



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D.C. 20555-0001

June 21, 2016

Vice President, Operations  
Entergy Operations, Inc.  
River Bend Station  
5485 U.S. Highway 61N  
St. Francisville, LA 70775

SUBJECT: RIVER BEND STATION, UNIT 1 - ISSUANCE OF AMENDMENT RE: CYBER  
SECURITY PLAN IMPLEMENTATION SCHEDULE (CAC NO. MF6579)

Dear Sir or Madam:

The U.S. Nuclear Regulatory Commission has issued the enclosed Amendment No. 190 to Facility Operating License No. NPF-47 for the River Bend Station, Unit 1 (RBS). The amendment consists of changes to the facility operating license in response to your application dated June 29, 2015, as supplemented by letter dated December 3, 2015.

The amendment approves a change to the RBS facility operating license to revise the RBS Cyber Security Plan (CSP) Milestone 8 full implementation date from June 30, 2016 to December 15, 2017, as set forth in the CSP Implementation Schedule. The license was also revised, in part, to include administrative and editorial corrections.

A copy of the related Safety Evaluation is enclosed. The Notice of Issuance will be included in the Commission's next biweekly *Federal Register* notice.

Sincerely,

A handwritten signature in black ink, appearing to read "Stephen S. Koenick", is positioned above the typed name.

Stephen S. Koenick, Senior Project Manager  
Plant Licensing IV-2 and Decommissioning  
Transition Branch  
Division of Operating Reactor Licensing  
Office of Nuclear Reactor Regulation

Docket No. 50-458

Enclosures:

1. Amendment No. 190 to NPF-47
2. Safety Evaluation

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UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D.C. 20555-0001

ENTERGY LOUISIANA, LLC

AND

ENTERGY OPERATIONS, INC.

DOCKET NO. 50-458

RIVER BEND STATION, UNIT 1

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 190  
License No. NPF-47

1. The Nuclear Regulatory Commission (the Commission) has found that:
  - A. The application for amendment by Entergy Operations, Inc. (the licensee), dated June 29, 2015, as supplemented by letter dated December 3, 2015, complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act), and the Commission's rules and regulations set forth in 10 CFR Chapter I;
  - B. The facility will operate in conformity with the application, as amended, the provisions of the Act, and the rules and regulations of the Commission;
  - C. There is reasonable assurance (i) that the activities authorized by this amendment can be conducted without endangering the health and safety of the public, and (ii) that such activities will be conducted in compliance with the Commission's regulations;
  - D. The issuance of this license amendment will not be inimical to the common defense and security or to the health and safety of the public; and
  - E. The issuance of this amendment is in accordance with 10 CFR Part 51 of the Commission's regulations and all applicable requirements have been satisfied.

Enclosure 1

2. Accordingly, the license is amended as indicated in the attachment to this license amendment, and paragraph 2.E of Facility Operating License No. NPF-47 is hereby amended to read as follows:

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. 171 as supplemented by changes approved by License Amendment Nos. 177, 184 and 190.

3. In addition, the license is amended to correct editorial errors as indicated in the attachment to this license amendment, and paragraph 2.F of the Facility Operating License No. NPF-47 is hereby amended to read as follows:

Except as otherwise provided in the Technical Specifications or Environmental Protection Plan, EOI shall report any violations of the requirements contained in Section 2, Items C.(1); C.(3) through (9); and C.(11) through (16) of this license in the following manner: initial notification shall be made within 24 hours to the NRC Operations Center via the Emergency Notification System with written followup within 60 days in accordance with the procedures described in 10 CFR 50.73(b), (c) and (e).

4. The license amendment is effective as of its date of issuance and shall be implemented within 30 days from the date of issuance. The full implementation of the CSP shall be in accordance with the implementation schedule submitted by the licensee on June 29, 2015, as supplemented by letter dated December 3, 2015, and approved by the NRC staff with this license amendment. All subsequent changes to the NRC-approved CSP implementation schedule will require NRC approval pursuant to 10 CFR 50.90.

