



August 30, 2012  
RC-12-0125

U.S. Nuclear Regulatory Commission (NRC)  
Document Control Desk  
Washington, D.C. 20555

Subject: LICENSE AMENDMENT REQUEST – CYBER SECURITY  
PLAN IMPLEMENTATION SCHEDULE MILESTONES (LAR 11-04076)  
VIRGIL C. SUMMER NUCLEAR STATION (VCSNS) UNIT 1  
DOCKET NO. 50-395  
OPERATING LICENSE NO. NPF-12

- References:
1. NRC letter to South Carolina Electric & Gas Company (SCE&G), *Issuance of Amendment Re: Approval of Cyber Security Plan*, dated August 24, 2011, as corrected in NRC letter to SCE&G, *Correction of Safety Evaluation Regarding Cyber Security Plan License Amendment*, dated July 12, 2012
  2. SCE&G letter to NRC, *Response to Additional Requests for Additional Information and Revision to the VCSNS Cyber Security Plan*, dated March 28, 2011

Dear Sir or Madam:

In Reference 1, the NRC issued license Amendment No. 184 to the Renewed Facility Operating License for VCSNS that approved the VCSNS *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. SCE&G is planning to implement the requirements of Implementation Schedule Milestone 6 in a slightly different manner than described in the approved 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, SCE&G is submitting this request for an amendment to the Facility Operating License for VCSNS. The *VCSNS Cyber Security Plan*, Revision 0 was previously provided in Reference 2.

Attachment 1 provides an evaluation of the proposed change. Attachment 2 contains proposed marked-up operating license pages for the Physical Protection license condition for VCSNS to reference the commitment change provided in this submittal. Attachment 3 contains the proposed revised operating license pages. Attachment 4 contains a change to the scope of Implementation Milestone 6. SCE&G requests that Attachments 1 (Sections 1, 2, and 3) and 4 which contain security-related information (SRI) be withheld from public disclosure in accordance with 10 CFR 2.390.

**Attachments 1 (Sections 1, 2, and 3) and 4 transmitted herewith contains security related information. When separated from this attachment, this transmittal document is decontrolled.**

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.

SCE&G 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.

The revised commitment contained in this submittal is summarized in Attachment 5. Should you have any questions about this submittal, please contact Mr. Bruce L. Thompson at (803) 931-5042.

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

8/30/2012  
Executed on

  
Thomas D. Gatlin for TDGATLIN

TS/TDG/wm

- Attachments:
1. Analysis of Proposed Operating License Change (contains SRI)
  2. Proposed VCSNS Operating License Changes (mark-up)
  3. Revised VCSNS Operating License Pages
  4. Revised Cyber Security Plan Implementation Schedule (contains SRI)
  5. List of Regulatory Commitments

cc: K. B. Marsh  
S. A. Byrne  
J. B. Archie  
N. S. Carns  
J. H. Hamilton  
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PRSF (RC-12-0125)

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**VIRGIL C. SUMMER NUCLEAR STATION (VCSNS)  
DOCKET NO. 50-395  
OPERATING LICENSE NO. NPF-12**

**ATTACHMENT 2**

**Proposed VCSNS Operating License Changes (mark-up)**

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- D. An exemption to the requirements of Paragraph III.B.4 of Appendix G to 10 CFR Part 50 is described in Section 5.3.1 of Supplement No. 1 to the Office of Nuclear Reactor Regulation's Safety Evaluation Report. A limited exemption to the requirements of Section IV.F.1(b) of Appendix E to 10 CFR Part 50 is described in a letter from B.J. Youngblood, NRC to O.W. Dixon, Jr., dated November 2, 1982. 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. 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. SCE&G 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 combined set of plans, which contain Safeguards Information protected under 10 CFR 73.21, is entitled: "Virgil C. Summer Nuclear Station Security Plan," as updated through May 15, 2006. This document includes the Security Training and Qualification Plan as Appendix B and the Safeguards Contingency Plan as Appendix C.

SCE&G shall fully implement and maintain in effect all provisions of the Commission-approved cyber security plan (CSP), including changes made pursuant to the authority of 10 CFR 50.90 and 10 CFR 50.54(p). ~~The SCE&G CSP was approved by License Amendment No. 184.~~

Replace with the following.

The VCSNS CSP was approved by License Amendment No. 184 as supplemented by a change approved by License Amendment No.

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**VIRGIL C. SUMMER NUCLEAR STATION (VCSNS)  
DOCKET NO. 50-395  
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**ATTACHMENT 3**

**Revised VCSNS Operating License Pages**

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- D. An exemption to the requirements of Paragraph III.B.4 of Appendix G to 10 CFR Part 50 is described in Section 5.3.1 of Supplement No. 1 to the Office of Nuclear Reactor Regulation's Safety Evaluation Report. A limited exemption to the requirements of Section IV.F.1(b) of Appendix E to 10 CFR Part 50 is described in a letter from B. J. Youngblood, NRC to O. W. Dixon, Jr., dated November 2, 1982. 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. 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. SCE&G 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 combined set of plans, which contains Safeguards Information protected under 10 CFR 73.21, is entitled: "Virgil C. Summer Nuclear Station Security Plan," as updated through May 15, 2006. This document includes the Security Training and Qualification Plan as Appendix B and the Safeguards Contingency Plan as Appendix C.

SCE&G shall fully implement and maintain in effect all provisions of the Commission-approved cyber security plan (CSP), including changes made pursuant to the authority of 10 CFR 50.90 and 10 CFR 50.54(p). The Virgil C. Summer Nuclear Station CSP was approved by License Amendment No. 184 as supplemented by a change approved by License Amendment No.

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**VIRGIL C. SUMMER NUCLEAR STATION (VCSNS)  
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**ATTACHMENT 5**

**List of Regulatory Commitments**

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List of Regulatory Commitments

The following table identifies those actions committed to by SCE&G 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	
SCE&G will implement milestones 1, 2, 3, 4, 5, and 7 described in Enclosure 2 of letter dated March 28, 2011, and the revised Milestone 6 in Attachment 4 of this submittal.	X		December 31, 2012