



**UNITED STATES
NUCLEAR REGULATORY COMMISSION**

REGION III
2443 WARRENVILLE ROAD, SUITE 210
LISLE, IL 60532-4352

April 25, 2013

Mr. Michael J. Pacilio
Senior Vice President, Exelon Generation Company, LLC
President and Chief Nuclear Officer, Exelon Nuclear
4300 Winfield Road
Warrenville, IL 60555

**SUBJECT: CLINTON POWER STATION, NOTIFICATION TO PERFORM A TEMPORARY
INSTRUCTION 2201/004 INSPECTION AND REQUEST FOR INFORMATION
FOR INSPECTION REPORT NUMBER 05000461/2013407**

Dear Mr. Pacilio:

On August 5, 2013, the U.S. Nuclear Regulatory Commission (NRC) will begin an inspection of Temporary Instruction (TI) 2201/004 at your Clinton Power Station. The TI inspection will be performed to evaluate and verify your ability to meet the interim milestone requirements of the NRC's Cyber Security Rule, Title 10, Code of Federal Regulations (CFR), Part 73, Section 54, "Protection of Digital Computer and Communication Systems and Networks."

In accordance with 10 CFR 73.54, each nuclear power plant licensee was required to submit a proposed cyber security plan (CSP) and implementation schedule for NRC approval. On December 14, 2009, by letter (ML093080517) to the Nuclear Energy Institute (NEI), the NRC provided their expectations for the proposed implementation schedule. On January 5, 2011, by letter (ML110060093) to the NRC, NEI issued an initial "Template for the Cyber Security Plan Implementation Schedule" (ML110060097). On February 28, 2011, by letter (ML110600206) to the NRC, NEI provided a revised "Template for the Cyber Security Plan Implementation Schedule." The purpose of the letter's attachment was to provide the licensee with a generically written template to develop their proposed CSP implementation schedule. Utilization of the generic template required the licensee to make conforming changes to ensure the submitted schedule accurately accounted for site-specific activities. Based on an NRC technical review (ML110070348), the template was found acceptable to develop the licensees' CSP implementation schedule (i.e., Milestones 1 through 8). On March 31, 2011, by letter (ML110940225) to the NRC, Exelon provided a revised CSP and implementation schedule that accounted for the site-specific activities. On August 10, 2011, by letter (ML111861341), the NRC issued an amendment that approved the Clinton Power Station CSP and associated implementation schedule. In addition, the amendment revised the existing facility operating license condition regarding physical protection to require the station to fully implement and maintain in effect all provisions of the NRC-approved CSP.

The subject TI inspection provides a programmatic level review and verification of the licensee's site-specific implementation of Interim Milestones 1 through 7. The schedule for the onsite TI Inspection for the Interim Milestones 1 through 7 is as follows:

- Information Gathering Visit: July 22 – 26, 2013; and
- Cyber Security TI Inspection: August 5 – 9, 2013.

The purpose of the information gathering visit is to: (1) obtain information and documentation needed to support the TI inspection; (2) become familiar with your cyber security program and plant layout; and (3) arrange administrative details, such as office space, availability of knowledgeable office personnel and to ensure unescorted site access privileges.

In order to assure a productive TI inspection, we have enclosed a request for documents needed to ensure that the inspectors are adequately prepared. These documents have been divided into four groups. The first group lists information necessary to aid the inspectors in planning for the TI inspection. It is requested that this information be provided to the lead inspector via mail or electronically no later than July 5, 2013. The second group also lists information and possible areas for discussion necessary to assist the inspectors during the TI inspection. It is requested this information be available during the information gathering visit (July 22, 2013). The third group of requested documents consists of those items that the inspectors will review, or need access to, during the TI inspection. Please have this information available by the first day of the onsite inspection week (August 5, 2013). The fourth group lists the information necessary to aid the inspectors in tracking questions and answers identified as a result of the TI inspection. It is requested that this information be provided to the lead inspector as the information is generated during the TI inspection. It is important that all of these documents are up to date and complete in order to minimize the number of additional documents requested during the preparation and/or the onsite portions of the TI inspection.

The lead inspector for this inspection is Dr. Stuart Sheldon. We understand that our regulatory contact for this inspection is Mr. Ronald Frantz of your organization. If there are any questions about the TI inspection or the material requested, please contact the lead inspector at (630) 829-9727 or via e-mail at stuart.sheldon@nrc.gov.

