



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

August 31, 2011

Mr. David A. Heacock  
President and Chief Nuclear Officer  
Dominion Nuclear  
Innsbrook Technical Center  
5000 Dominion Boulevard  
Glen Allen, VA 23060-6711

**SUBJECT: KEWAUNEE POWER STATION, NORTH ANNA POWER STATION UNIT  
NOS. 1 AND 2, SURRY POWER STATION UNIT NOS. 1 AND 2 - ISSUANCE  
OF AMENDMENTS RE: CYBER SECURITY PLAN (TAC NOS. ME4319,  
ME4322, ME4323, ME4324, AND ME4325)**

Dear Mr. Heacock:

The Nuclear Regulatory Commission has issued the enclosed amendments:

Amendment No. 210 to Renewed Facility Operating License No. DPR-43 for Kewaunee Power Station, revising License Condition 2.C.(4);

Amendment No. 264 to Renewed Facility Operating License No. NPF-4 for North Anna Power Station Unit 1, revising License Condition 2.E;

Amendment No. 245 to Renewed Facility Operating License No. NPF-7 for North Anna Power Station Unit 2, revising License Condition 2.E;

Amendment No. 276 to Renewed Facility Operating License No. DPR-32 for Surry Power Station Unit 1, revising License Condition 3.J; and

Amendment No. 276 to Renewed Facility Operating License No. DPR-37 for Surry Power Station Unit 2, revising License Condition 3.J.

The amendments consist of changes to the operating licenses in response to your application dated July 12, 2010, as supplemented by letters dated August 5, 2010, September 23, 2010, November 10, 2010, December 13, 2010, April 4, 2011, and May 17, 2011.

The amendments approve the Cyber Security Plan (CSP) and associated implementation schedule for all the nuclear plants named above, and revise the license condition regarding physical protection for each nuclear unit to reflect such approval. The amendments specify that the licensee fully implement and maintain in effect all provisions of the Commission-approved CSP as required by 10 CFR 73.54.

D. A. Heacock

- 2 -

A copy of our related safety evaluation is also enclosed. A Notice of Issuance will be included in the Commission's next biweekly *Federal Register* notice.

Sincerely,

A handwritten signature in black ink that reads "Karl Feintuch". The signature is written in a cursive style with a large, stylized 'K' and 'F'.

Karl Feintuch, Project Manager  
Plant Licensing Branch III-1  
Division of Operating Reactor Licensing  
Office of Nuclear Reactor Regulation

Docket No. 50-305, -338, -339, -280, -281

Enclosures:

1. Amendment No. 210 to DPR-43
2. Amendment No. 264 to NPF-4
3. Amendment No. 245 to NPF-7
4. Amendment No. 276 to DPR-32
5. Amendment No. 276 to DPR-37
6. Safety Evaluation

cc w/encls: Distribution via ListServ



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

DOMINION ENERGY KEWAUNEE, INC.

DOCKET NO. 50-305

KEWAUNEE POWER STATION

AMENDMENT TO RENEWED FACILITY OPERATING LICENSE

Amendment No. 210  
License No. DPR-43

1. The U.S. Nuclear Regulatory Commission (the Commission) has found that:
  - A. The application for amendment by Dominion Energy Kewaunee, Inc. dated July 12, 2010, as supplemented by letters dated August 5, 2010, September 23, 2010, November 10, 2010, December 13, 2010, April 4, 2011, and May 17, 2011, complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act), and the Commission's rules and regulations set forth in 10 CFR Chapter I;
  - B. The facility will operate in conformity with the application, the provisions of the Act, and the rules and regulations of the Commission;
  - C. There is reasonable assurance (i) that the activities authorized by this amendment can be conducted without endangering the health and safety of the public, and (ii) that such activities will be conducted in compliance with the Commission's regulations;
  - D. The issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public; and
  - E. The issuance of this amendment is in accordance with 10 CFR Part 51 of the Commission's regulations and all applicable requirements have been satisfied.
2. Accordingly, paragraph 2.C.(4) of Renewed Facility Operating License No. DPR-43 is hereby amended to read as follows:

(4) Physical Protection

The licensee shall fully implement and maintain in effect all provisions of the Commission-approved physical security, training and qualification, and safeguards contingency plans including amendments made pursuant to provisions of the Miscellaneous Amendments and Search Requirements revisions to 10 CFR 73.55 (51 FR 27817 and 27822) and to the authority of

10 CFR 50.90 and 10 CFR 50.54(p). The combined set of plans, which contains Safeguards Information protected under 10 CFR 73.21 is entitled: "Nuclear Management Company Kewaunee Nuclear Power Plant Physical Security Plan (Revision 0)" submitted by letter dated October 18, 2004, and supplemented by letter dated October 21, 2004, July 26, 2005, and May 15, 2006.

The licensee shall fully implement and maintain in effect all provisions of the Commission-approved Kewaunee, Millstone, North Anna, and Surry Power Stations Cyber Security Plan (CSP), including changes made pursuant to the authority of 10 CFR 50.90 and 10 CFR 50.54(p). The CSP was approved by License Amendment No. 210.

3. This license amendment is effective as of the date of issuance. The implementation of the CSP, including the key intermediate milestone dates and the full implementation date, shall be in accordance with the implementation schedule submitted by the licensee on April 4, 2011, and approved by the NRC staff with this license amendment. All subsequent changes to the NRC-approved CSP implementation schedule will require prior NRC approval pursuant to 10 CFR 50.90.

FOR THE NUCLEAR REGULATORY COMMISSION



Robert J. Pascarelli, Chief  
Plant Licensing Branch III-1  
Division of Operating Reactor Licensing  
Office of Nuclear Reactor Regulation

Attachment: Changes to DPR-43

Date of Issuance: August 31, 2011

ATTACHMENT TO LICENSE AMENDMENT NO. 210

RENEWED FACILITY OPERATING LICENSE NO. DPR-43

DOCKET NO. 50-305

Replace the following page of Facility Operating License DPR-43 with the attached revised page. The revised page is identified by amendment number and contains a marginal line indicating the area of change.

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Page 4

(4) Physical Protection

The licensee shall fully implement and maintain in effect all provisions of the Commission-approved physical security, training and qualification, and safeguards contingency plans including amendments made pursuant to provisions of the Miscellaneous Amendments and Search Requirements revisions to 10 CFR 73.55 (51 FR 27817 and 27822) and to the authority of 10 CFR 50.90 and 10 CFR 50.54(p). The combined set of plans, which contains Safeguards Information protected under 10 CFR 73.21 is entitled: "Nuclear Management Company Kewaunee Nuclear Power Plant Physical Security Plan (Revision 0)" submitted by letter dated October 18, 2004, and supplemented by letter dated October 21, 2004, July 26, 2005, and May 15, 2006.

The licensee shall fully implement and maintain in effect all provisions of the Commission-approved Kewaunee, Millstone, North Anna, and Surry Power Stations Cyber Security Plan (CSP), including changes made pursuant to the authority of 10 CFR 50.90 and 10 CFR 50.54(p). The CSP was approved by License Amendment No. 210.

(5) Deleted

(6) Steam Generator Upper Lateral Supports

The design of the steam generator upper lateral supports may be modified by reducing the number of snubbers from four (4) to one (1) per steam generator.

(7) Deleted

(8) Deleted

(9) Deleted

(10) Mitigation Strategy License Condition

Develop and maintain strategies for addressing large fires and explosions and that include the following key areas:

- (a) Fire fighting response strategy with the following elements:
  - 1. Pre-defined coordinated fire response strategy and guidance
  - 2. Assessment of mutual aid fire fighting assets
  - 3. Designated staging areas for equipment and materials
  - 4. Command and control
  - 5. Training of response personnel



UNITED STATES  
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VIRGINIA ELECTRIC AND POWER COMPANY

DOCKET NO. 50-338

NORTH ANNA POWER STATION, UNIT NO. 1

AMENDMENT TO RENEWED FACILITY OPERATING LICENSE

Amendment No. 264  
Renewed License No. NPF-4

1. The U.S. Nuclear Regulatory Commission (the Commission) has found that:
  - A. The application for amendment by Virginia Electric and Power Company, dated July 12, 2010, as supplemented by letters dated August 5, 2010, September 23, 2010, November 10, 2010, December 13, 2010, April 4, 2011, and May 17, 2011, complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act), and the Commission's rules and regulations set forth in 10 CFR Chapter I;
  - B. The facility will operate in conformity with the application, the provisions of the Act, and the rules and regulations of the Commission;
  - C. There is reasonable assurance (i) that the activities authorized by this amendment can be conducted without endangering the health and safety of the public, and (ii) that such activities will be conducted in compliance with the Commission's regulations;
  - D. The issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public; and
  - E. The issuance of this amendment is in accordance with 10 CFR Part 51 of the Commission's regulations and all applicable requirements have been satisfied.
2. Accordingly, paragraph 2.E of Renewed Facility Operating License No. NPF-4 is hereby amended to read as follows:
  - E. The licensee shall fully implement and maintain in effect all provisions of the Commission-approved physical security, guard training and qualification, and safeguards contingency plans including amendments made pursuant to provisions of the Miscellaneous Amendments and Search Requirements revisions to 10 CFR 73.55 (51 FR 27817 and 27822) and the authority of 10 CFR 50.90 and 10 CFR 50.54(p). The combined set of plans, which contains Safeguards Information protected under 10 CFR 73.21, is entitled: "Millstone, North Anna and Surry Power Stations' Security Plan, Training, and Qualification

Plan, Safeguards Contingency Plan, and Independent Spent Fuel Storage Installation Security Program" with revisions submitted through May 15, 2006.

