



September 29, 2014  
ACO 14-0031

ATTN: Document Control Desk  
Ms. Catherine Haney, Director  
Office of Nuclear Material Safety and Safeguards  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555-0001

**American Centrifuge Plant and American Centrifuge Lead Cascade Facility**  
**Docket Numbers 70-7004 and 70-7003**  
**License Numbers SNM-2011 and SNM-7003**

**Submission of Proposed Cyber Security Plan for the American Centrifuge Operating, LLC**  
**- Security-Related Information and Official Use Only**

**INFORMATION TRANSMITTED HERewith IS PROTECTED FROM PUBLIC  
DISCLOSURE AS CONFIDENTIAL COMMERCIAL OR FINANCIAL INFORMATION  
AND/OR TRADE SECRETS PURSUANT TO 10 CFR 2.390 AND 9.17(a)(1)**

Dear Ms. Haney:

**Purpose**

In accordance with 10 *Code of Federal Regulations* (CFR) 95.19, American Centrifuge Operating, LLC (ACO) hereby submits SP-3605-0013, *American Centrifuge Distributed Control System Information System Security Plan (ISSP)*, to the U.S. Nuclear Regulatory Commission (NRC) for review and approval.

**Background**

On June 22, 2011 (Reference 1), the NRC provided guidance regarding the re-accreditation of classified computer networks. The NRC letter recommended that all currently accredited classified computer networks be reaccredited under the existing requirements before these national standards are implemented. Networks accredited under the current U.S. Department of Energy (DOE) Manual 205.1A series requirements would be valid for the remainder of their three-year accreditation period.

Document herewith contains  
~~Security-Related Information - Withhold Under 10 CFR 2.390~~  
Official Use Only  
When separated from Enclosures 1 and 2, this letter is uncontrolled.

American Centrifuge Operating, LLC  
3930 U.S. Route 23 South - P.O. Box 628  
Piketon, OH 45661

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Ms. Catherine Haney  
September 29, 2014  
ACO 14-0031, Page 2

Over the course of a two year review and approval process for the transfer of materials licenses from USEC Inc. to ACO, the existing cyber security plans were revised awaiting final re-accreditation. On February 8, 2013 (Reference 2), NRC requested ACO to submit approved system ISSPs and the Security Test and Evaluations for each system in order for the NRC to re-accredit these systems until January 1, 2015. The requested information was submitted and on March 22, 2013 (Reference 3), the NRC authorized continued operation and processing of information up to and including, Secret Restricted Data until January 1, 2015 for SP-3605-0003, *Lead Cascade Distributed Control System Information System Security Plan (ISSP) – Processing Classified Information at Protection Index PI-2*.

### Discussion

Enclosure 1 of this letter provides a detailed description, justification, and ACO's significance determination for the newly-developed cyber security plan to address Reference 1 of this letter. In accordance with 10 CFR 95.19, the proposed cyber security plan has been determined to be a substantive change, requiring prior NRC review and approval.

In accordance with the new requirements for DOE accreditation and NRC approval of classified cyber security networks provided during a November 29, 2012 workshop on Classified Computer Networks, SP-3605-0013 (Revision 0, dated September 2014) was developed and is being provided as Enclosure 2 of this letter. Upon NRC's approval of SP-3605-0013; SP-3605-0003 will be superseded.

Enclosures 1 and 2 contain Security-Related Information. Additionally, in accordance with the guidance provided by the DOE, these enclosures also contain Official Use Only information. Therefore, ACO requests that these enclosures be withheld from public disclosure pursuant to 10 CFR 2.390(d)(1).

### Action

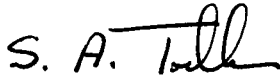
ACO requests NRC review and approval of this cyber security plan be completed at your earliest convenience to allow the DOE accreditation and NRC approval of this ISSP prior to the January 1, 2015, accreditation date as defined within Reference 3.

Ms. Catherine Haney  
September 29, 2014  
ACO 14-0031, Page 3

**Contact**

If you have any questions regarding this matter, please contact me at (301) 564-3250 or Mario Robles at (740) 897-3285.

Sincerely,



Steven A. Toelle  
Director, Regulatory Affairs

Enclosures: As Stated

**References:**

1. NRC letter from B.W. Smith to P.J. Miner (USEC) regarding Reaccreditation of Classified Computer Networks, dated June 22, 2011
2. NRC letter from B.W. Smith to P.J. Miner (USEC) regarding Revision to Security Program for American Centrifuge Operating, LLC and Cyber Security Plans (TAC No. L34141), dated February 8, 2013
3. NRC letter from B.W. Smith to P.J. Miner (USEC) regarding Submission of Cyber Security Plans and Security Test Evaluation Results for American Centrifuge Operating, LLC (TAC No. L34231), dated March 22, 2013

cc (without Enclosures unless noted):

R. DeVault, DOE  
J. Downs, NRC HQ  
K. Everly, NRC (w/Enclosures)  
T. Grice, NRC HQ  
J. Hickey, NRC Region II  
J. Hutson, DOE ORO (w/Enclosures)  
D. King, DOE Piketon (w/Enclosures)  
Q. Nguyen, DOE-ORO  
L. Pitts, NRC Region II (w/Enclosures)  
B. Smith, NRC HQ  
O. Siurano, NRC HQ (w/Enclosures)  
T. Vukovinsky, NRC Region II