FOR THE NUCLEAR REGULATORY COMMISSION



Shaun M. Anderson, Acting Chief  
Plant Licensing IV-2 and Decommissioning  
Transition Branch  
Division of Operating Reactor Licensing  
Office of Nuclear Reactor Regulation

Attachment:  
Changes to the Facility Operating  
License No. NPF-47

Date of Issuance: June 21, 2016

ATTACHMENT TO LICENSE AMENDMENT NO. 190

FACILITY OPERATING LICENSE NO. NPF-47

DOCKET NO. 50-458

Replace the following page of the Facility Operating License No. NPF-47 with the attached revised page. The revised page is identified by amendment number and contains a marginal line indicating the area of change.

Facility Operating License

REMOVE

INSERT

-7-

-7-

- D. 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 the 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 contain Safeguards Information protected under 10 CFR 73.21, is entitled: "Physical Security, Safeguards Contingency and Training & Qualification Plan," submitted by letter dated May 16, 2006.
- E. 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. 171 as supplemented by changes approved by License Amendment Nos. 177, 184, and 190.
- F. Except as otherwise provided in the Technical Specifications or Environmental Protection Plan, EOI shall report any violations of the requirements contained in Section 2, Items C.(1); C.(3) through (9); and C.(11) through (16) of this license in the following manner: initial notification shall be made within 24 hours to the NRC Operations Center via the Emergency Notification System with written followup within 60 days in accordance with the procedures described in 10 CFR 50.73(b), (c) and (e).
- G. The licensee shall have and maintain financial protection of such type and in such amounts as the Commission shall require in accordance with Section 170 of the Atomic Energy Act of 1954, as amended, to cover public liability claims.
- H. This license is effective as of the date of issuance and shall expire at midnight on August 29, 2025.

FOR THE NUCLEAR REGULATORY COMMISSION

Original signed by

Harold R. Denton, Director  
Office of Nuclear Reactor Regulation

Enclosures:

- 1. Attachments 1-5
- 2. Appendix A - Technical Specifications (NUREG-1172)
- 3. Appendix B - Environmental Protection Plan
- 4. Appendix C - Antitrust Conditions

Date of Issuance: November 20, 1985

Revised: December 16, 1993

Amendment No. ~~70-79-85-119-135-171-177, 184, 190~~  
~~Revised by letter dated October 28, 2004~~  
~~Revised by letter dated November 19, 2004~~  
~~Revised by letter dated January 24, 2007~~



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D.C. 20555-0001

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

RELATED TO AMENDMENT NO. 190

TO FACILITY OPERATING LICENSE NO. NPF-47

ENTERGY OPERATIONS, INC.

RIVER BEND STATION, UNIT 1

DOCKET NO. 50-458

1.0 INTRODUCTION

By application dated June 29, 2015 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML15188A369), as supplemented by letter dated December 3, 2015 (ADAMS Accession No. ML15345A389), Entergy Operations, Inc. (Entergy, the licensee), requested a change to the facility operating license for River Bend Station, Unit 1 (RBS). The proposed change would revise the date of Cyber Security Plan (CSP) Implementation Schedule Milestone 8 and paragraph 2.E of the facility operating license. Milestone 8 of the CSP implementation schedule concerns the full implementation of the CSP. In addition, the NRC staff identified administrative and editorial errors in the license, which are described further below in Section 3.4.

The U.S. Nuclear Regulatory Commission (NRC) staff initially reviewed and approved the licensee's original CSP implementation schedule by RBS License Amendment No. 171 dated July 29, 2011 (ADAMS Accession No. ML111940200). Subsequently, the NRC staff reviewed and approved Amendment No. 184, dated December 12, 2014, which extended the CSP implementation schedule (ADAMS Accession No. ML14304A181). This schedule required RBS to fully implement and maintain all provisions of the CSP no later than June 30, 2016.

