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William J. Steelman
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Waterford 3

W3F1-2010-0085

November 30, 2010

U.S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, DC 20555

Subject: Revision of Commitment to Supplement the Cyber Security Plan Regarding
Balance-of-Plant Systems
Waterford Steam Electric Station, Unit 3 (Waterford 3)
Docket No. 50-382
License No. NPF-38

- References:
1. Letter from Entergy to NRC, "License Amendment Request – Cyber Security Plan, Withdrawal and Re-submittal," dated July 15, 2010 (Waterford 3)
 2. Letter from Michael Moon (NERC) to Jim Nicholson (Entergy), "NERC's Response to the Completed Bright-Line Survey," dated August 27, 2010
 3. Letter from Entergy to NRC, "Notification Letter Designating Waterford 3 Balance-of-Plant Systems within the Cyber Security Rule Scope," dated September 27, 2010 (W3F1-2010-0074)
 4. Letter from Michael Moon (NERC) to Jim Nicholson (Entergy), "Update on 706-B Bright Line," dated November 8, 2010

Dear Sir or Madam:

In Reference 1, Entergy submitted a request for an amendment to the operating license for Waterford 3. The proposed amendment requested NRC approval of the Waterford 3 Cyber Security Plan, revision to the existing license condition (2.E), and the Cyber Security Plan Implementation Schedule.

In Reference 2, the North American Electric Reliability Corporation (NERC) required Entergy to "provide the NRC with a notification letter identifying all balance-of-plant (BOP) structures, systems, and components (SSCs) considered important-to-safety" within 30 days with a copy to NERC. In Reference 2, NERC also required Entergy to submit a revised cyber security plan for NRC review and approval, but without a specified time frame. Entergy provided the 30-day response to the NRC, as required by NERC, via Reference 3. Also in Reference 3, Entergy committed to supplement the Waterford 3 Cyber Security Plan by November 30, 2010, to clarify the BOP SSCs to be included within the scope of the cyber security program.

In Reference 4, NERC provided additional guidance regarding submittal of the Cyber Security Plan supplement. The letter stated:

In the near future, the NRC staff will articulate their Commission's decision regarding jurisdiction of the continuity of power, BOP SSCs. As a result, with respect to the requirement to submit "a revised cyber security plan...", NERC expects each licensee to provide its updated cyber security plan in accordance with a schedule to be provided by the NRC.


Based on the recent information and clarification from NERC, Entergy is deferring the proposed supplement to the Waterford 3 Cyber Security Plan (Reference 1) until after the NRC's staff has provided direction on how to revise the Cyber Security Plan to reflect the inclusion of balance of plant equipment.

There are no new commitments contained in this submittal. If you have any questions, please contact the Acting Licensing Manager, William Steelman at (504) 739-6685.

Sincerely,

FOR WILLIAM STEELMAN, ACT'G LICENSING
MANAGER,

WJS/JDW


MICHAEL E. MOON

cc: Mr. Elmo E. Collins, Jr.
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