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10 CFR 50.90  
10 CFR 50.54(p)

TMI-19-097

October 31, 2019

U.S. Nuclear Regulatory Commission  
Attn: Document Control Desk  
Washington, D.C. 20555-0001

Three Mile Island Nuclear Station, Unit 1  
Renewed Facility License No. DPR-50  
USNRC Docket No. 50-289

Subject: License Amendment Request – License Condition Revision for Removal of Cyber Security Plan Requirements

- References:
1. Exelon Letter to NRC, "Certification of Permanent Cessation of Operations for Three Mile Island Nuclear Station," dated June 20, 2017 (ADAMS Accession No. ML17171A151)
  2. Exelon Letter to NRC, "Certification of Permanent Removal of Fuel from the Reactor Vessel for Three Mile Island Nuclear Station, Unit 1," dated September 26, 2019 (ADAMS Accession No. ML19269E480)
  3. NRC Memorandum, Executive Director for Operations to NRC Commissioners, "Cyber Security Requirements for Decommissioning Nuclear Power Plants," dated December 5, 2016 (ADAMS Accession No. ML16172A284)
  4. NRC Letter to Crystal River Nuclear Plant, "Crystal River Unit 3 Nuclear Generating Plant – Issuance of Amendment Approving Removal of the Existing Cyber Security License Condition from the Facility Operating License (TAC No. L53155)," dated June 22, 2017 (ADAMS Accession No. ML17096A280)
  5. NRC Letter to Entergy Nuclear Operations, "Vermont Yankee Nuclear Power Station - Issuance of Amendment for Removal of Cyber Security Plan Requirements," dated June 27, 2018 (ADAMS Accession No. ML18145A208)

6. NRC Letter to Holtec International, "Oyster Creek Nuclear Power Station - Issuance of License Amendment for Removal of Cyber Security Plan Requirements," dated September 18, 2019 (ADAMS Accession No. ML19179A202)
7. Exelon Letter to NRC, "Request for Exemptions from Portions of 10 CFR 50.47 and 10 CFR Part 50 Appendix E," dated July 1, 2019 (ADAMS Accession No. ML19182A104)

In accordance with the provisions of 10 CFR 50.90, Exelon Generation Company, LLC (Exelon), is submitting a request for an amendment to the Renewed Facility License (RFL) No. DPR-50 for Three Mile Island, Unit 1 (TMI-1). Specifically, this license amendment request (LAR) is for the removal of the existing Cyber Security Plan (CSP) requirements contained in License Condition 2.c.(3) of the TMI-1 RFL.

By letter dated June 20, 2017 (Reference 1), Exelon provided formal notification to the U.S. Nuclear Regulatory Commission (NRC) pursuant to 10 CFR 50.4(b)(8) and 10 CFR 50.82(a)(1)(i) of Exelon's determination to permanently cease operations at TMI, Unit 1 (TMI-1) on or about September 30, 2019. On September 20, 2019, Exelon permanently ceased power operations at TMI-1. On September 26, 2019, pursuant to 10 CFR 50.82(a)(1)(ii) and 10 CFR 50.4(b)(9), Exelon provided certification to the NRC that all fuel had been permanently removed from the TMI-1 reactor vessel and placed in the spent fuel pool (SFP) (Reference 2). Since the certifications for permanent cessation of operations and permanent removal of fuel from the reactor vessel were submitted to the NRC pursuant to 10 CFR 50.82(a)(1)(i) and (ii), then pursuant to 10 CFR 50.82(a)(2), the 10 CFR 50 license no longer authorizes operation of the reactor or placement or retention of fuel in the reactor vessel. With the fuel permanently removed from the reactor vessel, spent fuel will be stored onsite in the SFP and/or, in an independent spent fuel storage installation (ISFSI) when completed.

The NRC staff has determined that 10 CFR 73.54, "*Protection of digital computer and communication systems and networks*," does not apply to reactor licensees that have submitted certifications of permanent cessation of power operations and permanent removal of fuel under 10 CFR 50.82(a)(1), and whose certifications have been docketed by the NRC, once sufficient time has passed such that the spent fuel stored in the spent fuel pool cannot reasonably heat up to clad ignition temperature within 10 hours (Reference 3).

