

January 15, 2010

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

Braidwood Station, Units 1 and 2  
Facility Operating License Nos. NPF-72 and NPF-77  
NRC Docket Nos. STN 50-456 and STN 50-457

Byron Station, Units 1 and 2  
Facility Operating License Nos. NPF-37 and NPF-66  
NRC Docket Nos. STN 50-454 and STN 50-455

Clinton Power Station, Unit 1  
Facility Operating License No. NPF-62  
NRC Docket No. 50-461

Dresden Nuclear Power Station, Units 2 and 3  
Renewed Facility Operating License Nos. DPR-19 and DPR-25  
NRC Docket Nos. 50-237 and 50-249

LaSalle County Station, Units 1 and 2  
Facility Operating License Nos. NPF-11 and NPF-18  
NRC Docket Nos. 50-373 and 50-374

Limerick Generating Station, Units 1 and 2  
Facility Operating License Nos. NPF-39 and NPF-85  
NRC Docket Nos. 50-352 and 50-353

Oyster Creek Nuclear Generating Station  
Renewed Facility Operating License No. DPR-16  
NRC Docket No. 50-219

Peach Bottom Atomic Power Station, Units 2 and 3  
Renewed Facility Operating License Nos. DPR-44 and DPR-56  
NRC Docket Nos. 50-277 and 50-278

Quad Cities Nuclear Power Station, Units 1 and 2  
Renewed Facility Operating License Nos. DPR-29 and DPR-30  
NRC Docket Nos. 50-254 and 50-265

Three Mile Island Nuclear Station, Unit 1  
Renewed Facility Operating License No. DPR-50  
NRC Docket No. 50-289

Subject: Revised No Significant Hazards Consideration Determination for the Exelon  
Cyber Security License Amendment Request

On November 23, 2009, in accordance with the provisions of 10 CFR 50.4 and 10 CFR 50.90, Exelon Generation Company, LLC (Exelon) submitted a request for an amendment to the Facility Operating Licenses (FOL) for Braidwood Station, Units 1 and 2; Byron Station, Units 1 and 2; Clinton Power Station, Unit 1; Dresden Nuclear Power Station, Units 2 and 3; LaSalle County Station, Units 1 and 2; Limerick Generating Station, Units 1 and 2; Oyster Creek Nuclear Generating Station; Peach Bottom Atomic Power Station, Units 2 and 3; Quad Cities Nuclear Power Station, Units 1 and 2; and Three Mile Island Nuclear Station, Unit 1. This proposed amendment requested U. S. Nuclear Regulatory Commission (NRC) approval of the Exelon Cyber Security Plan, provided an Implementation Schedule, and added a sentence to the existing FOL Physical Protection license condition to require Exelon to fully implement and maintain in effect all provisions of the Commission-approved Cyber Security Plan. This proposed amendment conformed to the model application contained in NEI 08-09, Revision 3, submitted to the NRC for endorsement on September 15, 2009.

Since the time of the original submittal, NEI, in response to NRC comments, revised the No Significant Hazards Consideration (NSHC) in the NEI 08-09 template. As a result of these comments, Exelon has revised the Cyber Security Plan submittal NSHC Determination based on the revised NEI template and is providing the updated version as Enclosure 1 to this letter. The revised NSHC Determination has been reviewed at each of the Exelon stations in accordance with Exelon programs and procedures.

In accordance with 10 CFR 50.91, a copy of this letter is being provided to the designated State Officials.

If you should have any questions regarding this submittal, please contact Mr. Doug Walker at 610-765-5952.

I declare under penalty of perjury that the foregoing is true and correct. Executed on the 15<sup>th</sup> day of January 2010.

Respectfully,

*DBK*  


Pamela B. Cowan  
Director - Licensing and Regulatory Affairs

Enclosure 1 – Revised No Significant Hazards Consideration Determination for the Exelon Cyber Security Plan License Amendment Request

cc: NRC Project Manager, NRR - Braidwood Station  
NRC Project Manager, NRR - Byron Station  
NRC Project Manager, NRR - Clinton Power Station  
NRC Project Manager, NRR - Dresden Nuclear Power Station  
NRC Project Manager, NRR - LaSalle County Station  
NRC Project Manager, NRR - Limerick Generating Station  
NRC Project Manager, NRR - Oyster Creek Nuclear Generating Station  
NRC Project Manager, NRR - Peach Bottom Atomic Power Station  
NRC Project Manager, NRR - Quad Cities Nuclear Power Station  
NRC Project Manager, NRR - Three Mile Island Nuclear Station  
USNRC Senior Resident Inspector - Braidwood Station  
USNRC Senior Resident Inspector - Byron Station  
USNRC Senior Resident Inspector - Clinton Power Station  
USNRC Senior Resident Inspector - Dresden Nuclear Power Station  
USNRC Senior Resident Inspector - LaSalle County Station  
USNRC Senior Resident Inspector - Limerick Generating Station  
USNRC Senior Resident Inspector - Oyster Creek Nuclear Generating Station  
USNRC Senior Resident Inspector - Peach Bottom Atomic Power Station  
USNRC Senior Resident Inspector - Quad Cities Nuclear Power Station  
USNRC Senior Resident Inspector - Three Mile Island Nuclear Station  
USNRC Region I, Regional Administrator  
USNRC Region III, Regional Administrator  
S. T. Gray, State of Maryland  
Illinois Emergency Management Agency - Division of Nuclear Safety  
R. R. Janati - Bureau of Radiation Protection, Commonwealth of Pennsylvania  
Director, Bureau of Nuclear Engineering, New Jersey Department of  
Environmental Protection  
Mayor of Lacey Township

