



Entergy Nuclear Northeast
Indian Point Energy Center
450 Broadway, GSB
P.O. Box 249
Buchanan, NY 10511-0249
Tel 914 254 6700

Anthony J. Vitale
Site Vice President

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

August 9, 2017

NL-17-096

U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
11555 Rockville Pike, OWFN-2 F1
Rockville, MD 20852-2738

SUBJECT: Supplemental Information for License Amendment Request – Cyber Security Plan Implementation Schedule (CAC Nos. MF9656, MF9657, MF9658)
Indian Point Unit Nos. 1, 2, and 3
Docket Nos. 50-003, 50-247 and 50-286
License Nos. DPR-5, DPR-26, and DPR-64

- REFERENCE:
1. Entergy Letter NL-17-049 to NRC, "License Amendment Request – Cyber Security Plan Implementation Schedule," dated April 28, 2017 (ML17129A612)
 2. NRC letter to Entergy, "Indian Point Nuclear Generating Unit Nos. 1, 2 and 3 - Issuance of Amendments Re: License Amendment Request - Cyber Security Plan (TAC Nos ME4212, ME4213, and ME4214)," dated August 2, 2011 (ML11152A027)
 3. NRC letter to Entergy, "Issuance of Amendments Re: Cyber Security Plan Implementation Schedule Milestones," dated November 28, 2012 (ML12258A268)
 4. NRC letter to Entergy, "Issuance of Amendments - Cyber Security Plan Implementation Schedule," dated December 11, 2014 (ML14316A526)
 5. NRC letter to Entergy, "Indian Point Nuclear Generating Unit Nos. 1, 2 and 3 – Issuance of Amendments Re: Cyber Security Plan Implementation Schedule," dated April 12, 2016 (ML16064A215)

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~~When Attachments are detached, this letter is no longer security related~~

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Dear Sir or Madam:

Pursuant to 10 CFR 50.90, *Application for amendment of license, construction permit, or early site permit*, Entergy Nuclear Operations, Inc. (Entergy) requested a License Amendment for Indian Point Unit No. 1 (IP1), Operating License (OL) DPR-5, Docket No. 50-003, for Indian Point Unit No. 2 (IP2), OL DPR-26, Docket No. 50-247, and for Indian Point Unit No. 3 (IP3), OL DPR-64, Docket No. 50-286. The License Amendment Request (LAR) (Reference 1) proposed a change to the Indian Point Energy Center (IPEC) Cyber Security Plan (CSP) Milestone 8 full implementation date as set forth in the CSP Implementation Schedule approved by Reference 2, and as amended by References 3, 4 and 5. A License Amendment is required because the Nuclear Regulatory Commission (NRC) Safety Evaluation Report (SER) provided in Reference 2, states that "All subsequent changes to the NRC-approved CSP implementation schedule will require prior NRC approval pursuant to 10 CFR 50.90.

An NRC onsite audit of the IPEC CSP implementation process was conducted on July 10 and 11, 2017. As a result of discussions between IPEC staff and NRC staff during the audit, Entergy has elected to revise the Reference 1 LAR to simplify the approach used to present the Milestone 8 partial implementation schedule.

The revised presentational approach specifically identifies the Critical Digital Assets (CDAs) planned for completion of the Milestone 8 actions by the partial implementation completion date, and also identifies those CDAs proposed for deferral of the Milestone 8 actions to the full implementation completion date. This simplified approach replaces the approach described in Section 2.0 of the Reference 1 LAR. The supplemental information is provided in Attachments 1 through 5 to this letter, and represents the current plant configuration. Specifically, Attachments 1 through 4 provide the identified in scope IPEC security system, safety related, hard wired direct trip (causes turbine/reactor trip), and important to safety CDAs, respectively, that will have their Milestone 8 assessment and remediation actions completed by December 31, 2017, as previously committed in Attachment 3 of the Reference 1 LAR. Attachment 5 to this letter provides the identified IPEC CDAs that are proposed to have their Milestone 8 assessment and remediation actions deferred to the December 31, 2022 full implementation date as previously committed in Attachments 2 and 3 of the Reference 1 LAR. The Milestone 1 through 7 actions will be maintained during the interim period.

The supplemental information provided in this letter has been reviewed by the IPEC Cyber Security Assessment Team and On Site Review Committee.

Entergy has determined that the supplemental information provided in this letter does not alter the conclusion reached in the original LAR (Reference 1) that the proposed change presents no significant hazards consideration under the standards set forth in 10 CFR 50.92(c). The supplemental information also does not alter the original LAR's bases for concluding that, pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment need be prepared in connection with issuance of the amendment.

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In accordance with 10 CFR 50.91(b), *State consultation*, a copy of this request and the associated Attachments is being submitted to the designated New York State official.

This letter contains no new NRC commitments. Should you have any questions concerning this letter or require additional information, please contact Mr. Robert Walpole, Manager, Regulatory Assurance at (914) 254-6710.

I declare under penalty of perjury that the foregoing is true and correct. Executed on August 9th, 2017

Sincerely,



AJV/cdm

- Attachments:
1. In Scope Security System Critical Digital Assets
 2. In Scope Safety Related Critical Digital Assets
 3. In Scope Hard Wired Direct Trip Critical Digital Assets
 4. In Scope Important to Safety Critical Digital Assets
 5. Critical Digital Assets Proposed for Deferral of Milestone 8 Actions
(Maintain Milestone 1-7 Actions)

cc: Mr. Richard Guzman, Senior Project Manager, NRC NRR DORL
Ms. Kimberly A. Conway, Project Manager, NRC FSME DWMEP DURLD
Mr. Daniel H. Dorman, Regional Administrator, NRC Region 1
NRC Resident Inspector's Office
Ms. Alicia Barton, President and CEO, NYSERDA
Ms. Bridget Frymire, New York State Dept. of Public Service