



Entergy Nuclear Operations, Inc.
Palisades Nuclear Power Plant
27780 Blue Star Memorial Highway
Covert, MI 49043-9530
Tel 269-764-2000

Thomas P. Kirwin
Acting Vice President-Operations

PNP 2011-028

April 4, 2011

U.S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, DC 20555

SUBJECT: Response to Additional Requests for Additional Information
(RAIs) and Revision to the PNP Cyber Security Plan
Palisades Nuclear Plant
Docket Nos. 50-255
License Nos. DPR-20

- References:
1. Entergy Nuclear Operations, Inc. letter to NRC, License Amendment Withdrawal and Request – Cyber Security Plan, dated July 26, 2010
 2. Entergy Nuclear Operations, Inc. letter to NRC, Revision of Commitment to Supplement the Cyber Security Plan Regarding Balance-of-Plant Systems, dated November 30, 2010
 3. Letter from Richard P. Correia (NRC) to Chris Earls (NEI) concerning scope of systems, dated January 5, 2011
 4. Entergy Nuclear Operations, Inc. letter to NRC, Response to Request for Additional Information (RAI) on the Palisades Nuclear Plant Cyber Security Plan, dated February 15, 2011 (PNP-2011-010)
 5. Letter from NRC to Entergy Nuclear Operations, Inc., Palisades Nuclear Plant -Request for Additional Information -Cyber Security Plan (TAC NO. ME4355), dated March 4, 2011
 6. Letter from Christopher E. Earls (NEI) to Richard P. Correia (NRC), Clarification to NEI 08-09, Revision 6 Regarding Records Retention, dated February 28, 2011
 7. Letter from Christopher E. Earls (NEI) to Richard P. Correia (NRC), Template for the Cyber Security Plan Implementation Schedule, dated February 28, 2011
 8. Letter from Richard P. Correia (NRC) to Christopher E. Earls (NEI), Cyber Security Plan Generic RAI on Records Retention, dated March 1, 2011
 9. Letter from Richard P. Correia (NRC) to Christopher E. Earls (NEI), Template for the Cyber Security Plan Implementation Schedule, dated March 1, 2011

~~This letter contains security-related information – Attachment 3 is withheld from public disclosure per 10 CFR 2.390~~

5001A
NRR

~~This letter contains security-related information. Attachments 1, 4, and 6 are withheld from public disclosure per 10 CFR 2.390~~

Dear Sir or Madam:

In Reference 1, Entergy Nuclear Operations, Inc. (ENO) submitted requests for amendments to the operating licenses for Palisades Nuclear Plant (PNP), requesting NRC approval of the PNP Cyber Security Plan. In accordance with Reference 4, ENO is revising Sections 2.1 "Scope and Purpose" and 4.3 "Defense-In-Depth Protective Strategies," to address clarifications with respect to data diodes/air gaps and emergency plan/preparedness as described in the request for additional information (RAI) responses. Subsequent to the submittal of these RAI responses, the NRC issued an additional generic RAI on the PNP Cyber Security Plan via Reference 5. ENO's response to the Reference 5 RAI is provided in Attachment 1.

Attachment 2 contains proposed marked-up operating license pages for the Physical Protection license condition for PNP to include the PNP Cyber Security Plan. Attachment 3 contains the proposed revised operating license pages. The marked-up pages in Attachment 2 and the revised pages in Attachment 3 replace, in their entirety, the pages previously submitted in Reference 1.

Attachment 6 provides a revised copy of the PNP Cyber Security Plan, Revision 0, which incorporates changes to Sections 2.1 "Scope and Purpose," 4.3 "Defense-In-Depth Protective Strategies," and 4.13 "Document Control and Records Retention and Handling." No other technical changes have been made to the PNP Cyber Security Plan. The enclosed PNP Cyber Security Plan replaces, in its entirety, the PNP Cyber Security Plan previously submitted in Reference 1. The changes discussed in this letter are clarifying or administrative and do not impact the conclusions of the no significant hazards consideration determination previously provided in Reference 1.

