



April 4, 2011

Robert G. Smith, P.E.
Site Vice President

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

SUBJECT: Entergy Nuclear Operations, Inc.
Pilgrim Nuclear Power Station
Docket No. 50-293
License No. DPR-35

Response to Additional Requests for Additional Information (RAIs) dated
March 3, 2011 and Revision to the PNPS Cyber Security Plan

- References:
1. Entergy Letter No. 2.10.034 to USNRC, "License Amendment Request – Pilgrim Nuclear Power Station Cyber Security Plan Submittal", dated July 15, 2010
 2. Entergy Letter No. 2.10.051 to USNRC, "Revision of Commitment to Supplement the Cyber Security Plan Regarding Balance-of-Plant Systems", dated November 30, 2010
 3. Letter from Richard P. Correia (USNRC) to Chris Earls (NEI) Concerning Scope of Systems, dated January 5, 2011
 4. Entergy Letter No. 2.11.005 to USNRC, "Response to RAI on the PNPS Cyber Security Plan", dated February 15, 2011
 5. USNRC Letter No. 1.11.008, "Request For Additional Information to Support the Review of Pilgrim Nuclear Power Station Cyber Security Plan" (ID: 2.10.034) (TAC NO. ME4351), dated March 3, 2011
 6. Letter from Chris Earls (NEI) to Richard P. Correia (USNRC), "Clarification to NEI 08-09, Revision 6 Regarding Records Retention", dated February 28, 2011
 7. Letter from Chris Earls (NEI) to Richard P. Correia (USNRC), "Template for the Cyber Security Plan Implementation Schedule", dated February 28, 2011
 8. Letter from Richard P. Correia (USNRC) to Chris Earls (NEI), "Cyber Security Plan Generic RAI on Records Retention", dated March 1, 2011
 9. Letter from Richard P. Correia (USNRC) to Chris Earls (NEI), "Template for the Cyber Security Plan Implementation Schedule", dated March 1, 2011

LETTER NUMBER 2.11.016

Dear Sir or Madam:

In Reference 1, Entergy Operations, Inc. (Entergy) submitted a request for an amendment to the operating license for the Pilgrim Nuclear Power Station (PNPS) requesting NRC approval

This letter contains security-related information – Attachment 1, 4, and 6 are withheld from public disclosure per 10 CFR 2.390

SOOIA
NRR

This letter contains security-related information – Attachments 1, 4, and 6 are withheld from public disclosure per 10 CFR 2.390

of the PNPS Cyber Security Plan. In accordance with Reference 4, Entergy is revising Sections 2.1 “Scope and Purpose” and 4.3 “Defense-In-Depth Protective Strategies,” to address clarifications with respect to data diodes/air gaps and emergency plan/preparedness as described in the request for additional information (RAI) responses. Subsequent to the submittal of these RAI responses, the NRC issued additional generic RAIs on the PNPS Cyber Security Plan via Reference 5. Entergy’s response to these RAIs is provided in Attachment 1.

Attachment 2 contains the proposed marked-up operating license change for the Physical Protection license condition for PNPS to include the PNPS Cyber Security Plan. Attachment 3 contains the proposed revised operating license change. The marked-up page in Attachment 2 and the revised page in Attachment 3 replace, in their entirety, the pages previously submitted in Reference 1.

The revised commitments contained in this submittal are summarized in Attachment 5.

Attachment 6 provides a revised copy of the PNPS Cyber Security Plan, Revision 0, which incorporates changes to Sections 2.1 “Scope and Purpose,” 4.3 “Defense-In-Depth Protective Strategies,” and 4.13 “Document Control and Records Retention and Handling” based on responses to NRC RAIs. No other technical changes have been made to the PNPS Cyber Security Plan. Attachment 6 replaces, in its entirety, the PNPS Cyber Security Plan previously submitted in Reference 1. The changes discussed in this letter are clarifying or administrative and do not invalidate the conclusions of the no significant hazards consideration determination previously provided in Reference 1.

Entergy requests that Attachments 1, 4, and 6 which contain security-related information (SRI), be withheld from public disclosure in accordance with 10 CFR 2.390.

Should you have any questions concerning this letter, or require additional information, please contact Joseph R. Lynch at 508-830-8403.

I declare under penalty of perjury that the foregoing is true and correct. Executed on April 4, 2011.

