



Tennessee Valley Authority
1101 Market Street, LP 3R
Chattanooga, Tennessee 37402-2801

R. M. Krich
Vice President
Nuclear Licensing

July 23, 2010

TS-470

10 CFR 50.4
10 CFR 50.90

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

Browns Ferry Nuclear Plant, Units 1, 2 and 3
Facility Operating License Nos. DPR-33, DPR-52, and DPR-68
NRC Docket Nos. 50-259, 50-260, and 50-296

Subject: **Second Supplement to Request for Approval of the Browns Ferry Nuclear Plant Cyber Security Plan**

- References:
1. Letter from TVA to NRC, "Request for Approval of the Browns Ferry Nuclear Plant Cyber Security Plan," dated November 23, 2009
 2. Letter from TVA to NRC, "Supplement to Request for Approval of the Browns Ferry Nuclear Plant Cyber Security Plan," dated December 18, 2009
 3. Letter from NRC to TVA, "Browns Ferry Nuclear Plant, Units 1, 2, and 3 - License Amendment Request for Approval of the Cyber Security Plan (TAC Nos. ME2707, ME2708, and ME2709)," dated June 7, 2010
 4. Letter from NRC to NEI, "Nuclear Energy Institute 08-09, 'Cyber Security Plan Template, Rev. 6,'" dated June 7, 2010

By letter dated November 23, 2009 (Reference 1) as supplemented December 18, 2009 (Reference 2), the Tennessee Valley Authority (TVA) submitted a license amendment request (LAR) for Browns Ferry Nuclear Plant, Units 1, 2, and 3. The proposed LAR included proposed changes to the existing Browns Ferry Nuclear Plant, Units 1, 2, and 3 operating licenses' Physical Protection license condition, a proposed

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Cyber Security Plan Implementation Schedule, and the Cyber Security Plan. This information was provided in the following Enclosures of the November 23, 2009 letter:

- Enclosure 1 - Evaluation of Proposed Change
- Enclosure 2 - Browns Ferry Nuclear Plant Cyber Security Plan Implementation Schedule
- Enclosure 3 - Browns Ferry Nuclear Plant Cyber Security Plan

Because of concerns with the Nuclear Energy Institute (NEI) guidance used to prepare the Cyber Security Plan, the Nuclear Regulatory Commission (NRC) by letter dated June 7, 2010 (Reference 3) requested TVA to provide a revised submittal to comply with the requirements of 10 CFR 73.54. The NRC further stated in the June 7, 2010 letter that submission of a cyber security plan using the template provided in NEI 08-09, "Cyber Security Plan Template, Revision 6," dated April 2010 would be acceptable to comply with the requirements of 10 CFR 73.54, with the exception of the definition of "cyber attack." The NRC requested a response within 60 days of the June 7, 2010 letter. This response is due by August 6, 2010.

TVA understands that NEI-08-09, Revision 6 addresses all the generic issues, with the exception to the "cyber attack" definition, provided in the March 9, 2010 e-mail referenced in the June 7, 2010 letter. TVA is therefore providing a revised cyber security plan as provided in Enclosure 3 of this letter. This cyber security plan was prepared using the NEI 08-09, Revision 6 template. The only exception taken to NEI 08-09, Revision 6, is the definition of "cyber attack." As noted in the cyber security plan and the Deviation Table attached to Enclosure 3, the definition used in TVA's submitted plan is: "any event in which there is reason to believe that an adversary has committed or caused, or attempted to commit or cause, or has made a credible threat to commit or cause malicious exploitation of a CDA (critical digital asset)." This definition was determined acceptable in NRC's June 7, 2010 letter (Reference 4). Enclosure 3 of this letter supersedes, in its entirety, the Enclosure 3 submitted in the November 23, 2009 letter.

In addition, TVA is providing revised Browns Ferry Nuclear Plant Cyber Security Plan Implementation Schedules for Units 1, 2, and 3 as provided in Enclosure 2 of this letter. The implementation schedules have been revised to include additional milestones and to provide a basis for the proposed completion dates. The implementation date follows the site's last scheduled refueling outage needed to implement the potential system modifications. Enclosure 2 of this letter supersedes, in its entirety, the Enclosure 2 submitted in the November 23, 2009 letter.

