



Entergy Nuclear Operations, Inc.
Pilgrim Nuclear Power Station
600 Rocky Hill Road
Plymouth, MA 02360

Robert G. Smith, P.E.
Site Vice President

10 CFR 2.390 Attachments Withheld

June 22, 2012

U.S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, DC 20555

SUBJECT: License Amendment Request – Cyber Security
Plan Implementation Schedule Milestones
Pilgrim Nuclear Power Station (PNPS)
Docket No. 50-293
License No. DPR-35

- References:
1. NRC letter to Entergy, *Issuance of Amendment Re: Approval of Cyber Security Plan*, dated July 22, 2011 (TAC NO. ME4351)
 2. Entergy letter to NRC, *Response to Additional Requests for Additional Information and Revision to the PNPS Cyber Security Plan*, dated April 4, 2011 (PNPS Letter No. 2.11.016)

LETTER NUMBER 2.12.033

Dear Sir or Madam:

In Reference 1, the NRC issued License Amendment No. 236 to the Facility Operating License for Pilgrim Nuclear Power Station (PNPS) that approved the *PNPS Cyber Security Plan* and associated implementation milestone schedule. The Cyber Security Plan Implementation Schedule contained in Reference 2 was utilized, as a portion of the basis for the NRC's safety evaluation report provided by Reference 1. Entergy Operations, Inc. (Entergy) is planning to implement the requirements of Implementation Schedule Milestone 6 in a slightly different manner than described in the approved Implementation Schedule. Although no change to the Implementation Schedule date is proposed, the change to the description of the milestone activity is conservatively considered to be a change to the Implementation Schedule, and in accordance with the provisions of 10 CFR 50.4 and 10 CFR 50.90, Entergy is submitting this request for an amendment to the Facility Operating License for PNPS. The *PNPS Cyber Security Plan*, Revision 0 was previously provided in Reference 2.

Attachment 1 provides an evaluation of the proposed change. Attachment 2 contains proposed marked-up operating license pages for the Physical Protection license condition for PNPS to reference the commitment change provided in this submittal. Attachment 3 contains the proposed revised operating license pages. Attachment 4 contains a change to the scope of Implementation Milestone 6.

This letter contains security-related information – Attachments 1 and 4
are withheld from public disclosure per 10 CFR 2.390

5001A



This letter contains security-related information – Attachments 1 and 4
are withheld from public disclosure per 10 CFR 2.390

Entergy requests that Attachments 1 (Sections 1, 2, and 3) and 4 which contain security-related information (SRI) be withheld from public disclosure in accordance with 10 CFR 2.390.

The proposed changes have been evaluated in accordance with 10 CFR 50.91(a)(1) using criteria in 10 CFR 50.92(c), and it has been determined that the changes involve no significant hazards consideration. The bases for these determinations are included in Attachment 1.

Entergy requests this license amendment be effective as of its date of issuance. Although this request is neither exigent nor emergency, your review and approval is requested prior to December 31, 2012.

The revised commitment contained in this submittal is summarized in Attachment 5. Should you have any questions concerning this letter, or require additional information, please contact Joseph R. Lynch at 508-830-8403.

I declare under penalty of perjury that the foregoing is true and correct. Executed on June 22, 2012.

Sincerely,



Robert G. Smith
Site Vice President

RGS/rmb

- Attachments:
1. Analysis of Proposed Operating License Change (contains SRI) (5 pages)
 2. Proposed PNPS Operating License Changes (mark-up) (1 page)
 3. Revised PNPS Operating License Pages (1 page)
 4. Revised Cyber Security Plan Implementation Schedule (contains SRI) (1 page)
 5. List of Regulatory Commitments (1 page)

This letter contains security-related information – Attachments 1 and 4
are withheld from public disclosure per 10 CFR 2.390

This letter contains security-related information – Attachments 1 and 4
are withheld from public disclosure per 10 CFR 2.390

cc:

Mr. William M. Dean
Regional Administrator, Region 1
U.S. Nuclear Regulatory Commission
2100 Renaissance Boulevard, Suite 100
King of Prussia, PA 19406-1415
(w/o Attachments)

Sr. Resident Inspector, Pilgrim Station

Mr. Richard V. Guzman, Project Manager
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Mail Stop O-8-C2
Washington, DC 20555

Mr. John Giarrusso, Jr.
Planning, Preparedness, & Nuclear Section Chief
Massachusetts Emergency Management Agency
400 Worcester Road
Framingham, MA 01702

This letter contains security-related information – Attachments 1 and 4
are withheld from public disclosure per 10 CFR 2.390

Attachment 2

Letter Number 2.11.033

Proposed PNPS Operating License Changes (mark-up BOLD)

provisions of the Act and to the rules, regulations, and orders of the Commission now or hereafter in effect; and is subject to the additional conditions specified below:

A. Maximum Power Level

ENO is authorized to operate the facility at steady state power levels not to exceed 2028 megawatts thermal.

