

# UNITED STATES NUCLEAR REGULATORY COMMISSION

REGION I 475 ALLENDALE RD, STE 102 KING OF PRUSSIA, PENNSYLVANIA 19406-1415

December 16, 2024

David P. Rhoades Senior Vice President Constellation Energy Generation, LLC President and Chief Nuclear Officer (CNO) Constellation Nuclear 4300 Winfield Road Warrenville, IL 60555

SUBJECT: CALVERT CLIFFS NUCLEAR POWER PLANT, UNITS 1 AND 2 -

INFORMATION REQUEST FOR THE CYBER SECURITY BASELINE

INSPECTION, NOTIFICATION TO PERFORM INSPECTION 05000317/2025403

AND 05000318/2025403

#### Dear David Rhoades:

On April 21, 2025, the U.S. Nuclear Regulatory Commission (NRC) will begin a baseline inspection in accordance with Inspection Procedure (IP) 71130.10 "Cyber Security," dated December 14, 2021, at Calvert Cliffs Nuclear Power Plant, Units 1 and 2. The inspection will be performed to evaluate and verify your ability to meet the requirements of the NRC's Cyber Security Rule, Title 10 of the *Code of Federal Regulations* (10 CFR), Part 73, Section 54, "Protection of Digital Computer and Communication Systems and Networks." The onsite portions of the inspection will take place from April 21-25, 2025.

Experience has shown that baseline inspections are extremely resource intensive, both for the NRC inspectors and the licensee staff. In order to minimize the inspection impact on the site and to ensure a productive inspection for both parties, we have enclosed a request for documents needed for the inspection. These documents have been divided into four groups.

The first group specifies information necessary to assist the inspection team in choosing the focus areas (i.e., "sample set") to be inspected by IP 71130.10. This information should be made available either on an online repository (preferred) or digital media (CD/DVD) no later than January 31, 2025. The inspection team will review this information and, by February 21, 2025, will request the specific items that should be provided for review.

The second group of additional requested documents will assist the inspection team in the evaluation of the critical systems and critical digital assets (CSs/CDAs), defensive architecture, and the areas of the licensee's Cyber Security Program selected for the cybersecurity inspection. This information will be requested for review in the regional office prior to the inspection by March 21, 2025, as identified above.

The third group of requested documents consists of those items that the inspection team will review, or need access to, during the inspection. Please have this information available by the first day of the onsite inspection, April 21, 2025.

The fourth group of information is necessary to aid the inspection team in tracking issues identified as a result of the inspection. It is requested that this information be provided to the lead inspector as the information is generated during the inspection.

It is important that all of these documents are up to date and complete in order to minimize the number of additional documents requested during the preparation and/or the onsite portions of the inspection. If any of the provided information changes between the time of submittal and the inspection, please inform the inspection team lead.

The lead inspector for this inspection is Brandon Pinson. We understand that our regulatory contact for this inspection is Travis Lefton of your organization. If there are any questions about the inspection or the material requested, please contact the lead inspector at (610) 337-5091 or via email at <a href="mailto:Brandon.Pinson@nrc.gov">Brandon.Pinson@nrc.gov</a>.

This letter does not contain new or amended information collection requirements subject to the *Paperwork Reduction Act of 1995* (44 U.S.C. 3501 et seq.). Existing information collection requirements were approved by the Office of Management and Budget, control number 3150-0011. The NRC may not conduct or sponsor, and a person is not required to respond to, a request for information or an information collection requirement unless the requesting document displays a currently valid Office of Management and Budget control number.

In accordance with 10 CFR 2.390, "Public Inspections, Exemptions, Requests for Withholding," of the NRC's "Rules of Practice," a copy of this letter and its enclosure will be available electronically for public inspection in the NRC's Public Document Room or from the Publicly Available Records component of the NRC's Agencywide Documents Access and Management System (ADAMS). ADAMS is accessible from the NRC website at http://www.nrc.gov/reading-rm/adams.html (the Public Electronic Reading Room).

Sincerely,

Glenn T. Dentel, Chief Engineering Branch 2 Division of Operating Reactor Safety

Docket Nos. 05000317 and 05000318 License Nos. DPR-53 and DPR-69

Enclosure:

Cybersecurity Inspection Document Request

cc: Distribution via ListServ

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INFORMATION REQUEST FOR THE CYBER SECURITY BASELINE

INSPECTION, NOTIFICATION TO PERFORM INSPECTION 05000317/2025403

AND 05000318/2025403 DATED DECEMBER 16, 2024

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DOCUMENT NAME: https://usnrc.sharepoint.com/teams/EngineeringBranch2/Shared Documents/\_Cyber Security/\_Baseline Inspections - OUO\_SRI/2025/Calvert Cliffs/Calvert Cliffs 2025 Cybersecurity RFI Letter.docx ADAMS ACCESSION NUMBER: ML24351A170

