

Enclosure XIII to ET 08-0014

**WCNOC Operation Plan, Rev. 1**

# ADVANCED LOGIC SYSTEM (ALS) CLASS 1E CONTROLS

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## OPERATION PLAN

REVISION 1

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Revision Control

<b>Rev #</b>	<b>Approval</b>	<b>Approval Date</b>	<b>Description of Change(s)</b>
<b>0</b>	<b>GWC</b>	<b>5/29/2007</b>	<b>Initial Revision</b>
<b>1</b>	<b>GWC</b>	<b>2/5/2008</b>	<b>Document overhaul for generic application at Wolf Creek for ALS Class 1E Controls. Added revision table. Added more specific wording for security requirements and referenced Regulatory Guide 1.152.</b>

**Table of Content**

**REVISION 1** ..... 1

1 Operations Plan ..... 4

1.1 Roles and Responsibilities ..... 4

    1.1.1 WCNOC ..... 4

    1.1.2 Class 1E Controls Supplier ..... 4

1.2 Security Requirements ..... 4

    1.2.1 Physical Security ..... 4

    1.2.2 Cyber Security ..... 4

1.3 Implementation Characteristics ..... 5

1.4 Procedures ..... 6

1.5 References ..... 6

    1.5.1 Regulatory Guide 1.152 - “Criteria for Digital Computers in Safety Systems of Nuclear Power  
Plants” ..... 6

## **1 Operations Plan**

The purpose of the Operation Plan is to identify the roles and responsibilities of operating the ALS Class 1E Controls equipment, identify the security requirements for the equipment, and address operational procedures required for the operation of the equipment.

### **1.1 Roles and Responsibilities**

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The following sections outline the roles and responsibilities for the operation of the ALS Class 1E Controls:

#### **1.1.1 WCNOG**

WCNOG is the system owner and is ultimately responsible for the successful operation of the ALS Class 1E Controls. The WCNOG Operations Department has direct responsibility for operating the plant equipment. The WCNOG Maintenance Department and System Engineering Group have ownership of the equipment to ensure it is operating and maintained properly.

#### **1.1.2 Class 1E Controls Supplier**

The Class 1E Controls Supplier is responsible for fulfilling Part 21 of 10CFR50, Appendix B. The Class 1E Controls Supplier is also responsible for delivery of the installation, operation, and maintenance manual. The installation, operation, and maintenance manual shall be incorporated into the WCNOG Documentation Controls system via the WCNOG Change Package process.

### **1.2 Security Requirements**

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This section discusses both the physical security and the cyber security of the ALS Class 1E Controls. This section shall serve as the documentation of the security requirements as identified in Regulatory Guide 1.152 – “Criteria for Digital Computers in Safety Systems of Nuclear Power Plants”.

#### **1.2.1 Physical Security**

The ALS Class 1E Controls equipment shall be located in the Control Building, specifically, the Main Control Equipment Room. This room is secured by the plant security system, which only allows authorized personnel into the area. If the particular application required installation of the ALS Class 1E Controls equipment is outside the Main Control Equipment Room, a revised Operation Plan shall be required.

#### **1.2.2 Cyber Security**

The ALS Class 1E Controls Equipment shall not be permanently connected to either the corporate network of the Plant Process Computer. The ALS Class 1E Controls equipment provides the ability for the maintenance personnel to connect via a laptop computer for the purposes of diagnostics and troubleshooting. The ALS Class 1E Controls shall indicate this connection to the control room via the annunciator system. The ALS Class 1E Controls does not provide a data transmission mechanism to allow communications between applications or functions. Therefore, there is no concern for the propagation of

errors within and between functions for the ALS Class 1E Controls. In addition there are no concerns regarding cyber security as the ALS Class 1E Controls equipment is not connected to either the corporate network or the Plant Process Computer network.

The ALS Class 1E Controls equipment provides the ability for the maintenance personnel to connect via a laptop computer for the purposes of diagnostics and troubleshooting. The laptop computer cannot change the ALS Class 1E Controls equipment logic or configuration. If a particular application of the ALS Class 1E Controls equipment required this capability, a revised Operation Plan shall be required.