The regulatory and technical evaluations included in this LAR are consistent with recent NRC guidance on cyber security requirements for decommissioning facilities (Reference 3). In addition, the NRC staff has recently approved similar amendment requests to delete the cyber security license condition from the Crystal River (Unit 3), Vermont Yankee, and Oyster Creek facility operating licenses (References 4, 5 and 6). Attachment 1 provides an analysis, including the regulatory and technical evaluations, of the proposed change. Attachment 2 contains the marked-up TMI-1 RFL page for the proposed change to license condition 2.c.(3).

By letter dated July 1, 2019 (Reference 7) Exelon provided the NRC with a TMI-1 site-specific analysis (Calculation C-1101-202-E410-476, Revision 1, "*DECOM Spent Fuel Pool TH Analysis*") (TMI-1 site-specific Zirconium-Fire Analysis) supporting the time period when sufficient time has passed such that the spent fuel stored in the spent fuel pool cannot reasonably heat up to clad

ignition temperature within 10 hours (Zirconium-Fire Window) for specific exemptions from specific Emergency Planning (EP) requirements. The TMI-1 site-specific Zirconium-Fire Analysis submitted with Reference 7, determined the minimum cooling time (Zirconium-Fire Window) to be 488 days after permanent cessation from power operation (i.e., January 20, 2021).

These proposed changes have been reviewed and approved by the TMI-1 Safety Review Committee in accordance with the requirements of the Exelon Decommissioning Quality Assurance Program.

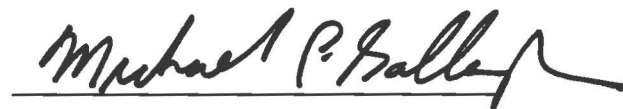
Exelon requests review and approval of the proposed license amendment by October 31, 2020. Exelon requests that the approved amendment become effective January 20, 2021 (488 days following the permanent shut down of TMI-1) with a 60-day implementation period. Approval of these changes by October 30, 2020, will allow TMI-1 adequate time to implement the changes to the security plan by the requested effective date.

In accordance with 10 CFR 50.91, a copy of this license amendment request, with attachments, is being provided to the designated State Official.

If you should have any questions or require additional information, please contact Leslie Holden at (630) 657-2524.

I declare under penalty of perjury that the foregoing is true and correct. Executed on the 31<sup>st</sup> day of October 2019.

Respectfully,



Michael P. Gallagher  
Vice President, License Renewal & Decommissioning  
Exelon Generation Company, LLC

- Attachments: 1. Evaluation of Proposed Change - License Condition Revision for Removal of Cyber Security Plan Requirements  
2. Proposed Facility License Change (Mark-Up)

cc: Regional Administrator - NRC Region I  
NRC Project Manager, NRR – Three Mile Island Nuclear Station – Unit 1  
NRC Project Manager, NMSS/DUWP/RDB – Three Mile Island – Unit 2  
Director, Bureau of Radiation Protection - PA Department of Environmental Resources

**ATTACHMENT 1**

**Evaluation of Proposed Change**

**License Condition Revision for Removal of Cyber Security Plan  
Requirements**

**Three Mile Island Nuclear Station, Unit 1**

**Renewed Facility License No. DPR-50**

## 1.0 SUMMARY DESCRIPTION

Exelon Generation Company, LLC (Exelon), is submitting a request for an amendment to the Renewed Facility License (RFL) No. DPR-50 for Three Mile Island Nuclear Station, Unit 1 (TMI-1). Specifically, this license amendment request (LAR) is for the removal of the existing Cyber Security Plan (CSP) requirements contained in license condition 2.c.(3) of the TMI-1 RFL. This change is requested to support the decommissioning of TMI-1.

Attachment 2 contains the existing RFL marked up to show the proposed change.

## 2.0 DETAILED DESCRIPTION

Cyber security requirements are described in the second paragraph of license condition 2.c.(3), which states:

"Exelon Generation Company 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 Exelon Generation Company CSP was approved by Renewed License Amendment No. 275 and modified by License Amendment Nos. 288."

The current regulatory language in 10 CFR 73.54 does not address the application of the cyber security rule to decommissioning nuclear power reactors that have filed certifications under 10 CFR 50.82, "Termination of license," but still have fuel in the spent fuel pool (SFP). However, the U.S. Nuclear Regulatory Commission (NRC) staff has determined that 10 CFR 73.54 does not apply to reactor licensees that have submitted certifications of permanent cessation of power operations and permanent removal of fuel under 10 CFR 50.82(a)(1), and whose certifications have been docketed by the NRC, once sufficient time has passed such that the spent fuel stored in the spent fuel pool cannot reasonably heat up to clad ignition temperature within 10 hours (Reference 1).

