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U.S. Nuclear Regulatory Commission
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Southern Nuclear Operating Company
Vogtle Electric Generating Plant Units 3 and 4 Combined License Application
Voluntary Letter Regarding Cyber Security Scope Clarification for Balance of Plant Systems

Ladies and Gentlemen:

By letter dated March 28, 2008, Southern Nuclear Operating Company (SNC) submitted an application for combined licenses (COLs) for proposed Vogtle Electric Generating Plant (VEGP) Units 3 and 4 to the U.S. Nuclear Regulatory Commission (NRC) for two Westinghouse AP1000 reactor plants, in accordance with 10 CFR Part 52. During the NRC's detailed review of this application, the Commission issued a policy determination that the NRC's cyber security rule at 10 CFR 73.54 is interpreted to include structures, systems, and components in the balance of plant that have a nexus to radiological health and safety at NRC-licensed nuclear power plants. The enclosure to this letter identifies changes to the VEGP Units 3 and 4 Cyber Security Plan that incorporate this Commission policy determination.

This letter identifies changes that will be made to a future revision of the VEGP Units 3 and 4 combined license application (COLA).

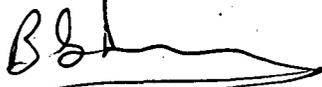
If you have any questions regarding this letter, please contact Mr. Wes Sparkman at (205) 992-5061.

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S001A
NRO

Mr. B. L. Ivey states he is a Vice President of Southern Nuclear Operating Company, is authorized to execute this oath on behalf of Southern Nuclear Operating Company and to the best of his knowledge and belief, the facts developed by Southern Nuclear Operating Company and set forth in this letter are true.

Respectfully submitted,

SOUTHERN NUCLEAR OPERATING COMPANY



B. L. Ivey

Sworn to and subscribed before me this 31st day of January, 2011

Notary Public: Nancy Louise Henderson

My commission expires: March 23, 2014

BLI/BJS

Enclosure: Changes to Cyber Security Plan to address Commission Policy
Determination regarding Structures, Systems, and Components in the
Balance of Plant



cc: Southern Nuclear Operating Company

Mr. J. H. Miller, III, President and CEO (w/o enclosure)
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Mr. J. T. Gasser, Executive Vice President, Nuclear Operations (w/o enclosure)
Mr. D. H. Jones, Site Vice President, Vogtle 3 & 4 (w/o enclosure)
Mr. T. E. Tynan, Vice President - Vogtle (w/o enclosure)
Mr. M. K. Smith, Technical Support Director (w/o enclosure)
Mr. D. M. Lloyd, Vogtle 3 & 4 Project Support Director (w/o enclosure)
Mr. M. J. Ajluni, Nuclear Licensing Director
Mr. C. R. Pierce, AP1000 Licensing Manager
Mr. T. C. Moorer, Manager, Environmental Affairs, Chemistry and Rad. Services
Mr. J. D. Williams, Vogtle 3 & 4 Site Support Manager
Mr. J. T. Davis, Vogtle 3 & 4 Site Licensing Supervisor
Mr. W. A. Sparkman, COL Project Engineer
Ms. A. G. Aughtman, Lead AP1000 Licensing Project Engineer
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File AR.01.02.06

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Mr. R. F. Ziesing, Director, US Licensing, NPP
Mr. S. A. Bradley, Vogtle Project Licensing Manager
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Mr. T. Miller, DOE/PM

Southern Nuclear Operating Company

ND-11-0207

Enclosure

**Changes to Cyber Security Plan
to address Commission Policy Determination regarding
Structures, Systems, and Components in the Balance of Plant**

NuStart QB Tracking No. 4255

RAI/OI Letter #: VEGP-VOL-CSP BOP SSCs

Official NRC RAI/OI #: VEGP 13.06 VR

In the staff requirements memorandum (SRM), CMWCO-10-0001, "Regulation of Cyber Security at Nuclear Power Plants," dated October 21, 2010, the Commission determined as a matter of policy that the U.S. Nuclear Regulatory Commission's (NRC's) cyber security rule at Title 10 of the *Code of Federal Regulations* (10 CFR) Section 73.54, "Protection of Digital Computer and Communication Systems and Networks," should be interpreted to include structures, systems, and components (SSCs) in the balance of plant (BOP) that have a nexus to radiological health and safety at NRC-licensed nuclear power plants (NPPs). By letter dated January 5, 2011, the Director of the Division of Security Policy in the NRC's Office of Nuclear Security and Incident Response informed the Nuclear Energy Institute Director of Security of the Commission's policy determination and provided text that licensees could use to supplement their cyber security plans to comply with the Commission's policy determination. The proposed text has been evaluated, and specific changes to the Vogtle Electric Generating Plant (VEGP) Units 3 and 4 Cyber Security Plan to comply with the policy determination have been identified. This enclosure provides the CSP changes that will address the Commission's policy determination.

