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Serial: RA-14-0005
March 31, 2014

10 CFR 50.90

U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, DC 20555-0001

BRUNSWICK STEAM ELECTRIC PLANT, UNIT NOS. 1 AND 2
DOCKET NOS. 50-325 AND 50-324 / RENEWED LICENSE NOS. DPR-71 AND DPR-62

CRYSTAL RIVER UNIT 3 NUCLEAR GENERATING PLANT
DOCKET NO. 50-302 / LICENSE NO. DPR-72

SHEARON HARRIS NUCLEAR POWER PLANT, UNIT 1
DOCKET NO. 50-400 / RENEWED LICENSE NO. NPF-63

H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2
DOCKET NO. 50-261 / RENEWED LICENSE NO. DPR-23

**SUBJECT: REDACTED VERSION OF LICENSE AMENDMENT REQUEST – CYBER
SECURITY PLAN IMPLEMENTATION SCHEDULE MILESTONE 8**

REFERENCES:

1. Duke Energy letter, *License Amendment Request – Cyber Security Plan Implementation Schedule Milestone 8*, dated December 19, 2013 (ADAMS Accession No. ML13357A189)

Ladies and Gentlemen:

By letter dated December 19, 2013 (Reference 1), Duke Energy submitted a license amendment request pertaining to the Cyber Security Plan implementation schedule, including a proposed revision to the existing Physical Protection license condition for the associated facility operating licenses. Enclosures 1 and 3 of Reference 1 were marked as Security-Related Information (SRI) to be withheld under 10 CFR 2.390. Enclosure 2 is not an SRI document and was not marked as such in the Reference 1 letter. With this submittal, Duke Energy provides a complete, redacted version of Enclosures 1 and 3 to the Reference 1 letter.

This submittal does not affect the conclusion of the Reference 1 license amendment request that the proposed changes involve no significant hazards consideration.

This submittal contains no new regulatory commitments. Should you have any questions concerning this letter, or require additional information, please contact Julie Olivier, Manager – Nuclear Fleet Licensing, at 980-373-4045.

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U.S. Nuclear Regulatory Commission

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

3/31/14.

Sincerely,

A handwritten signature in black ink, appearing to read "B. C. Waldrep", written in a cursive style.

Benjamin C. Waldrep

Vice President – Corporate Governance and Operations Support

MKL

Enclosure

cc: USNRC Region I
USNRC Region II
USNRC Resident Inspector – BSEP, Unit Nos. 1 and 2
USNRC Resident Inspector – SHNPP, Unit 1
USNRC Resident Inspector – HBRSEP, Unit No. 2
C. Gratton, NRR Project Manager – CR3
S. Lingam, NRR Project Manager – BSEP, Unit Nos. 1 and 2, and HBRSEP, Unit No. 2
A. Hon, NRR Project Manager – SHNPP, Unit 1
State of Florida Contact
W. L. Cox, III, Section Chief N.C. DHSR
S. E. Jenkins, Manager, Radioactive and Infectious Waste Management Section (SC)
A. Gantt, Chief, Bureau of Radiological Health (SC)
Attorney General (SC)
Chair – North Carolina Utilities Commission

bcc: Chris Nolan
Julie Olivier
Ed O'Neil
Brian Bernard
Garry Miller
Leo Martin
Susan Ritter
Glen Frix
George Hamrick
Allen Brittain
Shane Tynon
Lee Grzeck
Bill Murray (For BNP Licensing/Nuclear Records Files)
Terry Hobbs
Matt Widener
Mike Floyd
Daniel Westcott
Robert Taylor
Frieda Frando (For CR3 Licensing/Nuclear Records Files)
Ernie Kapopoulos
Terry Slake
Ivan LaCross
Dave Corlett
Cindy Hereford (For HNP Licensing/Nuclear Records Files)
Randy Gideon
Linwood Faulk
Steven Bull
Richard Hightower
Heidi Walters (For RNP Licensing/Nuclear Records Files)
Lara Nichols
David Cummings

File: (Corporate)

Enclosure
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Enclosure to RA-14-0005

Attached is the Redacted Version of the Enclosures to the December 19, 2013, Duke Energy Letter RA-13-1001, including the following:

- Enclosure 1 to RA-13-1001, Evaluation of the Proposed Change (*Redacted*)
- Enclosure 2 to RA-13-1001, Proposed Facility Operating License Changes (Mark-up)
- Enclosure 3 to RA-13-1001, Revised Cyber Security Plant Implementation Schedule (Milestone 8) (*Redacted*)

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Enclosure 1

Evaluation of the Proposed Change

Subject: This license amendment request (LAR) includes a proposed change to Milestone 8 of the Cyber Security Plan implementation schedule and a proposed revision to the existing Physical Protection license condition for the facility operating licenses

1. SUMMARY DESCRIPTION
2. DETAILED DESCRIPTION
3. TECHNICAL EVALUATION
4. REGULATORY EVALUATION
 - 4.1 Applicable Regulatory Requirements/Criteria
 - 4.2 Precedent
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1. SUMMARY DESCRIPTION

This license amendment request (LAR) includes a proposed change to Milestone 8 of the Cyber Security Plan implementation schedule and a proposed revision to the existing Physical Protection license condition for the facility operating licenses for Brunswick Steam Electric Plant, Unit Nos. 1 and 2 (BSEP, Unit Nos. 1 and 2), Crystal River Unit 3 Nuclear Generating Plant (CR-3), Shearon Harris Nuclear Power Plant, Unit 1 (SHNPP, Unit 1), and H. B. Robinson Steam Electric Plant, Unit No. 2 (HBRSEP, Unit No. 2). The completion date for Milestone 8 is proposed to be changed from [REDACTED], to [REDACTED].

2. DETAILED DESCRIPTION

Reference 1 provided, in part, the *Carolina Power & Light Company and Florida Power Corporation Cyber Security Plan (CSP)* (Enclosure 2 of Reference 1) and the CSP implementation schedule (Enclosure 3 of Reference 1). In Reference 2, the NRC approved the CSP and associated implementation schedule and added a license condition to each of the facility operating licenses to require the licensees to fully implement and maintain in effect all provisions of the NRC-approved CSP. In Reference 3, Carolina Power and Light (CP&L) and Florida Power Corporation (FPC) proposed a change to the scope of Milestone 6 of the implementation schedule. No change to the completion date for Milestone 6 was proposed. This request was approved by the NRC in Reference 4, and the license condition in each facility operating license was modified accordingly.

The CSP implementation schedule provided in Reference 1 listed a completion date of [REDACTED], for Milestone 8. Milestone 8 pertains to the date that full implementation of the CSP for all Safety, Security, and Emergency Preparedness (SSEP) functions will be achieved.

As stated in Reference 2 and reiterated in Reference 4, subsequent changes to the NRC-approved CSP implementation schedule require prior NRC approval pursuant to 10 CFR 50.90. Accordingly, pursuant to the provisions of 10 CFR 50.4 and 10 CFR 50.90, Duke Energy is submitting this request for an amendment to the aforementioned facility operating licenses to propose a change in the completion date for Milestone 8 from [REDACTED], to [REDACTED].


This license amendment application includes the proposed change to the existing operating license condition for "Physical Protection" (Enclosure 2 to the cover letter) for BSEP, Unit Nos. 1 and 2, CR-3, SHNPP, Unit 1, and HBRSEP, Unit No. 2. Enclosure 3 to the cover letter contains the proposed Revised Cyber Security Plan Implementation Schedule (Milestone 8).

3. TECHNICAL EVALUATION

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4. REGULATORY EVALUATION

4.1 Applicable Regulatory Requirements/Criteria

10 CFR 73.54 requires licensees to maintain and implement a Cyber Security Plan. Brunswick Steam Electric Plant, Unit Nos. 1 and 2 (Renewed Facility Operating License Nos. DPR-71 and DPR-62), Crystal River Unit 3 Nuclear Generating Plant (Facility Operating License No. DPR-72), Shearon Harris Nuclear Power Plant, Unit 1, (Renewed Facility Operating License No. NPF-63), and H. B. Robinson Steam Electric Plant, Unit No. 2 (Renewed Facility Operating License No. DPR-23) include a Physical Protection license condition that requires the respective licensees to fully implement and maintain in effect all provisions of the Commission-approved

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Cyber Security Plan, including changes made pursuant to the authority of 10 CFR 50.90 and 10 CFR 50.54(p).