The licensee shall fully implement and maintain in effect all provisions of the Commission-approved Kewaunee, Millstone, North Anna, and Surry Power Stations Cyber Security Plan (CSP), including changes made pursuant to the authority of 10 CFR 50.90 and 10 CFR 50.54(p). The CSP was approved by License Amendment No. 264.

3. This license amendment is effective as of the date of issuance. The implementation of the CSP, including the key intermediate milestone dates and the full implementation date, shall be in accordance with the implementation schedule submitted by the licensee on April 4, 2011, and approved by the NRC staff with this license amendment. All subsequent changes to the NRC-approved CSP implementation schedule will require prior NRC approval pursuant to 10 CFR 50.90.

FOR THE NUCLEAR REGULATORY COMMISSION

A handwritten signature in black ink, appearing to read "G. Kulesa for".

Gloria Kulesa, Chief  
Plant Licensing Branch II-1  
Division of Operating Reactor Licensing  
Office of Nuclear Reactor Regulation

Attachment: Changes to NPF-4

Date of Issuance: August 31, 2011



ATTACHMENT TO LICENSE AMENDMENT NO. 264

RENEWED FACILITY OPERATING LICENSE NO. NPF-4

DOCKET NO. 50-338

Replace the following page of Renewed Facility Operating License NPF-4 with the attached revised page. The revised page is identified by amendment number and contains a marginal line indicating the area of change.

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Page 6

- (4) The licensee is authorized to receive from the Surry Power Station, Unit Nos. 1 and 2, possess, and store irradiated Surry Power Station fuel assemblies containing special nuclear material, enriched to not more than 4.1 percent by weight U-235, subject to the following conditions:
- a. Surry Power Station fuel assemblies may not be placed in North Anna Power Station, Unit Nos. 1 and 2, reactors.
  - b. Irradiated fuel shipped to North Anna Power Station shall have been removed from the Surry Power Station reactors no less than 730 days prior to shipment.
  - c. No more than 500 Surry Power Station irradiated fuel assemblies shall be received for storage at the North Anna Power Station, Unit Nos. 1 and 2, spent fuel pool.

(5) Environmental Protection Plan

The Environmental Protection-Plan contained in Appendix B, as revised through Amendment No. 197, is hereby incorporated in the renewed license. The licensee shall operate the facility in accordance with the Environmental Protection Plan.

D. Fire Protection

VEPCO shall implement and maintain in effect all provisions of the approved fire protection program as described in the Updated Final Safety Analysis Report for the facility and as approved in the SER dated February 1979 subject to the following provision:

The licensee may make changes to the approved fire protection program without prior approval of the Commission only if those changes would not adversely affect the ability to achieve and maintain safe shutdown in the event of a fire.

E. Physical Protection

The licensee shall fully implement and maintain in effect all provisions of the Commission-approved physical security, guard training and qualification, and safeguards contingency plans including amendments made pursuant to provisions of the Miscellaneous Amendments and Search Requirements revisions to 10 CFR 73.55 (51 FR 27817 and 27822) and the authority of 10 CFR 50.90 and 10 CFR 50.54(p). The combined set of plans, which contains Safeguards Information protected under 10 CFR 73.21, is entitled: "Millstone, North Anna and Surry Power Stations' Security Plan, Training, and Qualification Plan, Safeguards Contingency Plan, and Independent Spent Fuel Storage Installation Security Program" with revisions submitted through May 15, 2006.

The licensee shall fully implement and maintain in effect all provisions of the Commission-approved Kewaunee, Millstone, North Anna, and Surry Power Stations Cyber Security Plan (CSP), including changes made pursuant to the authority of 10 CFR 50.90 and 10 CFR 50.54(p). The CSP was approved by License Amendment No. 264.



UNITED STATES  
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VIRGINIA ELECTRIC AND POWER COMPANY

DOCKET NO. 50-339

NORTH ANNA POWER STATION, UNIT NO. 2

AMENDMENT TO RENEWED FACILITY OPERATING LICENSE

Amendment No. 245  
Renewed License No. NPF-7

1. The U.S. Nuclear Regulatory Commission (the Commission) has found that:
  - A. The application for amendment by Virginia Electric and Power Company, dated July 12, 2010, as supplemented by letters dated August 5, 2010, September 23, 2010, November 10, 2010, December 13, 2010, April 4, 2011, and May 17, 2011, complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act), and the Commission's rules and regulations set forth in 10 CFR Chapter I;
  - B. The facility will operate in conformity with the application, the provisions of the Act, and the rules and regulations of the Commission;
  - C. There is reasonable assurance (i) that the activities authorized by this amendment can be conducted without endangering the health and safety of the public, and (ii) that such activities will be conducted in compliance with the Commission's regulations;
  - D. The issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public; and
  - E. The issuance of this amendment is in accordance with 10 CFR Part 51 of the Commission's regulations and all applicable requirements have been satisfied.
2. Accordingly, paragraph 2.E of Renewed Facility Operating License No. NPF-7 is hereby amended to read as follows:
  - E. The licensee shall fully implement and maintain in effect all provisions of the Commission-approved physical security, guard training and qualification, and safeguards contingency plans including amendments made pursuant to provisions of the Miscellaneous Amendments and Search Requirements revisions to 10 CFR 73.55 (51 FR 27817 and 27822) and the authority of 10 CFR 50.90 and 10 CFR 50.54(p). The combined set of plans, which contains Safeguards Information protected under 10 CFR 73.21, is entitled: "Millstone, North Anna and Surry Power Stations' Security Plan, Training, and Qualification

Plan, Safeguards Contingency Plan, and Independent Spent Fuel Storage Installation Security Program" with revisions submitted through May 15, 2006.

The licensee shall fully implement and maintain in effect all provisions of the Commission-approved Kewaunee, Millstone, North Anna, and Surry Power Stations Cyber Security Plan (CSP), including changes made pursuant to the authority of 10 CFR 50.90 and 10 CFR 50.54(p). The CSP was approved by License Amendment No. 245.

3. This license amendment is effective as of the date of issuance. The implementation of the CSP, including the key intermediate milestone dates and the full implementation date, shall be in accordance with the implementation schedule submitted by the licensee on April 4, 2011, and approved by the NRC staff with this license amendment. All subsequent changes to the NRC-approved CSP implementation schedule will require prior NRC approval pursuant to 10 CFR 50.90.

FOR THE NUCLEAR REGULATORY COMMISSION

A handwritten signature in cursive script, appearing to read "G. Kulesa for".

Gloria Kulesa, Chief  
Plant Licensing Branch II-1  
Division of Operating Reactor Licensing  
Office of Nuclear Reactor Regulation

Attachment: Changes to NPF-7

Date of Issuance: August 31, 2011

ATTACHMENT TO LICENSE AMENDMENT NO. 245

RENEWED FACILITY OPERATING LICENSE NO. NPF-7

DOCKET NO. 50-339

Replace the following page of Renewed Facility Operating License NPF-7 with the attached revised page. The revised page is identified by amendment number and contains a marginal line indicating the area of change.

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- (4) The licensee is authorized to receive from the Surry Nuclear Power Station, Unit Nos. 1 and 2, possess, and store irradiated Surry Power Station fuel assemblies containing special nuclear material, enriched to not more than 4.1 percent by weight U-235, subject to the following conditions:
- a. Surry Power Station fuel assemblies may not be placed in North Anna Power Station, Unit Nos. 1 and 2, reactors.
  - b. Irradiated fuel shipped to North Anna Power Station shall have been removed from the Surry Power Station reactors no less than 730 days prior to shipment.
  - c. No more than 500 Surry Power Station irradiated fuel assemblies shall be received for storage at the North Anna Power Station, Unit Nos. 1 and 2, spent fuel pool.

(5) Environmental Protection Plan

The Environmental Protection Plan contained in Appendix B, as revised through Amendment No. 178, is hereby incorporated in the renewed license. The licensee shall operate the facility in accordance with the Environmental Protection Plan.

D. Fire Protection

VEPCO shall implement and maintain in effect all provisions of the approved fire protection program as described in the licensee's Updated Final Safety Analysis Report for the facility and as approved in the SER dated February 1979 subject to the following provision:

The licensee may make changes to the approved fire protection program without prior approval of the Commission only if those changes would not adversely affect the ability to achieve and maintain safe shutdown in the event of a fire.

E. Physical Protection

The licensee shall fully implement and maintain in effect all provisions of the Commission-approved physical security, guard training and qualification, and safeguards contingency plans including amendments made pursuant to provisions of the Miscellaneous Amendments and Search Requirements revisions to 10 CFR 73.55 (51 FR 27817 and 27822) and to the authority of 10 CFR 50.90 and 10 CFR 50.54(p). The combined set of plans, which contains Safeguards Information protected under 10 CFR 73.21, is entitled: "Millstone, North Anna and Surry Power Stations' Security Plan, Training, and Qualification Plan, Safeguards Contingency Plan, and Independent Spent Fuel Storage Installation Security Program" with revisions submitted through May 15, 2006.

