



**UNITED STATES
NUCLEAR REGULATORY COMMISSION**

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

June 18, 2015

Mr. Anthony Vitale
Vice President, Operations
Entergy Nuclear Operations, Inc.
Palisades Nuclear Plant
27780 Blue Star Memorial Highway
Covert, MI 49043-9530

SUBJECT: PALISADES NUCLEAR PLANT - INFORMATION REQUEST FOR
TEMPORARY INSTRUCTION 2201/004 INSPECTION, NOTIFICATION
TO PERFORM "INSPECTION OF IMPLEMENTATION OF INTERIM CYBER
SECURITY MILESTONES 1 – 7"; 05000255/2015403

Dear Mr. Vitale:

On August 31, 2015, the U.S. Nuclear Regulatory Commission (NRC) will begin an inspection of Temporary Instruction (TI) 2201/004 at your Palisades Nuclear Plant (PNP). 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 associated 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 November 19, 2009, by letter (ML093230831) to the NRC, Entergy Nuclear Operations, Inc. (ENO) provided the PNP CSP and the CSP's associated implementation schedule that accounted for the site-specific activities. On July 26, 2010, by letter (ML102110090) to the NRC, ENO submitted a license amendment withdrawal, and revised license amendment request for PNP. On July 28, 2011, by letter (ML111801243) to ENO, the NRC issued Amendment No. 243 that approved the existing license condition regarding physical protection in the facility operating license to require the licensee to fully implement and maintain in effect all provisions of the NRC-approved CSP. On June 20, 2012, by letter (ML12184A149) to the NRC, ENO requested the NRC approve a license amendment change to Milestone 6. On December 5, 2012, by letter (ML12318A234) to ENO, the NRC issued

Amendment No. 248 that approved the Milestone 6 implementation schedule change. On December 30, 2013, by letter (ML13364A328) to the NRC, ENO requested a change to the PNP CSP's Milestone 8 full implementation date. On December 8, 2014, by letter (ML14237A144) to ENO, the NRC issued Amendment No. 253 that approved the Milestone 8 implementation schedule's date change for PNP.

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: August 31 - September 4, 2015; and
- Cyber Security TI Inspection: September 14 - 18, 2015

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 CSP 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 August 17, 2015. 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 (August 31 – September 4, 2015). 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 (September 14, 2015). 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 Mr. Gregory Hansen. We understand that our regulatory contact for this inspection is Mr. James Miksa of your organization. If there are any questions about the TI inspection or the material requested, please contact the lead inspector at (630) 829-9610, or via e-mail at Gregory.Hansen@nrc.gov.

A. Vitale

-3-

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.

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

Sincerely,

/RA/

Dariusz Szwarc, Chief (Acting)
Engineering Branch 3
Division of Reactor Safety

Docket Nos. 50-255 and 72-007
License No. DPR-20

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

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**INFORMATION REQUEST FOR CYBER SECURITY TEMPORARY INSTRUCTION 2201/004
INTERIM MILESTONES 1 – 7 INSPECTION**

Inspection Report No: 05000255/2015403

Inspection Onsite Dates: August 31 – September 4, 2015, (Information Gathering Visit)
September 14 - 18, 2015, (Cyber Security Temporary
Instruction Inspection)

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

NRC Inspectors:

Gregory Hansen, Lead Inspector (630) 829-9610 Gregory.Hansen@nrc.gov	George Hausman (630) 829-9743 George.Hausman@nrc.gov
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Alan Konkall (Cyber Security Contractor)
(561) 859-5232 (cell)
Alan.Konkall@nrc.gov

I. Information Requested Prior to the Information Gathering Visit

The following information is requested by August 17, 2015. If you have any questions regarding this request, please call the lead inspector as soon as possible. All information should be sent to Mr. Gregory Hansen (e-mail address Gregory.Hansen@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 a searchable Excel spreadsheet or "pdf" file on a compact disk (CD). The CD should be indexed and hyper-linked to facilitate ease of use. Please provide 3 copies of each CD submitted (one for each inspector and for a cyber security contractor).

A. Cyber Security Temporary Instruction Documentation

1. Provide a list of all documents required to complete each of the Cyber Security Milestones 1 - 7 identified by letter (ML102110090) dated July 26, 2010, Entergy Nuclear Operations, Inc. (ENO) - Palisades Nuclear Plant (PNP) Cyber Security Plan (CSP), and Revised Implementation Schedule, Attachments 6 and 5 respectively. 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- 7				
Document Number	Title	Description	Rev	Status
No. 1				
No. 2				
No. 3				
etc.				

Enclosure

INFORMATION REQUEST FOR CYBER SECURITY TEMPORARY INSTRUCTION 2201/004 INTERIM MILESTONES 1 – 7 INSPECTION

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.”

In addition to the documents identified in *I.A.1* above, ensure the documents identified below (*I.A.2* - *I.A.8*) for **MILESTONE 1 - 7** are included in the *I.A.1* table above.

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.
 - 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 systems have been identified as Critical Systems (CSs).
 - b. List of all digital assets noting which have been classified as Critical Digital Assets (CDAs), and which have not.
 - c. Procedure documenting the process by which CSs and CDAs are identified in accordance with 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.
 - c. Provide details of the implementation of the subject deterministic one-way device.

**INFORMATION REQUEST FOR CYBER SECURITY TEMPORARY INSTRUCTION 2201/004
INTERIM MILESTONES 1 – 7 INSPECTION**

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.
 - b. Training materials associated with the changes to plant programs associated with Milestone 5.
 7. **MILESTONE 6** - Provide the following documentation:
 - a. 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:
 - a. 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, Technical Specifications, and Technical Requirements Manual or equivalent.
 2. Provide a copy of the current cyber security “Health Report,” if available.
 3. Provide a copy of the current plant drawings used for operator training that provide additional information on system operation, system operating parameters, setpoints, etc. (e.g., some licensees 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
(August 31-September 4, 2015)**

The following information is requested to be provided to the inspectors during the on-site 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 CSP and;
 3. A phone list for licensee personnel.

**INFORMATION REQUEST FOR CYBER SECURITY TEMPORARY INSTRUCTION 2201/004
INTERIM MILESTONES 1 – 7 INSPECTION**

B. Facility Information:

1. Provide a presentation/discussion of your CSP, existing cyber security CSs, and associated CDAs.
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 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 Nuclear Energy Institute (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.
 - 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 in accordance with 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.
 - c. Provide governing procedures and results of vulnerability scans performed to comply with your CSP, Section 4.4.3.2

**INFORMATION REQUEST FOR CYBER SECURITY TEMPORARY INSTRUCTION 2201/004
INTERIM MILESTONES 1 – 7 INSPECTION**

***III. Information Requested to be Available on First Day of the Second On-site Week
(September 14, 2015)***

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).

- A. Any updates to information previously provided.

IV. Information Requested to Be Provided Throughout the TI Inspection

- A. 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).

If you have questions regarding the information requested, please contact Mr. Gregory Hansen, the Lead Inspector.

A. Vitale

-3-

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Sincerely,

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Dariusz Szwarc, Chief (Acting)
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