



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D.C. 20555-0001

November 25, 2020

MEMORANDUM TO: Michele M. Sampson, Acting Chief  
Cyber Security Branch  
Division of Physical and Cyber Security Policy  
Office of Nuclear Security and Incident Response

FROM: Eric J. Lee, Senior Cyber Security Specialist */RA/*  
Cyber Security Branch  
Division of Physical and Cyber Security Policy  
Office of Nuclear Security and Incident Response

SUBJECT: SUMMARY OF CATEGORY 2 PUBLIC MEETING ON  
NOVEMBER 17 AND 18, 2020, WITH INDUSTRY  
STAKEHOLDERS AND THE NUCLEAR ENERGY INSTITUTE

On November 17th and 18th, 2020, the U.S. Nuclear Regulatory Commission (NRC) staff conducted a two-day Category 2 public meeting with the Nuclear Energy Institute (NEI) and other stakeholders to discuss the implementation the NRC accepted NEI whitepapers "Changes to NEI 10-04 and NEI 13-10 Guidance for Identifying and Protecting Digital Assets Associated with the Balance of Plant" (Agencywide Documents Access and Management System [ADAMS] Accession No. ML20205L604) and "Changes to NEI 10-04 and NEI 13-10 Guidance for Identifying and Protecting Digital Assets Associated with Safety-Related and Important-to-Safety Functions" dated July 2020 (ADAMS Accession No. ML20199M368). These whitepapers provide a risk-informed approach to determine and protect critical digital assets (CDAs) associated with Balance of Plant (BoP) and Safety-Related and Important-to-Safety (SR & Its) functions.

The NRC and NEI opened the meeting with an overview of the white papers and provided an opportunity for any public comments or questions. Following the opening session, there was a more detailed discussion related to licensees' implementation of the whitepapers. This portion of the meeting was held in a closed session because licensee specific security details that are not appropriate for public discussion were presented. The meeting provided the NEI an opportunity to present examples for identifying and protecting CDAs associated with BoP and SR & Its functions using the guidance provided in the whitepapers. Additionally, the meeting provided the staff and the attendees an opportunity to ask questions and provide comments on

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the application of guidance provided in the whitepapers. The attendees were instructed to send their names and respective organizations to [daniel.warner@nrc.gov](mailto:daniel.warner@nrc.gov) for the November 17th meeting and to [eric.lee@nrc.gov](mailto:eric.lee@nrc.gov) for the November 18th meeting. The enclosure provides the list of attendees.

On November 17th, after NEI provided a presentation on three examples for identifying and protecting BoP CDAs using the guidance provided in NEI's BoP whitepaper, the staff provided the following three comments for consideration:

1. Need to clarify the discussions of how to address multiple units when determining impact level and reevaluate the use of High Impact when it doesn't apply to operating reactor licensees in the final revisions to NEI 10-04 and NEI 13-10.
2. Need further clarification on how common cause failure on similar components between units at the same site should be addressed when performing CDA assessment.
3. Need clarification on whether there are any requirements for operators to notify the grid operator if a unit will trip offline within the 15-minute time period, and if so, how licensees will comply with the requirement.

On November 18, after NEI provided a presentation on three examples for identifying CDAs associated with SR & Its functions using the guidance provided in NEI's whitepaper, staff provided the following three comments for consideration:

1. Need further clarification on how Emergency Operating Procedures, Abnormal Operating Procedures, and Emergency Action Level scheme are considered when guidance in the SR & Its whitepaper is used to determine CDAs associated with SR or Its functions.
2. Need further discussions, and potentially a future meeting, on application of the defense-in-depth approach to fire protection when guidance in the whitepaper is used to determine Its CDAs associated with fire protection.
3. Need to ensure the CDA determination process associated with BoP systems is clear when NEI integrates guidance in the BoP and SR & Its whitepapers into NEI 10-04 and NEI 13-10.

Based on the feedback received during the meeting the NRC and NEI will continue to engage on the subjects to ensure the comments received during the meeting are resolved. The next step is for NEI to integrate the whitepapers into the new revisions of NEI 10-04 and NEI 13-10 and submit them for the NRC's review.

Enclosure:  
Attendees List

SUBJECT: SUMMARY OF CATEGORY 2 PUBLIC MEETING ON NOVEMBER 17 AND 18, 2020, WITH INDUSTRY STAKEHOLDERS AND THE NUCLEAR ENERGY INSTITUTE

DATE: November 25, 2020

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\*via e-mail

| OFFICE | NSIR/DPCP/CSB* | NSIR/DPCP/CSB* |
|--------|----------------|----------------|
| NAME   | DWarner        | ELee           |
| DATE   | 11/25/2020     | 11/25/2020     |