The licensee shall fully implement and maintain in effect all provisions of the Commission-approved Kewaunee, Millstone, North Anna, and Surry Power Stations Cyber Security Plan (CSP), including changes made pursuant to the authority of 10 CFR 50.90 and 10 CFR 50.54(p). The CSP was approved by License Amendment No. 245.



UNITED STATES  
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WASHINGTON, D.C. 20555-0001

VIRGINIA ELECTRIC AND POWER COMPANY

DOCKET NO. 50-280

SURRY POWER STATION, UNIT NO. 1

AMENDMENT TO RENEWED FACILITY OPERATING LICENSE

Amendment No. 276  
Renewed License No. DPR-32

1. The U.S. Nuclear Regulatory Commission (the Commission) has found that:
  - A. The application for amendment by Virginia Electric and Power Company, dated July 12, 2010, as supplemented by letters dated August 5, 2010, September 23, 2010, November 10, 2010, December 13, 2010, April 4, 2011, and May 17, 2011, complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act), and the Commission's rules and regulations set forth in 10 CFR Chapter I;
  - B. The facility will operate in conformity with the application, the provisions of the Act, and the rules and regulations of the Commission;
  - C. There is reasonable assurance (i) that the activities authorized by this amendment can be conducted without endangering the health and safety of the public, and (ii) that such activities will be conducted in compliance with the Commission's regulations;
  - D. The issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public; and
  - E. The issuance of this amendment is in accordance with 10 CFR Part 51 of the Commission's regulations and all applicable requirements have been satisfied.
2. Accordingly, paragraph 3.J of Renewed Facility Operating License No. DPR-32 is hereby amended to read as follows:

J. Physical Protection

The licensee shall fully implement and maintain in effect all provisions of the Commission-approved physical security, guard training and qualification, and safeguards contingency plans including amendments made pursuant to provisions of the Miscellaneous Amendments and Search Requirements revisions to 10 CFR 73.55 (51 FR 27817 and 27822) and the authority of

10 CFR 50.90 and 10 CFR 50.54(p). The combined set of plans, which contains Safeguards Information protected under 10 CFR 73.21, is entitled: "Millstone, North Anna and Surry Power Stations' Security Plan, Training, and Qualification Plan, Safeguards Contingency Plan, and Independent Spent Fuel Storage Installation Security Program" with revisions submitted through May 15, 2006.

The licensee shall fully implement and maintain in effect all provisions of the Commission-approved Kewaunee, Millstone, North Anna, and Surry Power Stations Cyber Security Plan (CSP), including changes made pursuant to the authority of 10 CFR 50.90 and 10 CFR 50.54(p). The CSP was approved by License Amendment No. 276.

3. This license amendment is effective as of the date of issuance. The implementation of the CSP, including the key intermediate milestone dates and the full implementation date, shall be in accordance with the implementation schedule submitted by the licensee on April 4, 2011, and approved by the NRC staff with this license amendment. All subsequent changes to the NRC-approved CSP implementation schedule will require prior NRC approval pursuant to 10 CFR 50.90.

FOR THE NUCLEAR REGULATORY COMMISSION

A handwritten signature in black ink, appearing to read "G. Kulesa", followed by a stylized flourish.

Gloria Kulesa, Chief  
Plant Licensing Branch II-1  
Division of Operating Reactor Licensing  
Office of Nuclear Reactor Regulation

Attachment: Changes to DPR-32

Date of Issuance: August 31, 2011



ATTACHMENT TO LICENSE AMENDMENT NO. 276

RENEWED FACILITY OPERATING LICENSE NO. DPR-32

DOCKET NO. 50-280

Replace the following page of Renewed Facility Operating License DPR-32 with the attached revised page. The revised page is identified by amendment number and contains a marginal line indicating the area of change.

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November 18, 1982, January 17, 1984, February 25, 1988, and July 23, 1992), and the Safety Evaluation issued December 16, 1998, for Technical Specification Amendment No. 217 subject to the following provision:

The licensee may make changes to the approved fire protection program without prior approval of the Commission only if those changes would not adversely affect the ability to achieve and maintain safe shutdown in the event of a fire.

J. Physical Protection

The licensee shall fully implement and maintain in effect all provisions of the Commission-approved physical security, guard training and qualification, and safeguards contingency plans including amendments made pursuant to provisions of the Miscellaneous Amendments and Search Requirements revisions to 10 CFR 73.55 (51 FR 27817 and 27822) and the authority of 10 CFR 50.90 and 10 CFR 50.54(p). The combined set of plans, which contains Safeguards Information protected under 10 CFR 73.21, is entitled: "Millstone, North Anna and Surry Power Stations' Security Plan, Training, and Qualification Plan, Safeguards Contingency Plan, and Independent Spent Fuel Storage Installation Security Program" with revisions submitted through May 15, 2006.

The licensee shall fully implement and maintain in effect all provisions of the Commission-approved Kewaunee, Millstone, North Anna, and Surry Power Stations Cyber Security Plan (CSP), including changes made pursuant to the authority of 10 CFR 50.90 and 10 CFR 50.54(p). The CSP was approved by License Amendment No. 276.

- K. Deleted by Amendment 227
- L. Deleted by Amendment 227
- M. Deleted by Amendment 227
- N. Deleted by Amendment No. 203
- O. Deleted by Amendment 227
- P. Updated Final Safety Analysis Report

- (1) The Updated Final Safety Analysis Report supplement submitted pursuant to 10 CFR 54.21 (d), as revised on July 25, October 1, November 4, and December 2, 2002, describes certain future inspection activities to be completed before the period of extended operation. The licensee shall complete these activities no later than May 25, 2012, and shall notify the NRC in writing when implementation of these activities is complete and can be verified by NRC inspection.



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

VIRGINIA ELECTRIC AND POWER COMPANY

DOCKET NO. 50-281

SURRY POWER STATION, UNIT NO. 2

AMENDMENT TO RENEWED FACILITY OPERATING LICENSE

Amendment No. 276  
Renewed License No. DPR-37

1. The U.S. Nuclear Regulatory Commission (the Commission) has found that:
  - A. The application for amendment by Virginia Electric and Power Company, dated July 12, 2010, as supplemented by letters dated August 5, 2010, September 23, 2010, November 10, 2010, December 13, 2010, April 4, 2011, and May 17, 2011, complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act), and the Commission's rules and regulations set forth in 10 CFR Chapter I;
  - B. The facility will operate in conformity with the application, the provisions of the Act, and the rules and regulations of the Commission;
  - C. There is reasonable assurance (i) that the activities authorized by this amendment can be conducted without endangering the health and safety of the public, and (ii) that such activities will be conducted in compliance with the Commission's regulations;
  - D. The issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public; and
  - E. The issuance of this amendment is in accordance with 10 CFR Part 51 of the Commission's regulations and all applicable requirements have been satisfied.
2. Accordingly, paragraph 3.J of Renewed Facility Operating License No. DPR-37 is hereby amended to read as follows:

J. Physical Protection

The licensee shall fully implement and maintain in effect all provisions of the Commission-approved physical security, guard training and qualification, and safeguards contingency plans including amendments made pursuant to provisions of the Miscellaneous Amendments and Search Requirements revisions to 10 CFR 73.55 (51 FR 27817 and 27822) and the authority of 10 CFR 50.90 and 10 CFR 50.54(p). The combined set of plans, which contains

Safeguards Information protected under 10 CFR 73.21, is entitled: "Millstone, North Anna and Surry Power Stations' Security Plan, Training, and Qualification Plan, Safeguards Contingency Plan, and Independent Spent Fuel Storage Installation Security Program" with revisions submitted through May 15, 2006.

The licensee shall fully implement and maintain in effect all provisions of the Commission-approved Kewaunee, Millstone, North Anna, and Surry Power Stations Cyber Security Plan (CSP), including changes made pursuant to the authority of 10 CFR 50.90 and 10 CFR 50.54(p). The CSP was approved by License Amendment No. 276.

3. This license amendment is effective as of the date of issuance. The implementation of the CSP, including the key intermediate milestone dates and the full implementation date, shall be in accordance with the implementation schedule submitted by the licensee on April 4, 2011, and approved by the NRC staff with this license amendment. All subsequent changes to the NRC-approved CSP implementation schedule will require prior NRC approval pursuant to 10 CFR 50.90.

FOR THE NUCLEAR REGULATORY COMMISSION

A handwritten signature in cursive script, appearing to read "G. Kulesa for".

Gloria Kulesa, Chief  
Plant Licensing Branch II-1  
Division of Operating Reactor Licensing  
Office of Nuclear Reactor Regulation

Attachment: Changes to DPR-37

Date of Issuance: August 31, 2011

ATTACHMENT TO LICENSE AMENDMENT NO. 276

RENEWED FACILITY OPERATING LICENSE NO. DPR-37

DOCKET NO. 50-281

Replace the following page of Renewed Facility Operating License DPR-37 with the attached revised page. The revised page is identified by amendment number and contains a marginal line indicating the area of change.

