



December 5, 2014
ACO 14-0040

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**

Request for Extension of Cyber Security Plans for the American Centrifuge Operating, LLC (Technical Assignment Control Numbers L34289 and L34297)

Dear Ms. Haney:

Purpose

The purpose of this letter is to request an extension to provide resolution of U.S. Nuclear Regulatory Commission (NRC) comments provided (Reference 1) for the following proposed cyber security plans:

- SP-3605-0011, *American Centrifuge Classified Administrative Network Information System Security Plan (ISSP)*, Revision 0
- SP-3605-0013, *American Centrifuge Distributed Control System Information System Security Plan (ISSP)*, Revision 0

Likewise, American Centrifuge Operating, LLC (ACO) hereby requests an extension of the accreditation for the classified cyber security systems protected under the following cyber security plans:

- SP-3605-0002, *Classified Data Processing Network Information System Security Plan (ISSP) – Processing Classified Information at Protection Index PI-2*, Revision 2
- SP-3605-0003, *Lead Cascade Distributed Control System Information System Security Plan (ISSP)*, Revision 3

Background

On March 22, 2013 (Reference 2), the NRC authorized continued operation and processing of information up to and including, Secret Restricted Data for classified cyber security plans SP-3605-0002 and SP-3605-0003 until January 1, 2015.

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In accordance with the new requirements for U.S. Department of Energy (DOE) accreditation and NRC approval of classified cyber security networks provided during the November 29, 2012, workshop, SP-3605-0011, (Revision 0, dated April 2014) and SP-3605-0013 (Revision 0, September 2014) were developed and submitted to the NRC for prior review and approval respectively on May 28, 2014 (Reference 3), and September 29, 2014 (Reference 4). The NRC conducted a review of these submittals in coordination with the subject matter experts from the DOE's Nuclear Energy Oak Ridge Site Office. On November 5, 2014 (Reference 1), the NRC provided comments that must be addressed before final approval and accreditation of these classified cyber security plans can occur. The NRC staff requested that ACO resubmit SP-3605-0011 and SP-3605-0013 resolving these comments within 30 days from the date of Reference 1.

Discussion

ACO is in the process of addressing the NRC comments noted in Reference 1. However, ACO requests an extension from December 5, 2014, to December 31, 2014, to ensure that the comments are adequately addressed within the revised plans and the proper internal ACO technical peer reviews and management reviews are conducted.

Additionally, the currently accredited classified cyber security plans (SP-3605-0002 and SP-3605-0003) will expire on January 1, 2015. Reference 3 stated that upon NRC's approval of SP-3605-0011, this plan will replace the currently accredited SP-3605-0002. Reference 4 also stated that upon NRC's approval of SP-3605-0013, this plan will replace the currently accredited SP-3605-0003. ACO requests an extension of the accredited expiration date from January 1, 2015, to January 31, 2015, to allow these two plans to remain in place while the newly developed plans (SP-3605-0011 and SP-3605-0013) are being reviewed for approval by the NRC and DOE.


Action

ACO respectfully requests these extensions be granted at the NRC's earliest convenience.

Contact

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

Sincerely,

A handwritten signature in black ink, appearing to read "S. A. Toelle".

Steven A. Toelle
Director, Regulatory Affairs

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References:

1. NRC letter from B.W. Smith to S. Toelle (Centrus) regarding Submission of Proposed Cyber Security Plans for the American Centrifuge Operating, LLC – Technical Assignment Control Numbers L34289 and L34297, dated November 5, 2014
2. 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
3. Letter ACO 14-0016 from P.J. Miner to C. Haney regarding Submission of Proposed Cyber Security Plans for the American Centrifuge Operating, LLC, dated May 28, 2014
4. Letter ACO 14-0031 from P.J. Miner to C. Haney regarding Submission of Proposed Cyber Security Plan for the American Centrifuge Operating, LLC, dated September 29, 2014

cc:

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J. Downs, NRC HQ
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T. Grice, NRC HQ
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