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Enclosure 1 provides revisions to the proposed change to the license previously provided in Enclosure 1 of the November 23, 2009 letter. These revisions are a result of updating the Cyber Security Plan from Revision 3 to Revision 6 of NEI 08-09 and changing the date the Plan was submitted. In Section 3.0, "Technical Evaluation," reference to "Appendix A, Table 1" was deleted and is indicated by the strikethrough text and revision bar. This Table was removed in NEI 08-09, Revision 6. In Section 6.0, "References," Reference 3 was revised and is indicated by the bold text and revision bar. Attachments 1 and 2 were revised to change the date the Cyber Security Plan was submitted from "November 23, 2009" to "July 23, 2010." These revisions supersede Section 3.0, Section 6.0, and Attachments 1 and 2 provided in Enclosure 1 of the November 23, 2009 letter.

TVA has determined that the additional information provided by this letter does not affect the no significant hazards considerations associated with the proposed license amendment submitted by Reference 2.

TVA requests that Enclosures 2 and 3, which contain sensitive information, be withheld from public disclosure in accordance with 10 CFR 2.390, "Public inspections, exemptions, requests for withholding." Additionally, in accordance with 10 CFR 50.91(b)(1), TVA is sending a copy of this letter and attachments to the designated Alabama state official.

There are no commitments associated with this submittal. If you have any questions about this change, please contact Kevin Casey at (423) 751-8523.

I declare under penalty of perjury that the foregoing is true and correct. Executed on this 23rd day of July, 2010.

Respectfully,



R. M. Krich

Enclosures:

1. Evaluation of Proposed Change
2. Browns Ferry Nuclear Plant Cyber Security Plan Implementation Schedule
3. Browns Ferry Nuclear Plant Cyber Security Plan

cc: See Page 4

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Enclosures

cc: (Enclosures):

NRC Regional Administrator – Region II
NRC Senior Resident Inspector – Browns Ferry Nuclear Plant
State Health Officer - Alabama Department of Public Health (w/o Enclosures 2
and 3)

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Enclosure 1

Evaluation of Proposed Change

Request for Approval of the Browns Ferry Nuclear Plant Cyber Security Plan

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3.0 TECHNICAL EVALUATION

Federal Register Notice 74 FR 13926 issued the final rule that amended 10 CFR Part 73. Cyber security requirements are codified as new 10 CFR 73.54 and are designed to provide high assurance that digital computer and communication systems and networks are adequately protected against cyber attacks up to and including the design basis threat established by 10 CFR 73.1(a)(1)(v). These requirements are substantial improvements upon the requirements imposed by EA-02-026 (Reference 6.2).

NEI 08-09, "Cyber Security Plan Template," provides an approach for complying with the Commission's regulations for protecting digital computers, communications systems, and networks. ~~NEI 08-09 has been submitted to the NRC (Reference 6.3) for use by licensees in development of their own cyber security plans. The Browns Ferry Nuclear Plant Cyber Security Plan is in accordance with NEI 08-09 (Reference 6.3). with the exception that Appendix A, Table 1, "Systems Within the Scope of 10 CFR 73.54," and the associated references to Table 1 have not been included in the Cyber Security Plan. The removal of Table 1 was based on NRC feedback and is considered acceptable since the Table 1 listing of systems within the scope of 10 CFR 73.54 will be available for inspection on-site.~~

This LAR includes the proposed Plan (Enclosure 3) that conforms to the template provided in NEI 08-09. In addition the LAR includes the proposed change to the existing FOLs license conditions for "Physical Protection" (Attachments 1 and 2) for BFN Units 1, 2 and 3. Finally, the LAR contains the proposed Implementation Schedule (Enclosure 2) as required by 10 CFR 73.54.

