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From: "Adams, Brenda K." <bkadams@tva.gov>
To: <NRCREP@nrc.gov>
Date: Mon, Mar 14, 2005 3:29 PM
Subject: Comments on Draft Regulatory Guide 1130

12/16/04

Attached you will find TVA's Comments on DG 1130 - COMPUTERS IN SAFETY SYSTEMS (VOL. 69 FR 75359-75360).

69FR75359

Thank you.

(17)

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The Lord is my Light and my Salvation, whom shall I fear? The Lord is the Stronghold of my life, of whom shall I be afraid?

--Psalm 27:1

CC: "Brown, Robert M." <rmbrown@tva.gov>, "Adams, Brenda K." <bkadams@tva.gov>

E-RIDS = ADM-03

Call = S. Aggarwal - (SKA)

Sisp Review Complete

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Tennessee Valley Authority, 1101 Market Street, Chattanooga, Tennessee 37402-2801

March 14, 2005

Chief, Rules and Directives Branch
Division of Administrative Services
Office of Administration, Mail stop T-6D59
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555-0001

Gentlemen:

TENNESSEE VALLEY AUTHORITY (TVA) - COMMENTS ON DRAFT REGULATORY GUIDE (DG)-1130 - COMPUTERS IN SAFETY SYSTEMS (VOL. 69 FR 75359-75360)

This letter provides TVA's comments on Draft Regulatory Guide (DG)-1130, "Criteria for Use of Computers in Safety Systems of Nuclear Power Plants." This DG reflects NRC's proposed revision to Regulatory Guide (RG)-1.152, Revision 1. The proposed changes include new security requirements that TVA feels are inappropriate without prior collaboration with the Institute of Electrical and Electronic Engineers (IEEE) Committee. TVA's detailed comments are provided in the enclosure.

By Federal Register dated February 16, 2005 (70 FR 7973), the NRC extended the comment period to March 14, 2005.

TVA appreciates the opportunity to comment on the proposed draft regulatory guide. If you have any questions, please contact Rob Brown at (423) 751-7228.

Sincerely,

A handwritten signature in black ink, appearing to read 'Fredrick C. Mashburn'.

Fredrick C. Mashburn
Senior Program Manager
Nuclear Licensing

Enclosure

cc (Enclosure):

U. S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, D.C. 20555-0001

ENCLOSURE

Comments on Draft Guide (DG)-1130

1. **Generic Process Comment** – The addition of substantial security requirements in DG-1130 is inappropriate without prior consultation with the Institute of Electrical and Electronic Engineers (IEEE) committee. TVA believes that it would be appropriate, and useful, to address this issue in the standard with the IEEE 7-4.3.2 committee prior to going forward. TVA understands that the IEEE 7-4.3.2 committee had NRC representation, and the subject DG was not provided to the committee to address during the revision or balloting process. The IEEE 7-4.3.2 committee should have an opportunity to present the best method to implement new security requirements and represent the consensus of the industry. The NRC should allow the IEEE committee time to address new requirements prior to implementing any changes.
2. The new security guidance addressed in this DG-1130 is too general for a standard and more detail is needed. From the general context of these new requirements, it is not clear what should be performed to ensure security or what types of threats/attacks that need to be protected against. A guidance document should provide concise standards. From the review of DG-1130 and vendor software development programs, TVA does not believe that a majority of the vendors will meet these general and conceptual security requirements, thus possibly eliminating a majority of the TVA's equipment vendors.
3. It is reasonable to specify cyber security provisions in the functional requirements of the system. This is the logical security to build into the system. However, this information should be considered sensitive since it defines the functional controls used to secure the system from unauthorized access. TVA does not believe that DG-1130 should go beyond stating that the requirement documents should address security issues.
4. NUREG 6847 and Nuclear Energy Institute (NEI) 04-04 describe a cyber security assessment methodology which should be used to evaluate the proposed system's cyber security risk/vulnerabilities. The DG-1130 does not appear to recognize this NUREG.
5. It is unclear how to meet some of the requirements in DG-1130. For example, the code for undocumented code, back doors, and other means would allow unauthorized access to the system. How do you test for the undocumented/undefined? TVA believes it is reasonable for the DG to call attention to the cyber security issues that should be addressed in the design and development of safety system software; however, DG-1130 seems to take it to an extreme. The issues almost seem to overshadow the other software development/management considerations.

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