

June 9, 2010

ULNRC-05711

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

10 CFR 50.90

Ladies and Gentlemen:

**DOCKET NUMBER 50-483
CALLAWAY PLANT UNIT 1
UNION ELECTRIC CO.
FACILITY OPERATING LICENSE NPF-30
REQUEST FOR APPROVAL OF THE CALLAWAY PLANT
CYBER SECURITY PLAN (TAC NO. ME2663)
(LICENSE AMENDMENT REQUEST LDCN 09-0041)**

- References: 1. AmerenUE Letter ULNRC-05663, "Request for Approval of the Callaway Plant Cyber Security Plan (License Amendment Request LDCN 09-0041)," dated November 19, 2009
2. AmerenUE Letter ULNRC-05674, "Supplement to License Amendment Request LDCN 09-0041 for Approval of the Cyber Security Plan (TAC No. ME2663)," dated January 21, 2010

By letter dated November 19, 2009 (Reference 1) Union Electric Company (dba AmerenUE) submitted a request for amendment of the facility Operating License for Callaway, including a request for approval of the Callaway Cyber Security Plan. The license amendment request was derived from the model application provided in NEI 08-09, "Cyber Security Plan for Nuclear Power Reactors," Revision 3, dated September 2009.

Included with the Reference 1 letter were three enclosures. Enclosure 1 provided a description and an evaluation of the proposed license amendment. It included its own attachments wherein Attachment 1 provided a marked-up page from the Callaway Operating License containing the License Condition that would be modified by the amendment, and Attachment 2 provided re-typed pages to reflect that modification.



Enclosure 2 provided the Callaway Cyber Security Plan Implementation Schedule. Enclosure 3 provided the proposed Callaway Cyber Security Plan itself.

The November 19, 2009 application was supplemented by a follow-up letter dated January 21, 2010 (Reference 2) in which Enclosure 1 of the November 19, 2009 application was partially replaced (superseded) due to the revision of text within the No Significant Hazards Consideration evaluation. The attachments contained within the original Enclosure 1 were unchanged and thus were not provided with the Reference 2 letter.

In the Reference 1 letter for the application, it was noted that Enclosure 3 (the Cyber Security Plan) contained sensitive information. As such, it was noted that Enclosure 3 should be withheld from public disclosure in accordance with 10 CFR 2.390. Although it was pointed out that Enclosure 3 was the document containing sensitive information, every page in the Reference 1 cover letter, as well as in all three enclosures, contained a footer and header consisting of the words, "Security-Related Information – Withhold Under 10 CFR 2.390." Thus, the entire submittal was required to be withheld from public disclosure.

As the NRC staff is currently reviewing the amendment application, AmerenUE has been asked to submit a version of the November 19, 2009 application that is not required to be withheld from public disclosure (except for Enclosure 3). This is consistent with what was intended since only Enclosure 3 contained security-related/sensitive information.

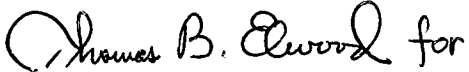
In response to that request, the November 19, 2009 application is hereby being supplemented by resubmitting a copy of several portions of the application as attachments to this letter. In particular, exact copies of the cover letter, the attachments provided with Enclosure 1, and all of Enclosure 2 are provided, except that the noted headers and footers have been removed. The documents are thus not identified as being required to be withheld from public disclosure. Enclosure 3 is not included since it has already been provided and is still intended to be withheld from public disclosure. The portion of Enclosure 1 exclusive of its attachments is also not provided since that portion was provided in the Reference 2 letter and was not requested to be withheld from public disclosure.

This supplement provides no new or additional information, does not change any of the evaluations contained in the November 19, 2009 application (or in the Reference 2 letter), and contains no new or additional commitments.

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If there are any questions regarding this letter or the attached, please contact Scott Maglio at 573-676-8719 or Tom Elwood at 314-225-1905.

Sincerely,

Handwritten signature of Thomas B. Elwood in cursive script, followed by the word "for".