ENO requests that Attachments 1, 4, and 6 which contain security-related information (SRI), be withheld from public disclosure in accordance with 10 CFR 2.390.

The revised commitments contained in this submittal are summarized in Attachment 5.

In accordance with 10 CFR 50.91 ENO is notifying the State of Michigan of this proposed license amendment by transmitting a copy of this letter, without the security-related information, to the designated state official.

~~This letter contains security-related information. Attachments 1, 4, and 6 are withheld from public disclosure per 10 CFR 2.390~~

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I declare under penalty of perjury that the foregoing is true and correct. Executed on April 4, 2011.

Sincerely,



tpk/rbh

- Attachments:
1. Response to Requests for Additional Information (contains SRI)
 2. Proposed PNP Renewed Facility Operating License Changes (mark-up)
 3. Revised PNP Renewed Facility Operating License Pages
 4. Cyber Security Plan Implementation Schedule (contains SRI)
 5. List of Regulatory Commitments
 6. Revised PNP Cyber Security Plan (contains SRI)

cc: Regional Administrator, Region III, USNRC
Project Manager, Palisades, USNRC
Resident Inspector, Palisades, USNRC
State of Michigan

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Attachment 2

Proposed PNP Renewed Facility Operating License Changes (mark-up)

- D. The facility has been granted certain exemptions from the requirements of Section III, G of Appendix R to 10 CFR Part 50, "Fire Protection Program for Nuclear Power Facilities Operating Prior to January 1, 1979." This section relates to fire protection features for ensuring the systems and associated circuits used to achieve and maintain safe shutdown are free of fire damage. These exemptions were granted in letters dated February 8, 1983, July 12, 1985, and July 23, 1985.

In addition, the facility has been granted certain exemptions from Appendix J to 10 CFR Part 50, "Primary Reactor Containment Leakage Testing for Water Cooled Power Reactors." This section contains leakage test requirements, schedules and acceptance criteria for tests of the leak-tight integrity of the primary reactor containment and systems and components which penetrate the containment. These exemptions were granted in a letter dated December 6, 1989.

These exemptions granted pursuant to 10 CFR 50.12, are authorized by law, will not present an undue risk to the public health and safety, and are consistent with the common defense and security. With these exemptions, the facility will operate, to the extent authorized herein, in conformity with the application, as amended, the provisions of the Act, and the rules and regulations of the Commission.

- E. ENO 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 combined set of plans, which contains Safeguards Information protected under 10 CFR 73.21, is entitled: "Entergy Nuclear Palisades Nuclear Plant Physical Security Plan."

ENO shall fully implement in accordance with an NRC-approved implementation schedule and maintain in effect all provisions of the NRC approved Palisades Nuclear Plant Cyber Security Plan pursuant to 10 CFR 73.55(c)(6) and 10 CFR 73.54 (74 FR 13970) and to the authority of 10 CFR 50.90 and 10 CFR 50.54(p).

- F. [deleted]

- G. ENP and ENO 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.

Attachment 3

Revised PNP Renewed Facility Operating License Pages

- E. The facility has been granted certain exemptions from the requirements of Section III, G of Appendix R to 10 CFR Part 50, "Fire Protection Program for Nuclear Power Facilities Operating Prior to January 1, 1979." This section relates to fire protection features for ensuring the systems and associated circuits used to achieve and maintain safe shutdown are free of fire damage. These exemptions were granted in letters dated February 8, 1983, July 12, 1985, and July 23, 1985.

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Attachment 5

List of Regulatory Commitments

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The following table identifies those actions committed to by Entergy Nuclear Operations, Inc. (ENO) in this document. Any other statements in this submittal are provided for information purposes and are not considered to be regulatory commitments.

COMMITMENT	TYPE (Check One)		SCHEDULED COMPLETION DATE
	ONE- TIME ACTION	CONTINUING COMPLIANCE	
ENO will implement milestones 1 through 7 described in Attachment 4.	X		December 31, 2012
Full implementation of Palisades Nuclear Plant Cyber Security Plan for all safety, security, and emergency preparedness functions will be achieved.	X		December 15, 2014