



A unit of American Electric Power

Indiana Michigan Power  
One Cook Place  
Bridgman, MI 49106  
IndianaMichiganPower.com

September 11, 2012

AEP-NRC-2012-70  
10 CFR 50.90  
10 CFR 73.54

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

Docket Nos.: 50-315  
50-316

Donald C. Cook Nuclear Plant Units 1 and 2  
LICENSE AMENDMENT REQUEST – CYBER SECURITY  
PLAN IMPLEMENTATION SCHEDULE MILESTONES

- References:
1. Letter from P. S. Tam, US Nuclear Regulatory Commission (NRC) to L. J. Weber, Indiana Michigan Power Company (I&M), "Donald C. Cook Nuclear Plant, Units 1 and 2 – Issuance of Amendments re: Cyber Security Plan (TAC Nos. ME4275 and ME4276)," dated July 28, 2011, ML1111182A178.
  2. Letter from J. P. Gebbie, I&M to NRC Document Control Desk, "Donald C. Cook Nuclear Plant Units 1 and 2, Response to Request for Information Regarding a License Amendment Request for Approval of the Donald C. Cook Nuclear Plant Cyber Security Plan (TAC Nos. ME4275 and ME 4276)," AEP-NRC-2011-18, dated April 8, 2011, ML111111A058.
  3. Letter from P. S. Tam, NRC, to L. J. Weber, I&M, "Donald C. Cook Nuclear Plant, Units 1 and 2 – Issuance of Amendments re: Cyber Security Plan (TAC Nos. ME4275 and ME4276)," dated August 13, 2012, ML12222A086.

By Reference 1 the NRC issued License Amendment Nos. 315 and 299 to I&M for the Renewed Facility Operating License for the Donald C. Cook Nuclear Plant (CNP), Units 1 and 2 respectively. The amendments approved the CNP Cyber Security Plan and associated implementation milestone schedule. The Cyber Security Plan Implementation Schedule contained in Reference 2 was utilized as a portion of the basis for the NRC's safety evaluation report provided by

This letter contains security-related information – Enclosures 2 (Sections 1, 2, and 3) and 4 are withheld from public disclosure per 10 CFR 2.390  
Upon removal of Enclosures 2 (Sections 1, 2, and 3) and 4, this letter is decontrolled.

~~SECURITY RELATED INFORMATION – WITHHOLD UNDER 10 CFR 2.390~~

Reference 1, as modified by Reference 3. I&M is planning to implement the requirements of Implementation Schedule Milestone 6 in a slightly different manner than described in the approved Implementation Schedule. Although no change to the Implementation Schedule date is proposed, the change to the description of the milestone activity is conservatively considered to be a change to the Implementation Schedule, and in accordance with the provisions of 10 CFR 50.4 and 10 CFR 50.90, I&M is submitting this request for an amendment to the Facility Operating Licenses for CNP. The CNP Cyber Security Plan, Revision 0 was previously provided in Reference 2.

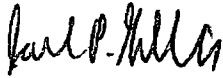
Enclosure 1 provides an affirmation. Enclosure 2 provides an evaluation of the proposed change. Enclosure 3 contains proposed marked-up operating license pages for the Physical Protection license condition for CNP to reference the commitment change provided in this submittal. Clean copies of operating license pages will be provided to our Project Manager upon request. Enclosure 4 contains a change to the scope of Implementation Milestone 6. I&M requests that Enclosures 2 (Sections 1, 2, and 3) and 4 which contain security-related information be withheld from public disclosure in accordance with 10 CFR 2.390.

The proposed changes have been evaluated in accordance with 10 CFR 50.91(a)(1) using criteria in 10 CFR 50.92(c), and it has been determined that the changes involve no significant hazards consideration. The bases for these determinations are included in Enclosure 2. Copies of this letter and its enclosures are being transmitted to the Michigan Public Service Commission and Michigan Department of Environmental Quality in accordance with the requirements of 10 CFR 50.91.

I&M requests this license amendment be effective as of its date of issuance. Although this request is neither exigent nor emergency, your review and approval is requested prior to December 31, 2012.

The revised commitment contained in this submittal is summarized in Enclosure 5. Should you have any questions concerning this letter, or require additional information, please contact Mr. Michael K. Scarpello at (269) 466-2649.

Sincerely,



Joel P. Gebbie  
Site Vice President

MCS/kmh

- Enclosures:
1. Affirmation
  2. Analysis of Proposed Operating License Change (contains SRI)
  3. Proposed CNP Operating License Changes (mark-up)
  4. Revised Cyber Security Plan Implementation Schedule (contains SRI)
  5. List of Regulatory Commitments

~~SECURITY RELATED INFORMATION - WITHHOLD UNDER 10 CFR 2.390~~

U. S. Nuclear Regulatory Commission

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c: C. A. Casto, NRC Region III  
J. T. King, MPSC  
S. M. Krawec, AEP Ft. Wayne, w/o enclosures  
MDEQ-RMD/RPS  
NRC Resident Inspector  
T. J. Wengert, NRC Washington DC

Enclosure 1 to AEP-NRC-2012-70

AFFIRMATION

I, Joel P. Gebbie, being duly sworn, state that I am Site Vice President of Indiana Michigan Power Company (I&M), that I am authorized to sign and file this request with the Nuclear Regulatory Commission on behalf of I&M, and that the statements made and the matters set forth herein pertaining to I&M are true and correct to the best of my knowledge, information, and belief.