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**Balance of Plant and Safety-Related/Important-to-Safety Tabletop Attendance  
Open Session  
11/17/2020**

|                                    |
|------------------------------------|
| Dan Warner (NRC)                   |
| George Hausman (NRC)               |
| Brian Thomas (NRC)                 |
| Nick Taylor (NRC)                  |
| Glenn Dentel (NRC)                 |
| Eric Lee (NRC)                     |
| Charity Pantalo (NRC)              |
| Greg Pick (NRC)                    |
| Michele Sampson (NRC)              |
| Sam Graves (NRC)                   |
| Raymond Hoffman (NRC)              |
| Kim Holloway (NRC)                 |
| Jim Beardsley (NRC)                |
| Dariusz Szwarc (NRC)               |
| Ismael Garcia (NRC)                |
| Brian Yip (NRC)                    |
| Mario Fernandez (NRC)              |
| Michael Brown (NRC)                |
| Shana Helton (NRC)                 |
| Shyrl Coker (NRC)                  |
| Clinton Hobbs (NRC)                |
| Philipp Braaten (NRC)              |
| Kimberlee Edwards (NRC Contractor) |
| Tim Marshall (NRC Contractor)      |
| Joseph Cristiano (NRC Contractor)  |
| Rich Mogavero (NEI)                |
| William Gross (NEI)                |
| Anthony M. Lowry (Ameren)          |
| John Conly (Certrec)               |
| Robin Ritzman (Curtiss-Wright)     |
| Jan Geib (Dominion Energy)         |
| Don Robinson (Dominion Energy)     |
| Raymond D LeBrun (DTE Energy)      |
| Mark Denton (Duke Energy)          |
| James Hazel (Duke Energy)          |
| Lori Tkaczyk (Enercon)             |
| Brian Young (Energy Harbor)        |
| Jason Castro (Entergy)             |
| Dewey Coulon (Entergy)             |

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| James Andersen (Excel Services)             |
| Jeffrey Wilson (Exelon Nuclear)             |
| Stephen Francis Flickinger (Exelon Nuclear) |
| Jason Taken (Exelon Nuclear)                |
| David Neff (Exelon Nuclear)                 |
| Eric R. Jebsen (Exelon Nuclear)             |
| Keith Kauffman (Exelon Nuclear)             |
| Gunter, Roderick:(Exelon Nuclear)           |
| Nathan Faith (Exelon Nuclear)               |
| Ryan L Zecman (Fermi)                       |
| Shannon L. Eggers (INL)                     |
| Gary Locklear (Kinectrics)                  |
| Richard Swanson (Luminant)                  |
| Max Robertson (NextEra Energy)              |
| Jan Perisse (NextEra Energy)                |
| Brian Derrico (NextEra Energy)              |
| Man Dao (NextEra Energy)                    |
| Denny Smith (NextEra Energy)                |
| Tim Isaacs (NuScale)                        |
| Andrea Langston (Point Beach)               |
| Jana Bergman (Scientech)                    |
| Ryan Moss (STP)                             |
| Eugene Keller (Talen Energy)                |
| Pamela J. Frey (Talen Energy)               |
| Jason Gasque (TVA)                          |
| Heather Pickard (TVA)                       |
| Edie Boyer (Xcel Energy)                    |
| David F. Feitl (Xcel Energy)                |
| Scott Greenslit (Xcel Energy)               |
| Richard Munden                              |
| John Hughey                                 |
| Goodman, Adam                               |
| Julie Ezell                                 |
| Kevin Deyette                               |
| David Lam                                   |
| Robert Regueiro                             |
| Randy Benter                                |

**Balance of Plant Closed Session Tabletop Attendance  
11/17/2020**

|                                    |
|------------------------------------|
| Dan Warner (NRC)                   |
| George Hausman (NRC)               |
| James Drake (NRC)                  |
| Sam Graves (NRC)                   |
| Glenn Dentel (NRC)                 |
| Clinton Hobbs (NRC)                |
| Dariusz Szwarc (NRC)               |
| Brian Yip (NRC)                    |
| Greg Pick (NRC)                    |
| Nick Taylor (NRC)                  |
| Jim Beardsley (NRC)                |
| Scott Shaeffer (NRC)               |
| Kim Holloway (NRC)                 |
| Eric Lee (NRC)                     |
| Mario Fernandez (NRC)              |
| Charity Pantalo (NRC)              |
| Michele Sampson (NRC)              |
| Philipp Braaten (NRC)              |
| Michael Brown (NRC)                |
| Brian Thomas (NRC)                 |
| Shyrl Coker (NRC)                  |
| Tim Marshall (NRC Contractor)      |
| Joseph Cristiano (NRC Contractor)  |
| Rich Mogavero (NEI)                |
| William Gross (NEI)                |
| Greg Stutzman (AEP)                |
| Anthony M. Lowry (Ameren)          |
| Robin Ritzman (Curtiss-Wright)     |
| Lillie Winckowski (Davis-Besse)    |
| Don Robinson (Dominion Energy)     |
| Raymond D LeBrun (DTE Energy)      |
| Mark Denton (Duke Energy)          |
| David Wroblewski (Energy Harbor)   |
| Dan Butor (Energy Harbor)          |
| Brian Young (Energy Harbor)        |
| Jim Blattner (Energy Harbor)       |
| Dewey Coulon (Entergy)             |
| Jason Castro (Entergy)             |
| Jim Andersen (Excel Services)      |
| Jeffrey W. Wilson (Exelon Nuclear) |
| David B Neff (Exelon Nuclear)      |
| Keith E Kauffman (Exelon Nuclear)  |