Sincerely,



Robert G. Smith
Site Vice President

RGS/rmb

- Attachments:
1. Response to Requests for Additional Information (contains SRI) (3 Pages)
 2. Proposed PNPS Operating License Changes (mark-up) (1 Page)
 3. Revised PNPS Operating License Changes (1 Page)
 4. Cyber Security Plan Implementation Schedule (contains SRI) (4 Pages)
 5. List of Regulatory Commitments (1 Page)
 6. Revised PNPS Cyber Security Plan (contains SRI) (23 Pages)

This letter contains security-related information – Attachments 1, 4, and 6 are withheld from public disclosure per 10 CFR 2.390

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cc:

Mr. William M. Dean
Regional Administrator, Region 1
U.S. Nuclear Regulatory Commission
475 Allendale Road
King of Prussia, PA 19406-1415
(w/o Attachments)

Sr. Resident Inspector, Pilgrim Station

Mr. Richard V. Guzman, Project Manager
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
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Washington, DC 20555

Mr. John Giarrusso, Jr.
Planning and Preparedness Division Manager
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This letter contains security-related information – Attachments 1, 4, and 6 are withheld from public disclosure per 10 CFR 2.390

Attachment 2

2.11.016

Proposed PNPS Operating License Changes (mark-up)

(1 Page)

B. Technical Specifications

Delete

The Technical Specifications contained in Appendix A, as revised through Amendment No. ~~230~~, are hereby incorporated in the license. The licensee shall operate the facility in accordance with the Technical Specifications.

C. Records

ENO shall keep facility operating records in accordance with the requirements of the Technical Specifications.

D. Equalizer Valve Restriction - DELETED

E. Recirculation Loop Inoperable - DELETED

F. Fire Protection

ENO shall implement and maintain in effect all provisions of the approved fire protection program as described in the Final Safety Analysis Report for the facility and as approved in the SER dated December 21, 1978 as supplemented subject to the following provision:

ENO may make changes to the approved fire protection program without prior approval of the Commission only if those changes would not adversely affect the ability to achieve and maintain safe shutdown in the event of a fire.

G. Physical Protection

The licensee shall fully implement and maintain in effect all provisions of the Commission-approved physical security, training and qualification, and safeguards contingency plans including amendments made pursuant to provisions of the Miscellaneous Amendments and Search Requirements revisions to 10 CFR 73.55 (51 FR27817 and 27822) and to the authority of 10 CFR 50.90 and 10 CFR 50.54(p). The combined set of plans, which contain Safeguards Information protected under 10 CFR 73.21, is entitled: "Pilgrim Nuclear Power Station Physical Security, Training and Qualification, and Safeguards Contingency Plan, Revision 0" submitted by letter dated October 13, 2004, as supplemented by letter dated May 15, 2006.

Add Text

The licensee shall fully implement in accordance with an NRC-approved implementation schedule and maintain in effect all provisions of the Commission-approved Pilgrim Station Cyber Security Plan pursuant to 10 CFR 73.55(c)(6) and 10 CFR 73.54 (74 FR 13970) and to the authority of 10 CFR 50.90 and 10 CFR 50.54(p).

Attachment 3

2.11.016

Revised PNPS Operating License Changes

(1 Page)

B. Technical Specifications

The Technical Specifications contained in Appendix A, as revised through Amendment No. are hereby incorporated in the license. The licensee shall operate the facility in accordance with the Technical Specifications.

C. Records

ENO shall keep facility operating records in accordance with the requirements of the Technical Specifications.

D. Equalizer Valve Restriction - DELETED

E. Recirculation Loop Inoperable - DELETED

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The licensee shall fully implement in accordance with an NRC-approved implementation schedule and maintain in effect all provisions of the Commission-approved Pilgrim Station Cyber Security Plan pursuant to 10 CFR 73.55(c)(6) and 10 CFR 73.54 (74 FR 13970) and to the authority of 10 CFR 50.90 and 10 CFR 50.54(p).

Attachment 5

2.11.016

List of PNPS Regulatory Commitments

(1 Page)

List of PNPS Regulatory Commitments

The following table identifies those actions committed to by Entergy in this document. Any other statements in this submittal are provided for information purposes and are not considered to be regulatory commitments.

COMMITMENT	TYPE (Check One)		SCHEDULED COMPLETION DATE (If Required)
	ONE- TIME ACTION	CONTINUING COMPLIANCE	
Entergy will implement milestones 1 through 7 as described in Attachment 4.	X		December 31, 2012
Full implementation of PNPS Cyber Security Plan for all safety, security, and emergency preparedness functions will be achieved.	X		December 15, 2014