

ROB received  
3/15/05

March 14, 2004

NRC Draft Regulatory Guide DG-1130: Criteria for use of Computers in Safety Systems of Nuclear Power Plants

Comments by Florida Power and Light

Approving DG-1130 at this time will cause problems with both the licensees and the NRC. The guidance for cyber security is still undergoing development. The NRC itself is conducting studies and evaluations on this topic. The regulatory positions identified in DG-1130 are a "work-in-progress" and are not yet finalized for general use. The NRC is working with NEI to define an acceptable cyber security program. Jumping ahead or second-guessing that effort will not succeed and will require another revision to 1.152 when the cyber security effort is complete. Florida Power and Light endorses the NEI comments on this subject.

Thank you,

Mark Dryden  
Regulatory Affairs  
Florida Power & Light

700 Universe Blvd.  
Juno Beach FL 333408  
[mark\\_dryden@fpl.com](mailto:mark_dryden@fpl.com)

12/16/04

69FR75359

15

SIS Review Complete  
Template = ADM-013

F-RIDS = ADM-03  
Call = S. Aggarwal (SKG)