The proposed change would revise the completion date of the CSP, by extending the date for full implementation of the CSP Milestone 8 at RBS to December 15, 2017. The NRC issued a proposed finding that the amendment involves no significant hazards consideration, published in the *Federal Register* on April 5, 2016 (81 FR 19647). The NRC has not received public comment on this determination.

2.0 REGULATORY EVALUATION

The NRC staff considered the following regulatory requirements and guidance in its review of this license amendment request to modify the existing CSP implementation schedule:

- Title 10 of the *Code of Federal Regulations* (10 CFR), Section 73.54, "Protection of digital computer and communication systems and networks," states, in part: "Each

[CSP] submittal must include a proposed implementation schedule. Implementation of the licensee's cyber security program must be consistent with the approved schedule."

- Facility Operating License No. NPF-047 includes a license condition that requires the licensee to fully implement and maintain in effect all provisions of the Commission-approved CSP.
- NRC Memorandum, "Review Criteria for Title 10 of the *Code of Federal Regulations* Part 73.54, Cyber Security Implementation Schedule Milestone 8 License Amendment Requests," dated October 24, 2013 (ADAMS Accession No. ML13295A467), in which the NRC staff lists criteria to consider during evaluations of licensees' requests to postpone their cyber security program implementation date (commonly known as Milestone 8).

The NRC staff does not regard the CSP milestone implementation dates as regulatory commitments that can be changed unilaterally by the licensee, particularly in light of the regulatory requirement at 10 CFR 73.54, that states, "[i]mplementation of the licensee's cyber security program must be consistent with the approved schedule." As the NRC staff explained in its letter to all operating reactor licensees dated May 9, 2011 (ADAMS Accession No. ML110980538), the implementation of the plan, including the key intermediate milestone dates and the full implementation date shall be in accordance with the implementation schedule submitted by the licensee and approved by the NRC. All subsequent changes to the NRC-approved CSP implementation schedule, thus, will require prior NRC approval pursuant to 10 CFR 50.90, "Application for amendment of license, construction permit, or early site permit."

### 3.0 TECHNICAL EVALUATION

#### 3.1 Licensee's Requested Change

The NRC staff issued Amendment No. 184 to Facility Operating License NPF-47 for RBS by letter dated December 12, 2014. The NRC staff approved the licensee's CSP implementation schedule, as discussed in the safety evaluation issued with the amendment. The licensee's implementation schedule was based on a template prepared by the Nuclear Energy Institute (NEI), which was transmitted to the NRC by letter dated February 28, 2011 (ADAMS Accession No. ML110600206). By letter dated March 1, 2011, the NRC staff found the NEI template acceptable for licensees to use to develop their CSP implementation schedules (ADAMS Accession No. ML110070348). The licensee's proposed implementation schedule for the CSP identified completion dates and bases for the following eight milestones:

- 1) Establish the Cyber Security Assessment Team (CSAT);
- 2) Identify Critical Systems (CSs) and Critical Digital Assets (CDAs);
- 3) Install deterministic one-way devices between lower level devices and higher level devices;
- 4) Implement the security control "Access Control For Portable And Mobile Devices";

- 5) Implement observation and identification of obvious cyber related tampering to existing insider mitigation rounds by incorporating the appropriate elements;
- 6) Identify, document, and implement technical cyber security controls in accordance with Mitigation of Vulnerabilities and Application of Cyber Security Controls for CDAs that could adversely impact the design function of physical security target set equipment;
- 7) Ongoing monitoring and assessment activities for those target set CDAs whose security controls have been implemented;
- 8) Fully implement the CSP.

Currently, Milestone 8 of the RBS CSP requires the licensee to fully implement the CSP by June 30, 2016. In its June 29, 2015, application, as supplemented by letter dated December 3, 2015, the licensee requested to change the Milestone 8 completion date to December 15, 2017.

