

May 6, 2015  
L-15-149

10 CFR 50.90

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

**SUBJECT:**

Beaver Valley Power Station, Unit Nos. 1 and 2  
Docket No. 50-334, License No. DPR-66  
Docket No. 50-412, License No. NPF-73  
Davis-Besse Nuclear Power Station  
Docket No. 50-346, License No. NPF-3  
Perry Nuclear Power Plant, Unit No. 1  
Docket No. 50-440, License No. NPF-58  
Supplement to Requests to Change Cyber Security Implementation Plan Milestone 8  
Completion Date (TAC Nos. MF5879, MF5880, MF5892, and MF5557)

In letters dated March 19, 2015 for the Beaver Valley Power Station, Unit Nos. 1 and 2 (BVPS), March 12, 2015 for the Davis-Besse Nuclear Power Station (DBNPS), and January 9, 2015, for the Perry Nuclear Power Plant (PNPP), FirstEnergy Nuclear Operating Company (FENOC) requested amendments to the Facility Operating Licenses in accordance with Title 10 of the *Code of Federal Regulations* (10 CFR), Part 50, Section 50.90, "Application for amendment of license, construction permit, or early site permit." The requested amendments proposed to change the cyber security implementation plan milestone 8 completion date.

The requested amendments were submitted in accordance with 10 CFR 2.390, "Public inspections, exemptions, requests for withholding," because significant portions of the amendments contain security-related information. Attachment 1 contains a copy of the Significant Hazards Consideration Analysis for BVPS that does not contain security-related information, which may be made public. Attachment 2 contains a copy of the Significant Hazards Consideration Analysis for DBNPS that does not contain security-related information, which may be made public. Attachment 3 contains a copy of the Significant Hazards Consideration Analysis for PNPP that does not contain security-related information, which may be made public.

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There are no regulatory commitments contained in this letter. If there are any questions or if additional information is required, please contact Mr. Thomas A. Lentz, Manager – Fleet Licensing at (330) 315-6810.

Sincerely,



Gregory H. Halnon  
Director – Fleet Regulatory Affairs

Attachments:

- 1 Significant Hazards Consideration Analysis for Beaver Valley Power Station, Unit Nos. 1 and 2
- 2 Significant Hazards Consideration Analysis for Davis-Besse Nuclear Power Station
- 3 Significant Hazards Consideration Analysis for Perry Nuclear Power Plant

cc: NRC Region I Administrator  
NRC Region III Administrator  
Nuclear Reactor Regulation Project Manager – BVPS  
Nuclear Reactor Regulation Project Manager – DBNPS and PNPP  
NRC Resident Inspector - BVPS  
NRC Resident Inspector - DBNPS  
NRC Resident Inspector - PNPP  
Executive Director, Ohio Emergency Management Agency  
State of Ohio (NRC Liaison)  
Director BRP/DEP  
Site BRP/DEP Representative

Attachment 1  
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Significant Hazards Consideration Analysis for Beaver Valley Power Station  
Unit Nos. 1 and 2  
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FirstEnergy Nuclear Operating Company has evaluated whether or not a significant hazards consideration is involved with the proposed amendment by focusing on the three standards set forth in 10 CFR 50.92, "Issuance of amendment," as discussed below.

1. Does the proposed amendment involve a significant increase in the probability or consequences of an accident previously evaluated?

Response: No.

The proposed amendment extends the completion date for milestone 8 of the Cyber Security Plan (CSP) implementation schedule. Revising the full implementation date for the CSP does not involve modifications to any safety-related structures, systems, or components (SSCs). The implementation schedule provides a timeline for fully implementing the CSP. The CSP describes how the requirements of 10 CFR 73.54 are to be implemented to identify, evaluate, and mitigate cyber attacks up to and including the design basis cyber attack threat; thereby achieving high assurance that the facility's digital computer and communications systems and networks are protected from cyber attacks. The revision of the CSP Implementation Schedule will not alter previously evaluated design basis accident analysis assumptions, add any accident initiators, modify the function of the plant safety-related SSCs, or affect how any plant safety-related SSCs are operated, maintained, tested, or inspected.

As the proposed change does not directly impact SSCs, and milestones 1 through 7 provide significant protection against cyber attacks, the proposed change does not involve a significant increase in the probability or consequences of an accident previously evaluated.

2. Does the proposed amendment create the possibility of a new or different kind of accident from any accident previously evaluated?

