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Christopher J. Schwarz
Vice President, Operations
Arkansas Nuclear One

OCAN041101

April 1, 2011

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

SUBJECT: Response to Additional Requests for Additional Information (RAIs) and Revision to the ANO Cyber Security Plan
Arkansas Nuclear One – Units 1 and 2
Docket Nos. 50-313 and 50-368
License Nos. DPR-51 and NPF-6

- References:
1. Entergy letter to NRC, *License Amendment Withdrawal and Request – Cyber Security Plan*, dated July 9, 2010 (OCAN071001)
 2. Entergy letter to NRC, *Revision of Commitment to Supplement the Cyber Security Plan Regarding Balance-of-Plant Systems*, dated November 30, 2010 (OCAN111001)
 3. Letter from Richard P. Correia (NRC) to Chris Earls (NEI) Concerning Scope of Systems, dated January 5, 2011
 4. Letter from Entergy to NRC, *Response to RAI on the ANO Cyber Security Plan*, dated February 15, 2011 (OCAN021101)
 5. Email from NRC to Entergy, *RAI on License Amendment Request, Cyber Security Plan*, dated February 23, 2011
 6. Letter from Chris Earls (NEI) to Richard P. Correia (NRC), *Clarification to NEI 08-09, Revision 6 Regarding Records Retention*, dated February 28, 2011
 7. Letter from Chris Earls (NEI) to Richard P. Correia (NRC), *Template for the Cyber Security Plan Implementation Schedule*, dated February 28, 2011
 8. Letter from Richard P. Correia (NRC) to Chris Earls (NEI), *Cyber Security Plan Generic RAI on Records Retention*, dated March 1, 2011
 9. Letter from Richard P. Correia (NRC) to Chris Earls (NEI), *Template for the Cyber Security Plan Implementation Schedule*, dated March 1, 2011

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

SOOIA
NRK

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Dear Sir or Madam:

In Reference 1, Entergy Operations, Inc. (Entergy) submitted requests for amendments to the operating licenses for Arkansas Nuclear One (ANO), Units 1 and 2 requesting NRC approval of the *ANO 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 *ANO Cyber Security Plan* via Reference 5. Entergy's response to these RAIs is provided in Attachment 1.

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

Attachment 6 provides a revised copy of the *ANO 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." No other technical changes have been made to the *ANO Cyber Security Plan*. The enclosed *ANO Cyber Security Plan* replaces, in its entirety, the *ANO Cyber Security Plan* previously submitted in Reference 1. The changes discussed in this letter are clarifying or administrative and do not impact 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.

The revised commitments contained in this submittal are summarized in Attachment 5. Should you have any questions concerning this letter, or require additional information, please contact Stephanie Pyle at 479.858.4704.

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

I declare under penalty of perjury that the foregoing is true and correct. Executed on April 1, 2011.

Sincerely,



CJS/nbm

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

cc: Mr. Elmo Collins
Regional Administrator
U. S. Nuclear Regulatory Commission
Region IV
612 E. Lamar Blvd., Suite 400
Arlington, TX 76011-4125

NRC Senior Resident Inspector
Arkansas Nuclear One
P.O. Box 310
London, AR 72847

U. S. Nuclear Regulatory Commission
Attn: Mr. Kaly Kalyanam
MS O-8 B1
One White Flint North
11555 Rockville Pike
Rockville, MD 20852

Mr. Bernard R. Bevill
Arkansas Department of Health
Radiation Control Section
4815 West Markham Street Slot #30
Little Rock, AR 72205

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Attachment 2

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Proposed ANO-1 and ANO-2 Operating License Changes (mark-up)

EOI shall fully implement in accordance with an NRC-approved implementation schedule and maintain in effect all provisions of the Commission-approved ANO 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).

(5) Implementation of the Improved Technical Specifications (ITS)

The licensee is authorized to relocate certain Technical Specification requirements previously included in Appendix A to licensee controlled documents, as described in Table R, Relocated Specifications, and Table LA, Removal of Details, attached to the Safety Evaluation for Amendment No. 215. These requirements shall be relocated to the appropriate documents as part of the implementation of the ITS.

