



**UNITED STATES
NUCLEAR REGULATORY COMMISSION**

REGION III
2443 WARRENVILLE ROAD, SUITE 210
LISLE, IL 60532-4352

May 22, 2012

Mr. Michael J. Pacilio
Senior Vice President, Exelon Generation Company, LLC
President and Chief Nuclear Officer (CNO), Exelon Nuclear
4300 Winfield Road
Warrenville IL 60555

SUBJECT: CLINTON POWER STATION, UNIT 1 - NOTIFICATION TO PERFORM AN ASSESSMENT OF TEMPORARY INSTRUCTION 2201/XXX, "INSPECTION OF IMPLEMENTATION OF INTERIM CYBER SECURITY MILESTONES 1 – 7" AND REQUEST FOR INFORMATION

Dear Mr. Pacilio:

On July 23, 2012, the U.S. Nuclear Regulatory Commission (NRC) will begin an assessment of Temporary Instruction (TI) 2201/XXX at your Clinton Power Station. As previously discussed with members of your staff, the TI assessment will be performed to evaluate and verify the TI's manpower resource requirements, time allocation requirements, and to assess the effectiveness of the TI in evaluating a licensee in meeting the NRC's Cyber Security Rule, Title 10, Code of Federal Regulations (CFR), Part 73, Section 54, "Protection of Digital Computer and Communication Systems and Networks."

In accordance with 10 CFR 73.54, each nuclear power plant licensee was required to submit a proposed cyber security plan (CSP) and implementation schedule for NRC approval. On December 14, 2009, by letter (ML093080517) to the Nuclear Energy Institute (NEI), the NRC provided their expectations for the proposed implementation schedule. On January 5, 2011, by letter (ML110060093) to the NRC, NEI issued an initial "Template for the Cyber Security Plan Implementation Schedule" (ML110060097). On February 28, 2011, by letter (ML110600206) to the NRC, NEI provided a revised "Template for the Cyber Security Plan Implementation Schedule." The purpose of the letter's attachment was to provide the licensee with a generically written template to develop their proposed CSP implementation schedule. Utilization of the generic template required the licensee to make conforming changes to ensure the submitted schedule accurately accounted for site-specific activities. Based on an NRC technical review (ML110070348), the template was found acceptable to develop the licensees' CSP implementation schedule (i.e., Milestones 1 through 8). On March 31, 2011, by letter (ML110940225) to the NRC, Exelon provided a revised CSP implementation schedule that accounted for the site-specific activities. On August 10, 2011, by letter (ML111861341), the NRC issued amendments that were approved for the letter's listed Exelon plants CSP and associated implementation schedules. In addition, the amendments revised the existing license condition regarding physical protection in each of the facility operating licenses to require the licensee to fully implement and maintain in effect all provisions of the NRC-approved CSP.

The subject TI provides a programmatic level review and verification of the licensee's site-specific implementation of only Milestones 1 through 7. The schedule for the onsite TI assessment for Milestones 1 through 7 is as follows:

- Information Gathering Visit: July 23 – 27, 2012; and
- Cyber Security TI Assessment: August 13 - 17, 2012.

The purpose of the information gathering visit is to: (1) obtain information and documentation needed to support the TI assessment; (2) become familiar with the Clinton Power Station's Cyber Security Program and plant layout; and (3) arrange administrative details, such as office space, availability of knowledgeable office personnel and to ensure unescorted site access privileges.

In order to assure a productive TI assessment, we have enclosed a request for documents needed to ensure that the inspectors are adequately prepared.. These documents have been divided into four groups. The first group lists information necessary to aid the inspectors in planning for the TI assessment. It is requested that this information be provided to the lead inspector via mail or electronically no later than June 25, 2012. The second group also lists information and possible areas for discussion necessary to assist the inspectors during the TI assessment. It is requested this information be available during the information gathering visit (July 23 - 27, 2012). The third group of requested documents consists of those items that the inspectors will review, or need access to, during the inspection. Please have this information available by the first day of the second onsite inspection week (August 13, 2012). The fourth group lists the information necessary to aid the inspectors in tracking questions and answers identified as a result of the TI assessment. It is requested that this information be provided to the lead inspector as the information is generated during the TI assessment. It is important that all of these documents are up to date and complete in order to minimize the number of additional documents requested during the preparation and/or the onsite portions of the TI assessment.

The lead inspector for this TI assessment is Mr. George M. Hausman. We understand that our regulatory contact for this TI assessment is Mr. Ronald Frantz of your organization. If there are any questions about the TI assessment or the material requested, please contact the lead inspector at (630) 829-9743 or via e-mail at george.hausman@nrc.gov.

This letter does not contain new or amended information collection requirements subject to the Paperwork Reduction Act of 1995 (44 U.S.C. 3501 et seq.). Existing information collection requirements were approved by the Office of Management and Budget, control number 3150-0011. The NRC may not conduct or sponsor, and a person is not required to respond to, a request for information or an information collection requirement unless the requesting document displays a currently valid Office of Management and Budget control number.

M. Pacilio

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In accordance with 10 CFR 2.390 of the NRC's "Rules of Practice," a copy of this letter and its enclosure will be available electronically for public inspection in the NRC Public Document Room or from the Publicly Available Records (PARS) component of NRC's document system (ADAMS). ADAMS is accessible from the NRC Web site at <http://www.nrc.gov/reading-rm/adams.html> (the Public Electronic Reading Room).

