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10 CFR 50.4
10 CFR 50.90

Serial: RA-12-031
September 12, 2012

U. S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, DC 20555-0001

BRUNSWICK STEAM ELECTRIC PLANT, UNIT NOS. 1 AND 2
DOCKET NOS. 50-325 AND 50-324 / RENEWED LICENSE NOS. DPR-71 AND DPR-62

CRYSTAL RIVER UNIT 3 NUCLEAR GENERATING PLANT
DOCKET NO. 50-302 / LICENSE NO. DPR-72

SHEARON HARRIS NUCLEAR POWER PLANT, UNIT NO. 1
DOCKET NO. 50-400 / RENEWED LICENSE NO. NPF-63

H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2
DOCKET NO. 50-261 / RENEWED LICENSE NO. DPR-23

SUBJECT: CAROLINA POWER & LIGHT COMPANY AND FLORIDA POWER CORPORATION'S LICENSE AMENDMENT REQUEST – CYBER SECURITY PLAN IMPLEMENTATION SCHEDULE MILESTONES

REFERENCES:

1. NRC letter, *Brunswick Steam Electric Plant, Units 1 and 2, H. B. Robinson Steam Electric Plant, Unit No.2, Shearon Harris Nuclear Power Plant, Unit 1, and Crystal River Unit 3 Nuclear Generating Plant - Issuance of License Amendments Regarding Approval of Cyber Security Plan (TAC Nos. ME4225, ME4226, ME4227, ME4228, and ME4229)*, dated July 29, 2011 (ADAMS Accession No. ML11193A028)
2. Progress Energy letter, *Response to Industry Generic Request for Additional Information on the Carolina Power and Light Company and Florida Power Corporation Cyber Security Plan, Revision 0*, dated April 7, 2011 (ADAMS Accession No. ML11108A022)

Ladies and Gentlemen:

In Reference 1, the NRC issued license amendments for the Facility Operating Licenses for the above listed plants that approved the *Carolina Power & Light Company and Florida Power Corporation 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 Reference 1. Carolina Power & Light Company (CP&L) and Florida Power Corporation (FPC) are 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

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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, CP&L and FPC are submitting this request for an amendment to the Facility Operating Licenses for the plants listed above. The *Carolina Power & Light Company and Florida Power Corporation Cyber Security Plan*, Revision 0 was previously provided in Reference 2.

Attachment 1 provides an evaluation of the proposed change. Attachment 2 contains proposed marked-up facility operating license pages for the Physical Protection license condition for the plants listed above to reference the commitment change provided in this submittal. Attachment 3 contains a change to the scope of Implementation Milestone 6.

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 Attachment 1.

CP&L and FPC request these license amendments 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.

This submittal contains a revised regulatory commitment as identified in Attachment 3. Should you have any questions concerning this letter, or require additional information, please contact Donna Alexander at 919-546-5357.

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

Sept 12, 2012.

Sincerely,

Bill Pitesa

Bill Pitesa
Senior Vice President
Nuclear Operations

DBM

Attachments:
1. Analysis of Proposed Facility Operating License Change
2. Proposed Facility Operating License Changes (Mark-up)
3. Revised Cyber Security Plan Implementation Schedule

cc: USNRC Region II
USNRC Resident Inspector – BSEP, Unit Nos. 1 and 2
USNRC Resident Inspector – CR3
USNRC Resident Inspector – SHNPP, Unit No. 1
USNRC Resident Inspector – HBRSEP, Unit No. 2
F. Saba, NRR Project Manager – BSEP, Unit Nos. 1 and 2; CR3
A. T. Billoch Colón, NRR Project Manager – SHNPP, Unit No. 1; HBRSEP, Unit No. 2
State of Florida Contact
Chair – North Carolina Utilities Commission
W. L. Cox, III, Section Chief N.C. DHSR
S. E. Jenkins, Manager, Radioactive and Infectious Waste Management Section (SC)
A. Gantt, Chief, Bureau of Radiological Health (SC)
Attorney General (SC)

Attachment 1

RA-12-031

Analysis of Proposed Facility Operating License Change

1.0 SUMMARY DESCRIPTION

This license amendment request (LAR) includes a proposed change to the scope of a Cyber Security Plan implementation schedule milestone and a proposed revision to the existing facility operating license Physical Protection license condition.

