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Christina L. Perino
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GNRO-2010/00065

September 23, 2010

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

SUBJECT: Notification Letter Designating Grand Gulf Nuclear Station Balance
of-Plant Systems Within the Cyber Security Rule Scope

Grand Gulf Nuclear Station, Unit 1
Docket No. 50-416
License No. NPF-29

- REFERENCES:
1. Letter from Jim Hughes (NERC) to Entergy, "Request for Data or Information: Nuclear Power Plant 'Bright-Line' Survey," dated June 14, 2010
 2. Letter from Michael Moon (NERC) to Grand Gulf Nuclear Station, Unit 1, "NERC's Response to the Completed Bright-Line Survey," dated August 27, 2010

Dear Sir or Madam:

By Order dated March 19, 2009¹, the Federal Energy Regulatory Commission (FERC) clarified that the "balance-of-plant" equipment within a nuclear power plant is subject to compliance with the FERC approved Critical Infrastructure Protection (CIP) Reliability Standards. Paragraph 50 of the Order provides for an exception from the CIP Reliability Standards for equipment in the balance-of-plant that is subject to the NRC cyber security regulations. Pursuant to paragraph 50 of the Order, the North American Electric Reliability Corporation (NERC) has been engaging in a "Bright-Line" determination process (Reference 1) to clarify the systems that would be subject to the NRC cyber security rule (10 CFR 73.54), and those that would be subject to the CIP Reliability Standards.

In Reference 2, NERC is requiring that Grand Gulf Nuclear Station (GGNS) provide the NRC with a letter identifying all balance-of-plant structures, systems, and components (SSCs) considered important-to-safety with respect to the NRC's cyber security regulation. As documented in our response to the Bright-Line survey (Reference 1), balance-of-plant SSCs in Attachment 1 of the survey are important-to-safety, and thus, are within the scope of 10 CFR 73.54.

¹ Mandatory Reliability Standards for Critical Infrastructure Protection, order on clarification, Order No. 706-B, 126 FERC 61,229 (2009)



In accordance with the requirements of 10 CFR 73.54 (b)(1), a comprehensive identification of SSCs subject to the requirements of 10 CFR 73.54 will be developed during the implementation of the cyber security program. The program is implemented in accordance with the schedule submitted to the NRC by letter dated July 22, 2010 (GNRO-2010/00047) with the GGNS Cyber Security Plan. This identification of SSCs will be available for inspection upon completion and will contain, at a minimum, those SSCs as identified in Attachment 1 of the Bright-Line Survey. Providing the requested information in this alternate manner satisfies the intent of the NERC letter.

In Reference 2, NERC is also requiring that each nuclear power plant submit a revised cyber security plan to the NRC for its review and approval. On or before November 30, 2010, Entergy will supplement the GGNS Cyber Security Plan submittal to clarify the scope of systems described in Section 2.1, Scope and Purpose. Section 2.1, will be amended to clarify the balance-of-plant SSCs that will be included in the scope of the cyber security program.

The new commitments contained in this submittal are summarized in the attachment.

If you have any questions regarding this submittal, please contact Peggy R. Rescheske at 601-437-1781.

Sincerely,

A handwritten signature in cursive script, appearing to read "CLP/PRR", written in black ink.

CLP/PRR

Attachment: List of Regulatory Commitments

cc:

NRC Senior Resident Inspector
Grand Gulf Nuclear Station
Port Gibson, MS 39150

U.S. Nuclear Regulatory Commission
ATTN: Mr. Elmo E. Collins, Jr. (w/2)
Region Administrator, Region IV
612 East Lamar Blvd, Suite 400
Arlington, TX 76011-4125

U. S. Nuclear Regulatory Commission
ATTN: Mr. Carl F. Lyon, NRR/DORL (w/2)
Mail Stop OWFN/8 B1
Washington, DC 20555-0001

Michael Moon
Director of Compliance Operations
North American Electric Reliability Corporation
116-390 Village Boulevard
Princeton, NJ 08540

Attachment

GNRO-2010/00065

List of Regulatory Commitments

List of Regulatory Commitments

The table below identifies actions discussed in this letter for which Entergy commits to perform. Any other statements or actions discussed in this submittal are for information purposes and are not considered commitments.

COMMITMENT	TYPE		SCHEDULED COMPLETION DATE (If Required)
	ONE-TIME ACTION	CONTINUING COMPLIANCE	
Entergy will supplement the GGNS Cyber Security Plan submittal to clarify the scope of systems described in Section 2.1, Scope and Purpose, to clarify the balance-of-plant SSCs that will be included in the scope of the cyber security program.	X		November 30, 2010
In accordance with the requirements of 10 CFR 73.54 (b)(1), a comprehensive identification of systems, structures, and components (SSCs) subject to the requirements of 10 CFR 73.54 will be developed during the implementation of the cyber security program. This identification of SSCs will be available for inspection upon completion and will contain, at a minimum, those SSCs as identified in Attachment 1 of the Bright-Line Survey.	X		September 30, 2014