### 1.3 Implementation Characteristics

The ALS Class 1E Controls are to be located in the existing cabinets for the particular system being replaced. All operator information is available on the front-panel of the control racks. Controls and indicators shall be clearly labeled and grouped and show the state of the system for efficient evaluation of system status by the operator. Figure 1-1 below provides an example of the front plate of an ALS Class 1E Controls rack, this example provides the view of the front panel of the MSIV controls rack for the MSFIS application.

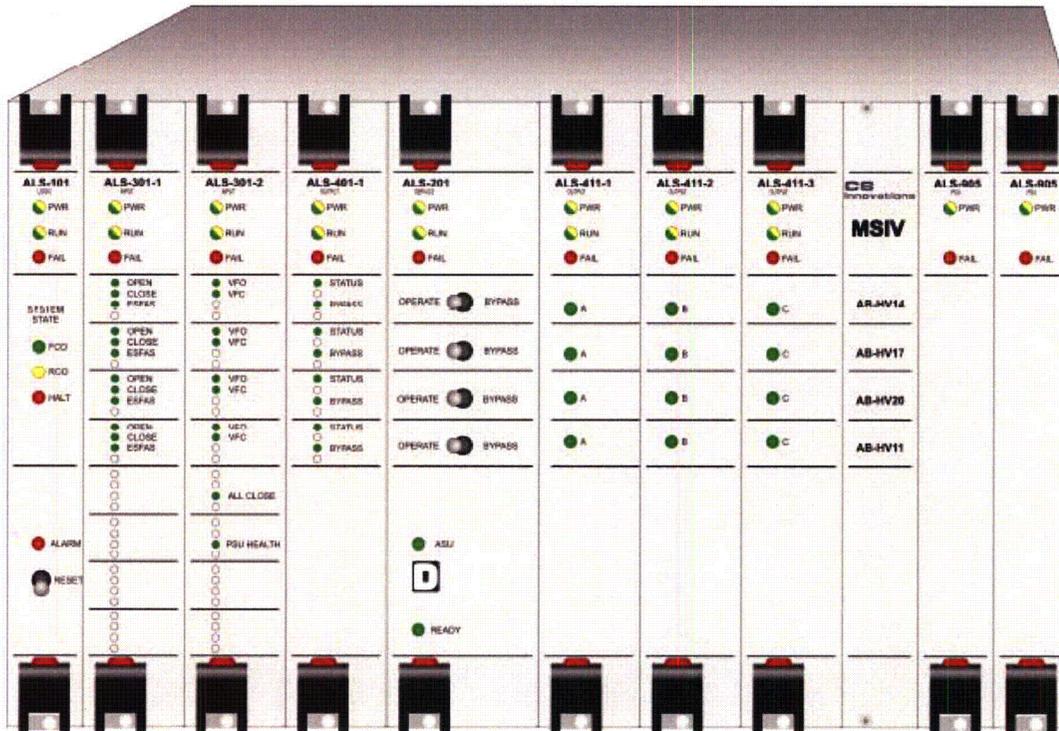


Figure 1-1: Front Panel View of the MSIV Controls Rack for MSFIS

## **1.4 Procedures**

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All procedures required for operation of ALS Class 1E Controls shall be generated or existing procedures revised as a part of the WCNOG Plant Modification Process. There are several aspects of the equipment operation that were implemented to limit the impact on the changes required in the existing operation procedures.

## **1.5 References**

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### **1.5.1 Regulatory Guide 1.152 - "Criteria for Digital Computers in Safety Systems of Nuclear Power Plants"**

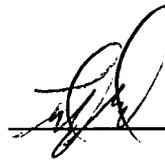
Enclosure XVI to ET 08-0014

**WCNOC Affidavit for Withholding Proprietary Information from Public Disclosure**

AFFIDAVIT

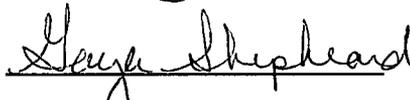
STATE OF KANSAS    )  
                                  ) SS  
COUNTY OF COFFEY )