6.0 REFERENCES

1. Federal Register Notice, Final Rule 10 CFR Part 73, Power Reactor Security Requirements, published on March 27, 2009, 74 FR 13926.
2. EA-02-026, Order Modifying Licenses, Safeguards and Security Plan Requirements, issued February 25, 2002.
3. **Letter from NRC to Nuclear Energy Institute, "Nuclear Energy Institute 08-09, 'Cyber Security Plan Template, Rev 6,'" dated May 5, 2010.**

E1-2

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Attachment 1

Proposed Facility Operating License Change (Marked-Up)

E1-3

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Browns Ferry Nuclear Plant, Unit 1

Proposed Facility Operating License Change (Marked-Up)

E1-4

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(11) The licensee 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 contains Safeguards Information protected under 10 CFR 73.21, is entitled: "Browns Ferry Nuclear Plant Physical Security Plan, Training and Qualification Plan, and Contingency Plan," submitted by letter dated April 28, 2006.

(12) Deleted.

(13) Browns Ferry Nuclear Plant shall implement and maintain in effect all provisions of the approved Fire Protection Program as described in the Final Safety Analysis Report for BFN as approved in the safety evaluations dated December 8, 1988; March 31, 1993; April 1, 1993; November 2, 1995; April 25, 2007, and Supplement dated November 3, 1989; subject to the following provision:

The licensee may make changes to the approved fire protection program without prior approval of the Commission only if those changes would not adversely affect the ability to achieve and maintain safe shutdown in the event of a fire.

(14) The licensee shall maintain the Augmented Quality Program for the Standby Liquid Control System to provide quality control elements to ensure component reliability for the required alternative source term function defined in the Updated Final Safety Analyses Report (UFSAR).

(15) The licensee is required to confirm that the conclusions made in TVA's letter dated September 17, 2004, for the turbine building remain acceptable using seismic demand accelerations based on dynamic seismic analysis prior to the restart of Unit 1.

(16) Upon implementation of Amendment No. 275, adopting TSTF-448, Revision 3, the determination of control room envelope (CRE) unfiltered air inleakage as required by SR 3.7.3.4, in accordance with TS 5.5.13.c.(i), the assessment of the CRE habitability as required by TS 5.5.13.c.(ii), and the measure of CRE pressure as required by TS 5.5.13.d, shall be considered met.

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(b) The licensee shall fully implement and maintain in effect all provisions of the Commission-approved Browns Ferry Nuclear Plant Cyber Security Plan submitted by letter dated July 23, 2010, and withheld from public disclosure in accordance with 10 CFR 2.390.

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Browns Ferry Nuclear Plant, Unit 2

Proposed Facility Operating License Change (Marked-Up)

E1-6

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The licensee may make changes to the approved fire protection program without prior approval of the Commission only if those changes would not adversely affect the ability to achieve and maintain safe shutdown in the event of a fire.

- (15) The licensee shall maintain the Augmented Quality Program for the Standby Liquid Control System to provide quality control elements to ensure component reliability for the required alternative source term function defined in the Updated Final Safety Analyses Report (UFSAR).
- (16) Upon complementation of Amendment No. 302, adopting TSTF-448, Revision 3, the determination of control room envelope (CRE) unfiltered air leakage as required by SR 3.7.3.4, in accordance with TS 5.5.13.c(i), the assessment of the CRE habitability as required by TS 5.5.13.c(ii), and the measurement of CRE pressure as required by TS 5.5.13.d, shall be considered met.

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(b) The licensee shall fully implement and maintain in effect all provisions of the Commission-approved Browns Ferry Nuclear Plant Cyber Security Plan submitted by letter dated July 23, 2010, and withheld from public disclosure in accordance with 10 CFR 2.390.

