



Entergy Nuclear Operations, Inc.  
Pilgrim Nuclear Power Station  
600 Rocky Hill Road  
Plymouth, MA 02360

September 22, 2010

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

SUBJECT: Entergy Nuclear Operations, Inc.  
Pilgrim Nuclear Power Station  
Docket No. 50-293  
License No. DPR-35

Notification Letter Designating Pilgrim Nuclear Power Station  
Balance-of-Plant Systems within the Cyber Security Rule Scope

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

LETTER NUMBER: 2.10.042

Dear Sir or Madam:

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.

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

5001A  
NRR

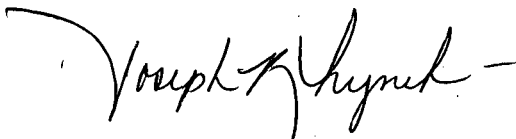
In the Reference 2 letter, NERC is requiring that Pilgrim Nuclear Power Station (Pilgrim) provide the NRC with a letter identifying all balance-of-plant systems, structures, and components (SSCs) considered important-to-safety with respect to the NRC's cyber security regulation. As documented in our response to the Bright-Line survey, 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.

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 15, 2010 (Ltr. No. 2.10.034) with Pilgrim's 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 the Reference 2 letter, 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 Pilgrim 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. Should you have any questions concerning this letter, or require additional information, please contact me at 508-830-8403.

Sincerely,

A handwritten signature in black ink, appearing to read "Joseph R. Lynch", followed by a horizontal line.

Joseph R. Lynch  
Manager, Licensing

Attachment: List of Regulatory Commitments

Entergy Nuclear Operations, Inc.  
Pilgrim Nuclear Power Station

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cc:

Regional Administrator, Region 1  
U.S. Nuclear Regulatory Commission  
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King of Prussia, PA 19406-1415  
(w/o Attachments)

Mr. Richard Guzman, Project Manager  
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Division of Operator Reactor Licensing  
Office of Nuclear Reactor Regulation  
U.S. Nuclear Regulatory Commission  
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11555 Rockville Pike  
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Mr. Michael Moon  
Director of Compliance Operations  
North American Electric Reliability Corporation  
116-390 Village Boulevard  
Princeton, NJ 08540

Sr. Resident Inspector, Pilgrim Station

Attachment to Letter No. 2.10.042

List of Regulatory Commitments

### List of Regulatory Commitments

The following table identifies those actions committed to by Entergy in this document. Any other statements in this submittal are provided for information purposes and are not considered to be regulatory commitments.

COMMITMENT	TYPE (Check One)		SCHEDULED COMPLETION DATE  (If Required)
	ONE-TIME ACTION	CONTINUING COMPLIANCE	
Entergy will supplement our Cyber Security Plan submittal to clarify the scope of systems described in Section 2.1, "Scope and Purpose" to include the following language, "The scope of 10 CFR 73.54 includes, in part, balance-of-plant equipment that, if compromised, could cause a reactivity event."	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