



Dale K. Atkinson
Vice President, Employee Development/
Corporate Services
P.O. Box 968, PE03
Richland, WA 99352-0968
Ph. 509.377.4302 | F. 509.377.4098
dkatkinson@energy-northwest.com

March 31, 2011
GO2-11-066

10 CFR 73.54

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

**Subject: COLUMBIA GENERATING STATION, DOCKET NO. 50-397
RESPONSE TO REQUEST FOR ADDITIONAL INFORMATION AND
SUPPLEMENT TO THE CYBER SECURITY PLAN FOR COLUMBIA
GENERATING STATION**

- References:**
- 1) Letter GO2-10-098 dated July 22, 2010, DK Atkinson (Energy Northwest) to NRC, "Request for Approval of the Columbia Generating Station Cyber Security Plan" (ADAMS Accession No. ML102150353)
 - 2) Letter GO2-10-143 dated September 27, 2010, DK Atkinson (Energy Northwest) to NRC, "Notification Letter Designating Columbia Generating Station Balance of Plant Systems within the Cyber Security Rule Scope" (ADAMS Accession No. ML102780398)
 - 3) Letter dated March 1, 2011, Balwant K. Singal (NRC) to Mark E. Reddemann (Energy Northwest), "Columbia Generating Station – Request for Additional Information Regarding Revision to the Facility Operating License and Request for Review and Approval of the Cyber Security Plan (TAC No. ME4381)"

Dear Sir or Madam:

In Reference 1, Energy Northwest submitted a request for amendment to the Facility Operating Licenses (FOL) for Columbia Generating Station (Columbia). The proposed amendment requested Nuclear Regulatory Commission (NRC) approval of the Cyber Security Plan (CSP) for Columbia, revision to the existing FOL Physical Protection license condition, and the Cyber Security Plan Implementation Schedule.

**THE ENCLOSURE(S) CONTAIN SECURITY SENSITIVE INFORMATION AS
DEFINED BY 10 CFR 2.390 AND SHOULD BE WITHHELD FROM PUBLIC
DISCLOSURE. PROTECT THIS INFORMATION ACCORDINGLY.**

S00/A
NKK

RESPONSE TO REQUEST FOR ADDITIONAL INFORMATION AND SUPPLEMENT TO THE CYBER SECURITY PLAN FOR COLUMBIA GENERATING STATION

Page 2

In Reference 2, Energy Northwest committed to amend Section 2.1, "Scope and Purpose," of the Cyber Security Plan for Columbia Generating Station to clarify the Balance of Plant (BOP) Systems, Structures, and Components (SSCs) that will be included in the scope of the cyber security program.

With Reference 3, Columbia received an NRC Request for Additional Information (RAI) regarding the CSP for the Columbia submittal. Enclosure 1 provides the Energy Northwest response to the NRC RAIs. With the RAI response, Energy Northwest has proposed revisions to Section 2.1, "Scope and Purpose," Section 4.13, "Document Control and Records Retention and Handling," and has added an Implementation Schedule for intermediate and final milestones of the CSP for Columbia.

Enclosure 2 provides a revised copy of the CSP for Columbia which incorporates the proposed revisions to Section 2.1 and Section 4.13. Additionally, "Revision 0" was added to title. No other changes have been made to the document other than pagination. The enclosed CSP replaces, in its entirety, the CSP for Columbia previously submitted as Enclosure 2 of Reference 1.

Enclosure 3 provides a copy of the Implementation Schedule for intermediate and final milestones of the CSP for Columbia and describes the commitments made in this submittal. The schedule and its commitments replace, in their entirety, the schedule and its commitments previously submitted as Enclosure 3 of Reference 1.

Energy Northwest requests that Enclosures 1, 2 and 3, which contain security-related information, be withheld from public disclosure in accordance with Section 2.390 of Title 10 of the Code of Federal Regulations (10 CFR).

Enclosure 4 contains revised marked-up and re-typed FOL pages for the Physical Protection license condition for Columbia Generating Station to clarify the addition of the cyber security plan and add reference to this supplement. The marked-up and re-typed pages in Enclosure 4 replace, in their entirety, the marked-up and re-typed pages previously submitted in Attachment 1 and Attachment 2 to Enclosure 1 of Reference 1.

Enclosure 5 contains a revised copy of the Columbia Generating Station Deviations from NEI 08-09, Revision 6, previously submitted in Enclosure 4 of Reference 1. The revised copy incorporates the change to address BOP systems discussed above with the section 2.1 and 4.13 changes, refers to the appropriate appendices in NEI 08-09, Revision 6 (where applicable), clarifies the appropriate title of senior site management in section 4.10, and corrects the cited wording for NEI 08-09 in Appendix A, Section 3.1.3, 2nd bullet, to state "Critical Digital Asset." Enclosure 5 replaces, in its entirety, the information previously submitted in Enclosure 4 of Reference 1.

