

September 28, 2010

AEP-NRC-2010-68  
10 CFR 73.54

U. S. Nuclear Regulatory Commission  
ATTN: Document Control Desk  
Washington, DC 20555-0001

Subject: Donald C. Cook Nuclear Plant Units 1 and 2  
Facility Operating License Nos. DPR-58 and DPR-74  
NRC Docket Nos. 50-315 and 50-316

Notification Letter Designating Donald C. Cook Nuclear Plant Units 1 and 2 Balance  
of Plant Systems within the Cyber Security Rule Scope

- References:
- (1) Mandatory Reliability Standards for Critical Infrastructure Protection, order on clarification, Order No. 706-B, 126 FERC ¶ 61,229 (2009).
  - (2) Letter from Monica Benson (NERC) to Thad Ness (AEP), "Request for Data or Information: Nuclear Power Plant 'Bright-Line' Survey," dated June 18, 2010.
  - (3) Letter from Michael Moon (NERC) to Thad Ness (AEP), "NERC's Response to the Completed 'Bright-Line' Survey," dated August 27, 2010.
  - (4) Letter from Joel Gebbie (AEP) to NERC, "Submission of Data Request Response to Nuclear Power Plant Bright-Line Survey Issued by North American Electric Reliability Corporation", dated July 15, 2010.
  - (5) Letter from Joel Gebbie (AEP) to the NRC, "License Amendment Request for Approval of the Donald C. Cook Nuclear Plant Cyber Security Plan", dated July 19, 2010.

Dear Sir or Madam:

By Reference (1), 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 Nuclear Regulatory Commission (NRC) cyber security regulations. Pursuant to paragraph 50 of the Order, by Reference (2), the North American Electric Reliability Corporation (NERC) has been engaging in a "Bright-Line" determination process 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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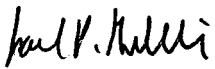
By Reference (3), NERC is requiring that Indiana Michigan Power Company (I&M), licensee for Donald C. Cook Nuclear Plant (CNP) Units 1 and 2, provide the NRC with a letter identifying all balance of plant Systems, Structures, and Components (SSCs) considered important to safety with respect to the NRC's cyber security regulation. As documented by Reference (4), the balance of plant SSCs in Attachment 1 of the Bright-Line 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 Reference (5). 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 manner satisfies the intent of the NERC letter.

In the Reference (3) 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, I&M 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 new or revised commitments in this letter. Should you have any questions concerning this letter, or require additional information, please contact Mr. Michael K. Scarpello, Regulatory Affairs Manager, at (269) 466-2649.

Sincerely,



Joel P. Gebbie  
Site Vice President

AMD/jmr

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