4.2 Precedent

The proposed full implementation date of [] is consistent with the full implementation date for the legacy Duke Energy sites (Catawba, McGuire, and Oconee nuclear stations) as provided via Reference 8 and approved by the NRC via Reference 9.

4.3 No Significant Hazards Consideration Determination

Duke Energy is requesting an amendment to the Brunswick Steam Electric Plant, Unit Nos. 1 and 2 (Renewed Facility Operating License Nos. DPR-71 and DPR-62), Crystal River Unit 3 Nuclear Generating Plant (Facility Operating License No. DPR-72), Shearon Harris Nuclear Power Plant, Unit 1, (Renewed Facility Operating License No. NPF-63), and H. B. Robinson Steam Electric Plant, Unit No. 2 (Renewed Facility Operating License No. DPR-23) Facility Operating Licenses to revise the Physical Protection license condition as it relates to the Cyber Security Plan. The current license condition reflects the Cyber Security Plan implementation schedule previously approved by the NRC, which listed a completion date of [] [], for Milestone 8. Milestone 8 pertains to the date that full implementation of the Cyber Security Plan for all Safety, Security, and Emergency Preparedness (SSEP) functions will be achieved. A revised Milestone 8 completion date of [], is requested.

Duke Energy has evaluated whether or not a significant hazards consideration is involved with the proposed amendment by focusing on the three standards set forth in 10 CFR 50.92, "Issuance of Amendment," as discussed below:

1. Does the proposed change involve a significant increase in the probability or consequences of an accident previously evaluated?

Response: No.

The proposed change to the Cyber Security Plan implementation schedule for Milestone 8 does not alter accident analysis assumptions, add any initiators, or affect the function of plant systems or the manner in which systems are operated, maintained, modified, tested, or inspected. The proposed change does not require any plant modifications which affect the performance capability of the structures, systems, and components relied upon to mitigate the consequences of postulated accidents and has no impact on the probability or consequences of an accident previously evaluated.

Therefore, the proposed change does not involve a significant increase in the probability or consequences of an accident previously evaluated.

2. Does the proposed change create the possibility of a new or different kind of accident from any accident previously evaluated?

Response: No.

The proposed change to the Cyber Security Plan implementation schedule for Milestone 8 does not alter accident analysis assumptions, add any initiators, or affect the function of plant systems or the manner in which systems are operated, maintained, modified, tested, or inspected. The proposed change does not require any plant modifications which affect the performance capability of the structures, systems, and components relied upon to mitigate the consequences of postulated accidents and does

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not create the possibility of a new or different kind of accident from any accident previously evaluated.

Therefore, the proposed change does not create the possibility of a new or different kind of accident from any accident previously evaluated.

3. Does the proposed change involve a significant reduction in a margin of safety?

Response: No.

Plant safety margins are established through limiting conditions for operation, limiting safety system settings, and safety limits specified in the technical specifications. The proposed change revises the Cyber Security Plan implementation schedule. Because there is no change to these established safety margins as result of this change, the proposed change does not involve a significant reduction in a margin of safety.

Therefore, the proposed change does not involve a significant reduction in a margin of safety.

Based on the above, Duke Energy concludes that the proposed change presents no significant hazards consideration under the standards set forth in 10 CFR 50.92(c), and accordingly, a finding of "no significant hazards consideration" is justified.

4.4 Conclusions

In conclusion, based on the considerations discussed above: (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 amendment will not be inimical to the common defense and security or to the health and safety of the public.

5. ENVIRONMENTAL CONSIDERATION

The proposed amendment provides a change to the Cyber Security Plan implementation schedule for Milestone 8. The proposed amendment meets the eligibility criterion for a categorical exclusion set forth in 10 CFR 51.22(c)(12). Therefore, pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment need be prepared in connection with the issuance of the amendment.

