

Joseph H. Plona  
Site Vice President

6400 N. Dixie Highway, Newport, MI 48166  
Tel: 734.586.5910 Fax: 734.586.4172



10 CFR 73.54

November 22, 2010  
NRC-10-0075

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

- References:
- 1) Fermi 2  
NRC Docket No. 50-341  
NRC License No. NPF-43
  - 2) Detroit Edison Letter to NRC, "Request for Approval of Revised Fermi 2 Cyber Security Plan," NRC-10-0050, dated July 27, 2010
  - 3) Detroit Edison Letter to NRC, "Notification Letter Designating Fermi 2 Balance of Plant Systems within the Cyber Security Rule Scope," NRC-10-0055, dated September 29, 2010

Subject: Clarification of Fermi 2 Cyber Security Plan Regarding  
Balance of Plant Systems within the Scope of the Program

In Reference 3, Detroit Edison indicated that the Cyber Security Plan provided in Reference 2 would be supplemented to clarify the scope of systems included in the plan. Specifically, Reference 3 stated that Section 2.1, "Scope and Purpose" of the plan would be amended to clarify the balance-of-plant systems, structures and components that will be included in the scope of the plan.

The revision to the plan is limited to Section 2.1, "Scope and Purpose." The following paragraph is being added to Section 2.1 to provide the clarification:

*The scoping provisions of 10 CFR 73.54 encompass certain Structures, Systems, and Components (SSCs) in the Balance of Plant (BOP). Specifically, included among the systems to be protected are those SSCs in the BOP out to the first inter-tie with the offsite distribution system whose compromise could result in a reactor scram or transient.*

USNRC  
NRC-10-0075  
Page 2

The entire revised Section 2.1 of the plan is provided in the enclosure to this letter.

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

Sincerely,

A handwritten signature in cursive script that reads "Joseph H. Plena".

Enclosure

cc: NRC Project Manager  
NRC Resident Office  
Reactor Projects Chief, Branch 4, Region III  
Regional Administrator, Region III  
Supervisor, Electric Operators,  
Michigan Public Service Commission

**Enclosure to  
NRC-10-0075**

**Fermi 2 NRC Docket No. 50-341  
Operating License No. NPF-43**

**Section 2.1, "Scope and Purpose"  
Of the Fermi 2 Cyber Security Plan**

## 2.1 Scope and Purpose

This Plan establishes a means to achieve high assurance that digital computer and communication systems and networks associated with the following functions (hereafter designated as Critical Digital Assets (CDAs)) are adequately protected against cyber attacks up to and including the Design Basis Threat (DBT) as described in 10 CFR 73.1:

1. Safety-related and important-to safety functions;
2. Security functions;
3. Emergency preparedness functions including offsite communications; and
4. Support systems and equipment which if compromised, would adversely impact safety, security, or emergency preparedness functions.

The safety-related and important-to safety functions, security functions, and emergency preparedness functions including offsite communications are herein referred to as SSEP functions.

The scoping provisions of 10 CFR 73.54 encompass certain Structures, Systems, and Components (SSCs) in the Balance of Plant (BOP). Specifically, included among the systems to be protected are those SSCs in the BOP out to the first inter-tie with the offsite distribution system whose compromise could result in a reactor scram or transient.

High assurance of adequate protection of systems associated with the above functions from cyber attacks is achieved by:

1. Implementing and documenting the “baseline” cyber security controls described in Section 3.1.6 of this Plan; and
2. Implementing and documenting a cyber security program to maintain the established cyber security controls through a comprehensive life cycle approach as described in Section 4 of this Plan.