



**Nebraska Public Power District**  
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NLS2012042  
June 14, 2012

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

**Subject:** License Amendment Request - Cyber Security Plan Implementation  
Schedule Milestone  
Cooper Nuclear Station, Docket No. 50-298, DPR-46

- References:**
1. Letter from Lynnea E. Wilkins, U.S. Nuclear Regulatory Commission, to Brian J. O'Grady, Nebraska Public Power District, dated July 27, 2011, "Cooper Nuclear Station - Issuance of Amendment Re: Approval of Cyber Security Plan (TAC No. ME4270)"
  2. Letter from Brian J. O'Grady, Nebraska Public Power District, to U.S. Nuclear Regulatory Commission, dated March 30, 2011, "Response to Request for Additional Information Regarding Revision to the Renewed Facility Operating License and Request for Review and Approval of the Cyber Security Plan"

Dear Sir or Madam:

The purpose of this letter is for the Nebraska Public Power District (NPPD) to request an amendment to Facility Operating License (FOL) DPR-46 for Cooper Nuclear Station (CNS) to revise the Physical Protection license condition as it relates to the cyber security plan.

In Reference 1, the U.S. Nuclear Regulatory Commission (NRC) issued License Amendment No. 238 to the Renewed FOL for CNS that approved the CNS Cyber Security Plan and associated implementation milestone schedule. The Cyber Security Plan Implementation Schedule contained in Reference 2 was utilized as a portion of the basis for the NRC's safety evaluation report provided by Reference 1. NPPD is planning to implement the requirements of Implementation Milestone 6 in a slightly different manner than described in the approved

**NOTE: ATTACHMENTS 1 (SECTIONS 1, 2, AND 3), 4, AND 5 TO THIS LETTER CONTAIN SECURITY-RELATED INFORMATION. UPON SEPARATION FROM THESE ATTACHMENTS, THE COVER LETTER AND REMAINDER OF DOCUMENT ARE DECONTROLLED.**

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Implementation Schedule. Although no change to the Implementation Schedule date is proposed, the change to the description of the milestone activity is conservatively considered to be a change to the Implementation Schedule, and in accordance with the provisions of 10 CFR 50.4 and 10 CFR 50.90, NPPD is submitting this request for an amendment to the FOL for CNS. The CNS Cyber Security Plan, Revision 0, was previously provided in Reference 2.

Attachment 1 provides an evaluation of the proposed change. Attachment 2 contains the existing FOL page marked-up to show the proposed change to the Physical Protection license condition for CNS to reference the change provided in this submittal. Attachment 3 contains the updated FOL change in final typed format. Attachment 4 contains a change to the scope of Implementation Milestone 6. Attachment 5 contains a revision to the commitment previously submitted in Reference 2. NPPD requests that Attachments 1 (Sections 1, 2 and 3), 4 and 5 which contain security-related information (SRI) be withheld from public disclosure in accordance with 10 CFR 2.390.

The proposed changes have been evaluated in accordance with 10 CFR 50.91(a)(1) using criteria in 10 CFR 50.92(c), and it has been determined that the changes involve no significant hazards consideration. The bases for these determinations are included in Attachment 1.

NPPD requests this license amendment be effective as of its date of issuance. Although this request is neither exigent nor emergency, your review and approval is requested prior to December 31, 2012, which is the current required completion date for the affected implementation milestone.

The proposed changes have been reviewed by the necessary safety review committees (Station Operations Review Committee and Safety Review and Audit Board). Amendments to the FOL through Amendment 241 issued February 16, 2012, have been incorporated into this request. This request is submitted under affirmation pursuant to 10 CFR 50.30(b).

By copy of this letter and its attachments, the appropriate State of Nebraska official is notified in accordance with 10 CFR 50.91(b)(1). Copies are also being provided to the NRC Region IV office and the CNS Resident Inspector in accordance with 10 CFR 50.4(b)(1).

Should you have any questions concerning this letter, or require additional information, please contact David Van Der Kamp, Licensing Manager, at (402) 825-2904.

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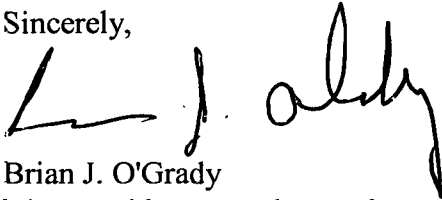
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I declare under penalty of perjury that the foregoing is true and correct.

Executed on: June 14 2012

Sincerely,



Brian J. O'Grady  
Vice President - Nuclear and  
Chief Nuclear Officer

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- Attachments:
1. Analysis of Proposed Operating License Change (contains SRI)
  2. Proposed Facility Operating License Change (Mark-up)
  3. Proposed Facility Operating License Change (Re-typed)
  4. Revised Cyber Security Plan Implementation Schedule (contains SRI)
  5. List of Regulatory Commitments (contains SRI)

cc: Regional Administrator w/attachments  
USNRC - Region IV

Cooper Project Manager w/attachments  
USNRC - NRR Project Directorate IV-1

Senior Resident Inspector w/attachments  
USNRC - CNS

Nebraska Health and Human Services w/attachments  
Department of Regulation and Licensure

NPG Distribution w/o attachments

CNS Records w/attachments

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