Before me, the undersigned authority, personally appeared Terry J. Garrett, who, being by me duly sworn according to law, deposes and says that he is authorized to execute this Affidavit on behalf of Wolf Creek Nuclear Operating Corporation (WCNOC), and that the averments of fact set forth in this Affidavit are true and correct to the best of his knowledge, information, and belief:

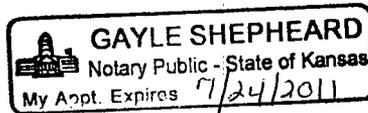


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Terry J. Garrett  
Vice President Engineering

Sworn to and subscribed  
before me this 28<sup>th</sup> day  
of February, 2008



\_\_\_\_\_  
Notary Public



- (1) I am Vice President Engineering, Wolf Creek Nuclear Operating Corporation (WCNOC), and as such, I have been specifically delegated the function of reviewing the proprietary information sought to be withheld from public disclosure in WCNOC's submittal of the WCNOC MSFIS D3 Assessment, Rev.1, and the WCNOC ALS Architecture Evaluation, Rev. 0, and am authorized to apply for its withholding on behalf of WCNOC.
- (2) I am making this Affidavit in conformance with the provisions of 10 CFR Section 2.390 of the Commission's regulations and in conjunction with WCNOC letter ET 08-0014 which includes the WCNOC MSFIS D3 Assessment, Rev.1, and the WCNOC ALS Architecture Evaluation, Rev. 0. accompanying this Affidavit.
- (3) I have personal knowledge of the criteria and procedures utilized by WCNOC in designating information as a trade secret, privileged or as confidential commercial or financial information.
- (4) Pursuant to the provisions of paragraph (b)(4) of Section 2.390 of the Commission's regulations, the following is furnished for consideration by the Commission in determining whether the information sought to be withheld from public disclosure should be withheld.
  - (i) The information sought to be withheld from public disclosure is owned and has been held in confidence by WCNOC.
  - (ii) The information is of a type customarily held in confidence by other organizations and not customarily disclosed to the public. Based on a review of 10 CFR 2.390, the information is held in confidence if it falls in one or more of several types, the release of which might result in the loss of an existing or potential competitive advantage, as follows:
    - (a) The information reveals the distinguishing aspects of a process (or component, structure, tool, method, etc.) where prevention of its use by any other company without license from WCNOC constitutes a competitive economic advantage over other companies.
    - (b) It consists of supporting data, including test data, relative to a process (or component, structure, tool, method, etc.), the application of which data secures a competitive economic advantage, e.g., by optimization or improved marketability.
    - (c) Its use by another company would reduce its expenditure of resources or improve its competitive position in the design, assurance of quality, or licensing a similar product.
    - (d) It is not the property of WCNOC, but must be treated as proprietary by WCNOC according to agreements with the owners of the information.

There are sound reasons behind the WCNOC position which include the following:

- (a) It is information which is marketable in many ways.

- (b) Use by other companies would put WCNOG at a competitive disadvantage by reducing their expenditure of resources at our expense.
  - (c) Each component of proprietary information pertinent to a particular competitive advantage is potentially as valuable as the total competitive advantage. If other companies acquire components of proprietary information, any one component may be the key to the entire puzzle, thereby depriving WCNOG of a competitive advantage.
- (iii) The information is being transmitted to the Commission in confidence and, under the provisions of 10 CFR Section 2.390, it is to be received in confidence by the Commission.
  - (iv) The information sought to be protected is not available in public sources or available information has not been previously employed in the same original manner or method to the best of our knowledge and belief.
  - (v) The proprietary information sought to be withheld in this submittal is the WCNOG MSFIS D3 Assessment, Rev.1, and the WCNOG ALS Architecture Evaluation, Rev. 0.

The subject information could only be duplicated by competitors if they were to invest time and effort equivalent to that invested by WCNOG provided they have the requisite talent and experience.

Public disclosure of this information is likely to cause substantial harm to the competitive position of WCNOG because it would simplify design and evaluation tasks without requiring a commensurate investment of time and effort.