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### CALVERT CLIFFS NUCLEAR POWER PLANT CYBER SECURITY INSPECTION DOCUMENT REQUEST

<u>Inspection Report</u>: 05000317/2025403 and 05000318/2025403

Inspection Dates: April 21, 2025 to April 25, 2025

<u>Inspection Procedure</u>: IP 71130.10, "Cybersecurity," dated December 14, 2021

(ADAMS Accession Number: ML21271A106)

**Reference:** Guidance Document for Development of the Request for

Information (RFI) and Notification Letter for IP 71130.10,

"Cybersecurity" (ML21330A088)

**NRC Inspectors:** Brandon Pinson, Lead Louis Dumont

(610) 337-5091 (610) 337-5183

<u>Brandon.Pinson@nrc.gov</u> <u>Louis.Dumont@nrc.gov</u>

**NRC Contractors**: Two contractors TBD

#### I. Information Requested for In-Office Preparation

The initial request for information (i.e., first RFI) concentrates on providing the inspection team with the general information necessary to select appropriate components and Cyber Security Program (CSP) elements to develop a site-specific inspection plan. The first RFI is used to identify the list of critical systems and critical digital assets (CSs/CDAs) plus operational and management security control portions of the CSP to be chosen as the "sample set" required to be inspected by the cybersecurity inspection procedure. The first RFI's requested information is specified below in Table RFI #1. The Table RFI #1 information is requested to be provided to the regional office by January 31, 2025, or sooner, to facilitate the selection of the specific items that will be reviewed during the onsite inspection weeks.

The inspection team will examine the returned documentation from the first RFI and identify/select specific systems and equipment (e.g., CSs/CDAs) to provide a more focused follow-up request to develop the second RFI. The inspection team will submit the specific systems and equipment list to your staff by February 21, 2025, which will identify the specific systems and equipment that will be utilized to evaluate the CSs/CDAs, defensive architecture, and the areas of the licensee's CSP selected for the cybersecurity inspection. We request that the additional information provided from the second RFI be made available to the regional office prior to the inspection by March 21, 2025.

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The required Table RFI #1 information shall be provided on an online repository (preferred) or digital media (CD/DVD) to the lead inspector by January 31, 2025. The preferred file format for all lists is a searchable Excel spreadsheet file. The information should be indexed and hyperlinked to facilitate ease of use. If you have any questions regarding this information, please call the inspection team leader as soon as possible.

Table RFI #1		
	on 3, graph Number / Title:	IP Ref
1	A list of all Identified Critical Systems and Critical Digital Assets – highlight/note any additions, deletions, or reclassifications due to new guidance from white papers, changes to NEI 10-04, 13-10, etc. since the last cybersecurity inspection	Overall
2	A list of emergency preparedness and Security onsite and offsite digital communication systems	Overall
3	Network Topology Diagrams to include information and data flow for critical systems in levels 2, 3 and 4 (If available)	Overall
4	Ongoing Monitoring and Assessment program documentation	03.01(a)
5	The most recent effectiveness analysis of the Cyber Security Program and the most recent cybersecurity Quality Assurance audit/assessment. Please include any condition reports (or similar) generated as a result of the audits/assessments	03.01(b)
6	Vulnerability screening/assessment and scan program documentation	03.01(c)
7	Cybersecurity incident response documentation, including incident detection, response, and recovery documentation as well as contingency plan development and implementation, including any program documentation that requires testing of security boundary device functionality	03.02(a) and 03.04(b)
8	Device Access and Key Control program documentation	03.02(c)
9	Password/Authenticator program documentation	03.02(c)
10	User Account/Credential program documentation	03.02(d)
11	Portable Media and Mobile Device control program documentation, including kiosk security control assessment/documentation	03.02(e)
12	Design change/modification program documentation and a list of all design changes completed (field complete) since the last cybersecurity inspection, including either a summary of the design change or the 50.59 documentation for the change. Please notate/highlight which design changes affected Critical Digital Assets (added, modified, deleted, etc.)	03.03(a)
13	Supply Chain Management documentation, including any security impact analysis for new acquisitions	03.03(a), (b) and (c)
14	Configuration Management program documentation, including any security impact analysis performed due to configuration changes since the last inspection	03.03(a) and (b)
15	Cyber Security Plan and any 50.54(p) analysis to support changes to the plan since the last inspection	03.04(a)
16	Cybersecurity Metrics tracked (if applicable)	03.06 (b)

### CALVERT CLIFFS NUCLEAR POWER PLANT CYBERSECURITY INSPECTION DOCUMENT REQUEST

	Table RFI #1			
Secti	Section 3,			
Paragraph Number / Title:				
17	Provide documentation describing any cybersecurity changes to the access authorization program since the last cybersecurity inspection	Overall		
18	Provide a list of all procedures and policies provided to the NRC as part of this RFI with their descriptive name and associated procedure number (if available)	Overall		
19	Performance testing report (if applicable)	03.06 (a)		
20	List of Condition Reports (or similar) associated with cybersecurity issues written since the last inspection. Please include CR #, date initiated, and a short description/title	Overall		

In addition to the above information please provide the following:

- (1) Electronic copy of the updated final safety analysis report and technical specifications.
- (2) Name(s) and phone numbers for the regulatory and technical contacts.
- (3) Current management and engineering organizational charts.

