



Entergy Operations, Inc.
P.O. Box 756
Port Gibson, Mississippi 39150
Tel: 601-437-2800

Mike Perito
Vice President, Operations
Grand Gulf Nuclear Station

GNRO-2011/00020

April 4, 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 GGNS Cyber Security Plan
Grand Gulf Nuclear Station – Unit 1
Docket Nos. 50-416
License No. NPF-29

- References:**
1. Entergy letter to NRC, *License Amendment Withdrawal and Request – Cyber Security Plan*, dated July 22, 2010 (GNRO-10/00047)
 2. Entergy letter to NRC, *Revision of Commitment to Supplement the Cyber Security Plan Regarding Balance-of-Plant Systems*, dated November 30, 2010 (GNRO-10/00074)
 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 GGNS Cyber Security Plan*, dated February 15, 2011 (GNRO-11/00002)
 5. Email from NRC to Entergy, *RAI on License Amendment Request, Cyber Security Plan*, dated March 4, 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~~

S001A
NRK

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

Dear Sir or Madam:

In Reference 1, Entergy Operations, Inc. (Entergy) submitted requests for amendments to the operating licenses for Grand Gulf Nuclear Station (GGNS) requesting NRC approval of the *GGNS Cyber Security Plan*. In accordance with Reference 4, Entergy is revising sections 4.3 "Defense-In-Depth Protective Strategies," to address clarifications with respect to data diodes/air gaps and emergency plan/preparedness and 4.4.3 "Ongoing Assessment of Cyber Security Controls" to clarify frequency of cyber security assessments as described in the request for additional information (RAI) responses. An additional clarification with respect to emergency plan/preparedness was made in section 2.1 "Scope and Purpose". Subsequent to the submittal of these RAI responses, the NRC issued additional generic RAIs on the *GGNS 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 GGNS to include the *GGNS 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 *GGNS 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 *GGNS Cyber Security Plan*; however, an administrative change was made to paragraph 3 in section 1 "Introduction" to match the Entergy template. The enclosed *GGNS Cyber Security Plan* replaces, in its entirety, the *GGNS 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.

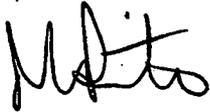
The revised commitments contained in this submittal are summarized in Attachment 5. Should you have any questions concerning this letter, or require additional information, please contact Christina Perino at 601-437-6299.

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

Sincerely,



MP/RRJ

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

cc:

NRC Senior Resident Inspector
Grand Gulf Nuclear Station
Port Gibson, MS 39150

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

U. S. Nuclear Regulatory Commission
ATTN: Mr. Alan Wang, NRR/DORL
Mail Stop OWFN 8 B1
Washington, DC 20555-0001

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

Attachment 2

to

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Proposed GGNS Operating License Changes (mark-up)

- (b) The first performance of the periodic assessment of CRE habitability, Specification 5.5.13.c.(ii), shall be within 3 years, plus the 9-month allowance of SR 3.0.2, as measured from March 2005, the date of the most recent successful tracer gas test, as stated in the June 30, 2005 letter response to Generic Letter 2003-01, or within the next 9 months if the time period since the most recent successful tracer gas test is greater than 3 years.
- (c) The first performance of the periodic assessment of the CRE boundary, Specification 5.5.13.d, shall be within the next 18 months, plus the 136 days allowed by SR 3.0.2, as measured from the date of issuance of this amendment.

