



Tennessee Valley Authority, 1101 Market Street, Chattanooga, Tennessee 37402

CNL-15-021

April 1, 2015

10 CFR 50.90

ATTN: Document Control Desk
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555-0001

Watts Bar Nuclear Plant, Unit 1
Facility Operating License No. NPF-90
NRC Docket No. 50-390

Subject: **Request for Approval of the Revised Watts Bar Nuclear Plant
Cyber Security Plan (CSP) and associated Watts Bar Nuclear Plant Unit 1
License Condition (WBN-TS-15-005)**

Reference: Letter from NRC to TVA, "Watts Bar Nuclear Plant - NRC Inspection of Unit 1
Cyber Security Milestones, Inspection Report No. 05000390/2014405, Inspection
of Unit 2 Implementation of the Cyber Security Program Requirements,
Inspection Report No. 05000391/2014406, and Enforcement Discretion," dated
September 8, 2014 [ML14252A491].

The purpose of this letter is to request U.S. Nuclear Regulatory Commission (NRC) approval of a proposed change to the Watts Bar Nuclear Plant (WBN) Cyber Security Plan (CSP), clarifying the demarcation point between regulatory jurisdiction for certain assets, based on function not physical location. The change to the WBN CSP requires changing the associated WBN Unit 1 License Condition E.(2).

As discussed in the referenced letter, the NRC identified an unresolved item associated with the demarcation point (Bright-Line) between digital components within the scope of the WBN CSP, under NRC jurisdiction, and those under the jurisdiction of the North American Electric Reliability Corporation (NERC). To aid in resolution of this issue, Tennessee Valley Authority (TVA) is providing, in Enclosure 1, an illustration of the "Bright-Line" between the critical digital assets that are in the scope of the WBN CSP and those that are under NERC jurisdiction. Enclosure 2 contains a revised CSP incorporating the necessary information contained in Enclosure 1 into the CSP. Enclosure 3 provides a proposed revision to WBN Unit 1 Facility Operating License Condition E.(2) associated with the WBN CSP.

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TVA has determined that there are no significant hazards considerations associated with the proposed CSP change and that the change qualifies for a categorical exclusion from environmental review pursuant to the provisions of *Title 10 of the U.S. Code of Federal Regulation* (10 CFR) 51.22(c)(12). Additionally, in accordance with 10 CFR 50.91(b)(1), TVA is sending a copy of this letter and enclosures to the Director, Division of Radiological Health - Tennessee State Department of Environment and Conservation.

TVA requests approval of this change by June 15, 2015, to support WBN Unit 2 startup, and that the revised CSP and License Condition be implemented within 30 days of NRC approval.

TVA considers Enclosures 1 and 2 to contain security related information and requests they be withheld from public disclosure pursuant to 10 CFR 2.390(d)(1).

There are no new regulatory commitments associated with this submittal. Please address any questions regarding this request to Gordon Arent at (423) 365-2004.

I declare under penalty of perjury that the foregoing is true and correct. Executed on this 1st day of April 2015.

Respectfully,

J. W. Shea

Digitally signed by J. W. Shea
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Valley Authority, ou=Nuclear
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J. W. Shea
Vice President, Nuclear Licensing

Enclosures:

1. Watts Bar Nuclear Plant - "Bright-Line" Demarcation Clarification
2. Watts Bar Nuclear Plant - Proposed Cyber Security Plan Changes
3. Watts Bar Nuclear Plant, Unit 1, Proposed Revised Cyber Security Plan License Condition

~~SECURITY RELATED INFORMATION - WITHHOLD UNDER 10 CFR 2.390~~

This letter is decontrolled when separated from Enclosures 1 and 2

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cc (w Enclosures):

NRC Regional Administrator - Region II
NRC Project Manager – Watts Bar Nuclear Plant, Unit 1
NRC Senior Resident Inspector - Watts Bar Nuclear Plant, Unit 2
NRC Project Manager – Watts Bar Nuclear Plant, Unit 2
Director, Division of Radiological Health - Tennessee State Department of Environment
and Conservation (w/o enclosures)

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ENCLOSURE 3

WATTS BAR NUCLEAR PLANT, UNIT 1

PROPOSED REVISED CYBER SECURITY PLAN LICENSE CONDITION

- (2) The facility was previously granted an exemption from the criticality monitoring requirements of 10 CFR 70.24 (see Special Nuclear Material License No. SNM-1861 dated September 5, 1979). The technical justification is contained in Section 9.1 of Supplement 5 to the Safety Evaluation Report, and the staff's environmental assessment was published on April 18, 1985 (50 FR 15516). The facility is hereby exempted from the criticality alarm system provisions of 10 CFR 70.24 so far as this section applies to the storage of fuel assemblies held under this license.
- (3) The facility requires an exemption from 10 CFR 73.55(c)(1.0). The justification for this exemption is contained in Section 13.6.9 of Supplement 15 and 20 to the Safety Evaluation Report. The staff's environmental assessment was published on April 25, 1995 (60 FR 20291). Pursuant to 10 CFR 73.5, the facility is exempted from the stated implementation schedule of the surface vehicle bomb rule, and may implement the same as late as February 17, 1996.
- (4) The facility was previously granted an exemption from certain requirements of 10 CFR 73.55(d)(5) relating to the returning of picture badges upon exit from the protected areas, such that individuals not employed by TVA who are authorized unescorted access into protected areas can take their badges offsite (see 59 FR 66061, December 22, 1994). The granting of this exemption is hereby affirmed.
- (5) The facility was previously granted an exemption from certain requirements of 10 CFR 50, Appendix E, such that the State of Tennessee, which is within the ingestion exposure pathway emergency planning zone, need not participate in the November 1995 full participation exercise (see 60 FR 54526, October 24, 1995). The granting of this exemption is hereby affirmed.
- E. (1) TVA shall fully implement and maintain in effect all provisions of the Commission approved physical security, training and qualification, and safeguards contingency plans including amendments made pursuant to provisions of the Miscellaneous Amendments and Search Requirements revisions to 10 CFR 73.55 (51 FR 27817 and 27822) and to the authority of 10 CFR 50.54(p). The combined set of plans, which contains Safeguards Information protected under 10 CFR 73.21, is entitled: "Watts Bar Nuclear Plant Security Plan, Training and Qualification Plan, and Safeguards Contingency Plan, Revision 3," submitted by letter dated May 16, 2006.
- (2) The licensee shall fully implement and maintain in effect all provisions of the Commission-approved cyber security plan (CSP), including changes made pursuant to the authority of 10 CFR 50.90 and 10 CFR 50.54(p). The licensee CSP was approved by License Amendment No 87, as amended by changes approved by License Amendment No. 97 and xx.