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|---|
| Nathan Faith (Exelon Nuclear)               |
| Stephen Francis Flickinger (Exelon Nuclear) |
| Roderick Gunter (Exelon Nuclear)            |
| Manu K Sharma (Exelon Nuclear)              |
| Jason C Taken (Exelon Nuclear)              |
| Ryan L Zecman (Fermi)                       |
| Shannon L. Eggers (INL)                     |
| Gary Locklear (Kinectrics)                  |
| Richard Swanson (Luminant)                  |
| Denny Smith (NextEra Energy)                |
| Max Robertson (NextEra Energy)              |
| Brian Derrico (NextEra Energy)              |
| Tim Isaacs (NuScale)                        |
| Jim Shank (PSEG)                            |
| Ryan Moss (STP)                             |
| Pamela J. Frey (Talen Energy)               |
| Eugene Keller (Talen Energy)                |
| Heather Pickard (TVA)                       |
| Edie Boyer (Xcel Energy)                    |
| Scott Greenslit (Xcel Energy)               |
| Peter Bruley                                |
| David P. Wheeler                            |
| Robert Regueiro                             |
| Kevin Deyette                               |
| Randy Benter                                |
| Shonique Miller                             |

**Safety-Related and Important-to-Safety Closed Session Tabletop Attendance  
11/18/2020**

|                                    |
|------------------------------------|
|                                    |
| Dan Warner (NRC)                   |
| Michael Brown (NRC)                |
| George Hausman (NRC)               |
| Sam Graves (NRC)                   |
| Philipp Braaten (NRC)              |
| Nick Taylor (NRC)                  |
| Raymond Hoffman (NRC)              |
| Charity Pantalo (NRC)              |
| James Drake (NRC)                  |
| Eric Lee (NRC)                     |
| Michele Sampson (NRC)              |
| Glenn Dentel (NRC)                 |
| Mario Fernandez (NRC)              |
| Brian Thomas (NRC)                 |
| Ismael Garcia (NRC)                |
| Dariusz Szwarc (NRC)               |
| Ralph Costello (NRC)               |
| Kim Holloway (NRC)                 |
| Greg Pick (NRC)                    |
| Brian Yip (NRC)                    |
| Scott Shaeffer (NRC)               |
| Jim Beardsley (NRC)                |
| Tim Marshall (NRC Contractor)      |
| Kimberlee Edwards (NRC Contractor) |
| Joseph Cristiano (NRC Contractor)  |
| Rich Mogavero (NEI)                |
| Greg Stutzman (AEP)                |
| Anthony Lowry (Ameren)             |
| Robin Ritzman (Curtiss-Wright)     |
| Lillie Winckowski (Davis-Besse)    |
| Jan Geib (Dominion Energy)         |
| Don Robinson (Dominion Energy)     |
| Raymond D LeBrun (DTE Energy)      |
| Dan Butor (Energy Harbor)          |
| Brian Young (Energy Harbor)        |
| Jason Castro (Entergy)             |
| Dewey Coulon (Entergy)             |
| David B. Neff (Exelon Nuclear)     |
| Manu K. Sharma (Exelon Nuclear)    |
| Jeffrey W. Wilson (Exelon Nuclear) |
| Roderick Gunter (Exelon Nuclear)   |
| Nathan Faith (Exelon Nuclear)      |



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|---|
| Stephen Francis Flickinger (Exelon Nuclear) |
| Ryan L Zecman (Fermi)                       |
| Shannon L. Eggers (INL)                     |
| Jeffrey M. Knight (INL)                     |
| Gary Locklear (Kinectrics)                  |
| Denny Smith (NextEra Energy)                |
| Brian Derrico (NextEra Energy)              |
| Max Robertson (NextEra Energy)              |
| Tim Isaacs (NuScale)                        |
| Jim Shank (PSEG)                            |
| Ryan Moss (STP)                             |
| Pamela J. Frey (Talen Energy)               |
| Heather Pickard (TVA)                       |
| Scott Greenslit (Xcel Energy)               |
| Edie Boyer (Xcel Energy)                    |
| J. Scott Junkin                             |
| Kevin S. Sykes                              |
| Barry Westreich                             |
| David F. Feitl                              |
| Robert Regueiro                             |
| David P. Wheeler                            |
| Paul B. Cardelli                            |
| Shonique Miller                             |
| Lori L. Fuller                              |
| David W. Clark                              |
| Peter Bruley                                |
| Adam Goodman                                |