

Revision to Hydropower Security Program

The program is predicated on the three Security Groups first developed in 2001 as based on consequence of loss, as envisioned in 2001.

Since then, the state-of-practice has advanced and the FERC will reclassify the Security Groups at the end of this year incorporating not only consequence, but vulnerability and likelihood of attack. The C, V, and L values of DAMSVR v2 will be used in this reclassification.

Licensees will be notified of the regroupings by January 2010.

Section number

Notable Revisions (5.0)

- Vulnerability Assessment (VA) – Group 1 – must be reprinted on 5-year cycle
- First round due 12/31/2010
- Owners will be notified 01/2010 of new Grouping 1, 2, or 3 based on 2009 DMSVR
- VA must be updated annually, especially related to Threat (12/31/10)
 - Address any changes from previous year
 - Intent: FERC wants to see a new Threat Assessment each year

Notable Revisions (5.0)

- VA must consider:
 - Insider
 - Vandalism/Theft
 - Group (3-5 individuals) w/small arms, & backpack explosives
 - Group (3-5 individuals) w/small arms, vehicles (land and water) & VBIED (delivery/water truck size)
 - SCADA controls attack
 - Any identified local/regional/national/transnational threat groups that are appropriate to the site
 - ELF, ALF, KKK, groups Etc.

Notable Revisions (6.0)

- Security Assessment (SA) – Group 1 & 2 – must be updated annually
 - Address any changes from previous year
- First round due 12/31/2010
- At a minimum, must consider an unarmed “intruder” (to measure security against)
 - (always consider local, suspected threats, when known)
- For Group 1, SA is included within the VA

Notable Revisions (7.0)

- Security Plan (SP) – Group 1 & 2 – must be reprinted by 12/31/2010
- Must be site-specific
- SP must be updated annually, or “as required”
 - Address any changes from previous year
- Added sub-element: Internal Emergency Response and Recovery (see 7.4)
 - (CIP-009-1 meets Recovery needs for cyber assets)
 - Internal Emergency Response: Group 1 & 2
 - Recovery: Group 1 only
- SP for Group 1 Dams must be tested (drill acceptable) every 5 years

Notable Revisions (8.0)

- Annual Certification Letter – Group 1 & 2
- First letter due 12/31/2010 (and 12/31 thereafter)
 - Certifies compliance with program (VA/SA/SP/testing)
 - Confirmation of security contact(s)

Future Licensee/Exemptee Requirements (2010)

- Licensees are under current guidance throughout 2009
- Notification of new Groups in December 2009
 - (Based on DAMSVR v2 analyses completed in 2009)
- Begin new guidance January 2010 (use old documentation in interim)
- New cycle of VA/SA/SP/Certification Letters due December 31, 2010
 - SP testing (5-year schedule)
 - (Does that mean 2015? – no; should show progress; drills are easy)

Special Cyber/SCADA Considerations

- Some FERC Projects are subject to NERC-CIP Standards
- If compliant, that is all FERC needs to know
- If not compliant, or not required, additional questions may be necessary

Summary of Requirements

Item	Security Group 1	Security Group 2	Security Group 3
Vulnerability Assessment	5-yr cycle (starts 12/31/10) Annual update (esp. Threat) Scenarios: - Insider - Vandal/Theft - 3-5 w/backpack - 3-5 w/VBIED - SCADA - any recognized	"Encouraged"	
Security Assessment	(included within the VA)	Annual update (starts 12/31/10) Based on "Intruder" as min.	"Encouraged"
Security Plan	Reprinted 12/31/10 Site-specific Annual update Exercised 5-yrs	Reprinted 12/31/10 Site-specific Annual update	"Encouraged"
Internal Emergency Response	Needed	Needed	"Encouraged"
Recovery Plan	Needed (CIP-009-1 for cyber okay)		
Annual Certification Letter	1 st due 12/31/10 Compliance w/ VA/SA/SP/testing Confirm contact	1 st due 12/31/10 Compliance w/ SA/SP/ Confirm contact	
Recreational change request	VA needed to justify	VA needed to justify	VA needed to justify

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Additional Resources

For additional information,
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Pertinent Documents

1. Hydro Security Program, v2

<http://www.ferc.gov/industries/hydropower/safety/guidelines/security/securitytext.pdf>

2. DAMSVR, v2 (manual/tables/excel) – online request form

<http://www.ferc.gov/industries/hydropower/safety/guidelines/security/damsvr-req.asp>