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I. Fire Protection

The licensee shall implement and maintain in effect the provisions of the approved fire protection program as described in the Updated Final Safety Analysis Report and as approved in the SER dated September 19, 1979 (and Supplements dated May 29, 1980, October 9, 1980, December 18, 1980, February 13, 1981, December 4, 1981, April 27, 1982, November 18, 1982, January 17, 1984, February 25, 1988, and July 23, 1992), and the Safety Evaluation issued December 16, 1998, for Technical Specification Amendment No. 217 subject to the following provision:

The licensee may make changes to the approved fire protection program without prior approval of the Commission only if those changes would not adversely affect the ability to achieve and maintain safe shutdown in the event of a fire.

J. Physical Protection

The licensee shall fully implement and maintain in effect all provisions of the Commission-approved physical security, guard training and qualification, and safeguards contingency plans including amendments made pursuant to provisions of the Miscellaneous Amendments and Search Requirements revisions to 10 CFR 73.55 (51 FR 27817 and 27822) and to the authority of 10 CFR 50.90 and 10 CFR 50.54(p). The combined set of plans, which contains Safeguards Information protected under 10 CFR 73.21, is entitled: "Millstone, North Anna and Surry Power Stations' Security Plan, Training, and Qualification Plan, Safeguards Contingency Plan, and Independent Spent Fuel Storage Installation Security Program" with revisions submitted through May 15, 2006.

The licensee shall fully implement and maintain in effect all provisions of the Commission-approved Kewaunee, Millstone, North Anna, and Surry Power Stations Cyber Security Plan (CSP), including changes made pursuant to the authority of 10 CFR 50.90 and 10 CFR 50.54(p). The CSP was approved by License Amendment No. 276.

- K. Deleted by Amendment 227
- L. Deleted by Amendment 227
- M. Deleted by Amendment 227
- N. Deleted by Amendment 203
- O. Deleted by Amendment 227



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

SAFETY EVALUATION BY THE  
OFFICE OF NUCLEAR REACTOR REGULATION  
RELATED TO

AMENDMENT NO. 210 TO RENEWED FACILITY OPERATING LICENSE NO. DPR-43

FOR THE KEWAUNEE POWER STATION, DOCKET NO 50-305

AMENDMENT NO. 264 TO RENEWED FACILITY OPERATING LICENSE NO. NPF-4

FOR THE NORTH ANNA POWER STATION, UNIT 1, DOCKET NO. 50-338,

AMENDMENT NO. 245 TO RENEWED FACILITY OPERATING LICENSE NO. NPF-7

FOR THE NORTH ANNA POWER STATION, UNIT 2, DOCKET NOS. 50-339,

AMENDMENT NO. 276 TO RENEWED FACILITY OPERATING LICENSE NO. DPR-32

FOR THE SURRY POWER STATION, UNIT 1, DOCKET NO. 50-280

AMENDMENT NO. 276 TO RENEWED FACILITY OPERATING LICENSE NO. DPR-37

FOR THE SURRY POWER STATION, UNIT 2, DOCKET NO. 50-281

1.0 INTRODUCTION

By letter dated November 20, 2009 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML093360247), as supplemented by letters dated July 12, 2010, August 5, 2010, September 23, 2010, November 10, 2010, December 13, 2010, April 4, 2011, and May 17, 2011 (ADAMS Accession Nos. ML102010091, ML102210284, ML102670641, ML103160422, ML103560083, ML110960665, and ML11143A063, respectively), Dominion Resources Services, Inc. (Dominion) submitted a license amendment request. Included in that license amendment request was a request for approval of the licensee's Cyber Security Plan (CSP) and Implementation Schedule for the Kewaunee Power Station (Kewaunee); the Millstone Power Station (Millstone), Units 2 and 3; the North Anna Power Station (North Anna), Units 1 and 2; and the Surry Power Station (Surry), Units 1 and 2 as required by Title 10 of the *Code of Federal Regulations* (10 CFR) 73.54 (Reference 1). The license amendment for Millstone is being evaluated separately. The supplement dated July 12, 2010, superseded, in its entirety, the letter dated November 20, 2009. On November 10, 2010, the licensee supplemented its CSP (ADAMS Accession No. ML103160422), to address: (1) scope of systems in response to the October 21, 2010, the U.S. Nuclear Regulatory Commission (NRC, the Commission) decision (Reference 5); (2) records retention; and (3) implementation schedule. In the May 17, 2011, supplement, having integrated information from its supplements dated August 5, 2010,

Enclosure

through April 4, 2011, the licensee submitted a consolidated Cyber Security Plan, which it identified as Revision 0. Revision 0 designates the CSP that the licensee will implement.

Documents ML102010091, ML102210284, ML102210284, ML103160422, ML103560083, ML110960665, and ML11143A064 are being withheld from public disclosure because they contain sensitive unclassified non-safeguards information (security-related) and, accordingly, are being withheld from public disclosure.

The July 12, 2010, August 5, 2010, September 23, 2010, November 10, 2010, December 13, 2010, April 4, 2011, and May 17, 2011, supplements contained clarifying information and did not change the U.S. Nuclear Regulatory Commission (NRC) staff's initial proposed finding of no significant hazards consideration determination as published in the *Federal Register* on November 9, 2010 (75 FR 68834) for Kewaunee and December 7, 2010 (75 FR 76047) for North Anna and for Surry.

The amendments would approve the CSP and associated implementation schedule and revise the affected facility operation licenses as follows:

- 1 – paragraph 2.C.(4) of Renewed Facility Operating License No. DPR-43 for Kewaunee
- 2 – paragraph 2.E of Renewed Facility Operating License No. NPF-4 for North Anna Unit No. 1
- 3 – paragraph 2.E of Renewed Facility Operating License No. NPF-7 for North Anna Unit No. 2
- 4 – paragraph 3.J of Renewed Facility Operating License No. DPR-32 for Surry Unit No. 1
- 5 – paragraph 3.J of Renewed Facility Operating License No. DPR-37 for Surry Unit No. 2.

The amendments provide a license condition to require each licensee to fully implement and maintain in effect all provisions of the NRC-approved CSP. The proposed change is generally consistent with Nuclear Energy Institute (NEI) 08-09, Revision 6, "Cyber Security Plans For Nuclear Power Plants."

## 2.0 REGULATORY EVALUATION

### 2.1 General Requirements

Consistent with 10 CFR 73.54(a), the licensee must provide high assurance that digital computer and communication systems, and networks are adequately protected against cyber attacks, up to and including the design basis threat (DBT), as described in 10 CFR 73.1. The licensee shall protect digital computer and communication systems and networks associated with: (i) safety-related and important-to-safety functions; (ii) security functions; (iii) emergency preparedness functions, including offsite communications; and (iv) support systems and equipment which, if compromised, would adversely impact safety, security, or emergency preparedness (SSEP) functions. The rule specifies that digital computer and communication systems and networks associated with these functions must be protected from cyber attacks that would adversely impact the integrity or confidentiality of data and software; deny access to systems, services, or data; or provide an adverse impact to the operations of systems, networks, and associated equipment.

In the October 21, 2010, Staff Requirements Memorandum (SRM)-COMWCO-10-0001, the Commission stated that the NRC's cyber security rule at 10 CFR 73.54 should be interpreted to include structures, systems, and components (SSCs) in the balance of plant (BOP) that have a nexus to radiological health and safety. The NRC staff determined that SSCs in the BOP that



have a nexus to radiological health and safety are those that could directly or indirectly affect reactivity of a nuclear power plant (NPP), and are therefore within the scope of important-to-safety functions described in 10 CFR 73.54(a)(1).

## 2.2 Elements of a CSP

As required by 10 CFR 73.54(e), the licensee must establish, implement, and maintain a CSP that satisfies the Cyber Security Program requirements of this regulation. In addition, the CSP must describe how the licensee will implement the requirements of the regulation and must account for the site-specific conditions that affect implementation. One method of complying with this regulation is to describe within the CSP how the licensee will achieve high assurance that all SSEP functions are protected from cyber attacks.

## 2.3 Regulatory Guide (RG) 5.71 and Nuclear Energy Institute (NEI) 08-09, Revision 6

NRC Regulatory Guide (RG) 5.71, "Cyber Security Programs for Nuclear Facilities" (Reference 2) describes a regulatory position that promotes a defensive strategy consisting of a defensive architecture and a set of security controls based on standards provided in the National Institute of Standards and Technology (NIST) Special Publication (SP) 800-53, "Recommended Security Controls for Federal Information Systems and Organizations" and NIST SP 800-82, "Guide to Industrial Control Systems Security," dated September 29, 2008. NIST SP 800-53 and NIST SP 800-82 are based on well understood cyber threats, risks, and vulnerabilities, coupled with equally well understood countermeasures and protective techniques. RG 5.71 divides the above-noted security controls into three broad categories: technical, operational, and management.