**Enclosure 1**

**Revised No Significant Hazards Consideration Determination for the  
Exelon Cyber Security Plan License Amendment Request**

Revised No Significant Hazards Consideration Determination for the Exelon Cyber Security Plan Submittal for Braidwood Station, Units 1 and 2; Byron Station, Units 1 and 2; Clinton Power Station, Unit 1; Dresden Nuclear Power Station, Units 2 and 3; LaSalle County Station, Units 1 and 2; Limerick Generating Station, Units 1 and 2; Oyster Creek Nuclear Generating Station; Peach Bottom Atomic Power Station Units 2 and 3; Quad Cities Nuclear Power Station, Units 1 and 2; and Three Mile Island Nuclear Station, Unit 1.

Basis for proposed no significant hazards consideration determination: As required by Title 10 of the Code of Federal Regulations (10 CFR), Section 50.91(a), Exelon Generation Company, LLC (Exelon) hereby provides its analysis of the issue of no significant hazards consideration (NSHC).

- (1) Does the proposed amendment involve a significant increase in the probability or consequences of an accident previously evaluated?

Response: No.

The proposed amendment incorporates a new requirement in the Facility Operating License (FOL) to implement and maintain a Cyber Security Plan as part of the facility's overall program for physical protection. Inclusion of the Cyber Security Plan in the FOL itself does not involve any modifications to the safety-related structures, systems or components (SSCs). Rather, the Cyber Security Plan describes how the requirements of 10 CFR 73.54 are to be implemented to identify, evaluate, and mitigate cyber attacks up to and including the design basis cyber attack threat, thereby achieving high assurance that the facility's digital computer and communications systems and networks are protected from cyber attacks. The Cyber Security Plan will not alter previously evaluated Final Safety Analysis Report (FSAR) design basis accident analysis assumptions, add any accident initiators, or affect the function of the plant safety-related SSCs. Any plant modifications or changes resulting from implementation of the Cyber Security Plan will be evaluated per 10 CFR 50.59 to determine if a License Amendment is required. Changes will be evaluated per 10 CFR 50.54(q) to determine if the effectiveness of the site Emergency Plan is reduced. Changes will be evaluated per 10 CFR 50.54(p) to determine if the effectiveness of the site Security Plan is reduced. Prior NRC approval will be obtained if required by these evaluations.

In addition, an editorial change to correct two typographical errors as part of the Braidwood FOL revisions for Unit 1 and Unit 2 is administrative in nature and has no impact on the probability or consequences of an accident previously evaluated.

Therefore, the proposed amendment does not involve a significant increase in the probability or consequences of an accident previously evaluated.

- (2) Does the proposed amendment create the possibility of a new or different kind of accident from any accident previously evaluated?

Response: No.

This proposed amendment provides assurance that safety-related SSCs are protected from cyber attacks. Implementation of 10 CFR 73.54 and the inclusion of a plan in the

FOL do not result in the need for any new or different FSAR design basis accident analysis. It does not introduce new equipment that could create a new or different kind of accident, and no new equipment failure modes are created. As a result, no new accident scenarios, failure mechanisms, or limiting single failures are introduced as a result of this proposed amendment. In addition, an editorial change to correct two typographical errors as part of the Braidwood FOL revisions for Unit 1 and Unit 2 is administrative in nature and does not create the possibility of a new or different kind of accident. Therefore, the proposed amendment does not create a possibility for an accident of a new or different type than those previously evaluated.

- (3) Does the proposed amendment involve a significant reduction in a margin of safety?

Response: No.

The margin of safety is associated with the confidence in the ability of the fission product barriers (i.e., fuel cladding, reactor coolant pressure boundary, and containment structure) to limit the level of radiation to the public. The proposed amendment would not alter the way any safety-related SSC functions and would not alter the way the plant is operated. The amendment provides assurance that safety-related SSCs are protected from cyber attacks. The proposed amendment would not introduce any new uncertainties or change any existing uncertainties associated with any safety limit. The proposed amendment would have no impact on the structural integrity of the fuel cladding, reactor coolant pressure boundary, or containment structure. In addition, an editorial change to correct two typographical errors as part of the Braidwood FOL revisions for Unit 1 and Unit 2 is administrative in nature and has no impact on the margin of safety. Based on the above considerations, the proposed amendment would not degrade the confidence in the ability of the fission product barriers to limit the level of radiation to the public. Therefore, the proposed change does not involve a significant reduction in a margin of safety.