Scott A. Maglio
Regulatory Affairs Manager

TBE/slk

Attachments

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cc: U.S. Nuclear Regulatory Commission (Original and 1 copy)
Attn: Document Control Desk
Washington, DC 20555-0001

Mr. Elmo E. Collins, Jr.
Regional Administrator
U.S. Nuclear Regulatory Commission
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Arlington, TX 76011-4125

Senior Resident Inspector
Callaway Resident Office
U.S. Nuclear Regulatory Commission
8201 NRC Road
Stedman, MO 65077

Mr. Mohan C. Thadani (2 copies)
Senior Project Manager, Callaway Plant
Office of Nuclear Reactor Regulation
U. S. Nuclear Regulatory Commission
Mail Stop O-8G14
Washington, DC 20555-2738

November 19, 2009

ULNRC-05663

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



10 CFR 50.90

Ladies and Gentlemen:

**DOCKET NUMBER 50-483
CALLAWAY PLANT UNIT 1
UNION ELECTRIC CO.
FACILITY OPERATING LICENSE NPF-30
REQUEST FOR APPROVAL OF THE CALLAWAY PLANT
CYBER SECURITY PLAN
(LICENSE AMENDMENT REQUEST LDCN 09-0041)**

In accordance with the provisions of 10 CFR 50.4 and 10 CFR 50.90, Union Electric (UE) dba AmerenUE is submitting a request for an amendment to the Facility Operating License (OL) for Callaway Plant Unit 1. Per this amendment request, AmerenUE requests NRC approval of the Callaway Plant Unit 1 Cyber Security Plan, provides an Implementation Schedule, and adds a sentence to the existing OL Physical Protection license condition to require UE to fully implement and maintain in effect all provisions of the Commission-approved Cyber Security Plan.

This proposed amendment is derived from the model application provided in NEI08-09, "Cyber Security Plan for Nuclear Power Reactors," Revision 3, dated September 2009. Essential information is provided in the enclosures to this letter:

- ◆ Enclosure 1 provides an evaluation of the proposed change. Enclosure 1 also contains an attachment that provides the existing OL page marked up and the retyped OL page to show the proposed change.
- ◆ Enclosure 2 provides a copy of the Callaway Plant Unit 1 Cyber Security Plan Implementation Schedule. The implementation milestones listed in Enclosure 2

Enclosure 3 to this letter contains sensitive information.
Withhold from public disclosure under 10 CFR 2.390.
Upon removal of Enclosure 3, this letter is uncontrolled.

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are considered to be regulatory commitments, and are identified as such in the enclosure. Commitment changes will be managed in accordance with NEI 99-04, "Guidelines for Managing NRC Commitment changes."

- ◆ Enclosure 3 provides a copy of the Callaway Plant Unit 1 Cyber Security Plan which is a stand-alone document that will be incorporated by reference into the Callaway Plant Physical Security Plan upon approval. UE requests that Enclosure 3, which contains sensitive information, be withheld from public disclosure in accordance with 10 CFR 2.390.

It has been determined that this amendment application does not involve a significant hazard consideration as determined per 10 CFR 50.92. Pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment need be prepared in connection with the issuance of this amendment.

The Callaway Plant Onsite Review Committee and a subcommittee of the Nuclear Safety Review Board have reviewed and approved the attached licensing evaluation and have approved the submittal of this amendment application.

In accordance with 10 CFR 50.91, a copy of this application, with attachments, is being provided to the designated Missouri State Official.

UE requests an implementation period of 90 days following NRC approval of the license amendment.

If there are any questions regarding this matter, please contact Scott Maglio at 573-676-8719.

I declare under penalty of perjury that the foregoing is true and correct.

Sincerely,



Scott Sandbothe
Manager, Plant Support

Executed on: 11/19/09

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Enclosures:

Enclosure 1 – Evaluation of Proposed Changes

Enclosure 2 – Callaway Plant Unit 1 Cyber Security Plan Implementation Schedule /
Identification of Commitments

Enclosure 3 – Callaway Plant Unit 1 Cyber Security Plan

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cc:

(copy w/out Enclosure 3 except as noted with asterisk*)

Mr. Elmo E. Collins, Jr.*
Regional Administrator
U.S. Nuclear Regulatory Commission
Region IV
612 E . Lamar Blvd., Suite 400
Arlington, TX 76011-4125

Senior Resident Inspector
Callaway Resident Office
U.S. Nuclear Regulatory Commission
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Stedman, MO 65077

Mr. Mohan C. Thadani (2 copies)*
Senior Project Manager, Callaway Plant
Office of Nuclear Reactor Regulation
U. S. Nuclear Regulatory Commission
Mail Stop O-8G14
Washington, DC 20555-2738

Index and send hardcopy to QA File A160.0761

Hardcopy:

Certrec Corporation
4200 South Hulen, Suite 422
Fort Worth, TX 76109
(Certrec receives ALL attachments as long as they are non-safeguards and may be publicly disclosed.)

