

# **ENERGY NORTHWEST**

P.O. Box 968 ■ Richland, Washington 99352-0968

May 25, 2004  
GO2-04-101

U. S. Nuclear Regulatory Commission  
Attention: Document Control Desk  
Washington, DC 20555-0001

Subject: **COLUMBIA GENERATING STATION, DOCKET NO. 50-397; USE OF  
ENCRYPTION SOFTWARE FOR ELECTRONIC TRANSMISSION OF  
SAFEGUARDS INFORMATION**

References: 1. 10 CFR 73.21  
2. NRC Regulatory Issue Summary 2002-15

Dear Sir or Madam:

Pursuant to the requirements of 10 CFR 73.21(g)(3), Energy Northwest 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 Software Development Kit (SDK) 3.0.3. National Institute of Standards and Technology Certificate 394 validates compliance of this SDK with Federal Information Processing Standard 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.

Energy Northwest intends to exchange SGI with the NRC, Nuclear Energy Institute, and other SGI holders who have received NRC approval to use PGP software. Mr. Maurice C. Peterson, Safeguards Specialist for Energy Northwest is responsible for the overall implementation of the SGI encryption program at Energy Northwest. Mr. Peterson 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 me at (509) 377-4342.

Respectfully,



DW Coleman  
Manager, Regulatory Programs  
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cc: BS Mallet - NRC - RIV  
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