

Public Meeting to Discuss Addendum 7 Alternative Security Controls (ML19058A511)

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Background

- December 14, 2018: NEI submitted Addendum 7 to NEI 08-09, “Evaluating and Documenting Use of Alternative Cyber Security Controls/Countermeasures,” Revision 6, for the U.S. Nuclear Regulatory Commission’s (NRC) review and endorsement.
- Submitted Addendum 7 to enhance clarity and consistency in implementing alternative security controls and what controls need to be implemented.

Reviews

- The proposed addendum does not constitute a decrease in the effectiveness of CSPs.
 - Maintain the intent and objectives of the cyber security plans and remain consistent with cyber security plans.
 - Reference the documents that have regulatory authorities.
 - Technically correct.

Comments

- The clarification and guidance provided in the proposed guidance document should be applicable to those security controls that do not have clear direction on how or when alternative security controls can be used to address the required security controls.
- Delete any references to inspection procedures or the significant determination process.

Comments

- Revise the defense in depth discussion included in the addendum to be consistent with the cyber security plan.
- Revise the alternative justifications to be consistent with Addendum 1 to NEI 08-09 Revision 6.
- Revise the not applicable security controls discussion to focus on explaining why particular security controls are not applicable.

Questions?