Response: No

The proposed change does not introduce a new mode of plant operation or involve a physical modification to the plant. New equipment is not installed with the proposed amendment, nor does the proposed amendment cause existing equipment to be operated in a new or different manner. The change to cyber security implementation plan milestone 8 is administrative in nature and relies on the significant protection against cyber attacks that has been gained through the implementation of CSP milestones 1 through 7. Since the proposed amendment does not involve a change to the plant design or operation, no new system interactions are created by this change. The proposed changes do not result in

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any new failure modes, and thus cannot initiate an accident different from those previously evaluated.

Therefore, the proposed change does not create the possibility of a new or different kind of accident from any previously evaluated.

3. Does the proposed amendment involve a significant reduction in a margin of safety?

Response: No.

The proposed amendment does not affect the performance of any structures, systems or components as described in the design basis analyses. The change to milestone 8 of the cyber security implementation plan is administrative in nature.

The proposed change does not introduce a new mode of plant operation or involve a physical modification to the plant. The proposed amendment does not introduce changes to limits established in the accident analysis. Since there is no impact to any SSCs, or any maintenance or operational practice, there is also no reduction in any margin of safety.

As the proposed change does not directly impact SSCs, and milestones 1 through 7 provide significant protection against cyber attacks, the proposed change does not involve a significant reduction in a margin of safety.

Based on the above, FirstEnergy Nuclear Operating Company concludes that the proposed amendment does not involve a significant hazards consideration under the standards set forth in 10 CFR 50.92(c), and, accordingly, a finding of "no significant hazards consideration" is justified.

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FirstEnergy Nuclear Operating Company has evaluated whether or not a significant hazards consideration is involved with the proposed amendment by focusing on the three standards set forth in 10 CFR 50.92, "Issuance of amendment," as discussed below.

1. Does the proposed amendment involve a significant increase in the probability or consequences of an accident previously evaluated?

Response: No.

The proposed amendment extends the completion date for milestone 8 of the Cyber Security Plan (CSP) implementation schedule. Revising the full implementation date for the CSP does not involve modifications to any safety-related structures, systems, or components (SSCs). The implementation schedule provides a timeline for fully implementing the CSP. The CSP describes how the requirements of 10 CFR 73.54 are to be implemented to identify, evaluate, and mitigate cyber attacks up to and including the design basis cyber attack threat; thereby achieving high assurance that the facility's digital computer and communications systems and networks are protected from cyber attacks. The revision of the CSP Implementation Schedule will not alter previously evaluated design basis accident analysis assumptions, add any accident initiators, modify the function of the plant safety-related SSCs, or affect how any plant safety-related SSCs are operated, maintained, tested, or inspected.

As the proposed change does not directly impact SSCs, and milestones 1 through 7 provide significant protection against cyber attacks, the proposed change does not involve a significant increase in the probability or consequences of an accident previously evaluated.

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any new failure modes, and thus cannot initiate an accident different from those previously evaluated.

Therefore, the proposed change does not create the possibility of a new or different kind of accident from any previously evaluated.

3. Does the proposed amendment involve a significant reduction in a margin of safety?

Response: No.

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Response: No.

The proposed amendment extends the completion date for milestone 8 of the Cyber Security Plan (CSP) implementation schedule. Revising the full implementation date for the CSP does not involve modifications to any safety-related structures, systems, or components (SSCs). The implementation schedule provides a timeline for fully implementing the CSP. The CSP describes how the requirements of 10 CFR 73.54 are to be implemented to identify, evaluate, and mitigate cyber attacks up to and including the design basis cyber attack threat; thereby achieving high assurance that the facility's digital computer and communications systems and networks are protected from cyber attacks. The revision of the CSP Implementation Schedule will not alter previously evaluated design basis accident analysis assumptions, add any accident initiators, modify the function of the plant safety-related SSCs, or affect how any plant safety-related SSCs are operated, maintained, tested, or inspected.

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any new failure modes, and thus cannot initiate an accident different from those previously evaluated.

Therefore, the proposed change does not create the possibility of a new or different kind of accident from any previously evaluated.

3. Does the proposed amendment involve a significant reduction in a margin of safety?

Response: No.

The proposed amendment does not affect the performance of any structures, systems or components as described in the design basis analyses. The change to milestone 8 of the cyber security implementation plan is administrative in nature.

The proposed change does not introduce a new mode of plant operation or involve a physical modification to the plant. The proposed amendment does not introduce changes to limits established in the accident analysis. Since there is no impact to any SSCs, or any maintenance or operational practice, there is also no reduction in any margin of safety.

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