

July 6, 2004

Mr. Stephen A. Byrne  
Senior Vice President, Nuclear Operations  
South Carolina Electric and Gas Company  
Post Office Box 88  
Jenkinsville, South Carolina 29065

SUBJECT: VIRGIL C. SUMMER NUCLEAR STATION - USE OF ENCRYPTION  
SOFTWARE FOR SECURE TRANSMISSION OF SAFEGUARDS  
INFORMATION (TAC NO. MC3579)

Dear Mr. Byrne:

By letter dated May 27, 2004, you requested approval to use encryption software for the transmission of Safeguards Information (SGI) for Virgil C. Summer Nuclear Station. Specifically, you requested approval for the use of Pretty Good Protection (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 for encryption of sensitive unclassified SGI.

Title 10 of the *Code of Federal Regulations* (10 CFR) Section 73.21(g)(3) states, in part, “. . . Safeguards Information shall be transmitted only by protected telecommunication circuits (including facsimile) approved by the NRC.” The Nuclear Regulatory Commission (NRC) considers those encryption systems that the National Institute of Standards and Technology (NIST) has determined conform to the Security Requirements for Cryptographic Modules in Federal Information Processing Standard (FIPS) 140-2, as being acceptable. The Secretary of Commerce has made use of Cryptographic Module Validation Program products mandatory and binding for Federal agencies when a Federal agency determines that cryptography is necessary for protecting sensitive information.

PGP Software Corporate Desktop Version 8.0 was developed with PGP SDK 3.0.3. NIST Certificate, Number 394, validates compliance of this software development tool with FIPS 140-2 requirements. Therefore, the NRC staff finds the use of this encryption software acceptable for processing and transmitting SGI electronically for your site. Later versions of PGP Software Corporate Desktop are also acceptable provided that:

1. They were developed using a software development tool e.g., PGP SDK 3.0.3 that meets and is validated by NIST to FIPS 140-2 requirements.
2. You notify the NRC of your intention to update your encryption software 30 days prior to its first use. When notifying the NRC, include a description of the new software you will be using and provide a statement indicating NIST certification of the software development tool.

It is important to remind you that in accordance with 10 CFR 73.21(a), you are required to establish and maintain an information protection system that satisfies 10 CFR 73.21(b) through (i). Compliance with the provisions of 10 CFR 73.21, including the use of encryption software for transmittal of SGI, is mandatory and inspectable.

Additionally, only one public key is to be generated per site. The PGP file containing the public key must be named according to the following syntax: LastName\_FirstName\_SiteName.asc. This naming convention represents the organizational point of contact indicated as owning the key-pair.

As stated in letter dated May 5, 2004, from R. P. Zimmerman, NRC, Office of Nuclear Security and Incident Response, to Stephen D. Floyd, Nuclear Energy Institute (NEI), please provide the public key for transmitting sensitive, unclassified SGI and the point of contact information (name, telephone number and e-mail address) to NEI and the NRC points of contact provided below. Once this information has been provided, we will provide a copy of the NRC public key to your point of contact. All SGI holders must employ an appropriate credentialing process to verify that individuals providing public keys are legitimate users. Private keys must be controlled as SGI.

The NRC point of contact for all transmittals related to the review and approval of the supplemental responses to the security orders is Mr. Bhalchandra K. Vaidya, Project Manager, Security Plan Review Team, Division of Licensing Project Management, who can be reached at (301)415-3308, or via e-mail at [bkv@nrc.gov](mailto:bkv@nrc.gov). For transmittal of other SGI, and for public key coordination, the NRC point of contact is Mr. Louis Grosman, Office of the Chief Information Officer, who can be contacted at (301)415-5826, or via e-mail at [lhg@nrc.gov](mailto:lhg@nrc.gov). As coordinated with the NEI, the industry point of contact for public key coordination is Mr. James W. Davis, who can be reached at (301)739-8105 and via e-mail at [jwd@nei.org](mailto:jwd@nei.org).

Encrypted SGI information shall be transmitted as attachments to an e-mail directed to [sprt@nrc.gov](mailto:sprt@nrc.gov). The e-mail message must also contain the name of the NRC staff member who is to receive the attachments.

If you have any questions, please contact me at (301)415-3308.

Sincerely,

*/RA/*

Bhalchandra K. Vaidya, Project Manager  
Security Plan Review Team  
Division of Licensing Project Management  
Office of Nuclear Reactor Regulation

Docket No. 50-395

cc: See next page

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Encrypted SGI information shall be transmitted as attachments to an e-mail directed to sprt@nrc.gov. The e-mail message must also contain the name of the NRC staff member who is to receive the attachments.

If you have any questions, please contact me at (301)415-3308.

Sincerely,

/RA/

Bhalchandra K. Vaidya, Project Manager  
Security Plan Review Team  
Division of Licensing Project Management  
Office of Nuclear Reactor Regulation

Docket No. 50-395

cc: See next page

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OFFICE	SPRT/PM	SPRT/LA	NSIR/DNS/SC	OCIO/PMAS	SPRT/SC
NAME	BVaidya	CHawes	SMorris	LHGrosman	JNakoski
DATE	06/29/04	06/29/04	06/29/04	06/30/04	07/06/04

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Mr. Stephen A. Byrne  
South Carolina Electric & Gas Company

VIRGIL C. SUMMER NUCLEAR STATION

cc:

Mr. R. J. White, Nuclear Coordinator  
S.C. Public Service Authority  
c/o Virgil C. Summer Nuclear Station  
Post Office Box 88, Mail Code 802  
Jenkinsville, South Carolina 29065

Resident Inspector/Summer NPS  
c/o U.S. Nuclear Regulatory Commission  
576 Stairway Road  
Jenkinsville, South Carolina 29065

Chairman, Fairfield County Council  
Drawer 60  
Winnsboro, South Carolina 29180

Mr. Henry Porter, Assistant Director  
Division of Waste Management  
Bureau of Land & Waste Management  
Dept. of Health & Environmental Control  
2600 Bull Street  
Columbia, South Carolina 29201

Mr. Jeffrey B. Archie, General Manager  
Nuclear Plant Operations  
South Carolina Electric & Gas Company  
Virgil C. Summer Nuclear Station  
Post Office Box 88, Mail Code 300  
Jenkinsville, South Carolina 29065

Mr. Ronald B. Clary, Manager  
Nuclear Licensing  
South Carolina Electric & Gas Company  
Virgil C. Summer Nuclear Station  
Post Office Box 88, Mail Code 830  
Jenkinsville, South Carolina 29065

Ms. Kathryn M. Sutton, Esquire  
Winston & Strawn Law Firm  
1400 L Street, NW  
Washington, DC 20005-3502