The changes discussed above are clarifying and do not impact the conclusions of the no significant hazards consideration determination previously provided in Reference 1.

**RESPONSE TO REQUEST FOR ADDITIONAL INFORMATION AND SUPPLEMENT TO
THE CYBER SECURITY PLAN FOR COLUMBIA GENERATING STATION**

Page 3

If you should have any questions regarding this submittal, please contact KD
Christianson, Acting Licensing Supervisor, at (509) 377-4315.

I declare under the penalty of perjury that the foregoing is true and correct. Executed
on the date of this letter.

Respectfully,



DK Atkinson

Vice President, Employee Development/Corporate Services

- Enclosures:
- 1) Response to Request for Additional Information (Security-Related Information – Withhold Under 10 CFR 2.390)
 - 2) Cyber Security Plan for Columbia Generating Station, Revision 0 (Security-Related Information – Withhold Under 10 CFR 2.390)
 - 3) Cyber Security Plan Implementation Schedule (Security-Related Information – Withhold Under 10 CFR 2.390)
 - 4) Attachment 1 - Marked-up Page Showing the Proposed FOL Changes
Attachment 2 - Proposed FOL Changes in Final Typed Format
 - 5) Columbia Generating Station Deviations from NEI 08-09, Revision 6

cc: NRC RIV Regional Administrator
NRC NRR Project Manager
NRC Senior Resident Inspector/988C
RN Sherman – BPA/1399
WA Horin – Winston & Strawn
EFSEC Manager
RR Cowley - WDOH

RESPONSE TO REQUEST FOR ADDITIONAL INFORMATION AND SUPPLEMENT TO THE CYBER SECURITY PLAN FOR COLUMBIA GENERATING STATION

Enclosure 4

Page 1 of 2

Attachment 1 – Marked-up Page Showing the Proposed FOL Changes

D. Exemptions from certain requirements of Appendices G, H and J to 10 CFR Part 50, are described in the Safety Evaluation Report. 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. Therefore, these exemptions are hereby granted pursuant to the granting of this exemption the facility with **physical security plan, training and qualification plan, and safeguards contingency** and cyber security plan, in conformity with the Act, and the rules and regulations.

E. The licensee shall fully implement and maintain in effect all provisions of the Commission-approved physical security plan, training and qualification plan, and safeguards contingency plan, 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 plan, which contains Safeguards Information protected under 10 CFR 73.21, is entitled: "Columbia Generating Station Physical Security Plan, Training and Qualification Plan, Safeguards Contingency Plan, and Independent Spent Fuel Storage Installation Plan, Revision 3" submitted May 18, 2006.

F. Deleted.

G. The licensee shall notify the Commission, as soon as possible but not later than one hour, of any accident at this facility which could result in an unplanned release of quantities of fission products in excess of allowable limits for normal operation established by the Commission.

H. The licensee shall have and maintain financial protection of such type and in such amounts as the Commission shall require in accordance with Section 170 of the Atomic Energy Act of 1954, as amended, to cover public liability claims.

The cyber security plan, which contains security-related information withheld from public disclosure under 10 CFR 2.390, is entitled: "Cyber Security Plan for Columbia Generating Station, Revision 0," submitted by letter dated July 22, 2010, and as supplemented by letter dated March 31, 2011.

Strike out "206"

**RESPONSE TO REQUEST FOR ADDITIONAL INFORMATION AND SUPPLEMENT TO
THE CYBER SECURITY PLAN FOR COLUMBIA GENERATING STATION**

Enclosure 4

Page 2 of 2

Attachment 2 - Proposed FOL Changes in Final Typed Format

- 10 -

- D. Exemptions from certain requirements of Appendices G, H and J to 10 CFR Part 50, are described in the Safety Evaluation Report. 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. Therefore, these exemptions are hereby granted pursuant to 10 CFR 50.12. With the granting of this exemption 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 plan, training and qualification plan, safeguards contingency plan, and cyber security plan, 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 physical security plan, training and qualification plan, and safeguards contingency plan, which contain Safeguards Information protected under 10 CFR 73.21, is entitled: "Columbia Generating Station Physical Security Plan, Training and Qualification Plan, Safeguards Contingency Plan, and Independent Spent Fuel Storage Installation Plan, Revision 3" submitted May 18, 2008. The cyber security plan, which contains security-related information withheld from public disclosure under 10 CFR 2.390, is entitled: "Cyber Security Plan for Columbia Generating Station, Revision 0," submitted by letter dated July 22, 2010, and as supplemented by letter dated March 31, 2011.
- F. Deleted.
- G. The licensee shall notify the Commission, as soon as possible but not later than one hour, of any accident at this facility which could result in an unplanned release of quantities of fission products in excess of allowable limits for normal operation established by the Commission.
- H. The licensee shall have and maintain financial protection of such type and in such amounts as the Commission shall require in accordance with Section 170 of the Atomic Energy Act of 1954, as amended, to cover public liability claims.

