



January 14, 2015  
ACO 15-0001

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**

**Cyber Security Plans for the American Centrifuge Operating, LLC (Technical Assignment  
Control Numbers L34289 and L34297) – 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 Reference 1, American Centrifuge Operating, LLC (ACO) hereby submits final comment resolution of the following cyber security plans to the U.S. Nuclear Regulatory Commission (NRC) for approval and accreditation:

- 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

Additionally, the following Security Assessment Reports (SARs) are being provided:

- SP-3605-0014, *American Centrifuge Distributed Control System Security Assessment Report*, Revision 0
- SP-3605-0015, *American Centrifuge Baseline Security Control (Distributed Control System) Security Assessment Report*, Revision 0

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When separated from Enclosures 1 through 6, this letter is uncontrolled.

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- SP-3605-0016, *American Centrifuge Baseline Security Control (Classified Administrative Network) Security Assessment Report*, Revision 0
- SP-3605-0017, *American Centrifuge Classified Administrative Network Security Assessment Report*, Revision 0

**Background**

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 review and approval on May 28, 2014 (Reference 2), and September 29, 2014 (Reference 3), respectively.

The NRC conducted a review of the initial submittals of SP-3605-0011 and SP-3605-0013 in coordination with the subject matter experts from the DOE's Nuclear Energy Oak Ridge Site Office. On November 5, 2014 (Reference 4), the NRC provided comments that must be resolved before final approval and accreditation of these classified cyber security plans can occur. Additionally, the NRC approved SP-3605-0010, *Interconnect Agreement for the American Centrifuge Program*.

As discussed with NRC and DOE staff, on December 5, 2014 (Reference 5), ACO requested an extension from December 5, 2014, to December 31, 2014, to ensure that the comments were adequately resolved within the revised plans and the proper internal ACO technical peer reviews and management reviews were conducted. Additionally, the currently accredited classified 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 and SP-3605-0003, *Lead Cascade Distributed Control System Information System Security Plan (ISSP)*, Revision 3) were scheduled to expire on January 1, 2015, and ACO requested an extension to January 31, 2015. This extension would allow these two plans to remain in place while the newly developed plans (SP-3605-0011 and SP-3605-0013) were being reviewed for approval by the NRC and DOE.

On December 15, 2014 (Reference 6), ACO submitted proposed comment resolution and revised cyber security plans (SP-3605-0009, *American Centrifuge Classified Networks Baseline Security Control Security Plan*, Revision 0; SP-3605-0011; and SP-3605-0013) to the NRC for review and approval. On December 18, 2014, the DOE Nuclear Energy Oak Ridge Site Office (NE-ORSO) staff completed a review of these cyber security plans and provided additional comments for resolution. On December 19, 2014, ACO addressed these comments and provided revised cyber security plans for final review.

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On December 30, 2014 (Reference 1), the NRC, in coordination with subject matter experts from the DOE NE-ORSO, determined that ACO had appropriately addressed all of the identified issues. As a result, ACO was approved to conduct the SARs for SP-3605-0011 and SP-3605-0013. ACO was also approved to conduct the SAR for SP-3605-0010, which was previously approved by the NRC on November 5, 2014 (Reference 2). Additionally, Reference 1 approved the requested extensions for SP-3605-0002 and SP-3605-0003 until January 31, 2015 to allow time to complete the requested SARs, submit of the revised ISSPs, and obtain authorization to operate under these new ISSPs.

**Discussion**

As verbally discussed with DOE NE-ORSO staff, on December 23, 2014, a SAR has not been completed for SP-3605-0010. This document is merely an agreement among the American Centrifuge program sites that connect to a common network environment and abide by the security policies set forth in the site-specific accredited ISSPs. Additionally, no changes have been made to cyber security plan SP-3605-0009; therefore, it remains as submitted under Reference 6.

Cyber security plans SP-3605-0011 and SP-3605-0013 were revised to resolve comments noted within Reference 1 and are being provided as Enclosures 1 and 2, respectively. Enclosure 3 provides the SAR (SP-3605-0014) for the American Centrifuge Distributed Control System. Enclosure 4 provides the SAR (SP-3605-0015) for the American Centrifuge Baseline Security Control for the Distributed Control System. Enclosure 5 provides the SAR (SP-3605-0016) for the American Centrifuge Baseline Security Control for the Classified Administrative Network. Enclosure 6 provides the SAR (SP-3605-0017) for the American Centrifuge Classified Administrative Network.

Enclosures 1 through 6 contain Security-Related Information. In accordance with the guidance provided by the DOE, these enclosures also contain Official Use Only information. Therefore, ACO requests these enclosures be withheld from public disclosure pursuant to 10 CFR 2.390(d)(1).

**Action**

ACO respectfully requests NRC review these cyber security plans in time to ensure the DOE accreditation and NRC approval of these security plans occur prior to the January 31, 2015 accreditation date as defined within Reference 1. As previously discussed References 2, 3, and 5, upon NRC's approval of plans SP-3605-0010, SP-3605-0011, and SP-3605-0013 these plans will replace the following currently accredited plans SP-2605-0027, SP-3605-0002 and SP-3605-0003, respectively.

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When separated from Enclosures 1 through 6, this letter is uncontrolled.**

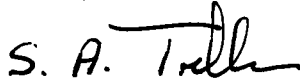
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**Contact**

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

cc (without Enclosures unless noted):

R. DeVault, DOE ORO  
J. Downs, NRC HQ  
K. Everly, NRC HQ (w/Enclosures)  
T. Grice, NRC HQ  
J. Hickey, NRC Region II  
J. Hutson, DOE ORO (w/Enclosures)  
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**References:**

1. NRC letter from B.W. Smith to S.A. Toelle (Centrus) regarding American Centrifuge Operating, LLC's Cyber Security Plans – Resolution of U.S. Nuclear Regulatory Commission's Comments and Approval of Proposed Plans – Technical Assignment Control Numbers L34289 and L342997, dated December 30, 2014
2. USEC letter ACO 14-0016 from P.J. Miner to C. Haney (NRC) regarding Submission of Proposed Cyber Security Plans for the American Centrifuge Operating, LLC, dated May 28, 2014
3. USEC letter ACO 14-0031 from P.J. Miner to C. Haney (NRC) regarding Submission of Proposed Cyber Security Plan for the American Centrifuge Operating, LLC, dated September 29, 2014
4. NRC letter from B.W. Smith to S.A. 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
5. Centrus letter ACO 14-0040 from S.A. Toelle to C. Haney (NRC) regarding Request for Extension of Cyber Security Plans for the American Centrifuge Operating, LLC (Technical Assignment Control Numbers L34289 and L34297), dated December 5, 2014
6. Centrus letter ACO 14-0042 from S.A. Toelle to C. Haney (NRC) regarding Comment Resolution for Cyber Security Plans for the American Centrifuge Operating, LLC (Technical Assignment Control Numbers L34289 and L34297), dated December 15, 2014