B. Technical Specifications

The Technical Specifications contained in Appendix A, as revised through Amendment No. **236 (DELETE)** are hereby incorporated in the license. The licensee shall operate the facility in accordance with the Technical Specifications.

C. Records

ENO shall keep facility operating records in accordance with the requirements of the Technical Specifications.

D. Equalizer Valve Restriction – DELETED

E. Recirculation Loop Inoperable - DELETED

F. Fire Protection

ENO shall implement and maintain in effect all provisions of the approved fire protection program as described in the Final Safety Analysis Report for the facility and as approved in the SER dated December 21, 1978 as supplemented subject to the following provision:

ENO 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.

G. 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 FR27817 and 27822) and to the authority of 10 CFR 50.90 and 10 CFR 50.54(p). The combined set of plans, which contain Safeguards Information protected under 10 CFR 73.21, is entitled: "Pilgrim Nuclear Power Station Physical Security, Training and Qualification, and Safeguards Contingency Plan, Revision 0" submitted by letter dated October 13, 2004, as supplemented by letter dated May 15, 2006.

The licensee shall fully implement and maintain in effect all provisions of the Commission-approved cyber security plan (CSP), including changes made pursuant of 10 CFR 50.90 and 10 CFR 50.54(p). **The licensee's CSP was approved by License Amendment No. 236 as supplemented by a change approved by License Amendment No.**

Attachment 3

Letter Number 2.11.033

Revised PNPS Operating License Page

provisions of the Act and to the rules, regulations, and orders of the Commission now or hereafter in effect; and is subject to the additional conditions specified below:

A. Maximum Power Level

ENO is authorized to operate the facility at steady state power levels not to exceed 2028 megawatts thermal.

B. Technical Specifications

The Technical Specifications contained in Appendix A, as revised through Amendment No. are hereby incorporated in the license. The licensee shall operate the facility in accordance with the Technical Specifications.

C. Records

ENO shall keep facility operating records in accordance with the requirements of the Technical Specifications.

D. Equalizer Valve Restriction - DELETED

E. Recirculation Loop Inoperable - DELETED

F. Fire Protection

ENO shall implement and maintain in effect all provisions of the approved fire protection program as described in the Final Safety Analysis Report for the facility and as approved in the SER dated December 21, 1978 as supplemented subject to the following provision:

ENO 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.

G. 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 FR27817 and 27822) and to the authority of 10 CFR 50.90 and 10 CFR 50.54(p). The combined set of plans, which contain Safeguards Information protected under 10 CFR 73.21, is entitled: "Pilgrim Nuclear Power Station Physical Security, Training and Qualification, and Safeguards Contingency Plan, Revision 0" submitted by letter dated October 13, 2004, as supplemented by letter dated May 15, 2006.

The licensee shall fully implement and maintain in effect all provisions of the Commission-approved cyber security plan (CSP), including changes made pursuant of 10 CFR 50.90 and 10 CFR 50.54(p). The licensee's CSP was approved by License Amendment No. 236 as supplemented by a change approved by License Amendment No.

Attachment 5

Letter Number 2.11.033

List of Regulatory Commitments

List of Regulatory Commitments

The following table identifies those actions committed to by Entergy in this document. Any other statements in this submittal are provided for information purposes and are not considered to be regulatory commitments.

COMMITMENT	TYPE (Check One)		SCHEDULED COMPLETION DATE (If Required)
	ONE- TIME ACTION	CONTINUING COMPLIANCE	
Entergy will implement milestones 1, 2, 3, 4, 5, and 7 described in Attachment 4 of letter dated April 4, 2011 (PNPS Letter No. 2.11.016), and the revised Milestone 6 in Attachment 4 of this submittal.	X		December 31, 2012