2.0 DETAILED DESCRIPTION

In Reference 1, the *Carolina Power & Light Company and Florida Power Corporation Cyber Security Plan* and associated implementation schedule were approved by the NRC. Because the Cyber Security Plan Implementation Schedule contained in Reference 2 was utilized as a portion of the basis for the NRC's safety evaluation provided by Reference 1, this LAR includes: a proposed change to the existing facility operating license for the Physical Protection/Security license condition for Brunswick Steam Electric Plant, Unit Nos. 1 and 2 (BSEP, Unit Nos. 1 and 2), Crystal River Unit 3 Nuclear Generating Plant (CR-3), Shearon Harris Nuclear Power Plant, Unit No. 1 (SHNPP, Unit No. 1), and H. B. Robinson Steam Electric Plant, Unit No. 2 (HBRSEP, Unit No. 2) to reference the change to an implementation schedule milestone and a proposed Revised Cyber Security Plan Implementation Schedule for the scope of Milestone 6. Milestone 6 requires the identification, documentation, and implementation of cyber security controls for critical digital assets (CDAs) that could adversely impact the design function of physical security target set equipment by no later than December 31, 2012. This change revises the scope of Milestone 6 to apply to only technical cyber security controls.

3.0 TECHNICAL EVALUATION

In Reference 3, the Nuclear Energy Institute (NEI) transmitted to the NRC an implementation schedule template to aid compliance with the NRC's cyber security regulations codified in 10 CFR 73.54 which was acknowledged in Reference 4 by the NRC. NEI engaged the industry in an effort to ensure that licensees submit an implementation schedule consistent with the template provided in Reference 3. Carolina Power & Light Company (CP&L) and Florida Power Corporation (FPC) provided the requested implementation schedule in Reference 2 in accordance with the template, which the NRC approved in Reference 1.

During the industry's efforts to submit implementation schedules, several other licensees changed, via deviation, the implementation schedule Milestone 6 scope. Milestone 6 of the template regards the identification, documentation, and implementation of cyber security controls for target set critical digital assets (CDAs) by December 31, 2012. The other licensees' Milestone 6 deviation was to change the scope of cyber security controls to be addressed to include only the NEI 08-09, Revision 6, Appendix D technical controls, excluding the operational and management controls, on the basis that implementing the technical controls for target set CDAs provides a high degree of protection against cyber-related attacks that could lead to radiological sabotage. Furthermore, these other licensees justified that existing licensee programs that are currently in place (e.g., physical protection, maintenance and work management, configuration management, and operational experience, etc.) provide a high degree of operational and management protection during the interim period until such time that the full Cyber Security Program is implemented. The NRC found the deviations to Milestone 6 scope for other licensees to be acceptable, and issued Safety Evaluations to plants whose implementation schedule incorporated the deviation. Precedent is cited in Section 4.2.

In Reference 2, CP&L and FPC previously submitted the implementation schedule without articulating the deviation to the scope of Milestone 6. Milestone 6 with the deviation focuses the

efforts on the application of technical cyber security controls to those CDAs that are part of a target set or could impact the proper functioning of target set equipment. Based on the above justification and the fact that this has already been approved for several other licensees, CP&L and FPC are requesting these license amendments in order to specify that the cyber security controls being identified, documented, and implemented in Milestone 6 are the technical cyber security controls and existing plant programs are sufficient to satisfy the Milestone 6 operational and management controls referenced in the *Carolina Power & Light Company and Florida Power Corporation Cyber Security Plan*.