By letter dated June 20, 2017 (Reference 2), Exelon provided formal notification to the NRC pursuant to 10 CFR 50.4(b)(8) and 10 CFR 50.82(a)(1)(i) of Exelon's determination to permanently cease operations at TMI-1 on or about September 30, 2019. On September 20, 2019, Exelon permanently ceased power operations at TMI-1. On September 26, 2019, pursuant to 10 CFR 50.82(a)(1)(ii) and 10 CFR 50.4(b)(9), Exelon provided certification to the NRC that all fuel had been permanently removed from the TMI-1 reactor vessel and placed in the spent fuel pool (SFP) (Reference 3). With the certifications for permanent cessation of operations and permanent removal of fuel from the reactor vessel submitted to the NRC pursuant to 10 CFR 50.82(a)(1)(i) and (ii), then pursuant to 10 CFR 50.82(a)(2), the 10 CFR 50 license no longer authorizes operation of the reactor or placement or retention of fuel in the reactor vessel. With the fuel permanently removed from the reactor vessel, spent fuel will be stored onsite in the SFP and/or, in an independent spent fuel storage installation (ISFSI) when completed.

By letter dated July 1, 2019 (Reference 4) Exelon provided the NRC with a TMI-1 site-specific analysis (Calculation C-1101-202-E410-476, Revision 1, "*DECOM Spent Fuel Pool TH Analysis*") (TMI-1 site-specific Zirconium-Fire Analysis) supporting the time period when sufficient time has passed such that the spent fuel stored in the spent fuel pool cannot reasonably heat up to clad ignition temperature within 10 hours (Zirconium-Fire Window) for specific exemptions from specific Emergency Planning (EP) requirements. The TMI-1 site-specific Zirconium-Fire Analysis submitted with Reference 4, determined the minimum cooling time (Zirconium-Fire Window) to be 488 days after permanent cessation from power operation.



To support the decommissioning of TMI-1, this LAR is being submitted to remove the existing cyber security requirements from license condition 2.c.(3). This request considers the cooling period for spent fuel stored in the SFP after the TMI-1 reactor has been permanently shut down. The evaluations included in this LAR are consistent with NRC guidance on cyber security requirements for decommissioning facilities (Reference 1).

Accordingly, pursuant to the provisions of 10 CFR 50.4 and 10 CFR 50.90, Exelon is submitting this request to amend the TMI-1 RFL to remove the existing cyber security requirements from license condition 2.c.(3) (stated above).

The proposed change has been evaluated in accordance with 10 CFR 50.91(a)(1) using the criteria in 10 CFR 50.92(c), and it has been determined that the proposed change involves no significant hazards consideration, as discussed in Section 4.3 below. Attachment 2 contains the marked-up TMI-1 RFL pages for the proposed change to license condition 2.c.(3).

### **3.0 TECHNICAL EVALUATION**

The proposed license amendment to remove the CSP requirements from license condition 2.c.(3) is based on the significantly reduced risks for a nuclear power facility that has permanently ceased operations, has removed all fuel from the reactor vessel, and where the spent fuel has had sufficient time to cool down such that the spent fuel stored in the spent fuel pool cannot reasonably heat up to clad ignition temperature within 10 hours. Compared to an operating nuclear power reactor, for a decommissioning facility with a permanently defueled reactor, the spectrum of possible accidents is significantly reduced, and the risk of an offsite radiological release is significantly lower. Correspondingly, cyber security risk is reduced due, in part, to the fact that there are significantly fewer critical digital assets (CDAs) needed to protect against and assess radiological events at a decommissioning facility than in comparison to the number at an operating reactor.

Since TMI-1 has permanently ceased power operations and all fuel has been removed from the reactor vessel, the digital computer and communication systems, and networks that require cyber protection are primarily those associated with security and emergency preparedness functions, and the functioning of safety systems that support operation of the SFP. However, once the recently irradiated spent fuel that is stored in the SFP has sufficiently decayed, the potential consequences of a cyber-attack are significantly reduced.

