

March 24, 2015

MEMORANDUM TO: Mark A. Satorius  
Executive Director for Operations

FROM: Annette L. Vietti-Cook, Secretary **/RA/**

SUBJECT: STAFF REQUIREMENTS – SECY-14-0147 – CYBER SECURITY  
FOR FUEL CYCLE FACILITIES

The Commission has disapproved the staff's recommendation (Option 1) to issue a security order to fuel cycle facilities followed by rulemaking, and approved (Option 2) initiation of a cyber security rulemaking for fuel cycle facilities. The rulemaking should be designated as a high priority and the final rule should be completed and implemented in an expeditious manner.

The staff should augment the work performed to date to develop the technical basis and interact with the stakeholders in developing the proposed and final rule. In developing a more fulsome technical basis the staff should ensure an adequate, integrated look at cyber security as only one aspect of site security (for example, site access controls provide an element of digital asset protection) and take the requisite care to avoid unintended adverse consequences to safety based on a stand-alone focus on cyber security. The technical basis should address the need to integrate the regulatory consideration of safety and security and the necessity to apply a disciplined, graded approach to the identification of digital assets and a graded, consequence-based approach to their protection.

During the rulemaking process, the staff should monitor licensee implementation of any "voluntary" cybersecurity measures undertaken by fuel cycle facilities.

With respect to the staff's estimate of a three year implementation period subsequent to approval of a final rule, the staff should consider a shorter period such as 18 months.

cc: Chairman Burns  
Commissioner Svinicki  
Commissioner Ostendorff  
Commissioner Baran  
OGC  
CFO  
OCA