In conclusion, existing programs at BSEP, Unit Nos. 1 and 2, CR-3, SHNPP, Unit No. 1, and HBRSEP, Unit No. 2 currently in place (e.g., physical protection, maintenance and work management, and configuration management, operational experience, etc.) provide sufficient operational and management protection during the interim period until such time that the full Cyber Security Program is implemented. The cyber security controls to be identified, documented, and implemented in Milestone 6 of the Revised Cyber Security Plan Implementation Schedule (Attachment 3) are the technical cyber security controls excluding the operational and management controls referenced in the *Carolina Power & Light Company and Florida Power Corporation Cyber Security Plan* that will be completed following evaluation of the remaining CDAs and implemented with full Cyber Security Program implementation.

This LAR includes the proposed change to the existing operating license condition for "Physical Protection" (Attachment 2) for BSEP, Unit Nos. 1 and 2, CR-3, SHNPP, Unit No. 1, and HBRSEP, Unit No. 2. The LAR contains the proposed Revised Cyber Security Plan Implementation Schedule (Attachment 3). The LAR also provides a revised list of regulatory commitments (Attachment 3).

4.0 REGULATORY EVALUATION

4.1 Applicable Regulatory Requirements/Criteria

10 CFR 73.54 requires licensees to maintain and implement a cyber security plan. Brunswick Steam Electric Plant, Unit Nos. 1 and 2 (Renewed Facility Operating License Nos. DPR-71 and DPR-62), Crystal River Unit 3 Nuclear Generating Plant (Facility Operating License No. DPR-72), Shearon Harris Nuclear Power Plant, Unit No. 1, (Renewed Facility Operating License No. NPF-63), and H. B. Robinson Steam Electric Plant, Unit No. 2 (Renewed Facility Operating License No. DPR-23) include a Physical Protection license condition that requires Carolina Power & Light Company (CP&L) or Florida Power Corporation (FPC) 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 for the Callaway Plant (Reference 5) approved an implementation schedule using the Nuclear Energy Institute (NEI) template (Reference 3), with the exception of Milestone 6. The Callaway Plant deviated from the template for Milestone 6 to address only the NEI 08-09, Revision 6, Appendix D technical controls, excluding 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 CP&L and FPC in this amendment request are similar to those approved in the Callaway Plant Amendment No. 203.

4.3 Significant Safety Hazards Consideration

CP&L and FPC are requesting an amendment to the 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 Facility Operating Licenses to include the proposed deviation. Specifically, CP&L and FPC propose a change to the scope of Implementation Milestone 6 to apply to only technical cyber security controls.

CP&L and FPC 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, CP&L and FPC conclude 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. NRC letter, *Brunswick Steam Electric Plant, Units 1 and 2, H. B. Robinson Steam Electric Plant, Unit No.2, Shearon Harris Nuclear Power Plant, Unit 1, and Crystal River Unit 3 Nuclear Generating Plant - Issuance of License Amendments Regarding Approval of Cyber Security Plan (TAC Nos. ME4225, ME4226, ME4227, ME4228, and ME4229)*, dated July 29, 2011 (ADAMS Accession No. ML11193A028)
2. Progress Energy letter, *Response to Industry Generic Request for Additional Information on the Carolina Power and Light Company and Florida Power Corporation Cyber Security Plan, Revision 0*, dated April 7, 2011 (ADAMS Accession No. ML11108A022)
3. Letter from Chris Earls (NEI) to Richard P. Correia (NRC), *Template for the Cyber Security Plan Implementation Schedule*, dated February 28, 2011 (ADAMS Accession No. ML110600211 and ML110600218)
4. Letter from Richard P. Correia (NRC) to Chris Earls (NEI), *Template for the Cyber Security Plan Implementation Schedule*, dated March 1, 2011 (ADAMS Accession No. ML110070348)
5. NRC letter from M. C. Thadani, USNRC, 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 (ADAMS Accession No. ML112140087)

Attachment 2

RA-12-031

Proposed Facility Operating License Changes (Mark-up)

at the end of the first surveillance interval that begins on the date the Surveillance was last performed prior to implementation of Amendment 203.

(a) Effective June 30, 1982, the surveillance requirements listed below need not be completed until July 15, 1982. Upon accomplishment of the surveillances, the provisions of Technical Specification 4.0.2 shall apply.

