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October 10, 2019

Ms. Shana Helton
Director, Division of Physical and Cyber Security Policy
Nuclear Security and Incident Response
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Subject: Endorsement of NEI White Paper, "Changes to NEI 10-04 and NEI 13-10 Guidance for Identifying and Protecting Digital Assets Associated with Emergency Preparedness Functions," Dated October 2019

Project Number: 689

Dear Ms. Helton:

By letter dated July 27, 2012,¹ the Nuclear Regulatory Commission (NRC) found NEI 10-04, "Identifying Systems and Assets Subject to the Cyber Security Rule," Revision 2, dated July 2012 acceptable for use by licensees to identify critical digital systems and critical digital assets. By letter dated September 7, 2017,² the NRC found NEI 13-10, "Cyber Security Control Assessments," Revision 6, dated August 2017, acceptable for use by licensees to address the security controls provided in their cyber security plans. Lessons learned through the implementation of cyber security programs indicate that improvements are necessary to enhance clarity, support efficient and consistent implementation and to support NRC oversight activities.

Accordingly, the Nuclear Energy Institute (NEI),³ on behalf of its members, is submitting the attached white paper proposing changes to NEI 10-04 and NEI 13-10 for NRC review and endorsement. The changes in this white paper improve the screening of digital computer and communication systems and networks associated with emergency preparedness functions, including offsite communications, and support systems and equipment which, if compromised, would adversely impact emergency preparedness functions. These changes are intended to improve the effectiveness and efficiency of licensee cyber security programs while maintaining adequate protection against the radiological sabotage cyber attack. The attached document

¹ ADAMS Accession No. ML12194A532

² ADAMS Accession No. ML17240A002

³ The Nuclear Energy Institute (NEI) is the organization responsible for establishing unified industry policy on matters affecting the nuclear energy industry, including the regulatory aspects of generic operational and technical issues. NEI's members include all entities licensed to operate commercial nuclear power plants in the United States, nuclear plant designers, major architect/engineering firms, fuel cycle facilities, nuclear materials licensees, and other organizations and entities involved in the nuclear energy industry.

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provides a technical basis for the changes and provides a markup of the relevant changes made to NEI 10-04 and NEI 13-10. The markup does not include all minor editorial and conforming changes. All changes will be incorporated into future revisions of NEI 10-04 and NEI 13-10.

NEI requests that the NRC review and endorse the NEI White Paper, "Changes to NEI 10-04 and NEI 13-10 Guidance for Identifying and Protecting Digital Assets Associated with Emergency Preparedness Functions," dated October 2019, by December 20, 2019. While each licensee must review changes to their Commission approved Cyber Security Plan in accordance with the requirements of 10 CFR 50.54(p), NEI requests that the NRC's review confirm that the changes proposed in this white paper do not decrease the effectiveness of the cyber security plan provided in NEI 08-09. If any revisions to this document are desired, please include suggested wording and the technical data to support the proposed change(s).

If you have any questions or require additional information, please contact Richard Mogavero, at (202) 739-8174 or rm@nei.org, or me.

Sincerely,



William R. Gross

Attachment

c: Mr. James D. Beardsley, NSIR/CSD, NRC
NRC Document Control Desk