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Cyber Security Programs for Nuclear Power Reactors

Comment On: NRC-2018-0182-0001
Cyber Security Programs for Nuclear Power Reactors

Document: NRC-2018-0182-DRAFT-0009
Comment on FR Doc # 2018-18231

Submitter Information

Name: Phillip Couture

General Comment

See attached file(s)

Attachments

CNRO-2018-00046 Comments on Draft Regulatory Guide DG-5061



Entergy Nuclear Operations, Inc.
1340 Echelon Parkway
Jackson, MS 39213

CNRO-2018-00046

Philip Couture
Manager, Fleet Licensing Programs

October 22, 2018

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

SUBJECT: Comments on Draft Regulatory Guide (DG)-5061, "Cyber Security Programs for Nuclear Power Reactors" (Docket ID NRC 2018-0182)

Dear Sir or Madam:

Entergy Nuclear Operations, Inc. and Entergy Operations, Inc. (collectively referred to as "Entergy") are providing this letter in response to the NRC request for comment on Draft Regulatory Guide (DG)-5061, "Cyber Security Programs for Nuclear Power Reactors". Entergy has been an active participant in the NRC and industry meetings regarding this topic and endorses the comments provided by the Nuclear Energy Institute (NEI).

Entergy emphasizes the following key points, which are consistent with the NEI comments:

- The Draft Regulatory Guide identified proposed changes which are not in alignment with current regulatory guidance documents NEI 08-09, Revision 6, Addendum 1; NEI 13-10, Revision 6; NEI 10-04, Revision 2, and additional Security Frequently Asked Questions (SFAQ) documents. Examples include Critical Digital Asset classification considerations, security control applicability, and alternative security control guidance.
- Entergy desires to support the NRC's self-assessment of the cyber security inspection process, including the efficiency of the guidance, scheduled to start in January 2019. Due to this upcoming work scope and ongoing full compliance cyber security inspections, it is anticipated that desired changes to Regulatory Guide (RG) 5.71 will be identified. Entergy respectfully requests that the NRC wait until after the conclusion of this self-assessment to revise RG 5.71. Additionally, Entergy suggests that the revision to RG 5.71 address "risk-informing" the Cyber Security Plans based upon Safety-related and important-to-safety, Security, Emergency Preparedness including offsite communication (SSEP) functions, align to NRC endorsed NEI guidance documents, and include resolution for cyber security inspection issues.

If you have any questions or require additional information, please contact me at (601) 368-5102.

Sincerely,

A handwritten signature in black ink, appearing to be "P. Couture".

plc