RG 5.71 provides a framework to aid in the identification of those digital assets that licensees must protect from cyber attacks. These identified digital assets are referred to as "critical digital assets" (CDAs). Licensees should address the potential cyber security risks to CDAs by applying the defensive architecture and addressing the collection of security controls identified in RG 5.71. RG 5.71 includes a CSP template that provides one method for preparing an acceptable CSP.

The organization of RG 5.71 reflects the steps necessary to meet the requirements of 10 CFR 73.54. Section C.3 of RG 5.71, describes an acceptable method for implementing the security controls, as detailed in Appendix B, "Technical Controls," and Appendix C, "Operational and Management Controls." Section C.4 of RG 5.71 discusses the need to maintain the established cyber security program, including comprehensive monitoring of the CDAs and the effectiveness of their security protection measures, ensuring that changes to the CDAs or the environment are controlled, coordinated, and periodically reviewed for continued protection from cyber attacks. Section C.5 of RG 5.71 provides licensees and applicants with guidance for retaining records associated with their cyber security programs. Appendix A to RG 5.71 provides a template for a generic CSP which licensees may use to comply with the licensing requirements of 10 CFR 73.54. Appendices B and C provide an acceptable set of security controls, which are based on well-understood threats, vulnerabilities, and attacks, coupled with equally well-understood and vetted countermeasures and protective techniques.

NEI 08-09, Revision 6, closely maps with RG 5.71; Appendix A of NEI 08-09, Revision 6, contains a CSP template that is comparable to Appendix A of RG 5.71. Appendix D of NEI 08-09, Revision 6, contains technical cyber security controls that are comparable to

Appendix B of RG 5.71. Appendix E of NEI 08-09, Revision 6, contains operational and management cyber security controls that are comparable to Appendix C of RG 5.71.

The NRC staff stated in a letter (Subject: Nuclear Energy Institute [NEI] 08-09, "Cyber Security Plan Template," Revision 6), dated May 5, 2010 (ADAMS Accession No. ML101190371), that the licensee may use the template in NEI 08-09, Revision 6 (Reference 3), to prepare an acceptable CSP, with the exception of the definition of "cyber attack." The NRC staff subsequently reviewed and approved by letter dated June 7, 2010 (ADAMS Accession No. ML101550052), a definition for "cyber attack" to be used in submissions based on NEI 08-09, Revision 6 (Reference 4). The licensee submitted a CSP for the Kewaunee Power Station; the Millstone Power Station, Units 2 and 3; the North Anna Power Station, Units 1 and 2; and the Surry Power Station, Units 1 and 2, that was based on the template provided in NEI 08-09, Revision 6, and included in the deviation table a definition of cyber attack that was acceptable to the NRC staff. Additionally, the licensee submitted a supplement to their CSP on November 10, 2010, to include information on SSCs in the BOP that, if compromised, could affect NPP reactivity.

RG 5.71 and NEI 08-09, Revision 6, are comparable documents; both are based on essentially the same general approach and same set of technical, operational, and management security controls. The submitted CSP was reviewed against the corresponding sections in RG 5.71.

### 3.0 TECHNICAL EVALUATION

The NRC staff performed a technical evaluation of the licensee's submittal. The licensee's submittal, with the exception of deviations described in Section 4.0, generally conformed to the guidance in NEI 08-09, Revision 6, which was found to be acceptable by the NRC staff and comparable to RG 5.71 to satisfy the requirements contained in 10 CFR 73.54. The NRC staff reviewed the licensee's submittal against the requirements of 10 CFR 73.54 following the guidance contained in RG 5.71. The NRC staff's evaluation of each section of the submittal is discussed below.

#### 3.1 Scope and Purpose

The licensee's CSP establishes a means to achieve high assurance that digital computer and communication systems and networks associated with the following functions are adequately protected against cyber attacks up to and including the DBT:

1. Safety-related and important-to-safety functions;
2. Security functions;
3. Emergency preparedness functions, including offsite communications; and
4. Support systems and equipment which, if compromised, would adversely impact SSEP functions.

The submitted CSP describes achievement of high assurance of adequate protection of systems associated with the above functions from cyber attacks by:

- Implementing and documenting the “baseline” security controls as described in Section 3.1.6 of NEI 08-09, Revision 6, which is comparable to Regulatory Position C.3.3 described in RG 5.71; and
- Implementing and documenting a Cyber Security Program to maintain the established cyber security controls through a comprehensive life cycle approach as described in Section 4 of NEI 08-09, Revision 6, which is comparable to Appendix A, Section A.2.1 of RG 5.71.

Thus, the licensee’s CSP, as originally submitted, is comparable to the CSP in NEI-08-09, Revision 6. However, in its submittal dated November 10, 2010, the licensee clarified its original submission and indicated that the scope of systems includes those BOP SSCs that have an impact on NPP reactivity if compromised. This is in response to and consistent with SRM COMWCO-10-0001, “Regulation of Cyber Security at Nuclear Power Plants,” October 21, 2010 (ADAMS Accession No. ML102940009), in which the Commission stated that the NRC’s cyber security rule at 10 CFR 73.54 should be interpreted to include SSCs in the BOP that have a nexus to radiological health and safety. The NRC staff determined that those systems that have a nexus to radiological health and safety that could directly or indirectly affect reactivity of a NPP, are therefore within the scope of important-to-safety functions described in 10 CFR 73.54(a)(1).

The NRC staff reviewed the CSP and supplemental information submitted by the licensee and found no deviation from Regulatory Position C.3.3 in RG 5.71 and Appendix A, Section A.2.1 of RG 5.71. The NRC staff finds that the licensee established adequate measures to implement and document the Cyber Security Program, including baseline security controls.

Based on the above, the NRC staff finds that the CSP adequately establishes the Cyber Security Program, including baseline security controls.

### 3.2 Analyzing Digital Computer Systems and Networks and Applying Cyber Security Controls

The licensee’s CSP describes that the Cyber Security Program is established, implemented, and maintained as described in Section 3.1 of NEI 08-09, Revision 6, which is comparable to Regulatory Position C.3.1 described in RG 5.71 to:

- Analyze digital computer and communications systems and networks; and
- Identify those assets that must be protected against cyber attacks to satisfy 10 CFR 73.54(a).

The submitted CSP describes how the cyber security controls in Appendices D and E of NEI 08-09, Revision 6, which are comparable to Appendices B and C in RG 5.71, are addressed to protect CDAs from cyber attacks.

This section is comparable to Regulatory Position C.3.1 in RG 5.71, without deviation.

Based on the above, the NRC staff finds that the CSP adequately addresses security controls.

### 3.3 Cyber Security Assessment and Authorization

The licensee provided information addressing the creation of a formal, documented, cyber security assessment and authorization policy. This included a description concerning the creation of a formal, documented procedure comparable to Section 3.1.1 of NEI 08-09, Revision 6.

The NRC staff finds that the licensee established adequate measures to define and address the purpose, scope, roles, responsibilities, management commitment, and coordination, and facilitates the implementation of the cyber security assessment and authorization policy.

The NRC staff reviewed the above information and found no deviation from Section 3.1.1 of NEI 08-09, Revision 6, which is comparable to Regulatory Position C.3.1.1 and Appendix A, Section A 3.1.1 of RG 5.71.

Based on the above, the NRC staff finds that the CSP adequately established controls to develop, disseminate, and periodically update the cyber security assessment and authorization policy and implementing procedure.

### 3.4 Cyber Security Assessment Team (CSAT)

The CSAT responsibilities include conducting the cyber security assessment, documenting key findings during the assessment, and evaluating assumptions and conclusions about cyber security threats. The submitted CSP outlines the requirements, roles and responsibilities of the CSAT comparable to Section 3.1.2 of NEI 08-09, Revision 6. It also describes that the CSAT has the authority to conduct an independent assessment.

The submitted CSP describes that the CSAT will consist of individuals with knowledge about information and digital systems technology; NPP operations, engineering, and plant technical specifications; and physical security and emergency preparedness systems and programs. The CSAT description in the CSP is comparable to Regulatory Position C.3.1.2 in RG 5.71.

The submitted CSP lists the roles and responsibilities for the CSAT which included performing and overseeing the cyber security assessment process; documenting key observations; evaluating information about cyber security threats and vulnerabilities; confirming information obtained during tabletop reviews, walk-downs, or electronic validation of CDAs; and identifying potential new cyber security controls.

This section of the CSP submitted by the licensee is comparable to Regulatory Position C.3.1.2 in RG 5.71 without deviation.

Based on the above, the NRC staff finds that the CSP adequately establishes the requirements, roles and responsibilities of the CSAT.

### 3.5 Identification of CDAs

The submitted CSP describes that the licensee will identify and document CDAs and critical systems (CSs), including a general description, the overall function, the overall consequences if a compromise were to occur, and the security functional requirements or specifications as

described in Section 3.1.3 of NEI 08-09, Revision 6, which is comparable to Regulatory Position C.3.1.3 of RG 5.71.

Based on the above, the NRC staff finds that the CSP adequately describes the process to identify CDAs.

