



September 23, 2010

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

Serial No.: 10-349B  
NL&OS/MAE: R4  
Docket Nos.: 50-305  
50-336/423  
50-338/339  
50-280/281  
License Nos.: DPR-43  
DPR-65  
NPF-49  
NPF-4/7  
DPR-32/37

**DOMINION ENERGY KEWAUNEE, INC.**  
**DOMINION NUCLEAR CONNECTICUT, INC.**  
**VIRGINIA ELECTRIC AND POWER COMPANY**  
**KEWAUNEE POWER STATION**  
**MILLSTONE POWER STATION UNITS 2 AND 3**  
**NORTH ANNA POWER STATION UNITS 1 AND 2**  
**SURRY POWER STATION UNITS 1 AND 2**  
**NOTIFICATION LETTER DESIGNATING BALANCE OF PLANT SYSTEMS**  
**WITHIN THE CYBER SECURITY RULE SCOPE**

- Reference: (1) Letters from Jim Hughes (NERC) to the subject stations, "Request for Data or Information: Nuclear Power Plant "Bright-Line" Survey," dated June 15, 2010.
- (2) Letters from Michael Moon (NERC) to the subject stations, "NERC's Response to the Completed Bright-Line Survey," dated August 27, 2010 and September 2, 2010.
- (3) E-mail dated July 15, 2010 from J. N. Bailey to Jim Hughes, Bright-Line Survey Results.

By Order dated March 19, 2009<sup>1</sup>, 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 the Reference (2) letters, NERC required that Dominion Energy Kewaunee, Inc. (DEK), Dominion Nuclear Connecticut, Inc. (DNC), and Virginia Electric and Power Company (Dominion) 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 Kewaunee, Millstone, North Anna, and Surry Power Stations. As documented in our response to the Bright-Line survey (Reference 3), balance

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



Commitments made in this letter: On or before November 30, 2010, DEK, DNC, and Dominion will supplement our Cyber Security Plan submittal to amend Section 2.1.

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