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**DTE Energy**



September 29, 2010  
NRC-10-0055

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

- Reference:
- 1) Fermi 2  
NRC Docket No. 50-341  
NRC License No. NPF-43
  - 2) Letter from Jim Hughes (NERC) to Kent Kujala, Detroit Edison, "Request for Data or Information: Nuclear Power Plant 'Bright-Line' Survey," dated June 15, 2010
  - 3) Letter from Michael Moon (NERC) to Kent Kujala, Detroit Edison, "NERC's Response to the Completed Bright Line Survey," dated August 30, 2010
  - 4) Detroit Edison Letter to NRC, "Request for Approval of Revised Fermi 2 Cyber Security Plan," NRC-10-0050, dated July 27, 2010

Subject: Notification Letter Designating Fermi 2 Balance of  
Plant Systems within the Cyber Security Rule Scope

By Order dated March 19, 2009, 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 2) 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.

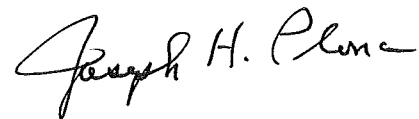
In Reference 3, NERC is requiring that the Fermi 2 Nuclear Power Plant provide the NRC with a letter identifying all balance of plant Systems, Structures, and Components (SSCs) considered important to safety with respect to the NRC's cyber security regulation. As documented in Detroit Edison's response 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 in Reference 4 with the Fermi 2 Cyber Security Plan. This identification of SSCs will be available for inspection upon completion and will contain those SSCs as identified in Attachment 1 of the Bright-Line Survey. Providing the requested information in this alternate matter satisfies the intent of the NERC letter.

In Reference 3, NERC is also requiring that each nuclear power plant submit a revised cyber security plan to the NRC for its review and approval. Therefore, Detroit Edison intends to supplement the Cyber Security Plan in Reference 4 by November 30, 2010, 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.

Should you have any questions or require additional information, please contact Mr. Rodney W. Johnson of my staff at (734) 586-5076.

Sincerely,

Handwritten signature of Joseph H. Plone in cursive script.

USNRC  
NRC-10-0055  
Page 3

cc: NRC Project Manager  
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