6. REFERENCES

1. Progress Energy letter, *Response to Industry Generic Request for Additional Information on the Carolina Power and Light Company and Florida Power Corporation Cyber Security Plan, Revision 0*, dated April 7, 2011 (ADAMS Accession No. ML11108A022)
2. NRC letter, *Brunswick Steam Electric Plant, Units 1 and 2, H. B. Robinson Steam Electric Plant, Unit No.2, Shearon Harris Nuclear Power Plant, Unit 1, and Crystal River Unit 3 Nuclear Generating Plant - Issuance of License Amendments Regarding Approval of Cyber Security Plan (TAC Nos. ME4225, ME4226, ME4227, ME4228, and ME4229)*, dated July 29, 2011 (ADAMS Accession No. ML11193A028)
3. Duke Energy letter, *Carolina Power and Light Company and Florida Power Corporation's License Amendment Request – Cyber Security Plan Implementation Schedule Milestones*, dated September 12, 2012 (ADAMS Accession No. ML12268A055)

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4. NRC letter, *Brunswick Steam Electric Plant, Units 1 and 2, H. B. Robinson Steam Electric Plant, Unit No.2, Shearon Harris Nuclear Power Plant, Unit 1, and Crystal River Unit 3 Nuclear Generating Plant - Issuance of License Amendments Regarding Cyber Security Plan Implementation Schedule Milestones* (TAC Nos. ME9545, ME9546, ME9549, ME9548, and ME9547), dated December 18, 2012 (ADAMS Accession No. ML12339A067)
5. Letter from Christopher E. Earls (NEI) to Richard P. Correia (NRC), *Template for the Cyber Security Plan Implementation Schedule*, dated February 28, 2011 (ADAMS Accession No. ML110600211 and ML110600218)
6. Letter from Richard P. Correia (NRC) to Christopher E. Earls (NEI), *Template for the Cyber Security Plan Implementation Schedule*, dated March 1, 2011 (ADAMS Accession No. ML110070348)
7. Security Frequently Asked Questions (SFAQ) Number 12-20, *Cyber Security Milestone 4*, approved April 8, 2013
8. Duke Energy letter, *Oconee Nuclear Station, Units 1, 2, and 3, Docket Nos. 50-269, 50-270, and 50-287, McGuire Nuclear Station, Units 1 and 2, Docket Nos. 50-369 and 50-370, and Catawba Nuclear Station, Units 1 and 2, Docket Nos. 50-413 and 50-414, Response to Request for Additional Information Regarding License Amendment Request for Cyber Security Plan*, dated April 15, 2011 (ADAMS Accession No. ML11109A074)
9. NRC letter, *Catawba Nuclear Station, Units 1 and 2 (Catawba 1 and 2), McGuire Nuclear Station, Units 1 and 2 (McGuire 1 and 2), and Oconee Nuclear Station, Units 1, 2, and 3 (Oconee 1, 2, and 3) – Issuance of Amendments Regarding Cyber Security Plans Based on Nuclear Energy Institute 08-09, Revision 6* (TAC Nos. ME4529, ME4530, Catawba; ME4531, ME4532, McGuire; ME4533, ME4534, ME4535, Oconee), dated August 31, 2011 (ADAMS Accession No. ML11216A064)

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Enclosure 2

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Proposed Facility Operating License Changes (Mark-up)

Brunswick Steam Electric Plant, Unit No. 1,
Docket No. 50-325 / Renewed License No. DPR-71

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- changes approved by License Amendment Nos. 261 and zzz.
- dated May 17, 2006, and "Guard Training and Qualification Plan, Revision 0," submitted by letter dated September 30, 2004.
- The licensee shall fully implement and maintain in effect all provisions of the Commission-approved cyber security plan (CSP), including changes made pursuant to the authority of 10 CFR 50.90 and 10 CFR 50.54(p). The licensee's CSP was approved by License Amendment No. 258, as supplemented by a change approved by License Amendment No. 661.
- E. This license is subject to the following additional conditions for the protection of the environment:
- a. Deleted per Amendment 54, 3-11-83
 - b. Deleted per Amendment 54, 3-11-83
 - c. The licensee shall comply with the effluent limitations contained in National Pollutant Discharge Elimination System Permit No. NC0007064 issued pursuant to Section 402 of the Federal Water Pollution Control Act, as amended.
- F. In accordance with the requirement imposed by the October 8, 1976, order of the United States Court of Appeals for the District of Columbia Circuit in Natural Resources Defense Council v. Nuclear Regulatory Commission, No. 74-1385 and 74-1586, that the Nuclear Regulatory Commission "shall make any licenses granted between July 21, 1976 and such time when the mandate is issued subject to the outcome of the proceedings herein," the license issued herein shall be subject to the outcome of such proceedings.
- G. Deleted by Amendment No. 206.
- H. This license is effective as of the date of issuance and shall expire at midnight on September 8, 2036.
- I. Deleted per Amendment No. 70 dated 5-25-84.
- J. Deleted per Amendment No. 70 dated 5-25-84.
- K. Deleted by Amendment No. 206.
- L. Power Uprate License Amendment Implementation
- The licensee shall complete the following actions as a condition of the approval of the power uprate license amendment (Amendment No. 183):
- (1) Deleted by Amendment No. 206.
 - (2) Deleted by Amendment No. 206.

