

~~SECURITY-RELATED INFORMATION - WITHHOLD UNDER 10 CFR 2.390~~

10 CFR 50.90

TMI-11-029
RA-11-016
RS-11-034

March 31, 2011

U.S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, D.C. 20555-0001

Braidwood Station, Units 1 and 2
Facility Operating License Nos. NPF-72 and NPF-77
NRC Docket Nos. STN 50-456 and STN 50-457

Byron Station, Units 1 and 2
Facility Operating License Nos. NPF-37 and NPF-66
NRC Docket Nos. STN 50-454 and STN 50-455

Clinton Power Station, Unit 1
Facility Operating License No. NPF-62
NRC Docket No. 50-461

Dresden Nuclear Power Station, Units 2 and 3
Renewed Facility Operating License Nos. DPR-19 and DPR-25
NRC Docket Nos. 50-237 and 50-249

LaSalle County Station, Units 1 and 2
Facility Operating License Nos. NPF-11 and NPF-18
NRC Docket Nos. 50-373 and 50-374

Limerick Generating Station, Units 1 and 2
Facility Operating License Nos. NPF-39 and NPF-85
NRC Docket Nos. 50-352 and 50-353

Oyster Creek Nuclear Generating Station
Renewed Facility Operating License No. DPR-16
NRC Docket No. 50-219

Peach Bottom Atomic Power Station, Units 2 and 3
Renewed Facility Operating License Nos. DPR-44 and DPR-56
NRC Docket Nos. 50-277 and 50-278

**Enclosures 1, 2 and 3 transmitted herewith contain Security-Related Information.
When separated from Enclosures, this document is decontrolled.**

Quad Cities Nuclear Power Station, Units 1 and 2
Renewed Facility Operating License Nos. DPR-29 and DPR-30
NRC Docket Nos. 50-254 and 50-265

Three Mile Island Nuclear Station, Unit 1
Renewed Facility Operating License No. DPR-50
NRC Docket No. 50-289

Subject: Response to Request for Additional Information regarding Exelon Cyber Security Plan

- Reference:**
- (1) Letter from Pamela B. Cowan to the USNRC Document Control Desk, "Request for Approval of the Exelon Cyber Security Plan," dated November 23, 2009
 - (2) Letter from Pamela B. Cowan to the USNRC Document Control Desk, "Re-submittal of the Exelon Cyber Security Plan," dated July 23, 2010
 - (3) Letter from Eva A. Brown, (U.S. Nuclear Regulatory Commission) to Mr. Michael J. Pacilio (Exelon Nuclear), "Request For Additional Information Regarding Approval of Cyber Security Plan," dated March 4, 2011
 - (4) Letter from Richard P. Correia, (U.S. Nuclear Regulatory Commission) to Mr. Chris Earls, Nuclear Energy Institute, dated January 5, 2011
 - (5) Letter from Richard P. Correia, (U.S. Nuclear Regulatory Commission) to Mr. Christopher E. Earls, Nuclear Energy Institute, "Cyber Security Plan Generic Request for Additional Information on Records Retention," dated March 1, 2011
 - (6) Letter from Richard P. Correia, (U.S. Nuclear Regulatory Commission) to Mr. Christopher E. Earls, Nuclear Energy Institute, "Template for the Cyber Security Plan Implementation Schedule," dated March 1, 2011

On November 23, 2009, in accordance with the provisions of 10 CFR 50.4 and 10 CFR 50.90, Exelon Generation Company, LLC (Exelon) submitted a request for an amendment to the Facility Operating Licenses (FOL) for the above listed facilities. This proposed amendment requested U.S. Nuclear Regulatory Commission (NRC) approval of the Exelon Cyber Security Plan, provided an Implementation Schedule for the Exelon Cyber Security Program, and added to the existing FOL Physical Protection license condition to require Exelon to fully implement and maintain in effect all provisions of the Commission-approved Cyber Security Plan. By letter dated July 23, 2010 (Reference 2), Exelon supplemented the Cyber Security Plan License Amendment Request with a revised Cyber Security Plan based on the template contained in NEI 08-09, Revision 6.

By letter to Exelon dated March 4, 2011 (Reference 3), the NRC issued a Request for Additional Information (RAI) regarding the submitted Exelon Cyber Security Plan. The RAI questions dealt with three generic industry issues. These issues were identified during the course of the NRC's

review of industry-submitted cyber security plans and proposed implementation schedules. The generic issues involve a clarification on the scope of 10 CFR 73.54 with respect to Balance of Plant (BOP) systems, cyber security records retention, and the Exelon Cyber Security Plan Implementation Schedule. The Nuclear Energy Institute (NEI) has worked to develop resolutions to these generic issues which have been accepted by the NRC staff (References 4, 5 and 6).

Exelon's responses to the RAIs are consistent with the industry guidance and are provided in Enclosure 1. Changes to the Exelon Cyber Security Plan are being made in accordance with the RAI response and the revised plan is provided in Enclosure 2. Note that the deviations submitted as part of the July 23, 2010, supplement (Reference 2) remain applicable to the Exelon Cyber Security Plan. Enclosure 3 contains an updated Exelon Implementation Schedule which has been revised as a response to the RAI. Exelon requests that Enclosures 1, 2 and 3, which contain security-related information, be withheld from public disclosure in accordance with 10 CFR 2.390.

There is no adverse impact to the previously submitted No Significant Hazards Consideration Determination. As stated in Reference 3, it is the NRC's intention to develop license conditions based on this RAI response. As a result, the previously submitted Regulatory Commitments regarding the Exelon Cyber Security Plan Implementation Schedule are superseded by the Regulatory Commitments contained in Enclosure 3, Revised Implementation Schedule. There are no additional Regulatory Commitments contained within this letter.

In accordance with 10 CFR 50.91, a copy of this letter is being provided to the designated State Officials. If you have any questions or require additional information, please contact Mr. Doug Walker at (610) 765-5952.

I declare under penalty of perjury that the foregoing is true and correct. Executed on the 31st day of March 2011.

Respectfully,



Darin M. Benyak
Director - Licensing and Regulatory Affairs
Exelon Generation Company, LLC

Enclosure 1 - Exelon Response to the Cyber Security Plan Request for Additional Information
Enclosure 2 - Cyber Security Plan For Exelon Nuclear
Enclosure 3 - Exelon Cyber Security Plan Revised Implementation Schedule

cc: USNRC Region I, Regional Administrator
USNRC Region III, Regional Administrator
NRC Project Manager, NRR - Braidwood Station
NRC Project Manager, NRR - Byron Station
NRC Project Manager, NRR - Clinton Power Station
NRC Project Manager, NRR - Dresden Nuclear Power Station