As documented in Reference 4, with TMI-1 permanently shut down, the only design basis accident that could potentially result in a radiological release is the fuel handling accident (FHA). An analysis of the consequences of a FHA provides that 365 days after shutdown (with no credit for safety systems), the dose at the exclusion area boundary (EAB) as a result of a FHA would be  $1.78 \times 10^{-4}$  rem TEDE and  $9.95 \times 10^{-13}$  rem Thyroid (Reference 5). This is less than 10% of the U.S. Environmental Protection Agency's (EPA's) Protective Action Guidelines (PAGs) of 1 rem TEDE and 5 rem at the EAB (Reference 6). Once TMI-1 has been permanently shut down for greater than 365 days, the possibility of an offsite radiological release from a design basis accident that could exceed the EPA PAGs is significantly reduced. With the significant reduction in radiological risk for TMI-1, the consequences of a cyber-attack are also significantly reduced.

The only analyzed beyond-design-basis accident scenario that progresses to a condition where a significant offsite release might occur involves the very unlikely (beyond-design-basis) event where the SFP drains in such a way that all modes of cooling or heat transfer are assumed to be unavailable, which is postulated to result in an adiabatic heat-up of the spent fuel. The analysis for this event, the Zirconium

Fire Analysis for Drained Spent Fuel Pool for the TMI-1 (Zirconium-Fire Analysis), was previously submitted to the NRC staff in support of requested exemptions from specific requirements of 10 CFR 50.47 and Appendix E to 10 CFR Part 50 for certain emergency planning requirements as appropriate for a decommissioning facility (Reference 4). This TMI-1 site-specific Zirconium-Fire Analysis determined that 488 days after shutdown, the spent fuel stored in the SFP has decayed to a point where a fire in the zirconium fuel cladding following a postulated beyond-design-basis event involving the loss of SFP water inventory is unlikely prior to 10 hours (Zirconium-Fire Window). The 10-hour time period provides sufficient time for mitigative actions to be taken to prevent spent fuel heat-up damage. The rationale to remove the cyber security requirements after the Zirconium-Fire Window is similar to the rationale used to justify a reduction of emergency preparedness requirements during decommissioning.

Therefore, based on there being (1) no design basis events that could result in an offsite radiological release exceeding the EPA PAG limits and consequently a significant reduction in radiological risk including consequences of a potential cyber-attack, and (2) sufficient time (at least 10 hours) to take prompt mitigative actions in response to a postulated zirconium fire accident scenario in the SFP, the elimination of the cyber security requirements from license condition 2.c.(3) is appropriate for the TMI-1.

## 4.0 REGULATORY EVALUATION

### 4.1 Applicable Regulatory Requirements/Criteria

10 CFR 73.54, "*Protection of digital computer and communication systems and networks*," establishes the requirements for licensees to maintain and implement a Cyber Security Program (CSP). This regulation at § 73.54(a) specifically states "... *each licensee currently licensed to operate a nuclear power plant under part 50 of this chapter shall submit, as specified in § 50.4 and § 50.90 of this chapter, a cyber security plan that satisfies the requirements of this section for Commission review and approval.*" In accordance with 10 CFR 50.54, "*Conditions of licenses*," upon approval the CSP becomes a condition in the license. TMI-1 has an approved CSP as described in the RFL license condition 2.c.(3), which requires TMI-1 to fully implement and maintain in effect all provisions of the Commission-approved CSP, including changes made pursuant to the authority of 10 CFR 50.90 and 10 CFR 50.54(p).

When the final rule for 10 CFR 73.54 was issued in March 2009, neither ISFSI-only facilities nor other facilities that were in the process of decommissioning were required to comply with the cyber security requirements. The NRC specifically limited cyber security requirements to a "*licensee currently licensed to operate a nuclear power plant under part 50.*" Additionally, the NRC staff has previously concluded in a December 5, 2016 NRC Memorandum, "*Cyber Security Requirements for Decommissioning Nuclear Power Plants*" (Reference 1), that 10 CFR 73.54 does not apply to reactor licensees that have submitted certifications of permanent cessation of power operations and permanent removal of fuel under 10 CFR 50.82(a)(1), and whose certifications have been docketed by the NRC, once sufficient time has passed such that the spent fuel stored in the spent fuel pool cannot reasonably heat up to clad ignition temperature within 10 hours.

