



Indian Point Energy Center
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J.E. Pollock
Site Vice President
Administration

SECURITY RELATED INFORMATION – WITHHOLD UNDER 10 CFR 2.390

NL-11-033

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 IPEC Cyber Security Plan (TAC NOS. ME4212,
ME4213, and ME4214)
Indian Point Generating Unit Nos. 1, 2 and 3
Docket Nos. 50-003, 50-247 and 50-286
License Nos. DPR-5, DPR-26 and DPR-64

- REFERENCES:**
1. Entergy Letter NL-10-096 to NRC Regarding License Amendment Withdrawal and Request - Cyber Security Plan, dated July 8, 2010.
 2. Entergy Letter NL-10-118 to NRC, Revision of Commitment to Supplement the Cyber Security Plan Regarding Balance-of-Plant Systems, dated November 30, 2010.
 3. Letter from Richard P. Correia (NRC) to Chris Earls (NEI) Concerning Scope of Systems, dated January 5, 2011.
 4. Entergy Letter NL-11-015 to NRC, Response to Request for Additional Information Regarding IPEC Cyber Security Plan, dated February 18, 2011.
 5. NRC Letter to Entergy, Request for Additional Information Regarding Amendment Application for Approval of the Indian Point Cyber Security Plan (TAC NOS. ME4212, ME4213, AND ME4214), dated March 3, 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.

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When Attachments 1, 4, and 6 are detached, this letter and other Attachments are no longer security related information

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8001A
FSME NRC

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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),
Template for the Cyber Security Plan Implementation Schedule,
dated March 1, 2011.

Dear Sir or Madam:

In Reference 1, Entergy Operations, Inc. (Entergy) submitted requests for amendments to the operating licenses for Indian Point Generating Units 1, 2, and 3 (IP1, IP2, and IP3) requesting NRC approval of the Indian Point Energy Center (IPEC) Cyber Security Plan. In accordance with the commitment in 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 provided in reference 4. Subsequent to the submittal of these RAI responses, the NRC issued additional generic RAIs on the IPEC 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 IP1, IP2, and IP3 to include the IPEC 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 4 contains the Entergy Operations, Inc. Cyber Security Plan Implementation Schedule. Attachment 5 contains the List of Regulatory Commitments established for implementation of IPEC Cyber Security Plan.

Attachment 6 provides a revised copy of the IPEC 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 IPEC Cyber Security Plan. The enclosed IPEC Cyber Security Plan replaces, in its entirety, the IPEC 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.

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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 Mr. Robert Walpole, Manager, Licensing at (914) 734-6710.

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

Sincerely,

A handwritten signature in black ink, appearing to be 'JEP/sp', written over a large, loopy circular mark.

JEP/sp

- Attachments:
1. Response to Requests for Additional Information (contains SRI)
 2. Marked Up Facility Operating License Changes
 3. Revised IP1, IP2, and IP3 Operating License Pages
 4. Cyber Security Plan Implementation Schedule (contains SRI)
 5. List of Regulatory Commitments
 6. Revised IPEC Cyber Security Plan (contains SRI)

cc: Mr. John P. Boska, Senior Project Manager, NRC NRR DORL
Mr. Stephen Giebel, Project Manager, NRC FSME DWMEP DURLD
Mr. William Dean, Regional Administrator, NRC Region 1
NRC Resident Inspectors
Mr. Francis J. Murray, Jr., President and CEO, NYSERDA
Mr. Paul Eddy, New York State Dept. of Public Service

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SECURITY RELATED INFORMATION – WITHHOLD UNDER 10 CFR 2.390

ATTACHMENT 2 TO NL-11-033

MARKED UP FACILITY OPERATING LICENSE PAGES

Affected Pages

IP1 FOL Page 3

IP2 FOL Page 5

IP3 FOL Page 4

Additions are underlined and deletions are double strikeout

**ENTERGY NUCLEAR OPERATIONS, INC.
INDIAN POINT NUCLEAR GENERATING UNITS NO. 1, 2 and 3
DOCKET NOS. 50-003, 50-247, and 50-286**

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and period of operation at each power level.

2. Records showing the radioactivity released or discharged into the air or water beyond the effective control of ENO as measured at or prior to the point of such release or discharge.
 3. Records of scrams, including reasons therefor.
 4. Records of principal maintenance operations involving substitution or replacement of facility equipment or components and the reasons therefor.
 5. Records of radioactivity measurements at on-site and off-site monitoring stations.
 6. Records of facility tests and measurements performed pursuant to the requirements of the Technical Specifications.
- d) ~~ENO shall fully implement and maintain in effect all provisions of the physical security, guard training and qualification, and safeguards contingency plans previously approved by the Commission and all amendments and revisions to such plans made pursuant to the authority of 10 CFR 50.90 and 10 CFR 50.54(p). The plans, which contain Safeguards Information protected under 10 CFR 73.21, are entitled: "Indian Point Station, Units 1 and 2 Physical Security Plan," with revisions submitted through July 25, 1989; "Indian Point Station, Units 1 and 2, Security Guard Training and Qualification Plan," with revisions submitted through December 8, 1986; and "Indian Point Station, Units 1 and 2, Safeguards Contingency Plan," with revisions submitted through November 7, 1986.~~ **ENO 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 plans¹ for the Indian Point Energy Center, which contain Safeguards Information protected under 10 CFR 73.21, is entitled: "Physical Security, Training and Qualification, and Safeguards Contingency Plan, Revision 0," and was submitted by letter dated October 14, 2004, as supplemented by letter dated May 18, 2006. ENO shall fully implement in accordance with an NRC approved implementation schedule and maintain in effect all provisions of the Commission-approved IPEC 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).**