D. The facility required exemptions from certain requirements of Appendices A and J to 10 CFR Part 50 and from certain requirements of 10 CFR Part 100. These include: (a) exemption from General Design Criterion 17 of Appendix A until startup following the first refueling outage, for (1) the emergency override of the test mode for the Division 3 diesel engine, (2) the second level undervoltage protection for the Division 3 diesel engine, and (3) the generator ground over current trip function for the Division 1 and 2 diesel generators (Section 8.3.1 of SSER #7) and (b) exemption from the requirements of Paragraph III.D.2(b)(ii) of Appendix J for the containment airlock testing following normal door opening when containment integrity is not required (Section 6.2.6 of SSER #7). These exemptions are authorized by law and will not endanger life or property or the common defense and security and are otherwise in the public interest. In addition, by exemption dated December 20, 1986, the Commission exempted licensees from 10 CFR 100.11(a)(1), insofar as it incorporates the definition of exclusion area in 10 CFR 100.3(a), until April 30, 1987 regarding deconstruction of authority to control all activities within the exclusion area (safety evaluation accompanying Amendment No. 27 to License (NPF-29). This exemption is authorized by law, and will not present an undue risk to the public health and safety, and is consistent with the common defense and security. In addition, special circumstances have been found justifying the exemption. Therefore, these exemptions are hereby granted pursuant to 10 CFR 50.12. With the granting of these exemptions, the facility will operate, to the extent authorized herein, in conformity with the application, as amended, the provisions of the Act and the rules and regulations of the Commission.

E. The licensee shall fully implement and maintain in effect all provision 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 plans, which contain Safeguards Information protected under 10 CFR 73.21, are entitled: "Physical Security, Safeguards Contingency and Training and Qualification Plan," and were submitted to the NRC on May 18, 2006.

INSERT →

EDI shall fully implement in accordance with an NRC-approved implementation schedule and maintain in effect all provisions of the Commission-approved GCNS Cyber Security Plan pursuant to 10CFR 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).

16a

Amendment No. ~~170, 178~~
Revised by Letter dated July 18, 2007

Attachment 3

to

GNRO-2011/00020

Revised GGNS Operating License Pages

- (b) The first performance of the periodic assessment of CRE habitability, Specification 5.5.13.c.(ii), shall be within 3 years, plus the 9-month allowance of SR 3.0.2, as measured from March 2005, the date of the most recent successful tracer gas test, as stated in the June 30, 2005 letter response to Generic Letter 2003-01, or within the next 9 months if the time period since the most recent successful tracer gas test is greater than 3 years.
 - (c) The first performance of the periodic assessment of the CRE boundary, Specification 5.5.13.d, shall be within the next 18 months, plus the 136 days allowed by SR 3.0.2, as measured from the date of issuance of this amendment.
9. The facility required exemptions from certain requirements of Appendices A and J to 10 CFR Part 50 and from certain requirements of 10 CFR Part 100. These include: (a) exemption from General Design Criterion 17 of Appendix A until startup following the first refueling outage, for (1) the emergency override of the test mode for the Division 3 diesel engine, (2) the second level undervoltage protection for the Division 3 diesel engine, and (3) the generator ground over current trip function for the Division 1 and 2 diesel generators (Section 8.3.1 of SSEK #7) and (b) exemption from the requirements of Paragraph III.D.2(b)(ii) of Appendix J for the containment airlock testing following normal door opening when containment integrity is not required (Section 6.2.6 of SSEK #7). These exemptions are authorized by law and will not endanger life or property or the common defense and security and are otherwise in the public interest. In addition, by exemption dated December 20, 1986, the Commission exempted licensees from 10 CFR 100.11(a)(1), insofar as it incorporates the definition of exclusion area in 10 CFR 100.3(a), until April 30, 1987 regarding demonstration of authority to control all activities within the exclusion area (safety evaluation accompanying Amendment No. 27 to License (NPF-29). This exemption is authorized by law, and will not present an undue risk to the public health and safety, and is consistent with the common defense and security. In addition, special circumstances have been found justifying the exemption. Therefore, these exemptions are hereby granted pursuant to 10 CFR 50.12. With the granting of these exemptions, the facility will operate, to the extent authorized herein, in conformity with the application, as amended, the provisions of the Act and the rules and regulations of the Commission.
- E. 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 FR 27817 and 27822) and 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: "Physical Security, Safeguards Contingency and Training and Qualification Plan," and were submitted to the NRC on May 18, 2006.
- EOI shall fully implement in accordance with an NRC-approved implementation schedule and maintain in effect all provisions of the Commission-approved GCNS Cyber Security Plan pursuant to 10CFR 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

to

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List of Regulatory Commitments

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 <i>GGNS Cyber Security Plan</i> for all safety, security, and emergency preparedness functions will be achieved.	X		December 15, 2014