Indiana Michigan Power Company



Joel P. Gebbie  
Site Vice President

SWORN TO AND SUBSCRIBED BEFORE ME

THIS 11 DAY OF September, 2012

  
Notary Public

My Commission Expires 04-04-2018

DANIELLE BURGOYNE  
Notary Public, State of Michigan  
County of Berrien  
My Commission Expires 04-04-2018  
Acting in the County of Berrien

## 4.0 REGULATORY EVALUATION

### 4.1 Applicable Regulatory Requirements/Criteria

10 CFR 73.54 requires licensees to implement and maintain a cyber security plan. CNP Facility Operating License Nos. DPR-58 and DPR-74 include a Physical Protection license condition that requires I&M to fully implement and maintain in effect all provisions of the Commission-approved cyber security plan, including changes made pursuant to the authority of 10 CFR 50.90 and 10 CFR 50.54(p).

### 4.2 Precedent

Amendment No. 203 (Reference 6) approved an implementation schedule using the Nuclear Energy Institute (NEI) template (Reference 4), with the exception of Milestone 6 for the Callaway Plant. The Callaway Plant deviated from the template for Milestone 6 to address only the NEI 08-09, Revision 6, Appendix D technical controls, excepting for the operational and management controls, on the basis that implementing the technical controls for the target set CDAs provides a high degree of protection against cyber related attacks that could lead to radiological sabotage.

The changes being proposed by I&M in this amendment request are similar to those approved in the Callaway Plant Amendment No. 203.

### 4.3 Significant Safety Hazards Consideration

I&M is requesting an amendment to the CNP Facility Operating Licenses to revise the Physical Protection license condition as it relates to the cyber security plan. This change includes a proposed deviation to the scope of a Cyber Security Plan Implementation Schedule milestone and a proposed revision to the CNP Facility Operating Licenses to include the proposed deviation. Specifically, I&M proposes a change to the scope of Implementation Milestone 6 to apply to only technical cyber security controls.

I&M 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 discussed 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. This 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 has 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 does 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 for operation, limiting safety system 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 to 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, I&M 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.

#### 4.4 Conclusion

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

## 5.0 ENVIRONMENTAL CONSIDERATION

The proposed amendment provides a change to the Cyber Security Plan Implementation Schedule. The proposed amendment meets the eligibility criterion for a categorical exclusion set forth in 10 CFR 51.22(c)(12). Therefore, 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.

## 6.0 REFERENCES

1. Letter from P. S. Tam, U. S. Nuclear Regulatory Commission (NRC) to L. J. Weber, Indiana Michigan Power Company, "Donald C. Cook Nuclear Plant, Units 1 and 2 – Issuance of Amendments re: Cyber Security Plan (TAC Nos. ME4275 and ME4276)," dated July 28, 2011, ML1111182A178.
2. Letter from J. P. Gebbie, I&M to NRC Document Control Desk, "Donald C. Cook Nuclear Plant Units 1 and 2, Response to Request for Information Regarding a License Amendment Request for Approval of the Donald C. Cook Nuclear Plant Cyber Security Plan (TAC Nos. ME4275 and ME 4276)," dated April 8, 2011, ML11111A058.
3. Letter from P. S. Tam, NRC, to L. J. Weber, I&M, "Donald C. Cook Nuclear Plant, Units 1 and 2 – Issuance of Amendments re: Cyber Security Plan (TAC Nos. ME4275 and ME4276)," dated August 13, 2012, ML12222A086.
4. Letter from Chris Earls (NEI) to Richard P. Correia (NRC), "Template for the Cyber Security Plan Implementation Schedule," dated February 28, 2011, ML110600218.
5. Letter from Richard P. Correia (NRC) to Chris Earls (NEI), "Template for the Cyber Security Plan Implementation Schedule," dated March 1, 2011, ML110070348.
6. NRC letter from M. C. Thadani, US NRC, to A. C. Heflin, Union Electric Company, "Callaway Plant, Unit 1 – Issuance of Amendment Re: Approval of Cyber Security Plan (TAC NO. ME4536)," August 17, 2011, ML112140087.

