



South Texas Project Electric Generating Station P.O. Box 289 Wadsworth, Texas 77483

September 23, 2010
NOC-AE-10002602
STI: 32747953

U. S. Nuclear Regulatory Commission
Attention: Document Control Desk
One White Flint North
11555 Rockville Pike
Rockville, MD 20852

South Texas Project
Docket Nos. STN 50-498, STN 50-499
Notification Letter Designating South Texas Project
Balance of Plant Systems within the Cyber Security Rule Scope

- Reference:
- (1) Letters from Jim Hughes (NERC) to Mike Berg, South Texas Project, Unit 1 and Unit 2 "Request for Data or Information: Nuclear Power Plant 'Bright-Line' Survey," dated June 15, 2010
 - (2) Letter from Michael Moon (NERC) to Mike Berg, South Texas Project, Units 1 and 2, "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) 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) letter, NERC is requiring that South Texas Project 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 our response to the Bright Line survey, the 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

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

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of the cyber security program. The program is implemented in accordance with the schedule submitted to the NRC by letter dated July 27, 2010 with the South Texas Project 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 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, STP Nuclear Operating Company 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.

There are no commitments in this letter.

Should you have any questions concerning this letter, or require additional information, please contact me at (361) 972-7454 or Marilyn Kistler at (361) 972-8385.



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