



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

January 7, 2011

Vice President, Operations  
Entergy Nuclear Operations, Inc.  
Palisades Nuclear Plant  
27780 Blue Star Memorial Highway  
Covert, MI 49043-9530

SUBJECT: PALISADES PLANT – REQUEST FOR ADDITIONAL INFORMATION – CYBER  
SECURITY PLAN (TAC NO. ME4355)

Dear Sir:

By letter dated July 26, 2010 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML102110090), Entergy Nuclear Operations, Inc. (ENO, the licensee), withdrew the request to amend the Renewed Facility Operating License (RFOL) No. DPR-20 for Palisades Nuclear Plant (PNP), as submitted in ENO's letter dated November 19, 2009 (ADAMS Accession No. ML093230831).

In the letter dated July 26, 2010, ENO submitted a new request for an amendment to the RFOL for PNP in accordance with provisions of Title 10 of the *Code of Federal Regulations* (10 CFR) 50.4 and 10 CFR 50.90. The proposed amendment requests Nuclear Regulatory Commission (NRC) approval of the PNP Cyber Security Plan (CSP), provides an implementation schedule, and revises the existing RFOL Physical Protection license condition to require ENO to fully implement and maintain in effect all provisions of the NRC-approved CSP for PNP.

The NRC staff of the Integrated Security Coordination and Policy Branch is reviewing the CSP and the proposed CSP Implementation Schedule and has determined that additional information is required to complete its technical review. A supplemental request for additional information is included in Enclosure 1 and was reviewed in accordance with the guidance provided in 10 CFR Section 2.390 and the NRC staff has determined that no security related or proprietary information is contained therein. The specific questions are found in the enclosed request for additional information (RAI).

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Please contact me @ 301-415-8371 or [Mahesh.chawla@nrc.gov](mailto:Mahesh.chawla@nrc.gov) to schedule a telephone conference between the NRC staff and the licensee to ensure that the NRC staff concerns are clear to the licensee and also to obtain a firm commitment date for the response to the RAIs. Please let me know if you have any questions or concerns relating to this issue.

Sincerely,



Mahesh L. Chawla, Project Manager  
Plant Licensing Branch III-1  
Division of Operating Reactor Licensing  
Office of Nuclear Reactor Regulation

Docket No. 50-255

Enclosure:  
Request for Additional Information

cc w/encl: Distribution via ListServ

REQUEST FOR ADDITIONAL INFORMATION  
REGARDING APPROVAL OF THE CYBER SECURITY PLAN  
ENTERGY NUCLEAR OPERATIONS, INC.  
PALISADES NUCLEAR PLANT

Cyber Security Plan (CSP) Section 4: Establishing, Implementing, and Maintaining the Cyber Security Program

RAI 1:

RAI Title: Defense-in-Depth Protective Strategies – Critical Digital Asset (CDA) Isolation Strategies

Title 10 of the *Code of Federal Regulations* (10 CFR) Section 73.54(c)(2) 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 Palisades CSP states in several instances when referring to protections which isolate or secure CDAs within various cyber security defensive levels, that boundaries may be secured via "an air gap or deterministic one-way isolation device such as a data diode or hardware VPN [virtual private network]."

Please clarify how hardware VPNs will sufficiently protect CDAs within defensive boundaries, including an explanation of the technical configurations that would enable it to mimic the capabilities of a deterministic one-way isolation device.

RAI 2:

RAI Title: Defense-in-Depth Protective Strategies – Protection of CDAs Associated with Emergency Preparedness Functions

Section 73.54(a)(1) of 10 CFR requires that "The licensee shall protect digital computer and communication systems and networks associated with... (iii) Emergency preparedness functions, including offsite communications; and (iv) Support systems and equipment which, if compromised, would adversely impact safety, security, or emergency preparedness functions."

Section 4.3, "Defense in Depth Protective Strategies" of the Palisades CSP, in describing its site defensive model, states that CDAs that "are not required to be within Level 4 due to their safety or security significance, and that perform security or Emergency Plan functions and security or Emergency Plan data acquisition or that perform safety monitoring, are within Level 3." Furthermore, the CSP states that "CDAs that are not required to be in at least Level 3 and that perform or support Emergency Plan functions are within Level 2."

The CSP does not indicate which protective strategies will be implemented for CDAs that perform Emergency Preparedness functions. Please clarify: (1) the distinction between CDAs that perform Emergency Planning and Emergency Preparedness functions; and (2) which protective strategies will be implemented for CDAs that perform "emergency preparedness" functions.

ENCLOSURE

Please contact me @ 301-415-8371 or [Mahesh.chawla@nrc.gov](mailto:Mahesh.chawla@nrc.gov) to schedule a telephone conference between the NRC staff and the licensee to ensure that the NRC staff concerns are clear to the licensee and also to obtain a firm commitment date for the response to the RAs. Please let me know if you have any questions or concerns relating to this issue.

Sincerely,

**/RA/**

Mahesh L. Chawla, Project Manager  
Plant Licensing Branch III-1  
Division of Operating Reactor Licensing  
Office of Nuclear Reactor Regulation

Docket No. 50-255

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Request for Additional Information

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ADAMS Accession No. ML110030661

\* Memo dated 12/14/10 – ML103410025

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DATE	01/06/11	01/06/11	12/14/10	01/07/11

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