The schedule for performing Surveillance Requirements (SRs) that are new or revised in Amendment No. 215 shall be as follows:

1. For SRs that are new in this amendment, the first performance shall be due at the end of the first surveillance interval, which begins on the date of implementation of this amendment.
2. For SRs that existed prior to this amendment whose intervals of performance are being reduced, the first reduced surveillance interval shall begin upon completion of the first surveillance performed after implementation of this amendment.
3. For SRs that existed prior to this amendment that contained modified acceptance criteria, the performance shall be due at the end of the first surveillance interval that began on the date the surveillance was last performed prior to the implementation of this amendment.
4. For SRs that existed prior to this amendment whose interval of performance are being extended, the first extended surveillance interval shall begin upon completion of the last surveillance performed prior to the implementation of this amendment.

(6) Deleted

(7) Deleted

Renewed License No. DPR-51
Amendment No. 215,
~~Revised by letter dated October 28, 2004,
November 22, 2004, February 7, 2007,
July 18, 2007~~

D. Physical Protection

EOI 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 FR 27817 and 27822) and to the authority of 10 CFR 50.90 and 10 CFR 50.54(p). The combined set of plans, which contains Safeguards Information protected under 10 CFR 73.21, is entitled: "Arkansas Nuclear One Physical Security, Safeguards Contingency and Training & Qualification Plan," as submitted on May 4, 2006.

EOI shall fully implement in accordance with an NRC-approved implementation schedule and maintain in effect all provisions of the Commission-approved ANO 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).

E. This renewed license is subject to the following additional condition for the protection of the environment:

Before engaging in additional construction or operational activities which may result in an environmental impact that was not evaluated by the Commission, EOI will prepare and record an environmental evaluation for such activity. When the evaluation indicates that such activity may result in a significant adverse environmental impact that was not evaluated, or that is significantly greater than that evaluated, in the Final Environmental Statement (NUREG-0254) or any addendum thereto, and other NRC environmental impact assessments, EOI shall provide a written evaluation of such activities and obtain prior approval from the Director, Office of Nuclear Reactor Regulation.

F. Updated Final Safety Analysis Report Supplement

The Final Safety Analysis Report supplement, as revised, shall be included in the next scheduled update to the Final Safety Analysis Report required by 10 CFR 50.71(e)(4) following issuance of this renewed license. Until that update is complete, ANO-2 may make changes to the programs and activities described in the supplement without prior Commission approval, provided that ANO-2 evaluates each such change pursuant to the criteria set forth in 10 CFR 50.59 and otherwise complies with the requirements of that section.

The ANO-2 Final Safety Analysis Report supplement, submitted pursuant to 10 CFR 54.21(d), describes certain future activities to be completed prior to the period of extended operation. ANO-2 shall complete these activities no later than July 17, 2018, and shall notify the NRC in writing when implementation of these activities is complete and can be verified by NRC inspection.

G. Reactor Vessel Material Surveillance Capsules

All capsules in the reactor vessel that are removed and tested must meet the test procedures and reporting requirements of American Society for Testing and Materials (ASTM) E 185-82 to the extent practicable for the configuration of the specimens in the capsule. Any changes to the capsule withdrawal schedule, including spare capsules, must be approved by the NRC prior to implementation. All capsules placed in storage must be maintained for future insertion.

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4. This renewed license is effective as of the date of issuance and shall expire at midnight, July 17, 2038.

FOR THE NUCLEAR REGULATORY COMMISSION

Original signed by J. E. Dyer

J. E. Dyer, Director
Office of Nuclear Reactor Regulation

Attachments:

1. Appendix A - Technical Specifications
2. Preoperational Tests, Startup Tests and other items which must be completed by the indicated Operational Mode

Date of Issuance: June 30, 2005

Attachment 3

OCAN041101

Revised ANO-1 and ANO-2 Operating License Pages

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Date of Issuance: June 30, 2005

Attachment 5

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List of Regulatory Commitments

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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 described in Attachment 4.	X		December 31, 2012
Full implementation of <i>ANO Cyber Security Plan</i> for all safety, security, and emergency preparedness functions will be achieved.	X		December 15, 2014