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September 27, 2010

U.S. Nuclear Regulatory Commission  
Washington, DC 20555-0001

**ATTENTION:** Document Control Desk

**SUBJECT:** **Calvert Cliffs Nuclear Power Plant**  
Unit Nos. 1 & 2; Docket Nos. 50-317 & 50-318  
**Nine Mile Point Nuclear Station**  
Unit Nos. 1 & 2; Docket Nos. 50-220 & 50-410  
**R. E. Ginna Nuclear Power Plant**  
Docket No. 50-244

**Notification Letter Designating Balance of Plant Systems within the Cyber Security Rule Scope**

- REFERENCES:**
- (a) Federal Energy Regulatory Commission (FERC) Order No. 706-B, 126 FERC 61,229, dated March 19, 2009, Mandatory Reliability Standards for Critical Infrastructure Protection
  - (b) Letters from J. Hughes (NERC) to K. J. Reynolds (Ginna), L. Williams (Calvert Cliffs), and B. E. Shanahan (Nine Mile Point), dated June 15, 2010, Request for Data or Information: Nuclear Power Plant "Bright-Line" Survey
  - (c) Letters from M. Moon (NERC) to K. J. Reynolds (Ginna), L. Williams (Calvert Cliffs), and B. E. Shanahan (Nine Mile Point), dated August 27, 2010, NERC's Response to the Completed Bright Line Survey
  - (d) Letter from M. G. Korsnick (CENG) to Document Control Desk (NRC), dated July 16, 2010, Request for Approval of the Constellation Energy Nuclear Group Cyber Security Plan

In Reference (a), 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 Reference (a) provides for an exception from the CIP Reliability Standards for equipment in the balance of plant that is subject to Nuclear Regulatory Commission (NRC) cyber security regulations. As a follow-up to Paragraph 50, the North American Electric Reliability Corporation (NERC) has been engaging in a "Bright-Line" determination process (Reference b) 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.

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NRC

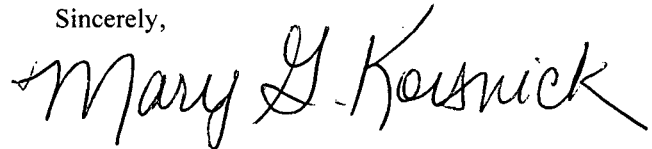
In Reference (c), NERC is requiring that each Constellation Energy Nuclear Group nuclear station provide the NRC with a letter identifying all balance of plant systems, structures, and components (SSC) considered important to safety under the NRC's cyber security regulation. As documented in our responses to the Bright-Line survey, balance of plant SSCs in Attachment 1 of the survey are important to safety and, therefore, 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 for each Constellation Energy Nuclear Group nuclear station during implementation of the cyber security program. The program will be implemented in accordance with the schedule submitted to the NRC in Reference (d). This identification of SSCs will be available for inspection upon completion and will contain those SSCs 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 (c), 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, we will supplement our Cyber Security Plan 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.

If there are any questions regarding this submittal, please contact Bruce Montgomery at 410-470-3777 or [Bruce.Montgomery@cenllc.com](mailto:Bruce.Montgomery@cenllc.com).

Sincerely,



Mary G. Korsnick

MGK/EMT/bjd

cc: D. V. Pickett, NRC  
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M. L. Dapas, NRC  
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M. Moon, NERC  
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A. L. Peterson, NYSERDA  
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