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Browns Ferry Nuclear Plant, Unit 3

Proposed Facility Operating License Change (Marked-Up)

E1-8

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- (3) The licensee is authorized to relocate certain requirements included in Appendix A and the former Appendix B to licensee-controlled documents. Implementation of this amendment shall include the relocation of these requirements to the appropriate documents, as described in the licensee's application dated September 6, 1996; as supplemented May 1, August 14, November 5 and 14, December 3, 4, 11, 22, 23, 29, and 30, 1997; January 23, March 12, April 16, 20, and 28, May 7, 14, 19, and 27, and June 2, 5, 10 and 19, 1998; evaluated in the NRC staff's Safety Evaluation enclosed with this amendment. This amendment is effective immediately and shall be implemented within 90 days of the date of this amendment.
- (4) Deleted.
- (5) Classroom and simulator training on all power uprate related changes that affect operator performance will be conducted prior to operating at uprated conditions. Simulator changes that are consistent with power uprate conditions will be made and simulator fidelity will be validated in accordance with ANSI/ANS 3.5-1985. Training and the plant simulator will be modified, as necessary, to incorporate changes identified during startup testing. This amendment is effective immediately.

INSERT
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(6) The licensee 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 contains Safeguards Information protected under 10 CFR 73.21, is entitled: "Browns Ferry Nuclear Plant Physical Security Plan, Training and Qualification Plan, and Contingency Plan," Revision 4, submitted by letter dated April 28, 2006.

(7) Browns Ferry Nuclear Plant shall implement and maintain in effect all provisions of the approved Fire Protection Program as described in the Final Safety Analysis Report for BFN as approved in the safety evaluations dated December 8, 1988; March 31, 1993; April 1, 1993; November 2, 1995; April 25, 2007, and Supplement dated November 3, 1989; subject to the following provision:

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(b) The licensee shall fully implement and maintain in effect all provisions of the Commission-approved Browns Ferry Nuclear Plant Cyber Security Plan submitted by letter dated July 23, 2010, and withheld from public disclosure in accordance with 10 CFR 2.390.

(9) The licensee shall maintain the Augmented Quality Program for the Standby Liquid Control System to provide quality control elements to ensure component reliability for the required alternative source term function defined in the Updated Final Safety Analyses Report (UFSAR).

(10) Mitigation Strategy License Condition

Develop and maintain strategies for addressing large fires and explosions and that include the following key areas:

- (a) Fire fighting response strategy with the following elements:
 - 1. Pre-defined coordinated fire response strategy and guidance
 - 2. Assessment of mutual aid fire fighting assets
 - 3. Designated staging areas for equipment and materials
 - 4. Command and control
 - 5. Training of response personnel

- (b) Operations to mitigate fuel damage considering the following:
 - 1. Protection and use of personnel assets
 - 2. Communications
 - 3. Minimizing fire spread
 - 4. Procedures for implementing integrated fire response strategy
 - 5. Identification of readily-available pre-staged equipment
 - 6. Training on integrated fire response strategy
 - 7. Spent fuel pool mitigation measures

- (c) Actions to minimize release to include consideration of:
 - 1. Water spray scrubbing
 - 2. Dose to onsite responders

(11) The licensee shall implement and maintain all Actions required by Attachment 2 to NRC Order EA-06-137, issued June 20, 2006, except the last action that requires incorporation of the strategies into the site security plan, contingency plan, emergency plan and/or guard training and qualification plan, as appropriate.

(12) Upon completion of Amendment No. 261, adopting TSTF-448, Revision 3, the determination of control room envelope (CRE) unfiltered air inleakage as required by SR 3.7.3.4, in accordance with TS 5.5.13.c(i), the assessment of the CRE habitability as required by TS 5.5.13.c(ii), and the measurement of the CRE pressure as required by TS 5.5.13.d, shall be considered met.

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Attachment 2

Proposed Facility Operating License Change (Re-Typed)

E1-11

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Browns Ferry Nuclear Plant, Unit 1

Proposed Facility Operating License Change (Re-Typed)

E1-12

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Browns Ferry Nuclear Plant, Unit 2

Proposed Facility Operating License Change (Re-Typed)

E1-14

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Browns Ferry Nuclear Plant, Unit 3

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E1-16

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- Develop and maintain strategies for addressing large fires and explosions and that include the following key areas:
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