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

M. Pacilio

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

Sincerely,

/RA by G. Hausman for/

Robert Daley, Chief
Engineering Branch 3
Division of Reactor Safety

Docket No. 50-461
License No. NPF-62

Enclosure: Document Request for Cyber Security Temporary Instruction 2201/004 Interim
Milestones 1 – 7 Inspection

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DOCUMENT REQUEST FOR CYBER SECURITY TEMPORARY INSTRUCTION 2201/004

Inspection Report: 05000461/2013407

Onsite Dates: July 22 – 26, 2013 (Information Gathering Visit)
August 5 – 9, 2013 (Cyber Security TI Inspection)

Procedure: Temporary Instruction 2201/004, "Inspection of Implementation of Interim Cyber Security Milestones 1 – 7"

Lead Inspector: Dr. Stuart Sheldon
(630) 829-9727
stuart.sheldon@nrc.gov

I. Information Requested Prior to the Information Gathering Visit

The following information is requested by **July 5, 2013**. If you have any questions regarding this request, please call the lead inspector as soon as possible. All information should be sent to Dr. Stuart Sheldon (e-mail address stuart.sheldon@nrc.gov). Electronic media is preferred. Where information is provided that includes tables and/or lists of data or other such information, please do not scan such tables and/or lists as images. The preferred file format is excel (.xls) for lists or a searchable "pdf" file on a compact disk (CD). The CD should be indexed and hyper-linked to facilitate ease of use. Please provide three copies of each CD submitted (one for each inspector and for a cyber security contractor).

A. Cyber Security TI Documentation

1. Provide a list of all documents required to complete each of the Cyber Security Milestones 1 through 7 identified by letter (ML110940225) dated March 31, 2011, Enclosure 3 - Exelon Cyber Security Plan Revised Implementation Schedule. Provide each milestone in a separate folder on the CD (e.g., Milestone 1, Milestone 2, etc.). Each milestone document shall be listed in a table as follows:

MILESTONE X, where X equals 1 through 7				
Document Number	Title	Description	Rev	Status
No. 1				
No. 2				
No. 3				
No. 4				
etc.				

Based on the list of documents identified in I.A.1 above, for each milestone document where the "Status" is identified as completed, place the completed document in its associated folder and hyperlink the associated document number to the completed document. For each document, the "Status" should be identified as "not started," "in-progress" or "completed."

DOCUMENT REQUEST FOR CYBER SECURITY TEMPORARY INSTRUCTION 2201/004

In addition to the documents identified in I.A.1 above, ensure the documents identified below (Items I.A.2 – I.A.8) for MILESTONE 1 – 7 are included in your response.

2. **MILESTONE 1** – Provide the following documentation for the Cyber Security Assessment Team (CSAT):
 - a. Procedures establishing the CSAT team;
 - b. List of CSAT members noting primary areas of responsibility;
 - c. Procedures detailing qualification requirements for CSAT members; and
 - d. Supporting documentation that demonstrates each CSAT member meets the requirements to fulfill their respective position on the team. For example, member resumes; evaluation of previous education and experience; training required by your implementing procedures and supporting documentation, which shows training was completed; or industry certifications).
3. **MILESTONE 2** - Provide the following documentation:
 - a. List of plant systems noting which system have been identified as critical systems (CSs); and
 - b. Procedure documenting the process by which CSs and Critical Digital Assets (CDAs) are identified in accordance with (IAW) your CSP, Section 3.1.3.
4. **MILESTONE 3** - Provide the following documentation:
 - a. Procedures establishing your cyber defensive architecture. Explain any variances from your CSP, Section 4.3, and tracking documents for their correction;
 - b. Provide an overview of your cyber defensive architecture, preferably with overview level diagrams showing the various levels and location of the subject deterministic one-way device; and
 - c. Provide details of the implementation of the subject deterministic one-way device.
5. **MILESTONE 4** - Provide the following documentation:
 - a. Procedures implementing the security control “Access Control for Portable and Mobile Devices.” Include any training material or promotional literature distributed to staff associated with the control.
6. **MILESTONE 5** - Provide the following documentation:
 - a. Procedures implementing the requirements described in Milestone 5; and

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- b. Training materials associated with the changes to plant programs associated with Milestone 5.