Enclosure 3 to AEP-NRC-2012-70

Proposed CNP Operating License Changes (mark-up)

Donald C. Cook Nuclear Plant Unit 1  
Renewed Facility Operating License DPR-58  
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Donald C. Cook Nuclear Plant Unit 2  
Renewed Facility Operating License DPR-74  
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D. Physical Protection

The Indiana Michigan Power Company 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 revision to 10 CFR 73.55 (51 FR 27817 and 27822), and the authority of 10 CFR 50.90 and 10 CFR 50.54(p). The combined set of plans<sup>1</sup>, which contain Safeguards Information protected under 10 CFR 73.21, is entitled: "Donald C. Cook Nuclear Plant Security Plan, Training and Qualification Plan, and Safeguards Contingency Plan, Revision 1," submitted by letter dated May 10, 2006.

The Indiana and Michigan Power Company shall fully implement and maintain in effect all provisions of the Commission-approved Donald C. Cook Nuclear Plant Cyber Security Plan (CSP), including changes made pursuant to the authority of 10 CFR 50.90 and 10 CFR 50.54(p). The Donald C. Cook Nuclear Plant CSP was approved by License Amendment No. 315 as supplemented by a change approved by License Amendment No. xxx.

E. Deleted by Amendment No. 80

F. Deleted by Amendment No. 80

G. In all places of this renewed operating license, the reference to the Indiana and Michigan Electric Company is amended to read Indiana Michigan Power Company.

H. Deleted by Amendment No. 287

I. Deleted by Amendment No. 287

J. The licensee is authorized to use digital signal processing instrumentation in the reactor protection system.

K. Updated Final Safety Analysis Report

The Indiana Michigan Power Company Updated Final Safety Analysis Report supplement, submitted pursuant to 10 CFR 54.21(d), describes certain future activities to be completed prior to the period of extended operation. The Indiana Michigan Power Company shall complete these activities no later than October 25, 2014, and shall notify the NRC in writing when implementation of these activities is complete and can be verified by NRC inspection.

The Updated Final Safety Analysis Report supplement, as revised, shall be included in the next scheduled update to the Updated Final Safety Analysis Report required by 10 CFR 50.71(e)(4) following issuance of this renewed operating license. Until that update is complete, Indiana Michigan Power Company may make changes to the programs and activities described in the supplement without prior Commission

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<sup>1</sup>The Training and Qualification Plan and Safeguards Contingency Plan are Appendices to the Security Plan

- (III) The first performance of the periodic measurement of CRE pressure, TS 5.5.16.d, shall be within 24 months, plus the 182 days allowed by SR 3.0.2, as measured from the date of the most recent successful pressure measurement test, or within 182 days if not performed previously.

D. Physical Protection

The Indiana Michigan Power Company 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 the authority of 10 CFR 50.90 and 10 CFR 50.54(p). The combined set of plans<sup>1</sup>, which contain Safeguards Information protected under 10 CFR 73.21, is entitled: "Donald C. Cook Nuclear Plant Security Plan, Training and Qualification Plan, and Safeguards Contingency Plan, Revision 1," submitted by letter dated May 10, 2006.

The Indiana and Michigan Power Company shall fully implement and maintain in effect all provisions of the Commission-approved Donald C. Cook Nuclear Plant Cyber Security Plan (CSP), including changes made pursuant to the authority of 10 CFR 50.90 and 10 CFR 50.54(p). The Donald C. Cook Nuclear Plant CSP was approved by License Amendment No. 299 as supplemented by a change approved by License Amendment No. xxx.

E. Deleted by Amendment No. 63

- F. In all places of this renewed operating license, the reference to the Indiana and Michigan Electric Company is amended to read Indiana Michigan Power Company.

G. Deleted by Amendment No. 269

H. Deleted by Amendment No. 269

I. Deleted by Amendment No. 261

(1) Deleted by Amendment No. 261

(2) Deleted by Amendment No. 261

- J. The licensee is authorized to use digital signal processing instrumentation in the reactor protection system.

K. Updated Final Safety Analysis Report

The Indiana Michigan Power Company Updated Final Safety Analysis Report supplement, submitted pursuant to 10 CFR 54.21(d), describes certain future activities to be completed prior to the period of extended operation. The Indiana Michigan Power Company shall complete these activities no later than December 23, 2017, and shall notify the NRC in writing when implementation of these activities is complete and can be verified by NRC inspection.

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<sup>1</sup> The Training and Qualification Plan and Safeguards Contingency Plan are Appendices to the Security Plan.

**Enclosure 5 to AEP-NRC-2012-70**

**List of Regulatory Commitments**

Enclosure 5 to AEP-NRC-2012-70

List of Regulatory Commitments

The following table identifies those actions committed to by Indiana Michigan Power Company (I&M) 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  (If Required)
	ONE- TIME ACTION	CONTINUING COMPLIANCE	
I&M will implement Milestones 1, 2, 3, 4, 5, and 7 described in AEP-NRC-2011-18, dated April 8, 2011, and the revised Milestone 6 in Enclosure 4 of this submittal.	X		December 31, 2012