



August 28, 2014

NG-14-0150
10 CFR 50.90

10 CFR 2.390 - Attachment 1 Withheld

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

Duane Arnold Energy Center
Docket No. 50-331
Renewed Op. License No. DPR-49

License Amendment Request (TSCR-147): Application to Revise Cyber Security Plan Milestone 8 Completion Date

- References: 1) NRC letter, Feintuch (NRC) to Costanzo (NextEra), "Duane Arnold Energy Center – Issuance of Amendment Pertaining to Cyber Security Plan," dated July 29, 2011, Amendment 278, (ML111940224)
- 2) NRC letter, Feintuch (NRC) to Anderson (NextEra), "Duane Arnold Energy Center – Issuance of Amendment Re: Revised Cyber Security Plan Implementation Schedule Milestone 6," dated November 28, 2012, Amendment 284, (ML12321A266)

Pursuant to 10 CFR 50.90, NextEra Energy Duane Arnold, LLC (hereafter, NextEra Energy Duane Arnold) hereby requests to amend the Cyber Security Plan for the Duane Arnold Energy Center. The Cyber Security Plan and implementation schedule were previously provided by NextEra Energy Duane Arnold and approved by the NRC in Reference 1, as amended by Reference 2.

NextEra Energy Duane Arnold considers Attachment 1 of this transmittal to be sensitive security information and requests that it be withheld from public disclosure pursuant to 10 CFR 2.390. The proposed amendment would revise the completion date (Milestone 8) of the Cyber Security Plan implementation schedule.

Attachment 1 transmitted herewith contains ~~security-related information to be withheld under 10 CFR 2.390~~. When separated from this transmittal, the remaining transmittal document is decontrolled.

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The proposed changes have been evaluated in accordance with 10 CFR 50.91(a)(1) using the criteria in 10 CFR 50.92(c). It has been determined that the changes involve no significant hazards consideration.

Approval of the proposed amendment is requested within one (1) year of receipt. Once approved, the amendment will be implemented within 60 days. This letter contains no new commitments and no revisions to existing commitments.

These changes have been reviewed by the Plant Onsite Review Group. Pursuant 10 CFR 50.91(b)(1), a copy of this letter is being forwarded to the designated State of Iowa official.

Should you have any questions regarding this submittal, please contact J. Michael Davis, Licensing Manager at (319) 851-7032.

I declare under penalty of perjury that the foregoing is true and correct.
Executed on August 28, 2014.



T. A. Vehec
Vice President, Duane Arnold Energy Center
NextEra Energy Duane Arnold, LLC

Attachments: 1. Description and Assessment
 2. No Significant Hazards Consideration Determination
 3. Proposed Operating License Changes (marked-up pages)
 4. Proposed Operating License Changes (clean/typed pages)

cc: USNRC Regional Administrator Region III
 USNRC Project Manager, Duane Arnold Energy Center
 USNRC Resident Inspector, Duane Arnold Energy Center
 A. Leek (State of Iowa)

**License Amendment Request for Application to
Revise Cyber Security Plan Milestone 8 Completion Date**

**Attachment 2
NextEra Energy Duane Arnold
No Significant Hazards Consideration Determination**

NextEra Energy Duane Arnold, LLC is requesting approval of changes to Duane Arnold Energy Center and Facility Operating No. DPR-49 to revise the Physical Protection license condition as it relates to the Cyber Security Plan. This change includes a proposed deviation to the Cyber Security Plan implementation schedule and a proposed revision to the Duane Arnold Energy Center Facility Operating License No. DPR-49 to include the proposed deviation. Specifically, NextEra Energy Duane Arnold, LLC proposes to change the completion date for full implementation (Milestone 8) of the Cyber Security Plan.

NextEra Energy Duane Arnold, LLC 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 described 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 is administrative in nature. The change 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, tested, or inspected. The proposed change does not require any plant modifications which affect the performance capability or the structures, systems, and components relied upon to mitigate the consequences of postulated accidents and have 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 is administrative in nature. This proposed change 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 do 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 of operation, limiting safety systems settings, and safety limits specified in the technical specifications. The proposed change to the Cyber Security Plan implementation schedule is administrative in nature. Because there is no change in 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, NextEra Energy Duane Arnold, LLC 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.

Attachment 3

NextEra Energy Duane Arnold, LLC

**Renewed Op. License No. DPR-49
Revised Operating License
(marked-up pages)**

1 page follows



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: "Duane Arnold Energy Center Physical Security Plan," submitted by letter dated May 16, 2006.

NextEra Energy Duane Arnold, LLC shall fully implement and maintain in effect all provisions of the Commission-approved Duane Arnold Energy Center/NextEra Energy Duane Arnold, LLC Cyber Security Plan (CSP), including changes made pursuant to the authority of 10 CFR 50.90 and 10 CFR 50.54(p). The Duane Arnold Energy Center/NextEra Energy Duane Arnold, LLC CSP was approved by License Amendment No. 278, as supplemented by a change approved by license Amendment No. 284X

(6) Deleted

and Amendment No. ____.

changes

(7) Additional Conditions

The Additional Conditions contained in Appendix B, as revised through Amendment No. 279, are hereby incorporated into this license. NextEra Energy Duane Arnold, LLC shall operate the facility in accordance with the Additional Conditions.

(8) The licensee is authorized to revise the Updated Final Safety Analysis Report by deleting the footnote for Section 9.1.4.4.5 which states: "*The NRC has not endorsed the reactor building crane as single-failure proof (Reference 9)," and by deleting Reference 9 of the references for Section 9.1.

(9) 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

(b) Operations to mitigate fuel damage considering the following:

1. Protection and use of personnel assets
2. Communications
3. Minimizing fire spread
4. Procedures for implementing integrated fire response strategy
5. Identification of readily-available pre-staged equipment
6. Training on integrated fire response strategy
7. Spent fuel pool mitigation measures

(c) Actions to minimize release to include consideration of:

1. Water spray scrubbing
2. Dose to onsite responders

(10) The licensee shall implement and maintain all Actions required by Attachment 2 to NRC Order EA-06-137, issued June 20, 2006, except the last action that requires incorporation of the strategies into the site security plan, contingency plan, emergency plan and/or guard training and qualification plan, as appropriate.

Renewed License No. DPR-49

Amendment ~~286~~ ____

Attachment 4

NextEra Energy Duane Arnold, LLC

**Renewed Op. License No. DPR-49
Revised Operating License
(retyped pages)**

1 page follows

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