The licensee submitted its application on June 29, 2015, as supplemented by letter dated December 3, 2015, using the NRC staff's guidance to evaluate requests to postpone Milestone 8 implementation dates. The licensee's application addressed all the criteria in the guidance. The intent of the staggered cyber security implementation schedule was for licensees to demonstrate ongoing implementation of their cyber security program prior to full implementation, which was scheduled for the date specified in Milestone 8. The licensee addressed the seven other milestones (Milestone 1 through Milestone 7) by December 31, 2012. Activities included establishing a CSAT, identifying CSs and CDAs, deterministically isolating plant computer networks and CDAs, implementing access control for portable and mobile devices, implementing methods and provided training to observe and identify obvious cyber related tampering, and conducting ongoing monitoring and assessment activities for target set CDAs. In their aggregate, the interim milestones demonstrate ongoing implementation of the cyber security program.<sup>1</sup>

The licensee provided the information pertinent to each of the criteria identified in the NRC guidance memorandum dated October 24, 2013 as summarized below.

1. Identification of the specific requirement or requirements of the cyber security plan that the licensee needs additional time to implement.

The licensee stated that the requirements of the CSP that need additional time to implement are Section 3, "Analyzing Digital Computer Systems and Networks," and Section 4, "Establishing, Implementing and Maintaining the Cyber Security Program." The licensee further noted that these sections describe requirements for application of cyber security controls and describes the process of security control assessments. The licensee also noted any combination of physical, logical (software-related), or programmatic/procedural changes could be required.

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<sup>1</sup> The NRC staff notes in License Amendment No. 177 dated December 5, 2012 (ADAMS Accession No. ML12261A472), the NRC approved the licensee's request to amend its CSP to provide that operational and management security controls, identified in Milestone 6 would be fully implemented concurrent with the full implementation of Milestone 8 of the CSP implementation schedule.



2. Detailed justification that describes the reason the licensee requires additional time to implement the specific requirement or requirements identified.

The licensee stated that Entergy hosted a "pilot" Milestone 8 inspection at the Indian Point site in March 2014. During the pilot, insight was gained into the NRC perspective on how to apply the cyber security controls listed in NEI 08-09, Revision 6, "Cyber Security Plan for Nuclear Power Reactors," dated April 2010 (ADAMS Accession No. ML101180437). During the pilot inspection, the NRC team reviewed several examples of CDAs with Entergy and indicated the level of detail and depth expected for the technical analyses against cyber security controls referenced in NEI 08-09. Based on this review, Entergy stated that the detail and depth of the technical analysis exceeds Entergy's prior understanding and necessitates a greater effort to achieve than initially anticipated.

The licensee stated that during 2015, each operating Entergy licensee had an inspection of compliance with interim Milestones 1 through 7. The preparation for and support of these inspections required a significant commitment of time from Entergy's most knowledgeable subject matter experts on nuclear cyber security, exceeding the estimate previously developed and therefore, drawing those resources away from Milestone 8 implementation activities.

3. A proposed completion date for Milestone 8 consistent with the remaining scope of work to be conducted and the resources available.

The licensee proposed a Milestone 8 completion date of December 15, 2017.

4. An evaluation of the impact that the additional time to implement the requirements will have on the effectiveness of the licensee's overall cyber security program in the context of milestones already completed.

The licensee indicated the impact of the requested additional implementation time on the effectiveness of the overall cyber security program is very low. The milestones already completed have resulted in a high degree of protection of safety-related, important-to-safety, and security CDAs against common threat vectors. Additionally, the licensee stated that extensive physical and administrative measures are already in place for CDAs because they are plant components, pursuant to the Physical Security Plan and Technical Specification requirements. The licensee also briefly described how it had implemented the various milestones.

5. A description of the licensee's methodology for prioritizing completion of work for critical digital assets associated with significant safety, security or emergency preparedness consequences and with reactivity effects in the balance of plant.

The licensee stated that because CDAs are plant components, prioritization follows the normal work management process that places the highest priority on apparent conditions adverse to quality in system, structure, and component design function and related factors such as safety risk and nuclear defense-in-depth, as well as threats to continuity of electric power generation in the balance-of-plant. High focus continues to be maintained on prompt attention to any emergent issue with these CDAs that would potentially challenge the established cyber

protective barriers. Additionally, it should be noted that these CDAs encompass those associated with physical security target sets.

