



December 23, 2011
AET 11-0058

ATTN: Document Control Desk
Ms. Catherine Haney, Director
Office of Nuclear Material Safety and Safeguards
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

**American Centrifuge Plant and Lead Cascade Facility
Docket Numbers 70-7004 and 70-7003; License Numbers SNM-2011 and SNM-7003
Submittal of Classified Cyber Security Plan for Reaccreditation Review – Security-Related
Information and Official Use Only**

**INFORMATION TRANSMITTED HEREWITH IS PROTECTED FROM PUBLIC
DISCLOSURE AS CONFIDENTIAL COMMERCIAL OR FINANCIAL INFORMATION
AND/OR TRADE SECRETS PURSUANT TO 10 CFR 2.390 AND 9.17(a)(4)**

Dear Ms. Haney:

Purpose

The purpose of this letter is to request the U.S. Nuclear Regulatory Commission (NRC) review and approval of proposed changes to the classified cyber security plan SP-HQ-0001, “Information System Security Plan (ISSP) for Thin Client Operation Processing Classified Information at Protection Index = 2” in accordance with 10 *Code of Federal Regulations* (CFR) 95.19(a).

Background

On June 22, 2011 (Reference 1), the NRC issued a letter notifying USEC Inc. (USEC) that the U.S. Department of Energy (DOE) is in the process of updating its requirements for classified computer networks and that the national standards that will be implemented appear to be more restrictive. For this reason, NRC recommended that all currently accredited classified computer networks be reaccredited under the existing requirements before these national standards are implemented. On September 2, 2011, the DOE provided guidance to the NRC regarding NRC licensees with DOE classified cyber security accreditation. Specifically, the letter stated that any DOE accredited systems submitted to DOE prior to January 1, 2012, will be reviewed against the current DOE requirements. As such, it would be beneficial for the NRC licensees to submit reaccreditation requests prior to January 1, 2012.

**Document herewith contains
Security-Related Information – Withhold Under 10 CFR 2.390
Official Use Only
When separated from Enclosure 2, this letter is uncontrolled.**

USEC Inc.
6903 Rockledge Drive, Bethesda, MD 20817-1818
Telephone 301-564-3200 Fax 301-564-3201 <http://www.usec.com>

NM5501
S001A

**Security-Related Information – Withhold Under 10 CFR 2.390
Official Use Only**

Ms. Catherine Haney
December 23, 2011
AET 11-0058, Page 2

Discussion

Enclosure 1 of this letter provides a detailed description, justification, and USEC's significance determination for the proposed changes associated with the classified cyber security plan SP-HQ-0001 to address References 1 and 2 of this letter. As verbally requested by the Designated Approval Authority (DAA) on March 7, 2011, the new name of American Centrifuge Operating, LLC has been incorporated into this classified computer network cyber security plan where needed. The changes to these plans have been determined to be a substantive change in accordance with 10 CFR 95.19 and accordingly, USEC is submitting the plan to the NRC for review and reaccreditation. Enclosure 2 of this letter provides SP-HQ-0001, Revision 1 dated December 2011. Changes provided within Enclosure 2 are designated with a revision bar in the right hand margin.

Enclosure 2 contains Security-Related Information and in accordance with the guidance provided by the DOE, this enclosure also contains Official Use Only information. Therefore, USEC requests this enclosure be withheld from public disclosure pursuant to 10 CFR 2.390(d)(1).

Action

USEC requests NRC review and approval of SP-HQ-0001, Revision 1 and DAA reaccreditation of same.

Additionally, USEC requests that the approval of the revised classified cyber security plan reset the three year reaccreditation date.

Contact

If you have any questions regarding this matter, please contact me at (301) 564-3470 or Terry Sensus at (740) 897-2412.