Electronic distribution for the following can be made via Tech Spec ULNRC Distribution:

(electronic copy w/out Enclosure 3)
A. C. Heflin
F. M. Diya
L. S. Sandbothe
S. A. Maglio
E. H. Bradley
S. L. Gallagher
T. L. Woodward (NSRB)
T. B. Elwood
D. E. Rickard
E. M. Fast
A. M. Lowry
Ms. Diane M. Hooper (WCNOC)
Mr. Dennis Buschbaum (Luminant Power)
Mr. Ron Barnes (APS)
Mr. Tom Baldwin (PG&E)
Mr. Wayne Harrison (STPNOC)
Ms. Linda Conklin (SCE)
Mr. John O'Neill (Pillsbury Winthrop Shaw Pittman LLP)
Missouri Public Service Commission
Mr. Floyd Gilzow (DNR)

Attachment 1
Proposed Operating License Change (Marked-up)

The following text is to be inserted at the end of the Callaway Plant Unit 1 OL Condition 2.E. for Physical Protection:

UE shall fully implement and maintain in effect all provisions of the Commission-approved Callaway Plant Unit 1 Cyber Security Plan submitted by letter dated November 19, 2009 and withheld from public disclosure in accordance with 10 CFR 2.390.

This marked-up OL change is provided on the next page.

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license. UE shall operate the facility in accordance with the Additional Conditions.

- D. An Exemption from certain requirements of Appendix J to 10 CFR Part 50, are described in the October 9, 1984 staff letter. This exemption is authorized by law and will not endanger life or property or the common defense and security and are otherwise in the public interest. Therefore, this exemption is hereby granted pursuant to 10 CFR 50.12. With the granting of this exemption the facility will operate, to the extent authorized herein, in conformity with the application, as amended, the provisions of the Act, and the rules and regulations of the Commission.
- E. UE shall fully implement and maintain in effect all provisions of the Commission-approved physical security, training and qualification, and safeguards contingency plans including amendments made pursuant to provisions of the Miscellaneous Amendments and Search Requirements revisions to 10 CFR 73.55 (51 FR 27817 and 27822) and to the authority of 10 CFR 50.90 and 10 CFR 50.54(p). The combined set of plans, which contain Safeguards Information protected under 10 CFR 10 CFR 73.21, are entitled: "Callaway Security Plan, Training and Qualification Plan, and Safeguards Contingency Plan, Revision 0" submitted by letter dated October 20, 2004, as supplemented by the letter May 11, 2006.
- F. Deleted per Amendment No. 169.
- G. UE shall have and maintain financial protection of such type and in such amounts as the Commission shall require in accordance with Section 170

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MISSION

Insert

UE shall fully implement and maintain in effect all provisions of the Commission-approved Callaway Plant Unit 1 Cyber Security Plan submitted by letter dated November 19, 2009 and withheld from public disclosure in accordance with 10 CFR 2.390.

Office of Nuclear Reactor Regulation

Attachments/Appendices:

- 1. Attachment 1 (Deleted per Amendment No. 169)
- 2. Attachment 2 (Deleted per Amendment No. 169)
- 3. Appendix A - Technical Specifications (NUREG-1058, Revision 1)
- 4. Appendix B - Environmental Protection Plan
- 5. Appendix C - Additional Conditions

Date of Issuance: October 18, 1984

Revised by letter dated June 26, 2007

Attachment 2
Retyped Operating License Change

The following text is to be inserted at the end of the Callaway Plant Unit 1 OL Condition 2.E. for Physical Protection:

UE shall fully implement and maintain in effect all provisions of the Commission-approved Callaway Plant Unit 1 Cyber Security Plan submitted by letter dated November 19, 2009 and withheld from public disclosure in accordance with 10 CFR 2.390.

This retyped OL change is provided on the next page.

license. UE shall operate the facility in accordance with the Additional Conditions.

