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Rules and Directives Branch,
Office of Administration
U. S. Nuclear Regulatory Commission
11555 Rockville Pike
Rockville, MD 20555-0001

12/16/04
69FR 75359

Reference: Federal Register, Vol. 69, No. 241, at 75359

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Subject: Comments on Draft Guide 1130

As noticed in the referenced citation, Exelon Generation Company, LLC (Exelon) and AmerGen Energy Company, LLC (AmerGen) are submitting the following comments on Draft Regulatory Guide 1130, "Criteria for Use of Computers in Safety Systems of Nuclear Power Plants."

Exelon and AmerGen endorse the comments provided by the Nuclear Energy Institute (NEI) in a letter from NEI on this topic dated March 14, 2005. Specifically, we agree that the guidance should focus on cyber security and application to the use of computers in safety applications. The programmatic aspects of digital safety system security should be addressed within the broader context of Information Security Management and not via an add-on to an existing Regulatory Guide. This subject is sufficiently important and complex to merit a more considered set of guidance.

Further, the guidance does not provide the clarity needed and will result in significant implementation issues. While it is important to clearly identify the intended outcome of a particular requirement, there may be a variety of acceptable methods of achieving that outcome. For example, the material as presented in DG-1130 is based solely upon a life-cycle approach, which is overly restrictive. Other approaches, such as risk-based approaches, are available and should be permitted to address safety system security.

We also recommend that the NRC staff conduct a public meeting, after Section C.2 has been redrafted. This could significantly aid in achieving the clarity needed in the cyber security requirements of the guide.

If you have any questions on this issue, please contact Mr. Allan R. Haeger at 630 657-2807.

Respectfully,

Patrick R. Simpson

Patrick R. Simpson
Manager - Licensing

E-RIDS = ADM-03

SESP Review Complete

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Template = ADM-013