



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

February 9, 2015

LICENSEE: Southern California Edison
FACILITY: San Onofre Nuclear Generating Station, Units 2 and 3
SUBJECT: SUMMARY OF JULY 31, 2014, CATEGORY 1 MEETING WITH SOUTHERN CALIFORNIA EDISON TO DISCUSS CYBER SECURITY ISSUES (CLOSED MEETING)

On July 31, 2014, the U.S. Nuclear Regulatory Commission (NRC) staff held a closed meeting with representatives of Southern California Edison (SCE, the licensee), at NRC Headquarters, Three White Flint North, Landsdown Road, North Bethesda, MD. The purpose of the meeting was to discuss the licensee's proposed scope and schedule regarding cyber security for San Onofre Nuclear Generating Station (SONGS), Units 2 and 3. The licensee's meeting handout is provided in Enclosure 1.

The licensee described its current status with respect to cyber security. The licensee has implemented the Cyber Security Rule Milestones 1 – 7. These milestones are (1) establishment of a Cyber Security Assessment Team (CSAT); (2) identification and documentation of critical systems (CSs) and critical digital assets (CDAs); (3) installation of protective devices between lower and higher security levels as described in the CSP; (4) implementation of access control for portable mobile devices; (5) observation for, and identification of, obvious cyber related tampering; (6) implementation of cyber security controls for CDAs that could adversely impact the design function of target set equipment; and (7) implementing and commencing on-going monitoring and assessment activities. The licensee stated that an NRC inspection was conducted in early 2013 to verify completion of Milestones 1 – 7. The licensee has not yet completed Milestone 8, the Full Program Plan, and requested a meeting to describe its proposed plan and schedule for achieving full compliance.

The facility is permanently shut down and defueled. The licensee intends to proceed expeditiously to decontamination and dismantlement of the facility. The licensee is currently performing the engineering work necessary to isolate the spent fuel pool and its support equipment from the balance of the plant to facilitate decommissioning activities. Because of the broad scope of the ongoing engineering design work and the extensive modifications that will be necessary, the licensee explained that the list of critical systems and critical digital assets will change significantly. Currently, the licensee cannot predict whether certain critical digital assets will be retained or replaced during the transition to the spent fuel pool "island" configuration. Shortly thereafter, the licensee plans to move the fuel to dry storage, and anticipates a significant reduction in the number of critical digital assets at that point. Therefore, the licensee plans to submit a license amendment request for a lengthy schedule extension for completion of Milestone 8.

The NRC staff stated that it would be difficult to justify a blanket extension for the length of time the licensee was considering, and provided some feedback on extension requests that have


previously been approved by the staff. The staff noted that SCE may be able to provide sufficient justification to support an extension request of a similar duration. The NRC staff could consider additional extension requests on a functional basis, or for families of functions. The staff stressed that the documentation supporting the request should address any vulnerabilities during the transition period.

Also during the meeting, inspection activities during the interim period were discussed. The NRC staff indicated that the scope of any cyber security inspections would be based on the criteria in effect at the time of the inspection. The staff has developed a draft temporary instruction for the inspection that will be piloted soon.

Members of the public were not in attendance. Public Meeting Feedback forms were not received.

A list of meeting attendees is provided in Enclosure 2.

Please direct any inquiries to me at 301-415-4037, or e-mail Thomas.Wengert@nrc.gov.



Thomas Wengert, Senior Project Manager
Plant Licensing IV-2 and Decommissioning
Transition Branch
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Docket Nos. 50-361 and 50-362