Based on this information, the inspection team will identify and select specific systems and equipment (e.g., CSs/CDAs) from the information requested by Table RFI #1 and submit a list of specific systems and equipment to your staff by February 21, 2025, for the second RFI (i.e., RFI #2).

#### II. Additional Information Requested to be Available Prior to Inspection.

As stated in Section I above, the inspection team will examine the returned documentation requested from Table RFI #1 and submit the list of specific systems and equipment to your staff by February 21, 2025, for the second RFI (i.e., RFI #2). The second RFI will request additional information required to evaluate the CSs/CDAs, defensive architecture, and the areas of the licensee's CSP selected for the cybersecurity inspection. The additional information requested for the specific systems and equipment is identified in Table RFI #2.

The Table RFI #2 information shall be provided to the lead inspector by March 21, 2025. The preferred file format for all lists is a searchable Excel spreadsheet. The information should be indexed and hyperlinked to facilitate ease of use. If you have any questions regarding this information, please call the inspection team leader as soon as possible.

Table RFI #2			
Secti	on 3,		
Paragraph Number / Title:		Items	
	For the systems and CDAs chosen for inspection provide:		
1	Ongoing Monitoring and Assessment activity performed on the system(s)	03.01(a)	
2	All Security Control Assessments for the selected CDAs	03.01(a)	

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	Table RFI #2		
	Section 3,		
Para	graph Number / Title:	Items	
3	All vulnerability screenings/assessments associated with, or scans performed on the selected system(s) since the last cybersecurity inspection	03.01(c)	
4	Documentation (including configuration files and rules sets) for Network-based Intrusion Detection/Protection Systems (NIDS/NIPS), Host-based Intrusion Detection Systems (HIDS), and Security Information and Event Management (SIEM) systems for system(s) chosen for inspection	03.02(b)	
5	Documentation (including configuration files and rule sets) for intra- security level firewalls and boundary devices used to protect the selected system(s)	03.02(c)	
6	Copies of all periodic reviews of the access authorization list for the selected systems since the last inspection	03.02(d)	
7	Baseline configuration data sheets for the selected CDAs	03.03(a)	
8	Documentation on any changes, including Security Impact Analyses, performed on the selected system(s) since the last inspection	03.03(b)	
9	Copies of the purchase order documentation for any new equipment purchased for the selected systems since the last inspection	03.03(c)	
10	Copies of any reports/assessment for cybersecurity drills performed since the last inspection	03.02(a) 03.04(b)	
11	Copy of the individual recovery plan(s) for the selected system(s) including documentation of the results the last time the backups were executed	03.02(a) 03.04(b)	
12	Corrective actions taken as a result of cybersecurity incidents/issues to include previous NRC violations and Licensee Identified Violations since the last cybersecurity inspection	03.05	
13	For the selected systems/modifications, provide design change/modification packages including completed work orders since the last cybersecurity inspection	03.03(a)	

### III. <u>Information Requested to be Available on First Day of Inspection</u>

Please provide the following information to the team by April 21, 2025, the first day of the inspection.

Section 3, Paragraph Number / Title:		
1	Any cybersecurity event reports submitted in accordance with 10 CFR 73.77 since the last cybersecurity inspection	03.04(b)
2	Updated copies of corrective actions taken as a result of cybersecurity incidents/issues, to include previous NRC violations and Licensee Identified Violations since the last cybersecurity inspection, as well as vulnerability-related corrective actions	03.05

### CALVERT CLIFFS NUCLEAR POWER PLANT CYBERSECURITY INSPECTION DOCUMENT REQUEST

In addition to the above information please make the following information available to the team. Copies of the following documents do not need to be specifically available to the inspection team as long as the inspectors have easy and unrestrained access to them.

- a. Updated Final Safety Analysis Report, if not previously provided;
- b. Original Cybersecurity Safety Evaluation Report and Supplements;
- c. Quality Assurance (QA) Plan;
- d. Technical Specifications, if not previously provided; and
- e. Latest individual plant examination/probabilistic risk assessment report.

#### IV. Information Requested to be Provided Throughout the Inspection

- (1) Copies of any corrective action documents generated as a result of the inspection team's questions or queries during the inspection.
- (2) Copies of the list of questions submitted by the inspection team members and the status/resolution of the information requested (provided daily during the inspection to each inspection team member).

If you have any questions regarding the information requested, please contact the inspection team leader.