RGE
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Robert C. Mecredy
Vice President
Nuclear Operations

May 12, 2004

Mr. Robert L. Clark
Office of Nuclear Regulatory Regulation
U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
11555 Rockville Pike
Rockville, MD 20852

Subject: Use of Encryption Software for Electronic Transmission of Safeguards Information
R. E. Ginna Nuclear Power Plant
Docket No. 50-244

Dear Mr. Clark:

Pursuant to the requirements of 10 CFR 73.21(g)(3), Rochester Gas and Electric Corporation (RG&E) requests approval to process and transmit Safeguards Information (SGI) using PGP Software (Enterprise, Corporate, or Personal) Desktop Version 8.0 or the latest validated version, developed with PGP SDK 3.0.3. National Institute of Standards and Technology Certificate 394 validates compliance of this SDK with FIPS 140-2 requirements.

An information protection system for SGI that meets the requirements of 10 CFR 73.21(b) through (i) has been established and is being maintained. Prior to the first use of encryption software for SGI material, written procedures shall be in place to describe, as a minimum: access controls; where and when encrypted communications can be made; how encryption keys, codes and passwords will be protected from compromise; actions to be taken if the encryption keys, codes or passwords are, or are suspected to have been, compromised (for example, notification of all authorized users); and how the identity and access authorization of the recipient will be verified.

RG&E intends to exchange SGI with the NRC, Nuclear Energy Institute (NEI), and other SGI holders who have received NRC approval to use PGP software. The Manager, Nuclear Security is responsible for the overall implementation of the SGI encryption program at Ginna Station. The Manager, Nuclear Security is also responsible for collecting, safeguarding, and disseminating the software tools needed for encryption and decryption of SGI.

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Pursuant to 10 CFR 73.21(g)(3), the transmission of encrypted material to other authorized SGI holders, who have received NRC approval to use PGP software, would be considered a protected telecommunications system. The transmission and dissemination of unencrypted SGI is subject to the provisions of 10 CFR 73.21(g)(1) and (2).

Should you have any questions or require additional information, please contact Mr. Ron Teed, Manager, Nuclear Security at (585) 771-3232.

Very truly yours,

Robert C. Mecredy

xc: Regional Administrator, Region I
U.S. NRC Ginna Senior Resident Inspector
Scott Morris, NRC/NISR
Lynn Silvious, NRC/NSIR
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