Renewed License No. DPR-71
Amendment No. 269

Brunswick Steam Electric Plant, Unit No. 2
Docket No. 50-324 / Renewed License No. DPR-62

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next 12 hours and in COLD SHUTDOWN within the following 24 hours.

(3) Deleted by Amendment No. 236.

(4) Equalizer Valve Restriction

The valves in the equalizer piping between the recirculation loops shall be closed at all times during reactor operation, except for one bypass valve which is left open to prevent pressure build-up due to ambient and conduction heating of the water between the equalizer valves.

(5) Deleted by Amendment No. 233.

(6) 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 plans, which contain Safeguards Information protected under 10 CFR 73.21, are entitled: "Physical Security Plan, Revision 2," and "Safeguards Contingency Plan, Revision 2," submitted by letter dated May 17, 2006, and "Guard Training and Qualification Plan, Revision 0," submitted by letter dated September 30, 2004.

changes approved
by License
Amendment Nos.
289 and zzz.

The licensee shall fully implement and maintain in effect all provisions of the Commission-approved cyber security plan (CSP), including changes made pursuant to the authority of 10 CFR 50.90 and 10 CFR 50.54(p). The licensee's CSP was approved by License Amendment No. 286, as supplemented by a change approved by License Amendment No. 289.

- D. This license is subject to the following additional conditions for the protection of the environment:
- Deleted per Amendment 79, 3-11-83
 - Deleted per Amendment 79, 3-11-83
 - Deleted per Amendment 79, 3-11-83
 - The licensee shall comply with the effluent limitations contained in National Pollutant Discharge Elimination System Permit No. NC0007064 issued pursuant to Section 402 of the Federal Water Pollution Control Act, as amended.
- E. This license is effective as of the date of issuance and shall expire at midnight on December 27, 2034.
- F. Deleted per Amendment No. 98 dated 5-25-84.
- G. Deleted per Amendment No. 98 dated 5-25-84.

Renewed License No. DPR-62
Amendment No. 29†

Crystal River Unit 3 Nuclear Generating Plant
Docket No. 50-302 / License No. DPR-72

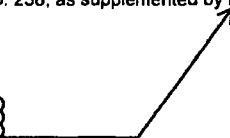
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2.D Physical and Cyber Security

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 2781.7 and 27822) and to the authority of 10 CFR 50.90 and 10 CFR 50.54(p). The plans, which contain Safeguards Information protected under 10 CFR 73.21, are entitled: "Physical Security Plan, Revision 5," and "Safeguards Contingency Plan, Revision 4," submitted by letter dated May 16, 2006, and "Guard Training and Qualification Plan, Revision 0," submitted by letter dated September 30, 2004, as supplemented by letters dated October 20, 2004, and September 29, 2005.

The licensee shall fully implement and maintain in effect all provisions of the Commission-approved cyber security plan (CSP), including changes made pursuant to the authority of 10 CFR 50.90 and 10 CFR 50.54(p). The licensee's CSP was approved by License Amendment No. 238, as supplemented by a change approved by License Amendment No. 242.

changes approved by
License Amendment
Nos. 242 and zzz.