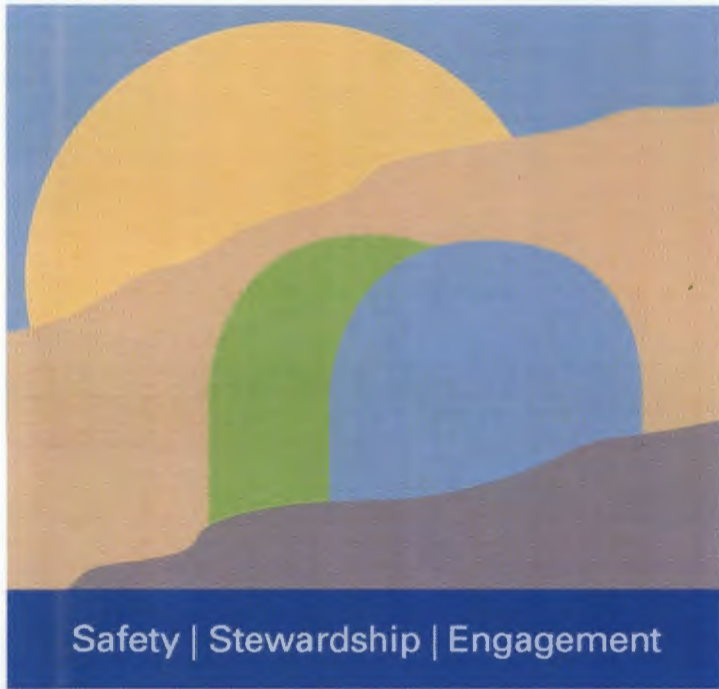
Enclosures:

1. Licensee's meeting handout
2. List of Attendees

cc w/enclosures: Distribution via Listserv

Enclosure 1

LICENSEE'S MEETING HANDOUT



Decommissioning
San Onofre
Nuclear Generating Station

SONGS Cyber Security Plan

Meeting with NRC

July 31, 2014



Decommissioning
San Onofre
Nuclear Generating Station

Meeting Agenda

Topic	Time
Introduction	9:00
Implementation Scope/Plan	9:05
Timeline Review: Cyber Security program actions Integration with plant decommissioning activities	9:15
License Amendment Request Plan	9:30
NRC Feedback	9:40
License Amendment Request Schedule	10:00
NRC Next Steps for SONGS Cyber Security	10:05
Meeting Summary/Actions	10:15
Wrap Up	10:25

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Introduction/ SONGS Current Cyber Security Status

- SONGS successfully implemented Cyber Security Rule Milestones 1-7 (12/2012)
- Successful NRC inspection early 2013
- Continued compliance with Cyber Security Rule Milestones 1-7
- Milestone 8 completion remaining
- SONGS working to align implementation of Milestone 8 with Plant Status based on the Decommissioning Schedule



Milestone 8 Implementation Scope/Plan

- Develop Milestone 8 Full Program Plan
- Alignment with NEI 08-09 Rev. 6
- Consistent with Cold and Dark Scope and Schedule
 - Modifying critical system configurations to support SONGS going Cold & Dark, Spent Fuel Islanding, and Protected Area reduction
 - Performing Security Impact Analysis
 - Completing Critical Digital Assets (CDA) assessments and mitigations
- Develop and submit License Amendment Request to extend compliance date



License Amendment Request Plan

- Develop and submit License Amendment Request to extend compliance date
- Justification for Extension
 - Commitments and program activities implemented for Milestones 1-7 have continued resource demands at SONGS
 - Industry-wide experienced and knowledgeable resource availability issues
 - Alignment with cold and dark schedules/deliverables and plant status
 - SONGS expectation for a significant reduction in Cyber Security Rule scope applicability following Pool-to-Pad Campaign completion
 - Current SONGS Cyber Security Scope
 - Operating Plant applicability
 - 10 CFR 50.82 Shutdown Plant applicability
 - Cold & Dark Plant applicability
 - Post Pool-to-Pad Campaign Completion applicability



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NRC Feedback

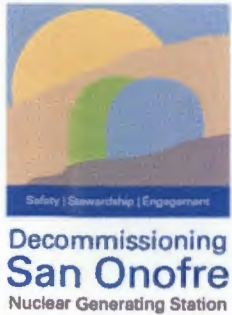




Decommissioning
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License Amendment Request Schedule

- LAR content consistent with other industry extension requests
- Additional LAR justification based on SONGS specific decommissioning plan and schedule
- Submit LAR to NRC September 2014
- NRC Review Schedule discussion

