



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D.C. 20555-0001

December 7, 2010

Mr. Michael J. Pacilio  
President and Chief Nuclear Officer  
Exelon Nuclear  
4300 Winfield Road  
Warrenville, IL 60555

SUBJECT: BRAIDWOOD STATION, UNITS 1 AND 2; BYRON STATION, UNIT NOS. 1 AND 2; CLINTON POWER STATION, UNIT NO. 1; DRESDEN NUCLEAR POWER STATION, UNITS 2 AND 3; LASALLE COUNTY STATION, UNITS 1 AND 2; LIMERICK GENERATING STATION, UNITS 1 AND 2; OYSTER CREEK NUCLEAR GENERATING STATION; PEACH BOTTOM ATOMIC POWER STATION, UNITS 2, AND 3; QUAD CITIES NUCLEAR POWER STATION, UNITS 1 AND 2; AND THREE MILE ISLAND NUCLEAR STATION, UNIT 1 - REQUEST FOR ADDITIONAL INFORMATION REGARDING APPROVAL OF CYBER SECURITY PLAN (TAC NOS. ME4298, ME4299, ME4301, ME4302, ME4303, ME4304, ME4305, ME4306, ME4307, ME4308, ME4309, ME 4310, ME4311, ME4312, ME4313, AND ME4314)

Dear Mr. Pacilio:

By letter to the Nuclear Regulatory Commission (NRC) dated July 23, 2010 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML102070168 (non-public)), Exelon Generation Company, LLC submitted its Cyber Security Plan, which superseded in its entirety the Cyber Security Plan dated November 23, 2009 (ADAMS Accession No. ML093280234 (non-public)).

The June 23, 2010, Cyber Security Plan is based on Nuclear Energy Institute (NEI) 08-09, Revision 6 which the the NRC staff stated, in its letter dated May 5, 2010 (ADAMS Accession No. ML101190371), would be acceptable for use by licensees to comply with the requirements of Title 10 of the *Code of Federal Regulations* (10 CFR) 73.54 with the exception of the definition of "cyber attack."

The NRC staff is reviewing your submittal and has determined that additional information is required to complete the review. The specific information requested is addressed in the enclosure to this letter. During a discussion with Mr. Douglas Walker of your staff on November 29, 2010, it was agreed that you would provide a response 30 days from the date of this letter.

The NRC staff considers that timely responses to requests for additional information help ensure sufficient time is available for staff review and contribute toward the NRC's goal of

M. Pacilio

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efficient and effective use of staff resources. If circumstances result in the need to revise the requested response date, please contact me at (301) 415-2315.

Sincerely,

*/RA/*

Eva A. Brown, Senior Project Manager  
Plant Licensing Branch III-2  
Division of Operating Reactor Licensing  
Office of Nuclear Reactor Regulation

Docket Nos. STN 50-456, 50-457, 50-454,  
50-455, 50-461, 50-237, 50-249, 50-373,  
50-374, 50-352, 50-353, 50-219, 50-277,  
50-278, 50-254, 50-265, and 50-289

Enclosure:  
Request for Additional Information

cc w/encl: Distribution via Listserv

REQUEST FOR ADDITIONAL INFORMATION

RELATED TO CYBER SECURITY PLAN REQUEST

FOR BRAIDWOOD STATION, UNITS 1 AND 2; BYRON STATION, UNIT NOS. 1 AND 2;  
CLINTON POWER STATION, UNIT NO. 1; DRESDEN NUCLEAR POWER STATION, UNITS  
2, AND 3; LASALLE COUNTY STATION, UNITS 1 AND 2; LIMERICK GENERATING  
STATION, UNITS 1 AND 2; OYSTER CREEK NUCLEAR GENERATING STATION; PEACH  
BOTTOM ATOMIC POWER STATION, UNITS 2, AND 3; QUAD CITIES NUCLEAR POWER  
STATION, UNITS 1 AND 2; AND THREE MILE ISLAND NUCLEAR STATION, UNIT 1  
DOCKET NOS. STN 50-456, STN 50-457, STN 50-454, STN 50-455, 50-461, 50-237, 50-249,  
50-373, 50-374, 50-352, 50-353, 50-219, 50-277, 50-278, 50-254, 50-265, AND 50-289

In reviewing the Exelon Generation Company's (Exelon's) submittal dated July 23, 2010, for the subject plants, the Nuclear Regulatory Commission staff has determined that the following information is needed in order to complete its review:

Cyber Security Plan Section 4: *Establishing, Implementing, and Maintaining the Cyber Security Program Title: Defense-in-Depth Protective Strategies – Critical Digital Asset (CDA) Isolation Strategies.*

Section 73.54(c)(2) to Title 10 to the *Code of Federal Regulations* requires the licensee to apply and maintain defense-in-depth protective strategies to ensure the capability to detect, respond to, and recover from cyber attacks. Section 4.3, "Defense-in-Depth Protective Strategies," of the Exelon Generation Company, LLC (Braidwood, Byron, Clinton, Dresden, LaSalle, Limerick, Oyster Creek, Peach Bottom, Quad Cities, and Three Mile Island) Cyber Security Plan states (1) when referring to protections which isolate or secure safety-related CDAs within Level 4 and security CDAs within cyber security defensive levels 4 and 3, that these devices may be secured via "one or more deterministic devices (i.e., data diodes, air gaps) that isolate CDAs in level 4, or one or more non-deterministic network isolation devices."

Clarify if any of the non-deterministic devices for the safety-related CDAs and security CDAs are in parallel (i.e., connecting the same network segments) with the deterministic devices. Clarify if any of the non-deterministic devices for the safety-related CDAs and security CDAs are in parallel (i.e., connecting the same network segments) with the deterministic devices. If any safety-related and security devices are in parallel address why this configuration would not negate the protection afforded by the deterministic devices.

Enclosure

M. Pacilio

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efficient and effective use of staff resources. If circumstances result in the need to revise the requested response date, please contact me at (301) 415-2315.

Sincerely,

**/RA/**

Eva A. Brown, Senior Project Manager  
Plant Licensing Branch III-2  
Division of Operating Reactor Licensing  
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50-278, 50-254, 50-265, and 50-289

Enclosure:  
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RidsNrrDorlLpl1-2 Resource

**LPL3-2 R/F**

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RidsNrrPMQuadCities Resource  
RidsAcrcAcnw\_MailCenter Resource  
RidsNrrPMEMiller Resource  
RidsNrrDorlDpr Resource  
RidsRgn1MailCenter Resource

**LPL1-2 R/F**

ADAMS Accession No. ML103340303

OFFICE	LPL3-2/PM	LPL3-2/LA	LPL3-2/BC	LPL3-2/PM
NAME	NDiFrancesco	THarris	RCarlson	EBrown
DATE	11 /29/10	12/2/10	12/2/10	12/7/10

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