Exelon notified the NRC of Exelon's plans to permanently cease operations at TMI-1, pursuant to 10 CFR 50.82(a)(1)(i) (Reference 2), on or about September 30, 2019. On September 20, 2019, Exelon permanently ceased power operations at TMI-1. On September 26, 2019, pursuant to 10 CFR 50.82(a)(1)(ii) and 10 CFR 50.4(b)(9), Exelon provided certification to the NRC that all fuel had been permanently removed from the TMI-1 reactor vessel and placed in the spent fuel pool (SFP) (Reference 3). With the certifications for permanent cessation of operations and permanent removal of fuel from the reactor vessel submitted to the NRC pursuant to 10 CFR 50.82(a)(1)(i) and (ii), then pursuant to 10 CFR

50.82(a)(2), the 10 CFR 50 license no longer authorizes operation of the reactor or placement or retention of fuel in the reactor vessel.

#### 4.2 Precedent

The NRC staff has recently approved similar license amendment requests to delete the cyber security license condition from the Crystal River (Unit 3), Vermont Yankee, and Oyster Creek Nuclear Generating Station licenses (References 7, 8 and 9).

#### 4.3 No Significant Hazards Consideration

Exelon Generation Company, LLC (Exelon) is requesting a license amendment to the Three Mile Island Nuclear Station (TMI-1) Renewed Facility License (RFL) to remove license condition 2.c.(3) as it relates to the Cyber Security Plan (CSP). This license condition requires TMI-1 to fully implement and maintain in effect all provisions of the Commission approved CSP, including changes made pursuant to the authority of 10 CFR 50.90 and 10 CFR 50.54(p). Specifically, the proposed change is to amend license condition 2.c.(3) to remove the cyber security requirements.

Exelon has evaluated whether or not a significant hazards consideration is involved with the proposed license 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

Following cessation of power operations and removal of all spent fuel from the reactor, spent fuel at TMI-1 will be stored in the spent fuel pool (SFP) and in the independent spent fuel storage installation (ISFSI) when completed. In this configuration, the spectrum of possible transients and accidents is significantly reduced compared to an operating nuclear power reactor. The only design basis accident that could potentially result in an offsite radiological release at TMI-1 is the fuel handling accident (FHA), which is predicated on spent fuel being stored in the SFP. An analysis has been performed that concludes that once TMI-1 has been permanently shut down for 365 days, there is no longer any possibility of an offsite radiological release from a design basis accident that could exceed the U.S. Environmental Protection Agency's (EPA's) Protective Action Guidelines (PAGs) (Reference 6). A discussion of the results of this analysis have been previously provided to the NRC (ADAMS Accession No. ML19182A104) (Reference 4). With the significant reduction in radiological risk based on TMI-1 being shut down for more than 365 days, the consequences of a cyber-attack are also significantly reduced.

Additionally, per an NRC Memorandum, "*Cyber Security Requirements for Decommissioning Nuclear Power Plants*" (ADAMS Accession No. ML16172A284) (Reference 1), the NRC staff has determined that 10 CFR 73.54 does not apply to reactor licensees that have submitted certifications of permanent cessation of power operations and permanent removal of fuel under 10 CFR 50.82(a)(1), and whose certifications have been docketed by the NRC (10 CFR 50.82(a)(2), once sufficient time has passed such that the spent fuel stored in the spent fuel pool cannot reasonably heat up to clad ignition temperature within 10 hours. Exelon has provided a site-specific analysis, "*DECOM Spent Fuel Pool TH Analysis*," in Reference 4 (ADAMS Accession No. ML19182A104), that provides the determination that sufficient time will have passed prior to



the requested implementation date such that the spent fuel stored in the spent fuel pool cannot reasonably heat up to clad ignition temperature within 10 hours.

This proposed change does not alter previously evaluated accident analysis assumptions, introduce or alter any initiators, or affect the function of facility structures, systems, and components (SSCs) relied upon to prevent or mitigate any previously evaluated accident or the manner in which these SSCs are operated, maintained, modified, tested, or inspected. The proposed change does not involve any facility modifications which affect the performance capability of any SSCs relied upon to prevent or mitigate the consequences of any previously evaluated accidents.