Sincerely,

/RA/

Robert C. Daley, Chief
Engineering Branch 3
Division of Reactor Safety

Docket No.: 50-461
License No.: NPF-62

Enclosure: Cyber Security Temporary Instruction (TI) 2201/XXX (Milestones 1 – 7)
Assessment

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**CYBER SECURITY TEMPORARY INSTRUCTION 2201/XXX (MILESTONES 1 – 7)
ASSESSMENT**

Report: None

Onsite Dates: July 23 - 27, 2012 (Information Gathering Visit)
August 13 - 17, 2012 (Cyber Security TI Assessment)

Procedure: DRAFT TI 2201/XXX, "Inspection of Implementation of Interim Cyber Security Milestones 1-7"

NRC Inspectors:

George M. Hausman, Lead Inspector (630) 829-9743 George.Hausman@nrc.gov	Stuart N. Sheldon (630) 829-9727 Stuart.Sheldon@nrc.gov
Jasmine A. Gilliam (630) 829-9728 Jasmine.Gilliam@nrc.gov	Mohammad Munir (630) 829-9797 Mohammad.Munir@nrc.gov
Gregory P. Hansen (630) 829-9610 Gregory.Hansen@nrc.gov	

I. Information Requested Prior to the Information Gathering Visit

The following information is requested by **June 25, 2012**. If you have any questions regarding this request, please call the lead inspector as soon as possible. All information should be sent to Mr. George M. Hausman (e-mail address George.Hausman@nrc.gov). Electronic media is preferred. Where information is provided that includes tables and/or lists of data or other such information, do not scan such tables and/or lists as images. The preferred file format is a searchable "pdf" file on a compact disk (CD). The CD should be indexed and hyper-linked to facilitate ease of use. Please provide six copies of each CD submitted (one for each inspector and for a cyber security contractor).

A. Cyber Security TI Documentation

1. Provide a list of all documents required to complete each of the Cyber Security Milestones 1 through 7 identified by letter (ML110940225) dated March 31, 2011, Enclosure 3 - Exelon Cyber Security Plan Revised Implementation Schedule. Provide each milestone in a separate folder on the CD (e.g., Milestone 1, Milestone 2, etc.). Each milestone document shall be listed in a table as follows:

**CYBER SECURITY TEMPORARY INSTRUCTION 2201/XXX (MILESTONES 1 – 7)
ASSESSMENT**

Milestone X , where X equals 1 through 7				
Document Number	Title	Description	Rev	Status
No. 1				
No. 2				
No. 3				
No. 4				
etc.				

2. Based on the list of documents identified in /A.1 above, for each milestone document where the “Status” is identified as complete, place the completed document in its associated folder and hyperlink the associated document number to the completed document. For each document the “Status” should be identified as “not started,” “in-progress” or “completed.”
3. Provide the following documentation for the Cyber Security Assessment Team (CSAT):
 - (a) member names; and
 - (b) member resumes (i.e., present position, previous work experience, and related cyber security training received that is required by your implementing procedures; provide supporting documentation that shows training was completed (e.g., certifications, etc.).
4. List of personnel contacts assigned to support the TI assessment.

B. Cyber Security Supporting Documentation

1. Provide a copy of the current version of the updated safety analysis report (USAR), Technical Specifications (TS), and technical requirements manual (TRM) or equivalent.
2. Provide a copy of the current cyber security “Health Report,” if available.
3. Provide a copy of the current plant drawings referred to as “Horse Notes,” for identified cyber security critical systems (CSs), if available.
4. Provide operator training lesson plans and/or operator training aids for identified cyber security CSs, if available.

**CYBER SECURITY TEMPORARY INSTRUCTION 2201/XXX (MILESTONES 1 – 7)
ASSESSMENT**

II. Information Requested During the Information Gathering Visit (July 23 - 27, 2012)

The following information is requested to be provided to the inspectors during the onsite information gathering visit. It is requested that the following information be provided on six sets of CDs (searchable, if possible).

- A. General Information:
 - 1. A listing of abbreviations and/or designators for plant systems;
 - 2. Organizational chart for corporate and site personnel involved in establishing, overseeing, and maintaining the cyber security program and;
 - 3. a phone list for licensee personnel.
- B. Facility Information:
 - 1. Provide a presentation/discussion of your CSP, existing cyber security CSs, and associated critical digital assets (CDAs).
 - 2. Provide a list and discussion of currently scheduled or planned cyber security related modifications to be installed in the plant.

III. Information Requested to be Available on First Day of the Second Onsite Week (August 13, 2012)

The following information is requested to be provided on the first day of the TI assessment. It is requested that this information be provided on six sets of CDs (searchable, if possible).

- A. Any updates to information previously provided.

IV. Information Requested to Be Provided Throughout the TI Assessment

- 1. Copies of the list of questions/documents requested identified by the inspector and the status/resolution of the information requested (provided daily during the TI assessment to each inspector).

If you have questions regarding the information requested, please contact the lead inspector.

M. Pacilio

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Sincerely,

/RA/

Robert C. Daley, Chief
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Docket No.: 50-461
License No.: NPF-62

Enclosure: Cyber Security Temporary Instruction (TI) 2201/XXX (Milestones 1 – 7) Assessment Document Request

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