### 3.6 Examination of Cyber Security Practices

The submitted CSP describes how the CSAT will examine and document the existing cyber security policies, procedures, and practices; existing cyber security controls; detailed descriptions of network and communication architectures (or network/communication architecture drawings); information on security devices; and any other information that may be helpful during the cyber security assessment process as described in Section 3.1.4 of NEI 08-09, Revision 6, which is comparable to Regulatory Position C.3.1.2 of RG 5.71. The examinations will include an analysis of the effectiveness of the existing Cyber Security Program and cyber security controls. The CSAT will document the collected cyber security information and the results of their examination of the collected information.

This section of the CSP submitted by the licensee is comparable to Regulatory Position C.3.1.2 in RG 5.71 without deviation.

Based on the above, the NRC staff finds that the CSP adequately describes the examination of cyber security practices.

### 3.7 Tabletop Reviews and Validation Testing

The submitted CSP describes tabletop reviews and validation testing, which confirm the direct and indirect connectivity of each CDA and identify direct and indirect pathways to CDAs. The CSP states that validation testing will be performed electronically or by physical walkdowns. The licensee's plan for tabletop reviews and validation testing is comparable to Section 3.1.5 of NEI 08-09, Revision 6, which is comparable to Regulatory Position C.3.1.4 of RG 5.71.

Based on the above, the NRC staff finds that the CSP adequately describes tabletop reviews and validation testing.

### 3.8 Mitigation of Vulnerabilities and Application of Cyber Security Controls

The submitted CSP describes the use of information collected during the cyber security assessment process (e.g., disposition of cyber security controls, defensive models, defensive strategy measures, site and corporate network architectures) to implement security controls in accordance with Section 3.1.6 of NEI 08-09, Revision 6, which is comparable to Regulatory Position C.3.3 and Appendix A.3.1.6 to RG 5.71. The CSP describes the process that will be applied in cases where security controls cannot be implemented.

The submitted CSP notes that before the licensee can implement security controls on a CDA, it will assess the potential for adverse impact in accordance with Section 3.1.6 of NEI 08-09, Rev. 6, which is comparable to Regulatory Position C.3.3 of RG 5.71.

Based on the above, the NRC staff finds that the CSP adequately describes mitigation of vulnerabilities and application of security controls.

### 3.9 Incorporating the Cyber Security Program into the Physical Protection Program

The submitted CSP states that the Cyber Security Program will be reviewed as a component of the Physical Security Program in accordance with the requirements of 10 CFR 73.55(m). This is comparable to Section 4.1 of NEI 08-09, Revision 6, which is comparable to Regulatory Position C.3.4 of RG 5.71.

This section of the CSP submitted by the licensee is comparable to Appendix A, Section A.3.2 in RG 5.71 without deviation.

Based on the above, the NRC staff finds that the CSP adequately describes review of the CSP as a component of the physical security program.

### 3.10 Cyber Security Controls

The submitted CSP describes how the technical, operational and management cyber security controls contained in Appendices D and E of NEI 08-09, Revision 6, that are comparable to Appendices B and C in RG 5.71, are evaluated and dispositioned based on site-specific conditions during all phases of the Cyber Security Program. The CSP describes that many security controls have actions that are required to be performed on specific frequencies and that the frequency of a security control is satisfied if the action is performed within 1.25 times the frequency specified in the control, as applied, and as measured from the previous performance of the action, as described in Section 4.2 of NEI 08-09, Revision 6.

This section of the CSP submitted by the licensee is comparable to Appendix A, Section A.3.1.6 in RG 5.71, without deviation.

Based on the above, the NRC staff finds that the CSP adequately describes implementation of cyber security controls.

### 3.11 Defense-in-Depth Protective Strategies

The submitted CSP describes the implementation of defensive strategies that ensure the capability to detect, respond to, and recover from a cyber attack. The CSP specifies that the defensive strategies consist of security controls, defense-in-depth measures, and the defensive architecture. The submitted CSP notes that the defensive architecture establishes the logical and physical boundaries to control the data transfer between these boundaries.

The licensee established defense-in-depth strategies by implementing and documenting: a defensive architecture as described in Section 4.3 of NEI 08-09, Revision 6, which is comparable to Regulatory Position C.3.2 in RG 5.71; a physical security program, including physical barriers; the operational and management controls described in Appendix E of NEI 08-09, Revision 6, which is comparable to Appendix C to RG 5.71; and the technical controls described in Appendix D of NEI 08-09, Revision 6, which is comparable to Appendix B to RG 5.71.

Bullet 4 of Section 6, "Defense-in-Depth" of Appendix E, "Operational and Management Cyber Security Controls" of the licensee's CSP includes a statement: "Data flow from lower security levels to higher security levels is restricted between levels that are indirectly connected through a security boundary control device such as a firewall." The NRC staff requested the licensee to clarify the term "indirectly connected" and asked the licensee to provide examples and/or diagrams to support the explanation. The licensee responded by letter dated May 17, 2011 (ADAMS Accession No. ML11143A063). In Attachment 1 to this letter, the licensee stated that the word "indirectly" would be removed from the sentence. Based on the statement in the licensee's CSP, Section 4.3, which states, "The boundary between Level 3 and Level 2 is implemented by (1) deterministically eliminating data flow from Level 2 to Level 3 or (2) restricting data flow and implementing network-based intrusion detection as described in Appendix D, Section 1.4, Information Flow Enhancement and Appendix E, Section 6, rule set characteristics," the NRC staff finds this clarification to be acceptable. This change was reflected in the CSP submitted as Attachment 2 of the May 17, 2011, letter.

This section of the CSP submitted by the licensee is comparable to Regulatory Position C.3.2 and Appendix A, Section A.3.1.5 in RG 5.71.

Based on the above, the NRC staff finds that the CSP adequately describes implementation of defense-in-depth protective strategies.

### 3.12 Ongoing Monitoring and Assessment

The submitted CSP describes how ongoing monitoring of cyber security controls to support CDAs is implemented comparable to Section 4.4 of NEI 08-09, Revision 6, which is comparable to Regulatory Positions C.4.1 and C.4.2 of RG 5.71. The ongoing monitoring program includes: configuration management and change control; cyber security impact analysis of changes and changed environments; ongoing assessments of cyber security controls; effectiveness analysis (to monitor and confirm that the cyber security controls are implemented correctly, operating as intended, and achieving the desired outcome) and vulnerability scans to identify new vulnerabilities that could affect the security posture of CDAs.

In the CSP Section 4.4.3.1, "Effectiveness Analysis," Dominion removed the phrase "and efficiency." The licensee justification provided states that, "Efficiency is not required by the Rule and will not necessarily be included in effectiveness analysis processes." NRC staff finds this deviation acceptable as it does not impact the cyber security program effectiveness.

In the CSP Section 4.4.3.2, "Vulnerability Scans," Dominion removed the phrase, "because of the potential for an adverse impact on SSEP functions." The licensee justification provided states that, "There are conditions other than 'adverse impact on SSEP functions' when vulnerability scanning cannot be performed. This change will permit alternate controls to be used when these conditions exist." While scanning can add some value to the understanding of the current state of the licensee's network, the NRC staff considered that most commercial scanning tools do not understand vulnerabilities or protocols that may exist in an industrial control systems environment. In addition, the staff has found that vulnerability assessments are generally as effective in an industrial environment when it comes to discovering vulnerabilities as automated vulnerability scanning tools. The licensee states that, "if vulnerability assessments or scanning cannot be performed on a production CDA, alternate controls are employed." The staff considered that when vulnerability assessments or scanning cannot be performed, that alternative controls exist that would mitigate any existing or potentially undiscovered

vulnerabilities. The NRC staff has reviewed this deviation and finds that applying alternate controls that are comparable in effectiveness to vulnerability assessments or vulnerability scanning, when these methods cannot be performed, is an acceptable method for meeting the intent of this section of the CSP.

This section of the CSP submitted by the licensee is comparable to Regulatory Positions C.4.1 and C.4.2 of RG 5.71.

Based on the above, the NRC staff finds that the CSP adequately describes ongoing monitoring and assessment.

### 3.13 Modification of Digital Assets

The submitted CSP describes how cyber security controls are established, implemented, and maintained to protect CDAs. These security controls ensure: that modifications to CDAs are evaluated before implementation; that the cyber security performance objectives are maintained; and that acquired CDAs have cyber security requirements in place to achieve the site's Cyber Security Program objectives. This is comparable to Section 4.5 of NEI 08-09, Revision 6, which is comparable to Appendices A.4.2.5 and A.4.2.6 of RG 5.71 without deviation.

Based on the above, the NRC staff finds that the CSP adequately describes modification of digital assets.

### 3.14 Attack Mitigation and Incident Response

The submitted CSP describes the process to ensure that SSEP functions are not adversely impacted due to cyber attacks, in accordance with Section 4.6 of NEI 08-09, Revision 6, which is comparable to Appendix C, Section C.8 of RG 5.71. The CSP includes a discussion about creating incident response policy and procedures, and addresses training, testing and drills, incident handling, incident monitoring, and incident response assistance. It also describes identification, detection, response, containment, eradication, and recovery activities comparable to Section 4.6 of NEI 08-09, Revision 6.

This section of the CSP submitted by the licensee is comparable to Appendix C, Section C.8 of RG 5.71, without deviation.

Based on the above, the NRC staff finds that the CSP adequately describes attack mitigation and incident response.