Amendment No. 57, 178, 183, 208
Revised by letter dated February 2, 2007

RESPONSE TO REQUEST FOR ADDITIONAL INFORMATION AND SUPPLEMENT TO THE CYBER SECURITY PLAN FOR COLUMBIA GENERATING STATION

Enclosure 5

Page 1 of 2

Columbia Generating Station Deviations from NEI 08-09, Revision 6

NEI 08-09 Location	NEI 08-09 Wording	CGS Deviation
Appendix A, Section 1 1 st Paragraph Last Sentence	[Site/Licensee] acknowledges that the implementation of this plan does not alleviate their responsibility to comply with other NRC regulations.	Changed to "Energy Northwest acknowledges that the implementation of this plan does not alleviate responsibility to comply with other NRC regulations." Deleted the word "their" for grammatical correctness.
Appendix A, Section 1 3 rd Paragraph	A Glossary of terms used within this Plan and Appendices of NEI 08-09, Revision 6, is contained in Appendix B of NEI 08-09, Revision 6.	This wording has been replaced with the actual terms contained within NEI 08-09, Revision 6, Appendix B. CGS has elected to incorporate the definitions directly into the Cyber Security Plan.
Appendix A, Section 2.1	None.	Added as new paragraph within Section 2.1 "Within the scope of NRC's cyber security rule at Title 10 of the Code of Federal Regulations (10 CFR) 73.54, systems or equipment that perform important to safety functions include structures, systems, and components (SSCs) in the balance of plant (BOP) that could directly or indirectly affect reactivity at a nuclear power plant and could result in an unplanned reactor shutdown or transient. Additionally, these SSCs are under the licensee's control and include electrical distribution equipment out to the first inter-tie with the offsite distribution system."
Appendix A, Section 3.1.3 – 1 st Bullet	Refer to NEI 08-09, Revision 6, Appendix B, Glossary for definition of Critical System.	Changed to "Refer to Section 1.3 for definition of Critical System." Definitions have been incorporated directly.
Appendix A, Section 3.1.3 – 2 nd Bullet	Refer to NEI 08-09, Revision 6, Appendix B, Glossary for definition of Critical Digital Asset.	Changed to "Refer to Section 1.2 for definition of Critical Digital Asset." Definitions have been incorporated directly.

RESPONSE TO REQUEST FOR ADDITIONAL INFORMATION AND SUPPLEMENT TO THE CYBER SECURITY PLAN FOR COLUMBIA GENERATING STATION

Enclosure 5

Page 2 of 2

Columbia Generating Station Deviations from NEI 08-09, Revision 6

NEI 08-09 Location	NEI 08-09 Wording	CGS Deviation
Appendix A, Section 4.10 1 st Paragraph Last Sentence	Senior nuclear management is [Chief Nuclear Officer, Chief Nuclear Operations Officer, Vice President of Nuclear Operations, Vice-President] who is accountable for nuclear plant(s) operation.	Changed to "The Senior Nuclear Management is defined as the Vice President of Nuclear Generation/Chief Nuclear Officer, who is accountable for nuclear plant operation and will make all decisions concerning cyber security which affect the safe operation of the plant."
Appendix A Section 4.13	Refer to NEI letter to NRC dated February 28, 2011 (ML1015500061).	The 2 nd paragraph through the end of the section has been re-worded per NEI letter to NRC (ML101550061).
Appendix B, "Cyber Attack"	Any event in which there is reason to believe that an adversary has committed or caused, or attempted to commit or cause, or has made a credible threat to commit or cause malicious exploitation of a SSEP function.	<p>This term has been added as Section 1.4 in the plan and the wording has been changed to read:</p> <p>Any event in which there is reason to believe that an adversary has committed or caused, or attempted to commit or cause, or has made a credible threat to commit or cause malicious exploitation of a CDA.</p> <p>Reference 1 below concluded that submission of the cyber security plan in accordance with NEI 08-09, Revision 6 with the exception of the definition of "cyber attack" would be acceptable. Reference 2 provided the above wording as an acceptable definition of "cyber attack" which has been incorporated as Section 1.4 in this plan.</p>

References: 1) NRC Letter dated May 24, 2010, CF Lyon (NRC) to JV Parrish (Energy Northwest), "Columbia Generating Station – License Amendment Request for Approval of the Cyber Security Plan (TAC No. ME2624)"

2) NRC Letter dated June 7, 2010, RP Correia (NRC) to CE Earls (NEI), "Nuclear Energy Institute 08-09, 'Cyber Security Plan Template, Rev. 6'"