record Package
Record Package # of Package being supplemented: View [Record Packages list](#) to determine correct Pkg. No. to select

Number of records in this transmittal:

Do not discard your copy of the attached record(s) prior to receiving the email notification that your transmittal has been Accepted.

These columns must be completed if the record is to go to the EPRR									
Record Title	Record Date	Record Originators	Document #(s)	Walls	Subject - Enter number for each Subject that applies (e.g. 1-4,9) 1. Air Quality 2. Biological Resources 3. Cultural Resources 4. Demolition/Decontamination/Decommissioning 5. Environmental Monitoring and Surveillance 6. Groundwater 7. Remediation 8. Storm Water 9. Waste Management	Regulator - Enter number for each Regulator that applies 1. NREED 2. US EPA 3. DOE	Regulation Type	Record	ERID # (RPF Use Only)
							<input type="checkbox"/> RCRA <input type="checkbox"/> 19 <input type="checkbox"/> Consent Order <input type="checkbox"/> DOE Order	<input type="checkbox"/> Click here to attach a file	

Print Form

Remarks:



ATTACHMENT 3

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E-Trans Instructions

All fields on the form must be filled in unless otherwise specified.

If a field is not applicable or information is not available, enter N/A in the field

- The on-line Electronic Transmittal Form includes self-expanding fields to accommodate all information required. Retrieve a copy of the form from the website for each use to ensure the latest version of the form is used.
- If changes to information entered on the Electronic Transmittal Form are required after printing and fixing electronically and re-printing is not feasible, then draw a single line through the incorrect information and initial and date the correction.

1.	Transmittal Date	Enter the date on which the record was transmitted to the RPF. (Note: Use the following format for the date: MM-DD-YYYY).
2.	Office of Record	From the drop down menu, choose the organization that owns the responsibility for the records. Generally this is the organization that created the records or received the records from an external party.
3.	Subcontractor	From the drop down menu, choose the appropriate Subcontractor Organization who created the records.
4.	Subcontract #	From the drop down menu, choose the appropriate Subcontract #.
5.	Hardcopy Submittal?	Check the Hardcopy box if the records are being submitted in Hardcopy form. If submitting records via Hardcopy, complete the form and submit. Then print the e-trans form to attach to hard copies prior to sending to DCRM for processing.
6.	No Contamination Potential	Check the box to verify submittal has no Contamination Potential (radioactive or biological). If the records are potentially contaminated, contact HPRT for Procedural Instructions per Procedure P1020-1, <i>Laboratory Records Management</i> .
7.	OUO / UCNI / PII	Check the box if the record(s) contains a type of information listed in the Freedom of Information Act Exemptions Table; otherwise check "No". (Note: If "Yes" is checked, ensure the front page (or cover page) of the record(s) that contain OUO/UCNI/PII is stamped with the proper OUO/UCNI/PII identifier. All pages within the document must be appropriately stamped to indicate this record needs to be handled differently. OUO/UCNI/PII records must be submitted separately from non- OUO/UCNI/PII records.
8.	Storm Water Submittal?	Check the box if submitting Storm Water records.
9.	Transmitter Z Number	Enter Z# of person preparing Transmittal then click on the icon to the right of the field.

ATTACHMENT 3

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10.	RPF Use Only Transmittal #	A unique auto generated transmittal number will be assigned after the E-Trans is submitted.
	Record Package #	For new record packages, the RPF will create a new unique number for the package. A copy of the E-Trans will be provided to the Transmitter. This package number should be referenced in future transmittals if the existing package needs to be supplemented with additional records.

11.	Transmittal Type:	Choose one by checking the appropriate box:
	<ul style="list-style-type: none">• Not Part of a Record Package• Constitute a new Record Package• Supplement an Existing Record Package	<p>Individual Records not part of a Record Package (records do not comprise a file related to a single activity or task).</p> <p>Constitutes a new Record Package (all the records support a single activity or task) is required if a record being submitted represents a new records package. Enter in the Title: block the name you want to call this new record package.</p> <p>If supplementing a previously submitted records package select the applicable Record Package Number by clicking on the Record Package list link</p> <p>Note: <i>Use separate E-Trans to submit records belonging to separate record packages.</i></p>

12.	Number of records in Transmittal	Enter the number of records that are being transmitted for each line item on this form.
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ATTACHMENT 3

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List of Individual Records or Records in the Records Package:

1.	Record Title	Enter the title as it appears on the original record. A full record title is required, if one is not available, then one must be created.
2.	Record Date	Enter the date the record was completed or approved. All records require a date. If no date is available, management can estimate the create date of the record.
3.	Record Originator(s)	Enter the last and first name of the author of the record. If there are multiple authors listed on a record include all names. Due to limited space on the E-Trans, 'Various' may be used in the case where many authors exist. The RPF will index all the authors listed on the record.
4.	Document #(s)	Enter the document number(s) that relate to the record. The record may have multiple document numbers, list all the numbers related to the record
5.	Wells	Enter all well number(s) that relate to the record. The record may have multiple well numbers.
6.	Reading Room Relevant (Note: Only on EPRR E-Trans Form)	If a record is required to be placed in the Electronic Public Reading Room (EPRR) (see definition) enter the relevant Subject; Regulatory Body; and Regulation Type from the options available. Enter NA in these blocks if the record does not need to be placed in the EPRR.
7.	Record Attachment	Click to attach a file. Browse and select appropriate document to upload.
8.	Unique # (RPF Use Only)	Records Processing Facility assigns a unique # to each record upon processing. This number is inserted into this field on the E-Trans for each record submitted.