### 3.15 Cyber Security Contingency Plan

The submitted CSP describes creation of a Cyber Security Contingency Plan and policy that protects CDAs from the adverse impacts of a cyber attack described in Section 4.7 of NEI 08-09, Revision 6, which is comparable to Regulatory Position C.3.3.2.7 and Appendix C.9 of RG 5.71. The licensee describes the Cyber Security Contingency Plan that would include the response to events. The plan includes procedures for operating CDAs in a contingency, roles and responsibilities of responders, processes and procedures for backup and storage of information, logical diagrams of network connectivity, current configuration information, and personnel lists for authorized access to CDAs.



This section of the CSP submitted by the licensee is comparable to Regulatory Position C.3.3.2.7 of RG 5.71, without deviation.

Based on the above, the NRC staff finds that the CSP adequately describes the cyber security contingency plan.

### 3.16 Cyber Security Training and Awareness

The submitted CSP describes establishment of training necessary for the licensee's personnel and contractors to perform their assigned duties and responsibilities in implementing the Cyber Security Program in accordance with Section 4.8 of NEI 08-09, Revision 6, which is comparable to Regulatory Position C.3.3.2.8 of RG 5.71.

The CSP states that individuals will be trained with a level of cyber security knowledge commensurate with their assigned responsibilities in order to provide high assurance that individuals are able to perform their job functions in accordance with Appendix E of NEI 08-09, Revision 6, which is comparable to Regulatory Position C.3.3.2.8 of RG 5.71 and describes three levels of training: awareness training, technical training, and specialized cyber security training.

Based on the above, the NRC staff finds that the CSP adequately describes the cyber security training and awareness.

### 3.17 Evaluate and Manage Cyber Risk

The submitted CSP describes how cyber risk is evaluated and managed utilizing programs and procedures comparable to Section 4.9 of NEI 08-09, Revision 6, which is comparable to Regulatory Position C.4 and Appendix C, Section C.13 of RG 5.71. The CSP describes Threat and Vulnerability Management, Risk Mitigation, the Operational Experience Program; and the Corrective Action Program and how each will be used to evaluate and manage risk.

In the CSP Section 4.9.1, "Threat and Vulnerability Management," Dominion replaced, "computer and control systems" with "CDA." The NRC staff finds this change acceptable since there are computer and control systems that are not CDAs and the requirements in 10 CFR 73.54(c)(1) are that the licensee protect CDAs.

This section of the CSP submitted by the licensee is comparable to Regulatory Position C.4 and Appendix C, Section C.13 of RG 5.71.

Based on the above, the NRC staff finds that the CSP adequately describes evaluation and management of cyber risk.

### 3.18 Policies and Implementing Procedures

The CSP describes development and implementation of policies and procedures to meet security control objectives in accordance with Section 4.10 of NEI 08-09, Revision 6, which is comparable to Regulatory Position C.3.5 and Appendix A, Section A.3.3 of RG 5.71. This includes the process to document, review, approve, issue, use, and revise policies and procedures.

The CSP also describes the licensee's procedures to establish specific responsibilities for positions described in Section 4.11 of NEI 08-09, Revision 6, which is comparable to Appendix C, Section C.10.10 of RG 5.71.

This section of the CSP submitted by the licensee is comparable to Regulatory Position C.3.5, Appendix A, Section A.3.3, and Appendix C, Section C.10.10 of RG 5.71, without deviation.

Based on the above, the NRC staff finds that the CSP adequately describes cyber security policies and implementing procedures.

### 3.19 Roles and Responsibilities

The submitted CSP describes the roles and responsibilities for the qualified and experienced personnel, including the Cyber Security Program Sponsor, the Cyber Security Program Manager, Cyber Security Specialists, the Cyber Security Incident Response Team (CSIRT), and other positions as needed. The CSIRT initiates in accordance with the Incident Response Plan, takes action when required to safeguard CDAs from cyber security compromise, and assists with the eventual recovery of compromised systems. Implementing procedures establish the roles and responsibilities for each of the cyber security positions in accordance with Section 4.11 of NEI 08-09, Revision 6, which is comparable to Regulatory Position C.3.1.2, Appendix A, Section A.3.1.2, and Appendix C, Section C.10.10 of RG 5.71.

Based on the above, the NRC staff finds that the CSP adequately describes cyber security roles and responsibilities.

### 3.20 Cyber Security Program Review

The submitted CSP describes how the Cyber Security Program establishes the necessary procedures to implement reviews of applicable program elements in accordance with Section 4.12 of NEI 08-09, Revision 6, which is comparable to Regulatory Position C.4.3 and Appendix A, Section A.4.3 of RG 5.71.

Based on the above, the NRC staff finds that the CSP adequately describes the Cyber Security Program review.

### 3.21 Document Control and Records Retention and Handling

The submitted CSP describes that the licensee has established the necessary procedures to ensure that sufficient records of items and activities affecting cyber security are developed, reviewed, approved, issued, and used, to reflect completed work. The CSP described that superseded portions of certain records will be retained for at least three years after the record is superseded, while audit records will be retained for no less than 12 months in accordance with Section 4.13 of NEI 08-09, Revision 6. However, this guidance provided by industry to licensees did not fully comply with the requirements of 10 CFR 73.54.

In a letter dated February 28, 2011 (ADAMS Accession No. ML110600204), NEI sent to the NRC proposed language for licensees' use to respond to the generic records retention issue, to which the NRC had no technical objection (Reference: Letter from NRC dated March 1, 2011, ADAMS Accession No. ML110490337). The proposed language clarified the requirement by providing examples (without providing an all-inclusive list) of the records and supporting

technical documentation that are needed to satisfy the requirements of 10 CFR 73.54. All records will be retained until the Commission terminates the license, and the licensee shall maintain superseded portions of these records for at least three years after the record is superseded, unless otherwise specified by the Commission. By retaining accurate and complete records and technical documentation until the license is terminated, inspectors, auditors, or assessors will have the ability to evaluate incidents, events, and other activities that are related to any of the cyber security elements described, referenced, and contained within the licensee's NRC-approved CSP. It will also allow the licensee to maintain the ability to detect and respond to cyber attacks in a timely manner. In a letter dated April 4, 2011, the licensee responded to the records retention issue using the language proposed by NEI in its letter dated February 28, 2011.

Based on the above, the NRC staff finds that the language the licensee proposes to adopt provides for adequate records retention and will support the licensee's ability to detect and respond to cyber attacks. The NRC staff further finds that this section is comparable to Regulatory Position C.5 and Appendix A, Section A.5 of RG 5.71 without deviation. Accordingly, the NRC staff concludes that the licensee's CSP adequately describes cyber security document control and records retention and handling.

### 3.22 Implementation Schedule

The submitted CSP provides a proposed implementation schedule for the Cyber Security Program. In a letter dated February 28, 2011 (ADAMS Accession No. ML110600206), NEI sent to the NRC a template for licensees to use to submit their CSP implementation schedules, to which the NRC had no technical objection (Reference: Letter from NRC dated March 1, 2011, ADAMS Accession No. ML110070348). These key milestones are:

- Establish the CSAT;
- Identify CSs and CDAs;
- Install a deterministic one-way device between lower level devices and higher level devices;
- Implement the security control "Access Control For Portable And Mobile Devices";
- Implement observation and identification of obvious cyber related tampering to existing insider mitigation rounds by incorporating the appropriate elements;
- Identify, document, and implement cyber security controls as per "Mitigation of Vulnerabilities and Application of Cyber Security Controls" for CDAs that could adversely impact the design function of physical security target set equipment; and
- Commence ongoing monitoring and assessment activities for those target set CDAs for which security controls have been implemented.

In a letter dated April 4, 2011 (ADAMS Accession No. ML110960676), the licensee provided a revised implementation schedule using the NEI template, with the exception of Milestone 6. The

licensee deviated from the template for Milestone 6 to address only the NEI 08-09, Revision 6, Appendix D, technical controls, excluding the operational and management controls, on the basis that implementing the technical controls for target set CDAs provides a high degree of protection against cyber-related attacks that could lead to radiological sabotage. Furthermore, the licensee's programs that are currently in place (e.g., physical protection, maintenance and work management, configuration management, operational experience, etc.) provide a high degree of protection during the interim period until such time that the full cyber security program is implemented.

The NRC staff acknowledges that, in its submittal dated April 4, 2011, the licensee proposed several CSP milestone implementation dates as regulatory commitments. The NRC staff does not regard the CSP milestone implementation dates as regulatory commitments that can be changed unilaterally by the licensee, particularly in light of the regulatory requirement at 10 CFR 73.54, that "[i]mplementation of the licensee's cyber security program must be consistent with the approved schedule." As the NRC staff explained in its letter to all operating reactor licensees dated May 9, 2011 (ADAMS Accession No. ML110980538), the implementation of the plan, including the key intermediate milestone dates and the full implementation date, shall be in accordance with the implementation schedule submitted by the licensee and approved by the NRC. All subsequent changes to the NRC-approved CSP implementation schedule, thus, will require prior NRC approval pursuant in 10 CFR 50.90.

