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Anthony J. Vitale
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October 26, 2017

NL-17-141

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

SUBJECT: Response to Request for Additional Information Regarding License
Amendment Request – Cyber Security Plan Implementation Schedule (CAC
Nos. MF9656, MF9657, MF9658, EPID: L-2017-LLA-0217)
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

- REFERENCES:
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: Cyber Security Plan Implementation Schedule," dated April 12, 2016 (ML16064A215)
 3. Entergy Letter NL-17-096 to NRC, "Supplemental Information for License Amendment Request – Cyber Security Plan Implementation Schedule (CAC Nos. MF9656, MF9657, MF 9658)," dated August 9, 2017 (ML17228A044)
 4. Entergy Letter NL-17-124 to NRC, "Revised Supplemental Information for License Amendment Request – Cyber Security Plan Implementation Schedule (CAC Nos. MF9656, MF9657, MF 9658)," dated September 28, 2017 (ML17277A140)
 5. NRC email to Entergy, "Indian Point Nuclear Units 1, 2, and 3 – Cyber Security Plan Milestone 8 Implementation Schedule LAR – Request for Additional Information (CAC Nos. MF9656, MF9657, MF 9658, EPID: L-2017-LLA-0217)," dated October 23, 2017

S001A
NMSSDI
NMSS
NRR

Dear Sir or Madam:

Pursuant to 10 CFR 50.90, 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 the license amendments issued in Reference 2.

Entergy revised the Reference 1 LAR to simplify the approach used to present the Milestone 8 partial implementation schedule. This simplified approach replaced and superseded the "High Risk Safety Related CDAs" approach described in Section 2.0 of the Reference 1 LAR. The supplemental information was provided in Attachments 1 through 5 to the Reference 3 letter. The Reference 4 letter revised the Milestone 8 full implementation commitment date previously provided in the Reference 1 LAR from December 31, 2022 to December 31, 2018.

The purpose of this letter is to submit additional information in response to a Nuclear Regulatory Commission (NRC) request for additional information (RAI) received in Reference 5. The response to the NRC RAI is provided in the Attachment to this letter.

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.

In accordance with 10 CFR 50.91(b), a copy of this request and the associated Attachment are 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
October 26, 2017

Sincerely,



AJV/cdm

Attachment: Response to NRC Request for Additional Information

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

ATTACHMENT TO NL-17-141

RESPONSE TO NRC REQUEST FOR ADDITIONAL INFORMATION

ENERGY NUCLEAR OPERATIONS, INC.
INDIAN POINT NUCLEAR GENERATING UNIT NOS. 1, 2, and 3
DOCKET NOS. 50-003, 50-247, and 50-286

RESPONSE TO NRC REQUEST FOR ADDITIONAL INFORMATION (RAI)
LICENSE AMENDMENT REQUEST RELATED TO
CYBER SECURITY PLAN IMPLEMENTATION SCHEDULE

RAI-1

Request

In its license amendment request (LAR) dated April 28, 2017 (NL-17-049), Entergy (the licensee) proposes a probabilistic risk assessment model-based approach for identifying and screening Critical Digital Assets (CDAs). By letter dated August 9, 2017 (NL-17-096), the licensee revised the LAR to simplify the approach for identifying the CDAs for completion or deferral of Milestone 8 actions. The letter also states that the simplified approach replaces the PRA model-based approach described in Section 2.0, "Detailed Description," of the LAR. In Section 3.0, "Technical Evaluation," of the LAR, under evaluation criterion 2, the licensee states, in part:

Completion of the remaining Milestone 8 actions by December 31, 2017 is not a prudent use of Entergy resources because the CDAs that remain after partial implementation of Milestone 8 do not pose as significant a risk as the CDAs that are included in the partial implementation of Milestone 8.

Please clarify whether this risk-based statement should also be removed as part of the intended revision of the August 9, 2017 letter; and if so, update the response for evaluation criterion 2, accordingly.