Specification 4.3.3.1, Table 4.3.3-1, Items 5.a and 5.b

(b) Effective July 1, 1982, through July 8, 1982, Action statement "a" Technical Specification 3.8.1.1 shall read as follows:

ACTION:

a. With either one offsite circuit or one diesel generator of the above required A.C. electrical power sources inoperable, demonstrate the OPERABILITY of the remaining A.C. sources by performing Surveillance Requirements 4.8.1.1.1.a and 4.8.1.1.2.a.4 within two hours and at least once per 12 hours thereafter; restore at least two offsite circuits and four diesel generators to OPERABLE status within 7 days or be in at least HOT SHUTDOWN within the next 12 hours and in COLD SHUTDOWN within the following 24 hours.

(3) Deleted by Amendment No. 206.

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 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 plans, which contain Safeguards Information protected under 10 CFR 73.21 are entitled: "Physical Security Plan, Revision 2," and "Safeguards Contingency Plan, Revision 2," submitted by letter dated May 17, 2006, and "Guard Training and Qualification Plan, Revision 0," submitted by letter dated September 30, 2004.

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. 258, as supplemented by a change approved by License Amendment No. zzz.

E. This license is subject to the following additional conditions for the protection of the environment:

a. Deleted per Amendment 54, 3-11-83

(4) Equalizer Valve Restriction

The valves in the equalizer piping between the recirculation loops shall be closed at all times during reactor operation, except for one bypass valve which is left open to prevent pressure build-up due to ambient and conduction heating of the water between the equalizer valves.

(5) Deleted by Amendment No. 233.

(6) 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 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 plans, which contain Safeguards Information protected under 10 CFR 73.21, are entitled: "Physical Security Plan, Revision 2," and "Safeguards Contingency Plan, Revision 2," submitted by letter dated May 17, 2006, and "Guard Training and Qualification Plan, Revision 0," submitted by letter dated September 30, 2004.

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. 286, as supplemented by a change approved by License Amendment No. zzz.

D. This license is subject to the following additional conditions for the protection of the environment:

a. Deleted per Amendment 79, 3-11-83

b. Deleted per Amendment 79, 3-11-83

c. Deleted per Amendment 79, 3-11-83

d. The licensee shall comply with the effluent limitations contained in National Pollutant Discharge Elimination System Permit No. NC0007064 issued pursuant to Section 402 of the Federal Water Pollution Control Act, as amended.

E. This license is effective as of the date of issuance and shall expire at midnight on December 27, 2034.

F. Deleted per Amendment No. 98 dated 5-25-84.

G. Deleted per Amendment No. 98 dated 5-25-84.

H. Deleted by Amendment No. 236.

2.D Physical and Cyber Security

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 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 plans, which contain Safeguards Information protected under 10 CFR 73.21, are entitled: "Physical Security Plan, Revision 5," and "Safeguards Contingency Plan, Revision 4," submitted by letter dated May 16, 2006, and "Guard Training and Qualification Plan, Revision 0," submitted by letter dated September 30, 2004, as supplemented by letters dated October 20, 2004, and September 29, 2005.

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. 238.

, as supplemented by a change approved by License Amendment No. zzz

E. Physical Security

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 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 plans, which contain Safeguards Information protected under 10 CFR 73.21, are entitled: "Guard Training and Qualification Plan" submitted by letter dated October 19, 2004, "Physical Security Plan" and "Safeguards Contingency Plan" submitted by letter dated October 19, 2004 as supplemented by letter dated May 18, 2006.

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. 156, as supplemented by a change approved by License Amendment No. zzz

F. Fire Protection Program

Carolina Power & Light Company shall implement and maintain in effect all provisions of the approved fire protection program that comply with 10 CFR 50.48(a) and 10 CFR 50.48(c), as specified in the revised license amendment request dated October 9, 2009, supplemented by letters dated February 4, 2010, and April 5, 2010, and approved in the associated safety evaluation dated June 28, 2010. Except where NRC approval for changes or deviations is required by 10 CFR 50.48(c) and NFPA 805, and provided no other regulation, technical specification, license condition or requirement would require prior NRC approval, the licensee may make changes to the fire protection program without prior approval of the Commission if those changes satisfy the provisions set forth in 10 CFR 50.48(a) and 10 CFR 50.48(c), the change does not require a change to a technical specification or a license condition, and the criteria listed below are satisfied.

