

Nuclear Utility Plant

Case Study

PARTNERSHIP

A large US nuclear utility approached Framatome and FoxGuard in 2019 to help address challenges with their existing cybersecurity program. The customer self-identified gaps in the documentation of its cybersecurity program controls. However, the customer did not have the staff to self-perform the revision to its cybersecurity program documentation in a timely manner. FoxGuard and Framatome partnered with the customer and developed a team that included former NRC inspectors. The team leveraged its collective expertise, experience, and industry engagement to help the customer balance its cybersecurity processes and solutions against regulatory and operational needs and corrected weaknesses that exposed the plant to regulatory scrutiny.

THE CHALLENGE

The challenge was that the self-identified gaps and subsequent NRC inspection of the customer's cybersecurity program resulted in low significant findings and violations for the customer. Correction of the programmatic gaps to resolve the regulatory findings and violations within the timeframe prescribed by the NRC required a large project team with significant NEI 13-10, NEI 08-09 industry guidance and licensing expertise that the customer, like most utilities, no longer have in-house.



Cybersecurity assessment support to a large US nuclear utility customer.

THE SOLUTION

The team reviewed the customer's program and created a program gap analysis against 10 CFR 73.54, NEI 08-09, and NEI 13-10. Once the gap analysis was complete, the customer's cybersecurity assessment packages were updated with proper documentation of its cybersecurity controls, and a requirements traceability matrix was developed that mapped the customer's compliance to regulatory requirements in its site programs, processes, and procedures. We also produced an OMA report summarizing the CDA and program-level maintenance requirements to maintain regulatory compliance. Additionally, the team developed a CDA database to help the customer facilitate the execution, review, and management of CDA vulnerability assessments.

EXCEEDING EXPECTATIONS

The team's collective experience and expertise allowed the team to quickly and efficiently kickoff and execute the project to achieve the desired timeline to address the findings and violations while performing under budget. The NRC checked with the customer at 70% project completion and was pleased with the completed programmatic updates to address the findings and violations. In turn, the customer is delighted and, on its way, to achieving a fully compliant cybersecurity program and minimizing its regulatory risk.

Together Framatome and FoxGuard Solutions provided cybersecurity assessment support to a nuclear utility customer. The assessment support included review and revisions to cybersecurity assessment packages, development of Critical Digital Asset (CDA) Database, Ongoing Monitoring and Assessment (OM&A) Report, and Requirements Traceability Matrix (RTM).



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