- D. An Exemption from certain requirements of Appendix J to 10 CFR Part 50, are described in the October 9, 1984 staff letter. This exemption is authorized by law and will not endanger life or property or the common defense and security and are otherwise in the public interest. Therefore, this exemption is hereby granted pursuant to 10 CFR 50.12. With the granting of this exemption the facility will operate, to the extent authorized herein, in conformity with the application, as amended, the provisions of the Act, and the rules and regulations of the Commission.
- E. UE shall fully implement and maintain in effect all provisions of the Commission-approved physical security, training and qualification, and safeguards contingency plans including amendments made pursuant to provisions of the Miscellaneous Amendments and Search Requirements revisions to 10 CFR 73.55 (51 FR 27817 and 27822) and to the authority of 10 CFR 50.90 and 10 CFR 50.54(p). The combined set of plans, which contain Safeguards Information protected under 10 CFR 10 CFR 73.21, are entitled: "Callaway Security Plan, Training and Qualification Plan, and Safeguards Contingency Plan, Revision 0" submitted by letter dated October 20, 2004, as supplemented by the letter May 11, 2006. UE shall fully implement and maintain in effect all provisions of the Commission-approved Callaway Plant Unit 1 Cyber Security Plan submitted by letter dated November 19, 2009 and withheld from public disclosure in accordance with 10 CFR 2.390.
- F. Deleted per Amendment No. 169.
- G. UE shall have and maintain financial protection of such type and in such amounts as the Commission shall require in accordance with Section 170 of the Atomic Energy Act of 1954, as amended, to cover public liability claims.
- H. This license is effective as of the date of issuance and shall expire at Midnight on October 18, 2024.

FOR THE NUCLEAR REGULATORY COMMISSION

ORIGINAL SIGNED BY H. R. DENTON

Harold R. Denton, Director
Office of Nuclear Reactor Regulation

Amendment ###

Attachments/Appendices:

1. Attachment 1 (Deleted per Amendment No. 169)
2. Attachment 2 (Deleted per Amendment No. 169)
3. Appendix A - Technical Specifications (NUREG-1058, Revision 1)
4. Appendix B - Environmental Protection Plan
5. Appendix C – Additional Conditions

Date of Issuance: October 18, 1984

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ATTACHMENT 1

Deleted per Amendment No. 169.

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ATTACHMENT 2

Deleted per Amendment No. 169.

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IMPLEMENTATION SCHEDULE

The following table identifies those actions committed to by AmerenUE in this document. Any other statements in this document are provided for information purposes and are not considered commitments. Please direct questions regarding these commitments to Tom Elwood at 314-225-1905:

Commitment	Completion Date
<p>1. The analysis of digital computer systems and networks in accordance with Section 3 of the Callaway Plant Unit 1 Cyber Security Plan will be performed and results documented as required.</p> <p>The Completion Date is based on the time necessary to develop and implement the site governing procedures, revise department and program implementing procedures, train on their use, solicit and obtain contracted support, identify critical digital assets, conduct walkdowns with the plant in an acceptable operating mode, and document the results. This duration equates to approximately two operating cycles, depending upon when the NRC approves the Plan.</p>	<p>36 months after NRC approval of Cyber Security Plan</p>
<p>2. For cyber security controls that have been identified for implementation by the process described in Section 3, an implementation plan will be prepared and available for NRC inspection.</p> <p>The Completion Date is based on the time necessary to complete item 1, above, develop and implement additional procedures, processes and controls based on the analysis, train on their use, solicit and obtain contracted support, identify, develop and plan required configuration changes, conduct planning walkdowns with the plant in an acceptable operating mode for the identified changes, and document the controls and needed actions. This duration equates to one additional operating cycle, depending upon when the NRC approves the Plan.</p>	<p>54 months after NRC approval of Cyber Security Plan</p>

Commitment	Completion Date
<p>3. The elements to establish, implement, and maintain the Cyber Security Program as described in Section 4 of the Callaway Plant Unit 1 Cyber Security Plan will be implemented.</p> <p>The Completion Date is based on the time necessary to complete items 1 and 2, above, implement identified remediation plan activities with the plant in an acceptable operating mode for the identified activity, and fully implement the ongoing Cyber Security training program. This duration equates to approximately one additional operating cycle, depending upon when the NRC approves the Plan.</p>	<p>72 months after NRC approval of Cyber Security Plan</p>