1 The Training and Qualification Plan and Safeguards Contingency Plan are Appendices to the Security Plan.

Indian Point Energy Center, which contain Safeguards Information protected under 10 CFR 73.21, is entitled: "Physical Security, Training and Qualification, and Safeguards Contingency Plan, Revision 0," and was submitted by letter dated October 14, 2004, as supplemented by letter dated May 18, 2006. ENO shall fully implement in accordance with an NRC approved implementation schedule and maintain in effect all provisions of the Commission-approved IPEC 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).

- I. Deleted per Amdt. 133, 7-6-88.
- J. Deleted per Amdt. 133, 7-6-88.
- K. ENO shall implement and maintain in effect all provisions of the NRC-approved fire protection program as described in the Updated Final Safety Analysis Report for the facility and as approved in the Safety Evaluations Reports dated November 30, 1977, February 3, 1978, January 31, 1979, October 31, 1980, August 22, 1983, March 30, 1984, October 16, 1984, September 16, 1985, November 13, 1985, March 4, 1987, January 12, 1989, and March 26, 1996. ENO may make changes to the NRC-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.
- L. Deleted per Amendment 238
- M. Deleted per Amendment 238
- N. Mitigation Strategy License Condition

The licensee shall develop and maintain strategies for addressing large fires and explosions and that include the following key areas:

- (a) Fire fighting response strategy with the following elements:
 - 1. Pre-defined coordinated fire response strategy and guidance
 - 2. Assessment of mutual aid fire fighting assets
 - 3. Designated staging areas for equipment and materials
 - 4. Command and control
 - 5. Training of response personnel
- (b) Operations to mitigate fuel damage considering the following:
 - 1. Protection and use of personnel assets
 - 2. Communications
 - 3. Minimizing fire spread
 - 4. Procedures for implementing integrated fire response strategy
 - 5. Identification of readily-available pre-staged equipment
 - 6. Training on integrated fire response strategy
- (c) Actions to minimize release to include consideration of:
 - 1. Water spray scrubbing
 - 2. Dose to onsite responders

- G. ENO 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 CFR 50.54(p). The combined set of plans¹ for the Indian Point Energy Center, which contain Safeguards Information protected under 10 CFR 73.21, is entitled: "Physical Security, Training and Qualification, and Safeguards Contingency Plan, Revision 0," and was submitted by letter dated October 14, 2004, as supplemented by letter dated May 18, 2006. ENO shall fully implement in accordance with an NRC approved implementation schedule and maintain in effect all provisions of the Commission-approved IPEC 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).
- H. ENO shall implement and maintain in effect all provisions of the approved Fire Protection Program as described in the Final Safety Analysis Report for Indian Point Nuclear Generating Unit No. 3 and as approved in NRC fire protection safety evaluations (SEs) dated September 21, 1973, March 6, 1979, May 2, 1980, November 18, 1982, December 30, 1982, February 2, 1984, April 16, 1984, January 7, 1987, September 9, 1988, October 21, 1991, April 20, 1994, January 5, 1995, and supplements thereto, 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.
- I. (DELETED) Amdt. 205
2/27/01
- J. (DELETED) Amdt. 205
2/27/01
- K. (DELETED) Amdt. 49
5-25-84
- L. (DELETED) Amdt. 205
2/27/01
- M. (DELETED) Amdt. 205
2/27/01
- N. (DELETED) Amdt. 49
5-25-84

¹ The Training and Qualification Plan and Safeguards Contingency Plan are Appendices to the Security Plan.

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ATTACHMENT 3 TO NL-11-033

REVISED IP1, IP2 AND IP3 OPERATING LICENSE PAGES

Affected Pages

IP1 FOL Page 3

IP2 FOL Page 5

IP3 FOL Page 4

**ENTERGY NUCLEAR OPERATIONS, INC.
INDIAN POINT NUCLEAR GENERATING UNITS NO. 1, 2 and 3
DOCKET NOS. 50-003, 50-247, and 50-286**

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ATTACHMENT 5 TO NL-11-033

LIST OF REGULATORY COMMITMENTS

**ENTERGY NUCLEAR OPERATIONS, INC.
INDIAN POINT NUCLEAR GENERATING UNITS NO. 1, 2 and 3
DOCKET NOS. 50-003, 50-247, and 50-286**

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

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