

RS-10-154
TMI-10-091
RA-10-074

September 24, 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: Notification Letter Designating Exelon Station Balance of Plant Systems within the Cyber Security Rule Scope

Reference: (1) Letter from Jim Hughes (NERC) to Alison MacKellar (Exelon Generation Company, LLC), "Request for Data or Information: Nuclear Power Plant 'Bright-Line' Survey," dated June 15, 2010

(2) Letter from Michael Moon (NERC) to Exelon Nuclear Power Stations (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), "NERC's Response to the Completed Bright Line Survey," dated August 27, 2010

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) Cyber Security 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 the Reference (2) letters, NERC is requiring that Exelon Generation Company, LLC (Exelon) provide the NRC with a letter identifying all balance of plant Systems, Structures, and Components (SSCs) considered important to safety with respect to the NRC's cyber security regulation for each of the Exelon plants (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). As documented in our response to the Bright-Line Survey, the balance of plant Systems 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 schedules submitted to the NRC by letter dated July 23, 2010, with the Exelon Cyber Security Plan. This identification of SSCs will be available for inspection upon completion and will contain those Systems as identified in Attachment 1 of the Exelon response to the Bright-Line Survey. Providing the requested information in this alternate matter satisfies the intent of the NERC letter.

In the Reference (2) letters, 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, Exelon will supplement our 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.

There are no regulatory commitments contained in this letter. Should you have any questions concerning this letter, or require additional information, please contact Doug Walker at (610) 765-5952.

Respectfully,

gsk 

Pamela B. Cowan
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Exelon Generation Company, LLC

cc: Michael Moon, Director of Compliance Operations, NERC
Jim Hughes, NERC
James T. Wiggins, Director – Office of Nuclear Security & Incident Response, NRC
Eric Leads, Director – Office of Nuclear Reactor Regulation, NRC
USNRC Region I, Regional Administrator
USNRC Region III, Regional Administrator
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

cc (continued):

USNRC Senior Resident Inspector - Quad Cities Nuclear Power Station

USNRC Senior Resident Inspector -Three Mile Island Nuclear Station

S. T. Gray, State of Maryland

Illinois Emergency Management Agency - Division of Nuclear Safety

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Director, Bureau of Nuclear Engineering, New Jersey Department of

Environmental Protection

Mayor of Lacey Township

Alison Mackellar, Exelon Nuclear NERC Compliance Contact