7. **MILESTONE 6** - Provide the following documentation:

Procedures documenting the process by which technical cyber security controls have been identified for those CDAs which require the implementation of technical security controls for Milestone 6.

8. **MILESTONE 7** - Provide the following documentation:

Procedures implementing the ongoing monitoring and assessment activities as described in your CSP, Section 4.4.

B. Cyber Security Supporting Documentation

- 1. Provide a copy of the current version of the updated safety analysis report (USAR), Technical Specifications (TS), and technical requirements manual (TRM) or equivalent.
- 2. Provide a copy of the current cyber security "Health Report," if available.
- 3. Provide a copy of the current plant drawings use for operator training that provide additional information on system operation, system operating parameters, setpoints, etc. (e.g., some licensee's refer to these drawings as "Horse Notes") for identified cyber security CSs, if available.
- 4. Provide operator training lesson plans and/or operator training aids for identified cyber security CSs, if available.

II. ***Information Requested During the Information Gathering Visit (July 22 – 26, 2013)***

The following information is requested to be provided to the inspectors during the onsite information gathering visit. It is requested that the following information be provided on three sets of CDs (searchable, if possible).

A. General Information:

- 1. A listing of abbreviations and/or designators for plant systems;
- 2. Organizational chart for corporate and site personnel involved in establishing, overseeing, and maintaining the Cyber Security Program and;
- 3. A phone list for licensee personnel.

B. Facility Information:

- 1. Provide a presentation/discussion of your CSP, existing cyber security CSs, and associated CDAs.

DOCUMENT REQUEST FOR CYBER SECURITY TEMPORARY INSTRUCTION 2201/004

2. Provide a list and discussion of currently scheduled or planned cyber security related modifications to be installed in the plant.
- C. Specific Information Associated with the Milestones:
1. **MILESTONE 3-** Be prepared to provide an overview and familiarity walkdown of the cyber architecture within the plant including safety, security and emergency preparedness related CDAs.
 2. **MILESTONE 6-** Be prepared to present information for target set CDAs including a list of target set CDAs, and documentation of the process for identifying them.
 3. **MILESTONE 6-** For selected CDAs, be prepared to produce documentation for **each** of the technical controls in Appendix D of NEI 08-09, Revision 6, the results of reviews required under your CSP, Section 3.1.6.
 - (a) For controls that are implemented, provide the procedures implementing the control. Common controls for all CDAs may be provided in a separate list with the procedures implementing each of them;
 - (b) For alternate controls that have been implemented, provide the documented basis for employing alternative countermeasures, and the procedures implementing the alternative measures; and
 - (c) Where controls have been deemed unnecessary, provide the threat vector analysis supporting the conclusion that the threat vector does not exist.
 4. **MILESTONE 7 -** For the CDAs selected above, be prepared to produce documentation for **each** of the technical controls in Appendix D of NEI 08-09, Revision 6, and the results of immediate activities required under your CSP, Section 4.4.
 - (a) For all controls that are implemented, provide the objective evidence that the control is effective IAW your CSP, Section 4.4.3.1. This may be combined with the documentation provided for Milestone 6;
 - (b) Documentation for common controls for all CDAs may be provided in a separate list with the procedures implementing each of them; and
 - (c) Provide governing procedures and results of vulnerability scans performed to comply with your CSP, Section 4.4.3.2.

III. Information Requested to be Available on First Day of the Onsite Inspection Week (August 5, 2013)

The following information is requested to be provided on the first day of the TI inspection. It is requested that this information be provided on three sets of CDs (searchable, if possible).

DOCUMENT REQUEST FOR CYBER SECURITY TEMPORARY INSTRUCTION 2201/004

Any updates to information previously provided and copies of any cyber related IRs written since the beginning of the information gathering visit.

IV. Information Requested to be Provided Throughout the Temporary Instruction Inspection Assessment

Copies of the list of questions/documents requested identified by the inspector and the status/resolution of the information requested (provided daily during the TI inspection to each inspector).

Copies of any cyber related IRs written (provided daily during the TI inspection to each inspector).

If you have questions regarding the information requested, please contact the lead inspector.

M. Pacilio

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

Sincerely,

/RA by G. Hausman for/

Robert Daley, Chief
Engineering Branch 3
Division of Reactor Safety

Docket No. 50-461
License No. NPF-62

Enclosure: Document Request for Cyber Security Temporary Instruction 2201/004 Interim
Milestones 1 – 7 Inspection

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