



NORTH AMERICAN ELECTRIC  
RELIABILITY CORPORATION

## Standards Announcement

Ballot Pool and Pre-ballot Window (with Comment Period)

July 20–August 14, 2009

**Ballot Pool:** <https://standards.nerc.net/BallotPool.aspx>

**Comments:**

[http://www.nerc.com/filez/standards/Cyber\\_Security\\_Order706B\\_Nuclear\\_Plant\\_Implementation\\_Plan.html](http://www.nerc.com/filez/standards/Cyber_Security_Order706B_Nuclear_Plant_Implementation_Plan.html)

### **Cyber Security — Order 706B Nuclear Plant Implementation Plan**

A draft implementation plan for Version 1 critical infrastructure protection (CIP) Reliability Standards CIP-002-1 through CIP-009-1 for Nuclear Power Plants has been posted for a simultaneous pre-ballot review and comment period.

In order to be responsive to the September 15, 2009 filing deadline and as a reflection of the significant involvement of the nuclear community in the development of this proposal, the NERC Standards Committee approved the team to shorten the comment period and hold the comment period at the same time as the pre-ballot review period, and if necessary, offer changes to the proposal based on the comments received before proceeding to ballot.

### **Ballot Pool**

Registered Ballot Body members may join the ballot pool to be eligible to vote on this interpretation **until 8 a.m. EDT on August 14, 2009.**

During the pre-ballot window, members of the ballot pool may communicate with one another by using their “ballot pool list server.” (Once the balloting begins, ballot pool members are prohibited from using the ballot pool list servers.) The list server for this ballot pool is: [bp-Order706B\\_ImpPlan\\_in](#).

### **Comments**

An associated comment period is open **until 8 a.m. EDT on August 14, 2009.** Please use this [electronic form](#) to submit comments. If you experience any difficulties in using the electronic form, please contact Lauren Koller at [Lauren.Koller@nerc.net](mailto:Lauren.Koller@nerc.net). An off-line, unofficial copy of the comment form is posted on the project page:

[http://www.nerc.com/filez/standards/Cyber\\_Security\\_Order706B\\_Nuclear\\_Plant\\_Implementation\\_Plan.html](http://www.nerc.com/filez/standards/Cyber_Security_Order706B_Nuclear_Plant_Implementation_Plan.html)

### **Project Background:**

On January 18, 2008, FERC (or “Commission”) issued Order No. 706 that approved Version 1 of the CIP Reliability Standards: CIP-002-1 through CIP-009-1. On March 19, 2009, the Commission issued clarifying Order No. 706-B that clarified “the facilities within a nuclear generation plant in the United States that are not regulated by the U.S. Nuclear Regulatory Commission are subject to compliance with the eight mandatory “CIP” Reliability Standards approved in Commission Order No. 706.” However, in the ensuing discussion regarding the implementation timeframe for the nuclear power plants to comply with the CIP standards, the Commission noted in ¶59 that,

“[i]t is not appropriate to dictate the schedule contained in Table 3 of NERC’s Implementation Plan, i.e., a December 2010 deadline for auditable compliance, for nuclear power plants to comply with the CIP Reliability Standards. Instead of requiring nuclear power plants to implement the CIP Reliability Standards on a fixed schedule at this time, we agree to allow more flexibility.

Rather than the Commission setting an implementation schedule, we agree with commenters that the ERO should develop an appropriate schedule after providing for stakeholder input. Accordingly, we direct the ERO to engage in a stakeholder process to develop a more appropriate timeframe for nuclear power plants’ full compliance with CIP Reliability Standards. Further, we direct NERC to submit, within 180 days of the date of issuance of this order, a compliance filing that sets forth a proposed implementation schedule.”

This project addresses the development of the implementation plan specific for nuclear power plants. The draft plan was drafted by members of the original Version 1 Cyber Security Drafting Team with specific outreach to nuclear power plant owners and operators to ensure their interests were fairly represented. Further background information is available in the posted comment form.

### **Standards Development Process**

The [Reliability Standards Development Procedure](#) contains all the procedures governing the standards development process. The success of the NERC standards development process depends on stakeholder participation. We extend our thanks to all those who participate

*For more information or assistance,  
please contact Shaun Streeter at [shaun.streeter@nerc.net](mailto:shaun.streeter@nerc.net) or at 609.452.8060.*