Sincerely,



Peter J. Miner
Director, Regulatory and Quality Assurance

Enclosures: As Stated

**Security-Related Information – Withhold Under 10 CFR 2.390
Official Use Only**

Ms. Catherine Haney
December 23, 2011
AET 11-0058, Page 3

cc (without enclosures, unless otherwise noted):

J. Calle, NRC Region II
R. DeVault, DOE
J. Downs, NRC HQ
K. Everly, NRC HQ (w/enclosures)
D. Hartland, NRC Region II
Q. Nguyen, DOE (w/enclosures)
B. Smith, NRC HQ
O. Siurano, NRC HQ (w/enclosures)
B. Stapleton, NRC HQ

References:

1. NRC letter from B.W. Smith to P.J. Miner (USEC) regarding Reaccreditation of Classified Computer Networks, dated June 22, 2011
2. DOE letter from J.T. Howell to B.W. Smith (NRC) regarding Nuclear Regulatory Commission (NRC) Licensees with Department of Energy (DOE) Classified Cyber Security Accreditation, dated September 2, 2011

Enclosure 1 of AET 11-0058

Detailed Description, Justification for Change, and Significance Determination

**Information contained within
does not contain
Export Controlled Information**

**Reviewer: Gregg Peed
Date: 12/21/2011**

Detailed Description, Justification for Change, and Significance Determination

On June 22, 2011 (Reference 1), the NRC issued a letter notifying USEC Inc. (USEC) that the U.S. Department of Energy (DOE) is in the process of updating its requirements for classified computer networks and that the national standards that will be implemented appear to be more restrictive. For this reason, NRC recommended that all currently accredited classified computer networks be reaccredited under the existing requirements before these national standards are implemented. On September 2, 2011, the DOE provided guidance to the NRC regarding NRC licensees with DOE classified cyber security accreditation. Any DOE accredited systems submitted to DOE prior to January 1, 2012, will be reviewed against the current DOE requirements. As such, it would be beneficial for the NRC licensees to submit re-accreditation requests prior to January 1, 2012. Therefore, USEC Inc. Headquarters cyber security plan SP-HQ-0001, "Information System Security Plan (ISSP) for Thin Client Operation Processing Classified Information at Protection Index = 2" is being revised to update personnel changes that have occurred since the last update of this plan.

Additionally, as verbally requested by the Designated Approval Authority on March 7, 2011, the new names of the limited liability companies are being incorporated into the classified computer network cyber security plans where needed and the reference to ACP and USEC were deleted where a specific name was not required within these plans. Also editorial changes were made clarify the Security Plan.

Detailed Description of Change

Proposed changes for the SP-HQ-0001, "Information System Security Plan (ISSP) for Thin Client Operation Processing Classified Information at Protection Index = 2," Revision 1, dated December 2011 are provided in Enclosure 2 of this letter.

The proposed changes to these documents are identified by the following method:

- ~~Blue Strikeout~~ - Identifies text to be removed
- Red underline – Identifies text to be added

Justification for Proposed Changes

Headquarters Information System Security Plan SP-HQ-0001 is being revised to update personnel changes that have occurred since the last update of this plan. Also, this change incorporates the new names of the limited liability companies where needed and deleted the reference to ACP and USEC where a specific name was not required within the plans. These changes were made in response NRC June 22, 2011 letter (Reference 1) and the verbal requested by the Designated Approval Authority on March 7, 2011. Editorial changes were also made to SP-HQ-0001 to clarify the Security Plan.

The proposed changes will not decrease the overall level of security system performance to protect against the loss or compromise of classified matter. The proposed changes will not affect how the plant boundary is protected nor will it have an affect on documentation of patrols, performance of rounds, or training protective force personnel. The proposed changes will not affect tracking or protection of special nuclear material. Therefore, the proposed changes will not decrease the effectiveness of the Information System Security Plan.

The changes are considered a substantive change in accordance with 10 CFR 95.19; therefore, the proposed changes to the classified cyber security plan require NRC's pre-approval in accordance with 10 CFR 95.19. The proposed changes to the plan are administrative in nature and will not affect the classified computer network system performance needed to protect against the loss or compromise of classified matter.