6. A discussion of the licensee's cyber security program performance up to the date of the license amendment request.

The licensee stated there has been no identified compromise of safety, security, and emergency preparedness functions by cyber means. Additionally, a Quality Assurance (QA) audit was conducted in the fourth quarter of 2014 pursuant to the physical security program review required by 10 CFR 73.55(m). The QA audit included review of the cyber security program implementation. There were no significant findings related to overall cyber security program performance and effectiveness.

7. A discussion of cyber security issues pending in the licensee's corrective action program (CAP).

The licensee stated there are presently no significant (constituting a threat to a CDA via cyber means or calling into question program effectiveness) nuclear cyber security issues pending in the RBS CAP. However, several non-significant issues identified during the QA audit described above and identified during NRC inspections have been entered into the CAP.

8. A discussion of modifications completed to support the cyber security program and a discussion of pending cyber security modifications.

The licensee provided a brief discussion of a completed modification and pending modifications.

### 3.2 NRC Staff Evaluation

The NRC staff has evaluated the licensee's application using the regulatory requirements and guidance identified above. The NRC staff's evaluation is below. The NRC staff finds that the actions the licensee noted as being required to implement CSP, Section 3, "Analyzing Digital Computer Systems and Networks," and Section 4, "Establishing, Implementing and Maintaining the Cyber Security Program," are reasonable, as discussed below.

The licensee indicated that the activities described in the completed milestones provide a high degree of protection of safety-related, important-to-safety, and security CDAs against common threat vectors. Notwithstanding the partial implementation of Milestone 6, the NRC staff concludes that the Licensee's site is more secure after the implementation of Milestones 1 through 7 because the activities the licensee has completed mitigate the most significant cyber attack vectors for the most significant CDAs. Therefore, the NRC has reasonable assurance that full implementation of the CSP by December 15, 2017, will provide adequate protection of the public health and safety and the common defense and security.

The licensee stated that the detail and depth of the technical analysis exceeds Entergy's prior understanding and necessitates a greater time and effort to achieve than Entergy anticipated when the current implementation schedule was developed. The NRC staff recognizes that CDA assessment work, including application of controls, is more complex and resource intensive than Entergy anticipated. As a result, the licensee has a large number of additional tasks not

considered when developing its current CSP implementation schedule. The NRC staff concludes that the licensee's request for additional time to implement Milestone 8 is reasonable given the complexity, volume, and scope of the remaining work required to fully implement its CSP.

The licensee proposed a Milestone 8 completion date of December 15, 2017. This would also delay implementation of remaining aspects of Milestone 6 to December 15, 2017. The licensee's prioritization of completion of work for CDAs follows the normal work management process that places the highest priority on apparent conditions adverse to quality in system, structure, and component design function and related to factors such as safety risk and nuclear defense in depth. High focus continues to be maintained on prompt attention to any emergent issue with safety related, security and important to safety (including BOP) CDAs that would potentially challenge the established cyber protective barriers. The NRC staff concludes that the licensee's methodology for prioritizing work on CDAs is appropriate. The staff further concludes that the licensee's request to delay final implementation of the CSP until December 15, 2017, is reasonable given the complexity of the remaining work and the licensee's resource constraints.

### 3.3 Technical Evaluation Conclusion

Based on its review of the licensee's submissions, the NRC staff concludes that the licensee's request to delay full implementation of its CSP until December 15, 2017, is reasonable for the following reasons: (i) the licensee's implementation of Milestones 1 through 7 provides mitigation for significant cyber attack vectors for the most significant CDAs, as discussed in the staff evaluation above; (ii) the scope of the work required to come into full compliance with the CSP implementation schedule was much more complicated than the licensee anticipated when the current CSP implementation schedule was developed; and (iii) the licensee has reasonably prioritized and scheduled the work required to come into full compliance with its CSP implementation schedule.

