



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

January 19, 2024

MEMORANDUM TO: Jeff Bream, Acting Chief  
Cyber Security Branch  
Division of Physical and Cyber Security Policy  
Office of Nuclear Security and Incident Response

FROM: Tanvir Siddiky, IT Specialist (Cyber)  
Cyber Security Branch  
Division of Physical and Cyber Security Policy  
Office of Nuclear Security and Incident Response

A handwritten signature in black ink, appearing to read "Tanvir", written over the printed name of the sender.

Signed by Siddiky, Tanvir  
on 01/19/24

SUBJECT: SUMMARY OF DECEMBER 14, 2023, PUBLIC MEETING TO  
PROVIDE FEEDBACK ON THE NUCLEAR ENERGY  
INSTITUTE'S (NEI'S) ONGOING MONITORING AND  
ASSESSMENT WHITE PAPER.

On December 14, 2023, the U.S. Nuclear Regulatory Commission (NRC) held an open public meeting to provide feedback on the Nuclear Energy Institute's (NEI's) white paper, "Ongoing Monitoring and Assessment" (Agencywide Documents Access and Management System (ADAMS) Accession No. ML23205A200), submitted for the NRC's review in support of its planned revision to NEI 08-09, "Cybersecurity Plan for Nuclear Power Reactors". The meeting notice is available at ML23326A070. Approximately 52 participants, representing the NRC, the industry, and members of the public attended the meeting.

The white paper aims to provide licensees guidance and examples on Ongoing Monitoring and Assessment (OM&A) activities and changing control periodicity based on the nine categories in section 3.1.6 of NEI 08-09. The purpose of this public meeting was for the NRC staff to provide feedback following the review of the OM&A white paper for NEI's consideration as it develops Revision 7 to NEI 08-09.

The NRC presentation discussed the takeaways and results from the previous public meeting and discussion with NEI held on September 20, 2023 (ML23248A354). The NRC staff then presented two considerations related to changing any control periodicity. First, an alternate periodicity must meet the intent of the original control periodicity. Second, an alternate periodicity in lieu of implementing the original periodicity must mitigate the consequences of the threat/attack vector the control is intended to protect. Additionally, the basis for implementing an alternate periodicity must be documented.

The NRC staff presentation provided additional feedback and criteria on the periodicity extension due to nuclear safety risk and alignment of periodicity with regularly scheduled maintenance. The NRC staff disagreed with NEI's proposal regarding extending password change periodicity as the approach does not mitigate the consequence of the attack vector.

Additionally, the NRC staff stated that more details were needed in the guidance regarding continuously staffed and continuously surveilled locations. The NRC staff provided detailed feedback regarding crediting security information and event management (SIEM) for extending control periodicity. The NRC staff stated that generally accepted standard that are credited for alternate period justification must be implemented fully and could not be implemented in part. Finally, sections on industry operating experience, experience with security control, benchmarking, and audits/assessments lack adequate guidance. At this time, the NRC did not accept the proposed approach for use.

During the Q&A portion of the public meeting, NEI agreed with the feedback and stated that NEI will incorporate the feedback and discussion outcome into the next revision of NEI 08-09 Revision 7. NEI representatives commented they appreciated the opportunity to provide clarification and explore additional opportunities for efficient and effective improvements in the implementation of the cybersecurity program.

Enclosures:

NRC Presentation Slides

20231214 Public Meeting Summary on NEI White Paper Ongoing Monitoring and Assessment DATE  
January 19, 2024

DISTRIBUTION:

**ADAMS Accession No.: ML24018A170; ML24018A176**

OFFICE	NRC/NSIR/DPCP /CSB	NSIR/DSO/SOSB	NRC/NSIR/DPCP /CSB	
NAME	TSiddiky	<i>TS</i> JBream	<i>JB</i> TSiddiky	<i>TS</i>
DATE	Jan 18, 2024	Jan 19, 2024	Jan 19, 2024	

***OFFICIAL RECORD COPY***