



Department of Energy

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MEMORANDUM FOR DISTRIBUTION

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SUBJECT: Radiological Control Technical Position Regarding Use of
Social Security Numbers in Dose Reports

The Office of Worker Safety and Health Policy issues Radiological Control Technical Positions in response to questions or issues associated with Department of Energy (DOE) occupational radiation protection programs.

This technical position addresses acceptable approaches for having a unique identification number on radiation exposure data for individuals. There have been some questions about what information to include in radiation exposure reports. Specifically, there have been some concerns about the use of social security numbers in individual reports. The concern is how to protect the individuals and still be in compliance with title 10, Code of Federal Regulations, part 835, by having the reports be unique to each individual.

The attached technical position does not represent new policy or direction to the field. Rather, it provides clarification regarding providing radiation dose reports with unique identifying data.

Please ensure further distribution of the attached document to the applicable radiation protection organizations at your facilities. The DOE Radiological Control Coordinating Committee has reviewed this technical position.

Attachment

cc w/attachment:
See attached list.



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**Department of Energy
Office of Worker Safety and Health Policy
Radiological Control Technical Position
RCTP 2009-02**

Use of Social Security Number in Dose Reports to Individuals

Issue:

Title 10, Code of Federal Regulations, part 835 (10 C.F.R. 835), specifies requirements for recording radiation exposure data for individuals. Specifically, § 835.801(a) requires that exposure reports to individuals include: the Department of Energy (DOE) site or facility name, the name of the individual, and the individual's social security number, employee number, and/or other unique identification number. In addition, the Department's Environment, Safety and Health Reporting Manual (DOE M 231.1-1A-Ch 2) specifies use, when possible, of individual social security numbers in the dose data submitted to the Department.

There have been some questions about what information to include in radiation exposure reports sent to individuals. Particularly, there have been some concerns about the use of social security numbers in individual reports. Frequently, especially for visitors or short-term employees, no employee number or other unique identification (ID) number is assigned to the individual. For this reason, their radiation exposure reports must use their social security numbers as unique identifying numbers. The issue is how to protect individuals' privacy to the maximum extent possible and still be in accordance with 10 C.F.R. § 835.801(a) by having the reports being unique to each individual. There have also been some concerns on including social security numbers in the dose data submitted to the Department's Radiation Exposure Monitoring System (REMS).

Discussion:

Applicable Requirement

10 C.F.R. 835

835.801, Reports to Individuals

- (a) Radiation exposure data for individuals monitored in accordance with § 835.402 shall be reported as specified in this section. The information shall include the data required under § 835.702(c). Each notification and report shall be in writing and include: the DOE site or facility name, the name of the individual, and the individual's social security number, employee number, or other unique identification number.

Technical Position:

The Office of Worker Safety and Health Policy staff has reviewed dose reports from several sites, and a wide variety of methods for recording unique identifying numbers have been observed. Some sites use the full social security number, some use just the last four digits of the social security number, some use an employee number, and some have no apparent unique identifying number (which is contrary to 10 C.F.R. 835).

If an individual is assigned an employee identification number or other unique identifying number, then either of these numbers can be used in individual reports as opposed to the social security number. If these options are not available, then it is preferable not to include an individual's full social security number in dose reports to individuals. Only necessary and relevant Personally Identifiable Information (PII) should be used. As defined in DOE Order 206.1, *Department Of Energy Privacy Program*, PII is "[a]ny information maintained by the Department about an individual, including but not limited to, education, financial transactions, medical history and criminal or employment history, and information that can be used to distinguish or trace an individual's identity, such as his/her name, Social Security number, date and place of birth, mother's maiden name, biometric data, etc., and including any other personal information that is linked or linkable to a specific individual."

The Office of Worker Safety and Health Policy suggests, in the absence of an employee or other unique number, the use of the last four digits of the employee's social security number and their full name be used in the reports. The last four digits of the social security number alone is insufficient to be a unique identifier unless it is used in conjunction with the employee's full name. This is because it only takes a workforce of about 119 individuals to be in a situation where there is a greater than a 50 percent chance that two workers will have same four numbers at the end of their social security number. Thus, use of an individual's full name in conjunction with the use of the last four numbers of the individual's social security number should facilitate unique identification of an individual.

Regardless of the unique identifier used, the reports must be protected, consistent with the requirements of the Privacy Act. Any reports, databases, systems, etc., containing entire or partial social security numbers must be protected as PII.

Applicable Requirement

DOE M 231.1-1A Chg 2, ENVIRONMENT, SAFETY AND HEALTH REPORTING MANUAL

Table G-1 - Electronic Data Submittals

Element 6 requires the identification number for individuals. Element 7 requires input of type of identification number used to identify the individual. It refers user to Table G-6.

Table G-6 - Identification Codes

ID Type Code	Identification Type Description
SSN	U.S. Social Security Number
PPN	Passport Number
CSI	Canadian Social Insurance Number
WPN	Work Permit Number
OTH	Other ¹

¹Other identification numbers are unique identifiers assigned by the reporting organization when all other identification types are unavailable. The individual’s SSN should be used whenever possible. The first seven digits of an “other” identification number must be the organization code for the reporting organization. The remaining eight digits of the ID number should be unique for each individual being submitted by the reporting organization.

Technical Position:

For purposes of reporting doses to the Department in accordance with DOE M 231.1-1A-Ch 2, social security numbers are required to be used when possible. Submittal of this information to the Department and its control needs to be compliant with provisions of the Privacy Act. On May, 13, 2009, the Department issued, *REMS Policy for Submitting of PII Information* (attached). The REMS Program Policy discusses the appropriate method for securely transmitting REMS data to the Department.

Summary:

If an individual is assigned an employee identification number or other unique identifying number, then either of these numbers can be used in individual reports as opposed to the social security number. Using both the full name and the last four digits of the social security number is an acceptable approach for meeting the 10 C.F.R. § 835.801(a) *Reports to Individuals* requirement for use of a unique identification number while providing additional protection of employees’ privacy. Reporting the dose data to the Department’s REMS program still requires inclusion of social security numbers. Any reports, databases, systems, etc., containing entire or partial social security numbers must be protected as PII.