### 3.4 Revision to License Condition

By letter dated June 29, 2015, as supplemented by letter dated December 3, 2015, the licensee proposed to modify paragraph 2.E of Facility Operating License No. NPF-47, which provides a license condition requiring the licensee to fully implement and maintain in effect all provisions of the NRC-approved CSP. Additionally, the NRC staff identified administrative and editorial errors in paragraph 2.E and 2.F (i.e., inadvertently omitted reference to amendment 177 in paragraph 2.E and inadvertently omitted semicolons in 2.F).

The license condition in paragraph 2.E of Facility Operating License No. NPF-47 for RBS is modified, in part, as follows:

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. 171 as supplemented by changes approved by License Amendment Nos. 177, 184, and 190.

The license condition in paragraph 2.F of Facility Operating License No. NPF-47 for RBS is modified, in part, as follows:

Except as otherwise provided in the Technical Specifications or Environmental Protection Plan, EOI shall report any violations of the requirements contained in Section 2, Items C.(1); C.(3) through (9); and C.(11) through (16) of this license in the following manner: initial notification shall be made within 24 hours to the NRC Operations Center via the Emergency Notification System with written followup within 60 days in accordance with the procedures described in 10 CFR 50.73(b), (c) and (e).

The NRC staff determined that the administrative and editorial corrections in paragraphs 2.E and 2.F in License Amendment No. NPF-47 have no impact on the SE or the SE conclusions above. Based on the modified license conditions described above, the NRC staff concludes the changes are acceptable.

#### 4.0 REGULATORY COMMITMENTS

By letter dated June 29, 2015, as supplemented by letter dated December 3, 2015, the licensee made the following regulatory commitment:

Full implementation of *RBS Cyber Security Plan* for all safety, security, and emergency preparedness functions will be achieved.

Scheduled Completion Date: December 15, 2017

The above stated commitment is consistent with the revised Milestone 8 implementation date proposed by the licensee and evaluated by the NRC staff.

#### 5.0 STATE CONSULTATION

In accordance with the Commission's regulations, the Louisiana State official was notified of the proposed issuance of the amendment. The State official had no comments.

#### 6.0 ENVIRONMENTAL CONSIDERATION

This is an amendment to the 10 CFR Part 50 license that relates solely to safeguards matters and does not involve any significant construction impacts. This amendment is an administrative change to extend the date by which the licensee must have its CSP fully implemented. Accordingly, the amendment meets the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(12). In addition, the administrative and editorial changes included in this amendment meets the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(10)(v) for amendments that make editorial, corrective or minor revisions. 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.

## 7.0 CONCLUSION

The Commission has concluded, based on the considerations discussed above, that: (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, (2) there is reasonable assurance that 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.

Principal Contributor: J. Rycyna, NSIR/CSD

Date: June 21, 2016

June 21, 2016

Vice President, Operations  
Entergy Operations, Inc.  
River Bend Station  
5485 U.S. Highway 61N  
St. Francisville, LA 70775

SUBJECT: RIVER BEND STATION, UNIT 1 - ISSUANCE OF AMENDMENT RE: CYBER  
SECURITY PLAN IMPLEMENTATION SCHEDULE (CAC NO. MF6579)

Dear Sir or Madam:

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A copy of the related Safety Evaluation is enclosed. The Notice of Issuance will be included in the Commission's next biweekly *Federal Register* notice.

Sincerely,

/RA/

Stephen S. Koenick, Senior Project Manager  
Plant Licensing IV-2 and Decommissioning  
Transition Branch  
Division of Operating Reactor Licensing  
Office of Nuclear Reactor Regulation

Docket No. 50-458

Enclosures:

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2. Safety Evaluation

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**\*via email**

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DATE	5/16/16	5/16/16	4/19/16
OFFICE	OGC	NRR/DORL/LPL4-2/BC(A)	NRR/DORL/LPL4-2/PM
NAME	JBielecki	SAnderson	SKoenick
DATE	6/14/16	6/20/16	6/21/16

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