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Docket: NRC-2015-0179
Cyber Security at Fuel Facilities

Comment On: NRC-2015-0179-0001
Cyber Security at Fuel Cycle Facilities; Draft Regulatory Basis

Document: NRC-2015-0179-DRAFT-0002
Comment on FR Doc # 2015-22051

Submitter Information

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General Comment

See attached file(s)

Attachments

DCS-NRC-000404



Secretary
Attn: Rulemakings and Adjudications Staff
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

DCS-NRC-000404
05 October 2015

Subject: CB&I AREVA MOX Services
Comments in Response to RIN 3150-AJ64
Fuel Cycle Facility Cyber Security Draft Regulatory Basis

Reference: (A) NRC Docket 2015-0179, Rulemaking for Cyber Security at Fuel Cycle Facilities,
published in the Federal Register on September 4, 2015 (80 FR 53478)

CB&I AREVA MOX Services, LLC (MOX Services) hereby submits the following comments addressing the Federal Register Notice soliciting feedback on the Nuclear Regulatory Commission's (NRC) Fuel Cycle Facility Cyber Security Draft Regulatory Basis as published in Reference (A). MOX Services appreciates the public meeting discussions on cyber security and the opportunity to provide comments on the Draft Regulatory Basis.

If you have any questions, please feel free to contact me at (803) 442-6485 or Gary Clark, Security Director, at (803) 819-2341.

Sincerely,



David Del Vecchio
President and Project Manager

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Enclosure:

Comments in response to RIN 3150-AJ64

cc:

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EDMS: Corresp\Outgoing\NRC\2015 NRC

Enclosure

Comments in Response to RIN 3150-AJ64

Comments on RIN 3150-AJ64

MOX Services provides the following comments:

1. Include the following exemption for the application of this regulation: “Any digital asset residing within an accreditation boundary Certified and Accredited under another agency's (DOE, NNSA, etc.) cyber protection requirements is considered adequately protected and is exempt from the requirements of this regulation regardless of its function (e.g., physical security, MC&A, etc.).” The regulatory basis already includes an exemption for classified systems accredited by other agencies, presumably if protections for SNM and classified information can be managed by other agencies, then these agency’s protections for unclassified assets should also be acceptable.
2. Since the list of digital assets that perform functions that could result in consequences of concern are well understood, consider starting with this subset of licensee digital assets rather than requiring the licensee to tabulate thousands of SSEPMCA digital assets for which no critical safety or security function has been identified.
3. When performing the Risk Assessment to design appropriate cyber protections under this regulation, licensees should be able to consider the fact that failure mechanisms for cyber assets are already analyzed and mitigated with respect to failure effects in safety space (ISA) and security space (DBT and VA).
4. We endorse the use of the national consensus standard for cyber, NIST 800 series, as the basis for an NRC cyber program.