

ENCLOSURE 4, OCTOBER 22, 2015, PUBLIC MEETING SUMMARY AND ATTENDEES LIST  
FOR DISCUSSIONS ON THE TECHNICAL APPROACH FOR THE PROPOSED CYBER  
SECURITY RULEMAKING FOR FUEL CYCLE FACILITIES

(Note: This enclosure was inadvertently left off of Agencywide Documents Access & Management System (ADAMS) package ML15288A514).

**Public Meeting Summary**

On October 22, 2015, the US Nuclear Regulatory Commission (NRC) staff held a public meeting to host a presentation by the National Institute of Standards and Technology (NIST) on cyber security standards (NIST 800 series) and hold technical discussions on the proposed cyber security rulemaking and proposed guidance. The slides for the NIST presentation and the NRC technical discussion are enclosed. The meeting was attended by representatives from the fuel cycle industry, the Nuclear Energy Institute and several members of the public. The slide presentations for this meeting are enclosed.

During the morning session a representative from NIST provided an overview of managing cybersecurity risk. This presentation covered the cyber security threats, the risk management framework and information on how to adapt NIST standards to the nuclear fuel cycle industry. The applicable cyber security standards include NIST-800-30, -37, -39, -53, and -53A.

The afternoon session involved a technical discussion on the cyber security proposed rulemaking. The NRC staff developed a document entitled, "Technical Issues for Consideration Regarding the Fuel Cycle Cyber Security Proposed Rulemaking," available in the ADAMS ML15288A503, to facilitate the discussion. The NRC staff provided updates on the types of digital assets that would be within the scope of the rulemaking, the screening criteria for determining when additional controls are needed, and the grading criteria envisioned for determining the level of controls to apply to digital assets.

During the technical discussion participants identified a number of issues. These items are provided below:

1. Clarification was requested on the meaning of a compromise of a function. The term compromise should be clearly defined in writing so that it is not open to interpretation over time.
2. Certain support systems for critical safety and security systems are under consideration for evaluation as part of the proposed rulemaking. The extent of support systems that would need to be evaluated under the proposed rulemaking should be clearly delineated.
3. The proposed rulemaking should make clear to what extent classified networks would be out of scope. Particularly, if they are compliant with other regulatory requirements or authorities.

4. The reference to active and latent consequence of concern was introduced by the NRC at this meeting. Industry requested if latent consequence could be interpreted as degraded items relied on for safety (IROFS). The NRC staff indicated that the concept of degraded IROFS would be considered latent, if the degradation could lead to a consequence of concern.
5. The definition of consequences of concern should not reference performance requirements. The phrase is broad and includes a risk component which does not support the idea of establishing a specific threshold. The NRC staff agreed that references to performance requirements should be replaced with specific thresholds.
6. The proposed requirement to evaluate digital assets for support systems that could adversely impact the safety, security, emergency preparedness and material control and accounting needs further clarification. The phrase – adversely impact – should be defined.
7. Since the proposed guidance will reference the NIST standards, the NRC staff should include in the proposed guidance an option to use equivalent standards such as International Organization for Standards.
8. An individual asked what security requirements apply to conversion and deconversion facilities licensed under Part 40. The NRC staff noted that the existing requirements are based in part on security orders.
9. The NRC should consider increasing the set of controls that would apply to emergency preparedness. The NRC staff noted that communications are the primary area of interest and these communications have substantial redundancies.
10. The proposed rulemaking should clarify if licensees would be required to conduct a risk assessment and document the findings in security plan that is submitted to the NRC for approval.
11. The proposed rulemaking or guidance should clarify the role of the authorizing official.
12. The NRC staff should clarify if the proposed rulemaking will require licensees to develop and submit for approval a Network Information System Security Plan (ISSP).
13. Examples on the screening criteria should be expanded in future meetings. The NRC staff emphasized that the screening criteria in the proposed guidance would allow licensees to take credit for alternate, equivalent controls (e.g., non-digital IROFS) that could be used in place of implementing additional digital controls.

The issues raised by stakeholders, including the items listed above, will be used to inform the NRC staff's development of the proposed rulemaking and guidance. Additional meetings are planned for December 10, 2015, and in late January 2016, to conduct further technical discussions.

**Attendees Sheet for Public Meeting on Cyber Security  
Rulemaking for Fuel Cycle Facilities  
September 23, 2015**

<b>First Name</b>	<b>Last Name</b>	<b>Organization</b>
Timothy	Tate	AREVA
David	Teyssier	AREVA
Andrew	Rander	BWXT
Joe	Brown	Centrus Energy
Kelly	Coriell	Centrus Energy
John	Corrado	Centrus Energy
Chris	Harper	Centrus Energy
Jennifer	Hawley	CWX Technologies
Brian	Buckley	GE
Drew	Williams	GE
Danny	Stewart	Global Laser Enrichment
Leoncio	Estevez	Honeywell
Gary	Hamby	Honeywell
Steve	Kostin	Honeywell
Lidia	Litinski	Honeywell
Bryan	Perriello	Honeywell
Mark	Wolf	Honeywell
George	Simonds	Infrashield
Ayan	Islam	Law Student/ UDC Law
Gary	Clark	MOX Services
Dealis	Gwyn	MOX Services
Aaron	Kent	MOX Services
Nima	Ashneboussi	NEI
William	Gross	NEI
Andrew	Sabisch	NFS
Ron	Ross	NIST
Brad	Bergemann	NMSS/CSD
Philipp	Braaten	NRC
Rodney	Fanner	NRC
Jasmine	Gilliam	NRC
Amy	Hardin	NRC
TR	Rowe	NRC
Melana	Singleary	NRC
Charity	Pantalo	NRC/CSD
Suzanne	Ani	NRC/NMSS
Matt	Bartlett	NRC/NMSS
Craig	Erlanger	NRC/NMSS
Brian	Smith	NRC/NMSS

Paul	Rades	NRC/OIG
Norman	StAmour	OGC
Tamara	Bloomer	OGC/WCO
Ebaide	Esoimeme	OIG
Steven	Dolley	Platts
Marvin	Lewis	Public
Jack	Roe	Talisman
Edwin	Lyman	Union of Concerned Scientist
Brandon	Maxwell	Urenco USA
Ricardo	Medina	Urenco USA
Kevin E.	Barber	Westinghouse
Alan	Batten	Westinghouse
Nancy	Parr	Westinghouse
Rick	Vislocky	Westinghouse
Doug	Weaver	Westinghouse
Camille	Zozula	Westinghouse
John	Hentschel	Westinghouse