



June 22, 2011

L-2011-239
10 CFR 50.90
10 CFR 50.4

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

RE: St. Lucie Units 1 and 2
Docket Nos. 50-335 and 50-389
Response to Request for Additional Information Regarding License Amendment
Request for Approval of the St. Lucie/FPL Cyber Security Plan

- References:
- (1) FPL Letter L-2010-149 dated August 2, 2010, "Request for Approval of the St. Lucie/FPL Cyber Security Plan,"
 - (2) FPL Letter L-2010-213 dated September 27, 2010, "Notification Letter Designating St. Lucie Balance of Plant Systems within the Cyber Security Rule Scope."
 - (3) FPL Letter L-2010-254 dated November 17, 2010, "Request for Approval of the St. Lucie/FPL Cyber Security Plan."
 - (4) Letter from NRC, T. Orf, to R. Anderson, FPL, Request for Additional Information Regarding License Amendment Request for Approval of Cyber Security Plan (TAC No. ME4549, ME4550, ME4582, and ME4583) dated June 15, 2011 (ML11147A119)

By letter dated August 2, 2010 (Reference 1), as supplemented by letters dated September 27, 2010 (Reference 2), November 17, 2010 (Reference 3), Florida Power and Light Company (FPL) submitted a license amendment request (LAR) for St. Lucie Units 1 and 2. The proposed amendment requested approval of the St. Lucie/FPL Cyber Security Plan.

In Reference 4, the NRC requested additional information in order to complete its review of the LAR. The Enclosure provides the request for additional information along with our response.

This letter contains no new Regulatory Commitments and no revisions to existing Regulatory Commitments.

The information contained in this letter does not alter the no significant hazards consideration contained in Reference (3) and continues to satisfy the criteria of 10 CFR 51.22(c)(12).

SODA
MRL

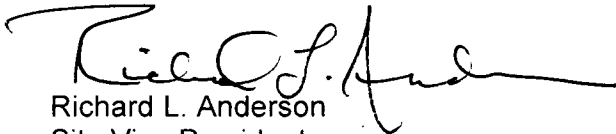
Florida Power and Light Company
St. Lucie Units 1 and 2
Response to Request for Additional Information

L-2011-239
Page 2

If you have any questions or require additional information, please contact Eric Katzman, Licensing Manager, at (772) 467-7734.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on *June 22,* 2011.

A handwritten signature in black ink, appearing to read "Richard L. Anderson". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Richard L. Anderson
Site Vice President
St. Lucie Plant

Enclosure

cc: Mr. W. A. Passetti, Florida Department of Health (with Enclosure)

ENCLOSURE

RESPONSE TO REQUEST FOR ADDITIONAL INFORMATION REGARDING
LICENSE AMENDMENT REQUEST FOR APPROVAL OF CYBER SECURITY PLAN

NRC Request for Additional Information

The requirements of 10 CFR 73.54(a) are that each licensee subject to the requirements of this section shall provide high assurance that digital computer and communication systems and networks are adequately protected against cyber attacks, up to and including the design basis threat as described in Section 73.1. Furthermore, 10 CFR 73.54(a)(1) states that the licensee shall protect digital computer and communication systems and networks associated with: (i) safety-related and important-to-safety functions; (ii) security functions; (iii) emergency preparedness functions, including offsite communications; and (iv) support systems and equipment that, if compromised, would adversely impact safety, security, or emergency preparedness functions.

Section 3.0 of Enclosure 1 to the cyber security plan, Evaluation of Proposed Change, includes clarifications to the Nuclear Energy Institute 08-09 Cyber Security Plan template with regard to Emergency Preparedness and states, "Therefore, the systems and portions of systems to be protected from cyber attack in accordance with 10 CFR 73.54(a)(1)(iii), must: (1) Perform a RSPS [Risk Significant Planning Standards]-related EP [emergency preparedness] function, and (2) Be within the licensee's complete custody and control."

The rule clearly states that digital computer and communication systems and networks associated with emergency preparedness functions, including offsite communications, shall be adequately protected against cyber attacks. For systems and networks that are not within the licensee's complete custody and control, the licensee is still required to ensure protection against cyber attacks.

Explain Florida Power & Light Company's deviation from the 10 CFR 73.54(a)(1).

FPL Response to the RAI:

FPL withdraws the clarification regarding Emergency Preparedness from further NRC review.

Prior to a conference call with the NRC staff on May 24, 2011, FPL did not consider the clarification regarding Emergency Preparedness to be a deviation from the

requirements of 10 CFR 73.54(a)(1). However, FPL now understands how the clarification could result in a deviation from the requirements of 10 CFR 73.54(a)(1). Therefore, FPL withdraws the clarification regarding Emergency Preparedness included in Section 3.0, Technical Evaluation, of References 1, and 3.