Facility Operating License No. DPR-72
Amendment No. 242

Shearon Harris Nuclear Power Plant, Unit 1
Docket No. 50-400 / Renewed License No. NPF-63

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E. Physical and Cyber Security (Section 13.6.2.10)

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 the authority of 10 CFR 50.90 and 10 CFR 50.54(p). The plans, which contain Safeguards Information protected under 10 CFR 73.21, are entitled: "Guard Training and Qualification Plan" submitted by letter dated October 19, 2004, "Physical Security Plan" and "Safeguards Contingency Plan" submitted by letter dated October 19, 2004 as supplemented by letter dated May 16, 2006.

changes
approved by
License
Amendment Nos.
140 and zzz.

The licensee shall fully implement and maintain in effect all provisions of the Commission-approved cyber security plan (CSP), including changes made pursuant to the authority of 10 CFR 50.90 and 10 CFR 50.54(p). The licensee's CSP was approved by License Amendment No. 136, as supplemented by a change approved by License Amendment No. 140.

F. Fire Protection Program

Duke Energy Progress, Inc. shall implement and maintain in effect all provisions of the approved fire protection program that comply with 10 CFR 50.48(a) and 10 CFR 50.48(c), as specified in the revised license amendment request dated October 9, 2009, supplemented by letters dated February 4, 2010, and April 5, 2010, and approved in the associated safety evaluation dated June 28, 2010. Except where NRC approval for changes or deviations is required by 10 CFR 50.48(c) and NFPA 805, and provided no other regulation, technical specification, license condition or requirement would require prior NRC approval, the licensee may make changes to the fire protection program without prior approval of the Commission if those changes satisfy the provisions set forth in 10 CFR 50.48(a) and 10 CFR 50.48(c), the change does not require a change to a technical specification or a license condition, and the criteria listed below are satisfied.

(1) Risk-Informed Changes that May Be Made Without Prior NRC Approval

A risk assessment of the change must demonstrate that the acceptance criteria below are met. The risk assessment approach, methods, and data shall be acceptable to the NRC and shall be appropriate for the nature and scope of the change being evaluated; be based on the as-built, as-operated and maintained plant; and reflect the operating experience at the plant. Acceptable methods to assess the risk of the proposed change may include methods that have been used in the peer-reviewed Fire PRA model, methods that have been approved by the NRC via a plant-specific license amendment or through NRC approval of generic methods specifically for use in NFPA 805 risk assessments, or methods that have been demonstrated to bound the risk impact.

Renewed License No. NPF-63
Amendment No. 142

H. B. Robinson Steam Electric Plant, Unit No. 2
Docket No. 50-261 / Renewed License No. DPR-23

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C. Reports

Duke Energy Progress, Inc. shall make certain reports in accordance with the requirements of the Technical Specifications.

D. Records

Duke Energy Progress, Inc. shall keep facility operating records in accordance with the requirements of the Technical Specifications.

E. Fire Protection Program

Duke Energy Progress, Inc. 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 Fire Protection Safety Evaluation Report dated February 28, 1978, and supplements thereto. Duke Energy Progress, Inc. 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.

F. Physical Protection and Cyber Security

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 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: "H. B. Robinson Steam Electric Plant Security, Training and Qualification, and Safeguards Contingency Plan, Revision 0" submitted by letter dated October 1, 2004, as supplemented by letter dated October 20, 2004.

changes
approved by
License
Amendment Nos.
230 and zzz.

The licensee shall fully implement and maintain in effect all provisions of the Commission-approved cyber security plan (CSP), including changes made pursuant to the authority of 10 CFR 50.90 and 10 CFR 50.54(p). The licensee's CSP was approved by License Amendment No. 226, as supplemented by a change approved by License Amendment No. 230.

G. The following programs shall be implemented and maintained by the licensee:

- (1) DELETED

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Redacted

**Revised Cyber Security Plan Implementation Schedule
(Milestone 8)**

#	Implementation Milestone (Regulatory Commitment)	Completion Date	Basis
8	Full implementation of the <i>Carolina Power & Light Company and Florida Power Corporation Cyber Security Plan</i> for all SSEP functions will be achieved.		By the completion date, the <i>Carolina Power & Light Company and Florida Power Corporation Cyber Security Plan</i> will be fully implemented for all SSEP functions in accordance with 10 CFR 73.54. This date also bounds the completion of all individual asset security control design remediation actions including those that require a refuel outage for implementation.