(1) Risk-Informed Changes that May Be Made Without Prior NRC Approval

A risk assessment of the change must demonstrate that the acceptance criteria below are met. The risk assessment approach, methods, and data shall be acceptable to the NRC and shall be appropriate for the nature and scope of the change being evaluated; be based on the as-built, as-operated and maintained plant; and reflect the operating experience at the plant. Acceptable methods to assess the risk of the proposed change may include methods that have been used in the peer-reviewed Fire PRA model, methods that have been approved by the NRC via a plant-specific license amendment or through NRC approval of generic methods specifically for use in NFPA 805 risk assessments, or methods that have been demonstrated to bound the risk impact.

H. B. Robinson Steam Electric Plant, Unit No. 2
Docket No. 50-261 / Renewed License No. DPR-23

C. Reports

Carolina Power & Light Company shall make certain reports in accordance with the requirements of the Technical Specifications.

D. Records

Carolina Power & Light Company shall keep facility operating records in accordance with the requirements of the Technical Specifications.

E. Fire Protection Program

Carolina Power & Company shall implement and maintain in effect all provisions of the approved Fire Protection Program as described in the Updated Final Safety Analysis Report for the facility and as approved in the Fire Protection Safety Evaluation Report dated February 28, 1978, and supplements thereto. Carolina Power & Light Company may make changes to the approved Fire Protection Program without prior approval of the Commission only if those changes would not adversely affect the ability to achieve and maintain safe shutdown in the event of a fire.

F. Physical Protection and Cyber Security

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 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, which contains Safeguards Information protected under 10 CFR 73.21, is entitled: "H. B. Robinson Steam Electric Plant Security, Training and Qualification, and Safeguards Contingency Plan, Revision 0" submitted by letter dated October 1, 2004, as supplemented by letter dated October 20, 2004.

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. 226, as supplemented by a change approved by License Amendment No. zzz

G. The following programs shall be implemented and maintained by the licensee:

(1) DELETED

Attachment 3

RA-12-031

Revised Cyber Security Plan Implementation Schedule

Revised Carolina Power & Light Company and Florida Power Corporation
Cyber Security Plan
Implementation Schedule
(for Milestone 6)

#	Implementation Milestone Regulatory Commitment	Completion Date	Note
6	Identify, document, and implement NEI 08-09, Revision 6, Appendix D technical cyber security controls in accordance with the Cyber Security Plan Section 3.1.6 "Mitigation of Vulnerabilities and Application of Cyber Security Controls" for target set critical digital assets (CDAs) that could adversely impact the design function of physical security target set equipment. The implementation of controls that require a design modification that are not finished by the completion date will be documented in the site configuration management and/or change control program to assure completion of the design modification as soon as possible, but no later than the final implementation date.	Dec. 31, 2012	The site physical protection program provides high assurance that these elements are protected from physical harm by an adversary. The cyber security program will enhance the defense-in-depth nature of the protection of CDAs associated with target sets. Implementing Cyber Security Plan security controls to target set CDAs provides a high degree of protection against a cyber-related attacks that could lead to radiological sabotage. Security controls will be addressed in accordance with Cyber Security Plan Section 3.1.6 with the exception of those that require a design modification. Note that the operational and management cyber security controls, as provided in NEI 08-09, Revision 6, Appendix E, will be implemented in conjunction with the full implementation of the Cyber Security Program as previously submitted. These controls are primarily procedure-based programs and must be implemented in coordination with the comprehensive Cyber Security Program. However, a high degree of protection against cyber-related attacks is maintained as major elements of these programs (e.g., physical protection, access control, maintenance and work management, configuration management, operational experience, etc) are currently in place and are well established within the nuclear industry.