Response

Entergy Nuclear Operations, Inc. (Entergy) agrees that the reference to risk retained in the criterion 2 evaluation in the April 28, 2017 LAR (NL-17-049) (Reference 1 to this letter) should be clarified. Consistent with the letter dated August 9, 2017 (NL-17-096) (Reference 3 to this letter), there should no longer be any inference that a risk-based Probabilistic Safety Assessment (PSA) methodology was used for identifying the CDAs for completion or deferral of the Milestone 8 implementation actions. The implied risk-based statement has been removed, and the criterion 2 evaluation is revised as follows:

As identified in criterion 4 below, Entergy will be making a partial implementation of Milestone 8. Completion of the remaining Milestone 8 actions by December 31, 2017 is not a prudent use of Entergy resources because the CDAs that remain after partial implementation of Milestone 8 do not pose a significant impact on the effectiveness of the overall CSP. Furthermore, Entergy's recent decision to permanently cease power operations of Indian Point Unit 2 (IP2) by April 30, 2020 and Unit 3 (IP3) by April 30, 2021 has placed additional regulatory, programmatic, and administrative burden on plant resources. Notwithstanding, the Milestone 1 through 7 actions have been completed, and the completion of the Milestone 8 assessment and remediation actions for the security system, safety-related, and important to safety CDAs by December 31, 2017 will further strengthen the protection against common threat vectors. In addition, Entergy continues to give prompt attention to any emergent issues with CDAs that would potentially

challenge the established cyber protective barriers. As such, the Indian Point Energy Center (IPEC) Cyber Security Assessment Team and On Site Review Committee have concluded that the proposed one year deferral of the Cyber Security Plan (CSP) full implementation of Milestone 8 to December 31, 2018 is acceptable and will have no adverse effect on nuclear safety.

RAI-2

Request

By letter dated September 28, 2017 (NL-17-124), the licensee revised its original proposed Milestone 8 full implementation date from December 31, 2022 to December 31, 2018. In Section 3.0, "Technical Evaluation," of the LAR, under evaluation criterion 3, the licensee states:

The proposed completion date for Milestone 8 is December 31, 2022. By this date, the IPEC operating reactors will have ceased power operations, and it is anticipated that the reactors will have been defueled, and the fuel stored in the spent fuel pools are expected to have decayed to the point where the risk of a fire in the zirconium fuel cladding following a beyond-design-basis event involving the loss of spent fuel pool water inventory is significantly reduced, which is based on industry direction of 16 to 18 months. Once these plant conditions are achieved, the CSP license conditions are no longer required and Entergy plans to submit a LAR to remove the conditions from the OLS of the IPEC units.

Please update the response for evaluation criterion 3 based on the supplemental letter dated September 28, 2017, which cites a Milestone 8 full implementation date of December 31, 2018.

Response

As requested in RAI-2 (this RAI), the Milestone 8 full implementation date has been updated from the December 31, 2022 date originally proposed in the April 28, 2017 LAR (NL-17-049) (Reference 1 to this letter) to the current commitment date of December 31, 2018. Also, please note that the reference to the originally requested December 31, 2022 date for Milestone 8 full implementation indicated in criterion 1 should be considered similarly updated to December 31, 2018. The revised criterion 3 evaluation reflecting the current commitment date of December 31, 2018 for achieving Milestone 8 full implementation follows:

The proposed completion date for Milestone 8 is December 31, 2018. Entergy has reassessed its progress toward completing the IPEC CSP Milestone 8 actions and determined that the expected completion date could be improved upon. Accordingly, the previous request to extend the Milestone 8 full implementation completion date to December 31, 2022 is not needed, and Entergy now proposes a one year extension of the completion date to December 31, 2018. By this date, as committed in the supplemental letter dated September 28, 2017 (NL-17-124) (Reference 4 to this letter), full implementation of the IPEC CSP for all safety, security, and emergency preparedness functions will be achieved.