The NRC staff considers this April 4, 2011, supplement to be the approved schedule as required by 10 CFR 73.54. Based on the provided schedule ensuring timely implementation of those protective measures that provide a higher degree of protection against radiological sabotage, the NRC staff finds the Cyber Security Program implementation schedule is satisfactory.

### 3.23 Revision to License Conditions for Kewaunee, North Anna, and Surry

By letter dated July 12, 2010, the licensees proposed to add a paragraph to their respective Renewed Operating Licenses as follows:

- 1 – Paragraph 2.C.(4) of Renewed Facility Operating License No. DPR-43 for Kewaunee
- 2 – Paragraph 2.E of Renewed Facility Operating License No. NPF-4 for North Anna Unit No. 1
- 3 – Paragraph 2.E of Renewed Facility Operating License No. NPF-7 for North Anna Unit No. 2
- 4 – Paragraph 3.J of Renewed Facility Operating License No. DPR-32 for Surry Unit No. 1
- 5 – Paragraph 3.J of Renewed Facility Operating License No. DPR-37 for Surry Unit No. 2

respectively, to provide a license condition to require each licensee to fully implement and maintain in effect all provisions of the NRC-approved CSP. The NRC staff modified the proposed wording of these license conditions described in the licensee's submittal dated July 12, 2010, and the licensee agreed with the revised license condition proposed by the NRC staff.

The following paragraphs are added to the affected Paragraphs of the Renewed Facility Operating Licenses:

- 1 – to Paragraph 2.C.(4) of Renewed Facility Operating License No. DPR-43 for Kewaunee:

The licensee shall fully implement and maintain in effect all provisions of the Commission-approved Kewaunee, Millstone, North Anna, and Surry Power Stations Cyber Security Plan (CSP), including changes made pursuant to the authority of 10 CFR 50.90 and 10 CFR 50.54(p). The CSP was approved by License Amendment No. 210.

- 2 – to Paragraph 2.E of Renewed Facility Operating License No. NPF-4 for North Anna Unit No. 1

The licensee shall fully implement and maintain in effect all provisions of the Commission-approved Kewaunee, Millstone, North Anna, and Surry Power Stations Cyber Security Plan (CSP), including changes made pursuant to the authority of 10 CFR 50.90 and 10 CFR 50.54(p). The CSP was approved by License Amendment No. 264.

- 3 – to Paragraph 2.E of Renewed Facility Operating License No. NPF-7 for North Anna Unit No. 2

The licensee shall fully implement and maintain in effect all provisions of the Commission-approved Kewaunee, Millstone, North Anna, and Surry Power Stations Cyber Security Plan (CSP), including changes made pursuant to the authority of 10 CFR 50.90 and 10 CFR 50.54(p). The CSP was approved by License Amendment No. 245.

- 4 – to Paragraph 3.J of Renewed Facility Operating License No. DPR-32 for Surry Unit No. 1

The licensee shall fully implement and maintain in effect all provisions of the Commission-approved Kewaunee, Millstone, North Anna, and Surry Power Stations Cyber Security Plan (CSP), including changes made pursuant to the authority of 10 CFR 50.90 and 10 CFR 50.54(p). The CSP was approved by License Amendment No. 276.

- 5 – to Paragraph 3.J of Renewed Facility Operating License No. DPR-37 for Surry Unit No. 2.

The licensee shall fully implement and maintain in effect all provisions of the Commission-approved Kewaunee, Millstone, North Anna, and Surry Power Stations Cyber Security Plan (CSP), including changes made pursuant to the authority of 10 CFR 50.90 and 10 CFR 50.54(p). The CSP was approved by License Amendment No. 276.

As noted in Section 1.0 of this Safety Evaluation, the license amendment for Millstone is being evaluated separately.

Based on the information in Section 3.0 of this safety evaluation and the modified license condition described above, the NRC concludes this is acceptable.

#### 4.0 DIFFERENCES FROM NEI 08-09, REVISION 6

In addition to the table of deviations found in Enclosure 1, Attachment 3 of the licensee's CSP, the NRC staff notes the following additional differences between the licensee's submission and NEI 08-09, Revision 6:

- In Section 3.1, "Scope and Purpose," the licensee clarified the definition of important-to-safety functions, consistent with SRM-COMWCO-10-0001.
- In Section 3.21, "Document Control and Records Retention and Handling," the licensee clarified the definition of records and supporting documentation that will be retained to conform to the requirements of 10 CFR 73.54.
- In Section 3.22, "Implementation Schedule," the licensee submitted a revised implementation schedule, specifying the interim milestones and the final implementation date, including supporting rationale. The licensee deviated from the template for Milestone 6 to address only the NEI 08-09, Revision 6, Appendix D technical controls.

The NRC staff finds all of these deviations to be acceptable as discussed in the respective sections.

#### 5.0 STATE CONSULTATION

In accordance with the Commission regulations, the Virginia, and Wisconsin officials were notified of the proposed issuance of the amendments. The officials of these states had no comments.

#### 6.0 ENVIRONMENTAL CONSIDERATION

The amendments change a requirement with respect to installation or use of a facility component located within the restricted area as defined in 10 CFR Part 20. The NRC staff has determined that the amendments involve no significant increase in the amounts, and no significant change in the types, of any effluents that may be released offsite, and that there is no significant increase in individual or cumulative occupational radiation exposure. The Commission has previously issued a proposed finding that the amendments involve no significant hazards consideration, and there has been no public comment on such finding published in the *Federal Register* for each licensee: 75 FR 68834 dated November 9, 2010 for Kewaunee, 76 FR 5616 dated February 1, 2011 for Millstone, and 75 FR 76047 dated December 7, 2010 for North Anna and for Surry.

Also, these amendments relate to safeguards matters and do not involve any significant construction impacts, and relate to changes in recordkeeping, reporting, or administrative procedures or requirements. Accordingly, the amendments meet the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9), (10), and (12). Pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment need be prepared in connection with the issuance of the amendments.

## 7.0 CONCLUSION

The NRC staff's review and evaluation of the licensee's CSP was conducted using the NRC staff positions established in the relevant sections of RG 5.71. Based on the NRC staff's review, the NRC finds that the licensee addressed the relevant information necessary to satisfy the requirements of 10 CFR 73.54, 10 CFR 73.55(a)(1), 10 CFR 73.55(b)(8), and 10 CFR 73.55(m), as applicable and that the licensee's Cyber Security Program provides high assurance that CDAs are adequately protected against cyber attacks, up to and including the design basis threat (DBT), as described in 10 CFR 7.3.1. This includes protecting digital computer and communication systems and networks associated with: (i) safety-related and important-to-safety functions; (ii) security functions; (iii) emergency preparedness functions including offsite communications; and (iv) support systems and equipment that, if compromised, would adversely impact SSEP functions.

Therefore, the NRC staff finds the information contained in this CSP to be acceptable and upon successful implementation of this program, operation of the Kewaunee Power Station; the Millstone Power Station, Units 2 and 3; the North Anna Power Station, Units 1 and 2; and the Surry Power Station, Units 1 and 2, will not be inimical to the common defense and security.

The NRC staff has concluded, based on the considerations discussed above, that: (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, (2) such activities will be conducted in compliance with the Commission's regulations, and (3) the issuance of the amendments will not be inimical to the common defense and security or to the health and safety of the public.

## 8.0 REFERENCES

1. Section 73.54 of 10 CFR, "Protection of Digital Computer and Communication Systems and Networks," U.S. Nuclear Regulatory Commission, Washington, DC, March 27, 2009.
2. RG 5.71, "Cyber Security Programs for Nuclear Facilities," U.S. Nuclear Regulatory Commission, Washington, DC, January 2010. (ADAMS Accession No. ML090340159)
3. Letter from Jack Roe, Nuclear Energy Institute, to Scott Morris, U.S. Nuclear Regulatory Commission, "NEI 08-09, Revision 6, 'Cyber Security Plan for Nuclear Power Reactors; April 2010,'" April 28, 2010. (ADAMS Accession No. ML101180434)
4. Letter from Richard Correia, U.S. Nuclear Regulatory Commission, to Jack Roe, Nuclear Energy Institute, "Nuclear Energy Institute 08-09, 'Cyber Security Plan Template, Revision 6,'" May 5, 2010. (ADAMS Accession No. ML101190371)
5. SRM-COMWCO-10-0001, "Regulation of Cyber Security at Nuclear Power Plants," October 21, 2010. (ADAMS Accession No. ML102940009)

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Date of issuance: August 31, 2011

D. A. Heacock

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A copy of our related safety evaluation is also enclosed. A Notice of Issuance will be included in the Commission's next biweekly *Federal Register* notice.

Sincerely,

/RA/

Karl Feintuch, Project Manager  
Plant Licensing Branch III-1  
Division of Operating Reactor Licensing  
Office of Nuclear Reactor Regulation

Docket No. 50-305, -338, -339, -280, -281

Enclosures:

1. Amendment No. 210 to DPR-43
2. Amendment No. 264 to NPF-4
3. Amendment No. 245 to NPF-7
4. Amendment No. 276 to DPR-32
5. Amendment No. 276 to DPR-37
6. Safety Evaluation

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\*Safety evaluation transmitted by memo of 6/23/11 and revised by e-mail of 7/11/11  
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