



414 Nicollet Mall – MP4
Minneapolis, MN 55401

January 14, 2010

L-XE-10-001
10 CFR 50.90

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

Prairie Island Nuclear Generating Plant,
Units 1 and 2
Dockets 50-282 and 50-306
License Nos. DPR-42 and DPR-60

Monticello Nuclear Generating Plant
Docket 50-263
Renewed License No. DPR-22

Supplement to License Amendment Request (LAR) for Approval of the Northern States Power Company - Minnesota (NSPM) Cyber Security Plan

- References: 1. Letter from Northern States Power Company, a Minnesota corporation (NSPM) to the Nuclear Regulatory Commission (NRC), "Request for Approval of the Northern States Power Company - Minnesota (NSPM) Cyber Security Plan," dated November 23, 2009.

In Reference 1, NSPM, doing business as Xcel Energy, submitted an LAR for the Prairie Island Nuclear Generating Plant (PINGP), Units 1 and 2, and Monticello Nuclear Generating Plant (MNGP) requesting NRC approval of the NSPM Cyber Security Plan, proposed Implementation Schedule, and addition of a sentence to the existing PINGP and MNGP Facility Operating Licenses (FOL) Physical Protection license conditions to require NSPM to fully implement and maintain in effect all provisions of the Commission approved Cyber Security Plan. The proposed amendments generally conformed to the model application prepared by the Nuclear Energy Institute (NEI). Subsequently NEI has issued a revised model for the determination of no significant hazards consideration (NSHC) which is the basis for Enclosure 1 to this letter. The NSHC provided in Enclosure 1 to this letter replaces Section 4.2 in Enclosure 1 of Reference 1. NSPM submits this supplement in accordance with the provisions of 10 CFR 50.90.

In accordance with 10 CFR 50.91, NSPM is notifying the State of Minnesota of this LAR supplement by transmitting a copy of this letter to the designated State Official.

If you have questions regarding this submittal, please contact Mr. Dale Vincent, P.E., at 651-388-1121.

Document Control Desk
Page 2

Summary of Commitments

This letter contains no new commitments and no revisions to existing commitments.

I declare under penalty of perjury that the foregoing is true and correct.
Executed on January 14, 2010.



Gabor Salamon
Director, Nuclear Licensing and Emergency Preparedness
Northern States Power Company - Minnesota

Enclosures (1)

cc: Administrator, Region III, USNRC
Project Manager, PINGP, USNRC
Resident Inspector, PINGP, USNRC
Project Manager, MNGP, USNRC
Resident Inspector, MNGP, USNRC
State of Minnesota

ENCLOSURE 1

4.2 Significant Hazards Consideration

This license amendment request proposes changes to the Prairie Island Nuclear Generating Plant (PINGP), Units 1 and 2, and Monticello Nuclear Generating Plant (MNGP) Facility Operating Licenses (FOLs) required by 10 CFR 73.54 (the Rule) and includes three parts. The first part is the submittal of the Cyber Security Plan (Plan) for NRC review and approval. The Plan conforms to the template provided in NEI 08-09, Revision 3, (with some deviations) and provides a description of how the requirements of the Rule will be implemented at PINGP and MNGP. The Plan establishes the licensing basis for the Northern States Power Company, a Minnesota corporation (NSPM), Cyber Security Program for PINGP and MNGP. The Plan establishes how to achieve high assurance that nuclear power plant digital computer and communication systems and networks associated with the following are adequately protected against cyber attacks up to and including the design basis threat:

- Safety-related and important-to-safety functions,
- Security functions,
- Emergency preparedness functions including offsite communications, and
- Support systems and equipment which if compromised, would adversely impact safety, security, or emergency preparedness functions.

The second part of the proposed changes is a proposed Implementation Schedule. The third part adds a sentence to the existing PINGP and MNGP FOL license conditions for Physical Protection. Both of these changes are administrative.

Northern States Power Company, a Minnesota corporation (NSPM), has evaluated the proposed amendments using the criteria in 10 CFR 50.92 and has determined that the proposed amendments do not involve a significant hazards consideration. An analysis of the issue of no significant hazards consideration is presented below:

1. **Does the proposed amendment involve a significant increase in the probability or consequences of an accident previously evaluated?**

Response: No

The proposed amendments incorporate new requirements in the Facility Operating Licenses (FOLs) to implement and maintain a Cyber Security Plan (Plan) as part of the facilities' overall program for physical protection. Inclusion of the Plan in the FOLs itself does not involve any modifications to the safety-related structures, systems or components (SSCs). Rather, the 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 facilities' digital computer and communications systems and networks are protected from cyber attacks. The Plan and any plant modifications will not alter previously evaluated Updated Safety Analysis Report (USAR) design basis accident analysis assumptions, add any accident initiators, or affect the function of the plant safety-related SSCs as to how they are operated, maintained, modified, tested, or inspected. Therefore, the proposed amendments do 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

The proposed amendments provide assurance that safety-related SSCs are protected from cyber attacks. Implementation of 10 CFR 73.54 and the inclusion of a Plan in the FOLs do not result in the need of any new or different USAR 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 these proposed amendments. Therefore, the proposed amendments do 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 amendments would not alter the way any safety-related SSC functions and would not alter the way the plants are

Enclosure 1
Supplement

operated. These amendments provide assurance that safety-related SSCs are protected from cyber attacks. The proposed amendments would not introduce any new uncertainties or change any existing uncertainties associated with any safety limit. The proposed amendments would have no impact on the structural integrity of the fuel cladding, reactor coolant pressure boundary, or containment structure. Based on the above considerations, the proposed amendments 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 amendments do not involve a significant reduction in a margin of safety.

Based on the above considerations, Northern States Power Company, a Minnesota corporation (NSPM), concludes that the proposed amendments present no significant hazards consideration under the standards set forth in 10 CFR 50.92(c), and accordingly, a finding of no significant hazards consideration is justified.