As a result of the above discussed evaluation, the associated COL Application Revisions identified below will be included in a future COLA revision.

This response is expected to be STANDARD for each S-COLA.

Associated VEGP COL Application Revisions:

1. COLA Part 11C, Cyber Security Plan, Section 1, will be revised by adding a new paragraph after the first paragraph, as follows:

Within the scope of the NRC's cyber security rule at 10 CFR 73.54, systems or equipment that perform important to safety functions include structures, systems, and components (SSCs) in the balance of plant (BOP) that could directly or indirectly affect reactivity at a nuclear power plant and could result in an unplanned reactor shutdown or transient. Additionally, these SSCs are under the licensee's control and include electrical distribution equipment out to the first inter-tie with the offsite distribution system.

2. COLA Part 11C, Cyber Security Plan, Attachment A, "Vogtle Electric Generating Plant, Units 3 and 4 Cyber Security Plan (CSP) Deviations from Regulatory Guide (RG) 5.71, Rev. 0," will be revised by adding a new deviation # (where # is the next sequential number), as follows:

Deviation No. 18: Include Balance of Plant structures, systems, and components to the scope defined by important to safety – A deviation is taken to the guidance to clarify that systems or equipment that perform important to safety functions include structures, systems, and components (SSCs) in the balance of

plant (BOP) that could directly or indirectly affect reactivity and could result in an unplanned reactor shutdown or transient.

Basis: This change is consistent with Commission's position provided by the Director of the Division of Security Policy in the NRC's Office of Nuclear Security and Incident Response to the Nuclear Energy Institute Director of Security by letter dated January 5, 2011.

- COLA Part 11C, Cyber Security Plan, Attachment A, "Vogtle Electric Generating Plant, Units 3 and 4 Cyber Security Plan (CSP) Deviations from Regulatory Guide (RG) 5.71, Rev. 0," table titled "VEGP Units 3 and 4 Cyber Security Plan Deviations from RG 5.71, Rev. 0 Black Text," will be revised by adding a deviation after the current deviation to RG 5.71, Appendix A, Heading (Page A-1), as follows:

VEGP Units 3 and 4 Cyber Security Plan Deviations from RG 5.71, Rev. 0 Black Text			
Reference	RG 5.71 Rev. 0 Text	VEGP Units 3 and 4 CSP Text	Comments
RG 5.71, Section A.1, 1 st paragraph (Page A-1)	<p>"... up to and including the design-basis threat (DBT) described in 10 CFR 73.1, "Purpose and Scope":</p> <ul style="list-style-type: none"> safety-related and important-to-safety functions, security functions, emergency preparedness functions, including offsite communications, and support systems and equipment which, if compromised, would adversely impact safety, security, or emergency preparedness functions." 	<p>"... up to and including the design-basis threat (DBT) described in 10 CFR 73.1, "Purpose and Scope":</p> <ul style="list-style-type: none"> safety-related and important-to-safety functions, security functions, emergency preparedness functions, including offsite communications, and support systems and equipment which, if compromised, would adversely impact safety, security, or emergency preparedness functions." <p>Within the scope of the NRC's cyber security rule at 10 CFR 73.54, systems or equipment that perform important to safety functions include structures, systems, and components (SSCs) in the balance of plant (BOP) that could directly or indirectly affect reactivity at a nuclear power plant and could result in an unplanned reactor shutdown or transient. Additionally, these SSCs are under the licensee's control and include electrical distribution equipment out to the first inter-tie with the offsite distribution system.</p>	<p>Deviation No. 18: Include Balance of Plant structures, systems, and components to the scope defined by important to safety.</p> <p>Addition of this paragraph clarifies the intent of important-to-safety function, consistent with direction provided in a January 5, 2011, letter from Richard P. Correia (NRC) to Chris Earls (NEI) on this subject.</p>