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

This proposed change does not alter accident analysis assumptions, introduce or alter any initiators, or affect the function of facility SSCs relied upon to prevent or mitigate any previously evaluated accident, or the manner in which these SSCs are operated, maintained, modified, tested, or inspected. The proposed change does not involve any facility modifications which affect the performance capability of any SSCs relied upon to mitigate the consequences of previously evaluated 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 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 and design features specified in the TMI-1 Permanently Defueled Technical Specifications that were approved by the NRC Safety Evaluation dated August 29, 2019 (ADAMS Accession No. ML19211D317) (Reference 10). The proposed change does not involve any changes to the initial conditions that establish safety margins and does not involve modifications to any SSCs which are relied upon to provide a margin of safety. Because there is no change to established safety margins as a result of this proposed change, no significant reduction in a margin of safety is involved.

Therefore, the proposed change does not involve a significant reduction in a margin of safety.

Based on the above, Exelon concludes that the proposed license amendment does not involve a 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 change removes the existing cyber security license condition from the facility license. The proposed change is confined to safeguards matters and does not involve any significant construction impacts. Accordingly, the proposed change meets the eligibility criterion for 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 proposed amendment.

## 6.0 REFERENCES

1. NRC Memorandum, Executive Director for Operations to NRC Commissioners, "Cyber Security Requirements for Decommissioning Nuclear Power Plants", dated December 5, 2016 (ADAMS Accession No. ML16172A284)
2. Exelon Letter to NRC, "Certification of Permanent Cessation of Operations for Three Mile Island Nuclear Station," dated June 20, 2017 (ADAMS Accession No. ML17171A151)
3. Exelon Letter to NRC, "Certification of Permanent Removal of Fuel from the Reactor Vessel for Three Mile Island Nuclear Station, Unit 1," dated September 26, 2019 (ADAMS Accession No. ML19269E480)
4. Letter from Michael P. Gallagher, Exelon Generation Company, LLC to U.S. Nuclear Regulatory Commission, "Request for Exemptions from Portions of 10 CFR 50.47 and 10 CFR Part 50 Appendix E," dated July 1, 2019 (ADAMS Accession No. ML19182A104)
5. C-1101-900-E000-088, "Fuel Handling Accident Dose Consequence - Post Permanent Shutdown," Revision 0, dated May 11, 2018
6. U.S. Environmental Protection Agency, EPA 400-R-92-001, "Manual of Protective Action Guides and Protective Actions Guidelines for Nuclear Incidents," dated October 1991 (reprinted May 1992)
7. NRC Letter to Crystal River Nuclear Plant, "Crystal River Unit 3 Nuclear Generating Plant – Issuance of Amendment Approving Removal of the Existing Cyber Security License Condition from the Facility Operating License (TAC No. L53155)," dated June 22, 2017 (ADAMS Accession No. ML17096A280)
8. NRC Letter to Entergy Nuclear Operations, "Vermont Yankee Nuclear Power Station - Issuance of Amendment for Removal of Cyber Security Plan Requirements," dated June 27, 2018 (ADAMS Accession No. ML18145A208)
9. NRC Letter to Holtec International, "Oyster Creek Nuclear Generating Station - Issuance of License Amendment for Removal of Cyber Security Plan Requirements," dated September 18, 2019 (ADAMS Package Accession No. ML19179A202)
10. NRC Letter to Exelon, "Three Mile Island Nuclear Station, Unit 1 – Issuance of Amendment No. 297 Re: Defueled Technical Specifications and Revised License Conditions (EPID L-2018-LLA-0204)," dated August 29, 2019 (ADAMS Accession No. ML19211D317)

**ATTACHMENT 2**

**License Condition Revision for Removal of Cyber Security Plan Requirements**

**Proposed Facility License Change (Mark-Up)**

**Three Mile Island Nuclear Station**

**Renewed Facility License No. DPR-50**

(3) Physical Protection

Exelon Generation 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>, submitted by letter dated May 17, 2006, is entitled: "Three Mile Island Nuclear Station Security Plan, Training and Qualification Plan, and Safeguards Contingency Plan, Revision 3." The set contains Safeguards Information protected under 10 CFR 73.21.

~~Exelon Generation Company 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 Exelon Generation Company CSP was approved by License Amendment No. 275 and modified by License Amendment No. 288.~~

(4) DELETED

(5) DELETED

(6) Inservice Testing - DELETED

(7) Aircraft Movements - DELETED

(8) Repaired Steam Generators - DELETED

(9) Long Range Planning Program - DELETED

Sale and License Transfer Conditions

(10) DELETED

(11) DELETED

(12) DELETED

(13) DELETED

(14) DELETED

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