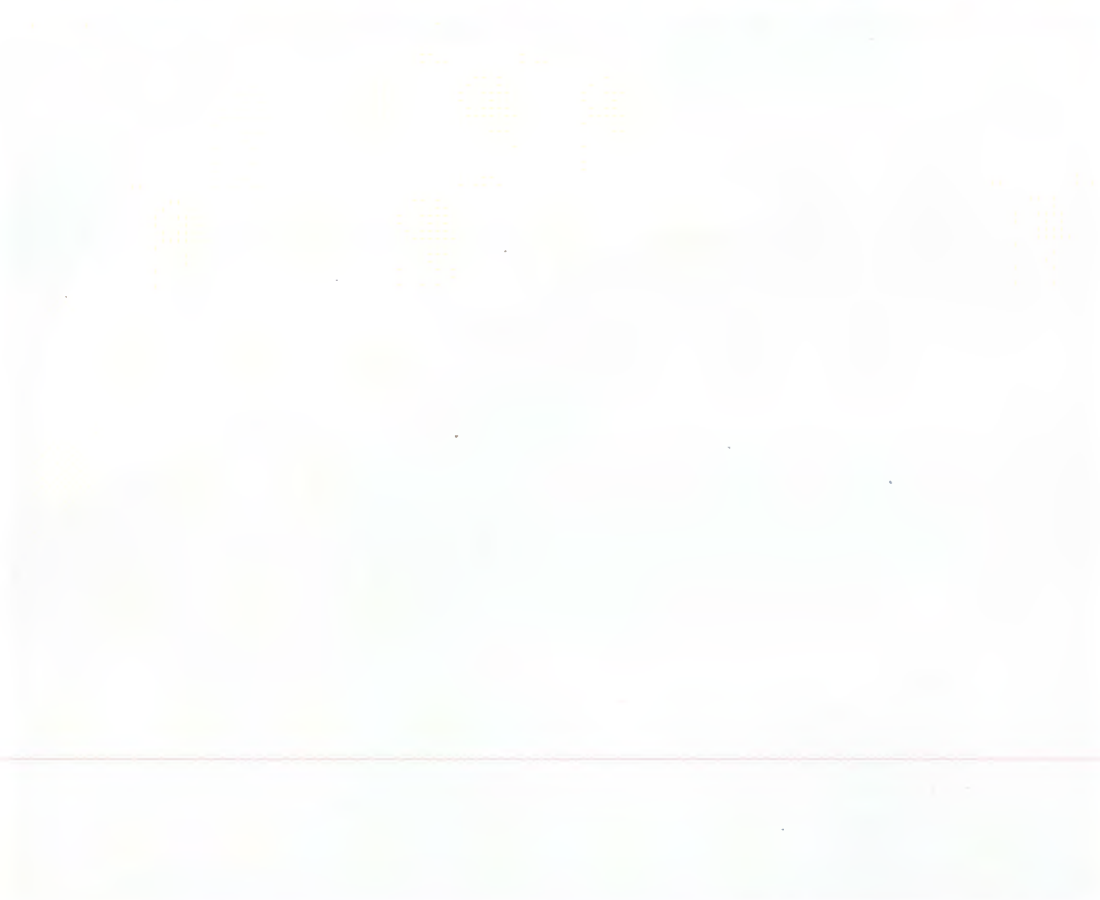


NRC Next Steps for SONGS Cyber Security

- Next cyber security inspection timeframe
- Scope of inspection
- Inspection Procedure



Meeting Wrap Up/Actions/Next Steps



LIST OF ATTENDEES

CLOSED MEETING WITH SOUTHERN CALIFORNIA EDISON

TO DISCUSS CYBER SECURITY ISSUES

SAN ONOFRE NUCLEAR GENERATING STATION

Thursday, July 31, 2014

Southern California Edison

Todd Adler
Ryan Pettus
Richard Brabec
Andrea Sterdis

U.S. Nuclear Regulatory Commission

Russ Felts
John Rycyna
Doug Broaddus
Duane White
Margaret Chernoff

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Please direct any inquiries to me at 301-415-2240, or e-mail Thomas.Wengert@nrc.gov.

/RA/

Thomas Wengert, Senior Project Manager
Plant Licensing IV-2 and Decommissioning
Transition Branch
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Docket Nos. 50-361 and 50-362

Enclosures:

1. Licensee's meeting handout
2. List of Attendees

cc w/enclosures: Distribution via Listserv

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DATE	8/4/14	8/4/14	2/6/15	2/9/15

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