These proposed changes will not impact the design function, or method of performing or controlling design functions, structures, systems, and components, nor will the change decrease the effectiveness of any program or plan contained in the License Application and Supporting Documents. Moreover, the proposed changes will not change the assumptions, or change, degrade, or prevent actions described or assumed in accident sequences evaluated and described in the Integrated Safety Analysis (ISA) Summaries, nor will any items relied on for safety (IROFS) be affected. Therefore, the proposed changes do not adversely affect safety or continued safe operation of the American Centrifuge Plant or American Centrifuge Lead Cascade Facility, or result in an increase in the radiological or chemical consequences or accident scenarios described in the ISA Summaries.

Significance Determination for Proposed Conforming Changes

USEC has reviewed the proposed changes and provides the following Significance Determination.

1. No significant change to any conditions to the License.

There is no license condition that pertains to the proposed changes; therefore, making the proposed changes will not involve any significant change to any condition to the license.

2. No significant increase in the probability of occurrence or consequences of previously evaluated accidents.

The proposed changes will not change any accident scenario identified in the ISA Summaries or exceed the performance requirements of 10 CFR 70.61; therefore, there is no significant increase in the probability of occurrence or consequences of the previously evaluated accidents.

3. No new or different type of accident.

The proposed changes do not create new or different types of accident sequences that, unless mitigated or prevented, would exceed the performance requirements of 10 CFR 70.61 and that have not previously been described in the ISA Summaries.

4. No significant reduction in the margins of safety.

The proposed changes do not decrease the margin of safety associated with any IROFS that are being credited to ensure the performance requirements of 10 CFR 70.61 are met.

5. No significant decrease in the effectiveness of any programs or plans contained in the licensing documents.

- The proposed changes to the Classified Cyber Security Plan are administrative in nature and will not decrease the overall level of security system performance to protect against the loss or compromise of classified matter. The proposed changes do not affect the control of classified storage areas or vaults, training of classifiers, documentation of classification of matter, or computer security. The proposed changes do not alter aspects of physical security or transportation of special nuclear material (SNM).
- The FNMCP will still meet the requirements of 10 CFR Parts 70 and 74 with the proposed changes.
- The Emergency Plan will still meet the requirements of 10 CFR Part 70 and the guidance of NRC Regulatory Guide 3.67. The proposed changes will not create a reduction in the levels of emergency preparedness discussed in the Emergency Plan, and will not decrease the abilities of the Responses Organization to mitigate accident consequences or

reasonably assure the adequate protection of the health and safety of the off-site and on-site personnel in the event of an emergency.

- The proposed changes do not represent an alternative to a requirement described in Quality Assurance Program Description (QAPD) and do not represent a relaxation of a requirement of QAPD which has not been previously reviewed and approved by the NRC.

Based on the above, the proposed changes will not result in a decrease in the effectiveness of the Security Program/Plans, FNMCP, Emergency Plan, or the QAPD contained in the licensing documents.

6. The proposed changes do not result in undue risk to: 1) public health and safety; 2) common defense and security; and 3) the environment.

There are no increases in hazardous materials or waste streams and no undue risk to public health and safety. The proposed changes will not increase the likelihood that protected material or SNM will be accessible to unauthorized personnel since facilities and activities are within the Controlled Access Area. The proposed changes do not result in undue risk to public health and safety, the environment, or to the common defense and security.

7. There is no change in the type or significant increases in the amounts of any effluents that may be released Off-site.

The proposed changes do not result in any new or unusual sources of hazardous substances, hazardous waste, or new waste streams that could be generated or used in unacceptable levels that exceed applicable regulatory requirements as a result of the proposed changes. In addition, there is no change in the type or significant increases in the amounts of any effluents that may be released off-site.

8. There is no significant increase in individual or cumulative occupational radiation exposure.

The proposed changes will not increase radiological or chemical releases beyond applicable regulatory limits (10 CFR 70.61) and will not create any new or unusual sources of radioactive waste. Likewise, the proposed changes will not result in significant increase in individual or cumulative occupational radiation exposure.

9. There is no significant construction impact.

The proposed changes will not require a change to any facilities. Therefore, the proposed change will have no significant impact on construction activities.