



Entergy Nuclear Operations, Inc.  
**Palisades Nuclear Plant**  
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Tel 269 764 2000

**Anthony J. Vitale**  
Site Vice President

PNP 2012-105

November 28, 2012

U.S. Nuclear Regulatory Commission  
Attn: Document Control Desk  
Washington, DC 20555

**SUBJECT:** Supplement to License Amendment Request – Cyber Security  
Plan Implementation Schedule Milestones

Palisades Nuclear Plant  
Docket 50-255  
License No. DPR-20

- References:
1. NRC letter to Entergy Nuclear Operations, Inc., "Palisades Nuclear Plant - Issuance of Amendment Regarding the Cyber Security Plan: (TAC No. ME4355)," dated July 28, 2011 (ADAMS Accession Number ML111801243)
  2. Entergy Nuclear Operations, Inc., letter to NRC, "Response to Additional Requests for Additional Information (RAIs) and Revision to the PNP Cyber Security Plan," dated April 4, 2011 (ADAMS Accession Number ML110950688)
  3. Entergy Nuclear Operations, Inc., letter to NRC, PNP 2012-046, "License Amendment Request – Cyber Security Plan Implementation Schedule Milestones," dated June 20, 2012 (ADAMS Accession Number ML12184A149)

Dear Sir or Madam:

In Reference 1, the NRC issued License Amendment No. 243 to the Renewed Facility Operating License for Palisades Nuclear Plant (PNP) which approved the PNP Cyber Security Plan and associated implementation milestone schedule. The Cyber Security Plan Implementation Schedule contained in Reference 2 was used as a portion of the basis for the NRC safety evaluation report provided by Reference 1.

In Reference 3, Entergy Nuclear Operations, Inc. (ENO) submitted a license amendment request to implement the requirements of Implementation Schedule Milestone 6 in a slightly different manner than described in the approved

Implementation Schedule. This amendment request included a change to the Physical Protection license condition in Section 2.E of the Renewed Facility Operating License. The change added a parenthetical statement that the PNP Cyber Security Plan approved by License Amendment No. 243 is supplemented by a clarification approved by the Reference 3 license amendment request.

This supplement to the Reference 3 submittal modifies the parenthetical statement in Section 2.E of the Renewed Facility Operating License. The parenthetical statement is modified by replacing "clarification" with "change."

This modification is reflected in Attachments 1 and 2 of this supplemental submittal. Attachment 1 contains the proposed marked-up operating license page for the Physical Protection license condition for PNP. Attachment 2 contains page change instructions and the proposed revised operating license page. These two attachments supersede the previously submitted Attachments 2 and 3 in Reference 3.

This supplement does not alter the significant hazards consideration or the environmental considerations previously provided in Reference 3.

I declare under penalty of perjury that the foregoing is true and correct. Executed on November 28, 2012.

Sincerely,

  
ajv/jse

Attachments: 1. Proposed PNP Operating License Change (mark-up)  
2. Renewed Operating License Page Change Instructions and Revised PNP Operating License Page

cc: Administrator, Region III, USNRC  
Project Manager, Palisades, USNRC  
Resident Inspector, Palisades, USNRC  
State of Michigan

**Attachment 1**

PNP 2012-105

**Proposed PNP Operating License Change (mark-up)**

(showing proposed change; addition is highlighted)

- D. The facility has been granted certain exemptions from the requirements of Section III, G of Appendix R to 10 CFR Part 50, "Fire Protection Program for Nuclear Power Facilities Operating Prior to January 1, 1979." This section relates to fire protection features for ensuring the systems and associated circuits used to achieve and maintain safe shutdown are free of fire damage. These exemptions were granted in letters dated February 8, 1983, July 12, 1985, and July 23, 1985.

In addition, the facility has been granted certain exemptions from Appendix J to 10 CFR Part 50, "Primary Reactor Containment Leakage Testing for Water Cooled Power Reactors." This section contains leakage test requirements, schedules and acceptance criteria for tests of the leak-tight integrity of the primary reactor containment and systems and components which penetrate the containment. These exemptions were granted in a letter dated December 6, 1989.

These exemptions granted pursuant to 10 CFR 50.12, are authorized by law, will not present an undue risk to the public health and safety, and are consistent with the common defense and security. With these exemptions, 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. ENO 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: "Entergy Nuclear Palisades Nuclear Plant Physical Security Plan."

ENO 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 Palisades CSP was approved by License Amendment No. 243 (as supplemented by a change approved by License Amendment No. 2xx).

- F. [deleted]
- G. ENP and ENO 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.

**Attachment 2**

PNP 2012-105

**Renewed Operating License Page Change Instructions**

**and**

**Revised PNP Operating License Page**

2 pages follow

**ATTACHMENT TO LICENSE AMENDMENT NO.**

**RENEWED FACILITY OPERATING LICENSE NO. DPR-20**

**DOCKET NO. 50-255**

Remove the following page of the Renewed Facility Operating License and replace with the attached revised page. The revised page is identified by amendment number and contains a line in the margin indicating the area of change.

**REMOVE**

Page 6

**INSERT**

Page 6

- D. The facility has been granted certain exemptions from the requirements of Section III, G of Appendix R to 10 CFR Part 50, "Fire Protection Program for Nuclear Power Facilities Operating Prior to January 1, 1979." This section relates to fire protection features for ensuring the systems and associated circuits used to achieve and maintain safe shutdown are free of fire damage. These exemptions were granted in letters dated February 8, 1983, July 12, 1985, and July 23, 1985.

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- F. [deleted]

- G. ENP and ENO 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.