

Control of Access: Part 50 & 73 Perspectives

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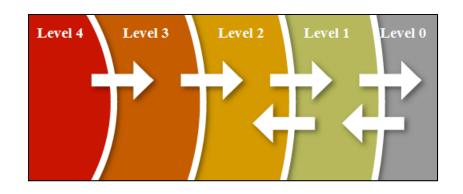


NRC Regulatory Framework

- Licensing reviews against the requirements of 10 CFR Part 50 specifically address safety
 - Focused on safety (i.e., non-malicious activity)
 - Staff will evaluate <u>digital safety systems</u> for a Secure Development and Operational Environment (SDOE)
- 10 CFR Part 73 covers security and protection from malicious activity, including cyber security
 - Staff will evaluate licensees' cyber programs and protection of Critical Digital Assets (CDAs)
 - CDAs include systems associated with safety, important-tosafety, security and emergency preparedness functions, as well as digital support systems for any of the above



ACRS Concern



- ACRS recommended staff review design certifications to ensure defensive architecture boundary between Level 3 (Control Systems) and Level 2 (Plant Data Network) is enforced by oneway hardware device(s)
- Staff agrees with the intent of the recommendation, which is addressed under Part 73 guidance; however, firm regulatory basis to do so in Part 50 may not exist
 - Staff has committed to raise the issue to the Commission for direction