

From: Thadani, Mohan
Sent: Tuesday, November 30, 2010 1:48 PM
To: Maglio, Scott A
Cc: Polickoski, James; Markley, Michael; Pederson, Perry; Erlanger, Craig; Lent, Susan
Subject: Request for additional Information for Application for Approval of Callaway Plant, Unit 1, Cyber Security Plan

Scott:

By letter dated August 12, 2010 (Agencywide Documents Access and Management System (ADAMS), Accession No. ML1022500750), Union Electric Company (the licensee) submitted a request to amend the Facility Operating License (No. NPF-30) for Callaway Plant Unit 1. The licensee requested approval of Callaway's Cyber Security Plan (CSP), (ML1022500770). The licensee provided a proposed CSP Implementation Schedule, and included a proposed revision to the Facility Operating License to incorporate the provisions for implementing and maintaining in effect the provisions of the approved CSP. The licensee's amendment request was based on a generic template developed by the Nuclear Energy Institute in concert with the industry.

The NRC staff is in the process of reviewing the proposed CSP and the proposed Implementation Schedule, and has determined that additional information is required to complete its technical review. A supplemental request for additional information is provided below. Please provide your response to this request within 30 days from the receipt of this request, or propose an alternate schedule for your response.

Thank You.

Mohan C Thadani

Senior Project Manager
Plant Licensing Branch IV
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation
(301) 415-1476 Mohan.Thadani@nrc.gov

Union Electric Company
Callaway Unit 1
Request for Additional Information (RAI)
Cyber Security Plan Amendment
Tabletop reviews and validation testing

Title 10 of the *Code of Federal Regulations* (10 CFR) 73.54(b)(1) requires the licensees to analyze digital computer and communication systems and networks, and identify those assets that must be protected against cyber attacks. 10 CFR 73.54(e)(1) requires that the cyber security plan must describe how the

requirements of this section will be implemented and must account for the site-specific conditions that affect implementation.

The Callaway Plant, Unit 1, Cyber Security Plan (CSP) Section 3.1.5, "Tabletop Reviews and Validation Testing" describes tabletop review and validation activities for the Cyber Security Assessment Team. The CSP further states that the "activities are validated for Critical Digital Asset through a combination of table top reviews and walk-downs."

The purpose of performing physical and electronic walk-downs is to validate that available plant documentation is up to date, accurate and comprehensive. Thus a walk down, unlike a table top review, can identify and correct documentation issues found by the walkdowns.

Explain the conditions under which the Licensee will use table top reviews, rather than conducting actual walk-downs. Please fully identify and document networks and site-specific conditions, to provide assurance that the table top reviews will provide acceptable level of confidence in validation as the walk-downs would.

E-mail Properties

Mail Envelope Properties (0A64B42AAA8FD4418CE1EB5240A6FED1241760F7AA)

Subject: Request for additional Information for Application for Approval of Callaway Plant, Unit 1, Cyber Security Plan
Sent Date: 11/30/2010 1:48:06 PM
Received Date: 11/30/2010 1:48:06 PM
From: Thadani, Mohan

Created By: Mohan.Thadani@nrc.gov

Recipients:

SMaglio@ameren.com (Maglio, Scott A)
Tracking Status: None
James.Polickoski@nrc.gov (Polickoski, James)
Tracking Status: None
Michael.Markley@nrc.gov (Markley, Michael)
Tracking Status: None
Perry.Pederson@nrc.gov (Pederson, Perry)
Tracking Status: None
Craig.Erlanger@nrc.gov (Erlanger, Craig)
Tracking Status: None
Susan.Lent@nrc.gov (Lent, Susan)
Tracking Status: None

Post Office:
HQCLSTR02.nrc.gov

Files	Size	Date & Time
MESSAGE	9281	11/30/2010

Options

Expiration Date:

Priority: oImportanceNormal

ReplyRequested: False

Return Notification: False

Sensitivity: oNormal

Recipients received: