your energy partner®
OPPD
Omaha Public Power District

444 South 16th Street Mall
Omaha NE 68102-2247

February 11, 2005
LIC-05-0019

U. S. Nuclear Regulatory Commission
ATTN: Rules and Directives Branch, Office of Administration
Washington, DC 20555-0001

Reference: Docket No. 50-285

SUBJECT: Comments on DG-1130, "Criteria for Use of Computers in Safety Systems of Nuclear Power Plants"

The Omaha Public Power District (OPPD) is pleased to provide the attached comments on NRC Draft Regulatory Guide DG-1130, "Criteria for use of Computers in Safety Systems of Nuclear Power Plants." These comments are provided in accordance with the December 16, 2004 Federal Register notification (69 FR 75359).

No commitments are made to the NRC in this letter. If you have any questions, please contact Mr. Chris Sterba at (402) 533-6683.

Sincerely,

R. L. Phelps
Division Manager
Nuclear Engineering

RLP/mle

Attachment

Section	Issue	OPPD Comment	Reason
Section A, Introduction	The definition of the term "computer" states: "the term "computer" means a system that includes computer hardware, software, firmware, and interfaces."	Revise definition to read: "the term computer means a system that includes microprocessor based hardware, software, firmware, and interfaces."	In general, the definition should not use the term being defined.
Section 2.3.1, System Features	"The safety system software security design configuration items should address control over (1) access to the software functions, (2) use of safety system services, (3) data communication with other systems, and (4) the list of personnel who may access and use the system."	Revise item (4) to read: "the list of functional positions that may access and use the system."	A list of functional positions restricts system access to those personnel whose job function requires access and is easier to administer than a list of named individuals.
Section 2.3.1, System Features	"Access control should be based on the results of risk analysis. The results of the analyses may require more complex access control, such as a combination of knowledge (e.g., password), property (e.g., key, smart-card) and personal features (e.g., fingerprints), rather than just a password."	OPPD agrees that safety system security is very important. However, it is OPPD's position that a well-defined Safety System Security Plan that includes network security could adequately address these issues.	Requiring additional security features could compromise the integrity of the safety system itself. It is OPPD's position that a Safety System Security Plan that includes network security and has well-defined roles and responsibilities of the staff organization is more beneficial than adding unnecessary complexity to the safety system.