Business Case Summary

Project #	ICISE055 ISE86251 - CAP ISE86252 – OMA	**Controlled Doc #**	TBD: OPG-BCS-08161-XXXXX
Project Title	CSA N290.7-21 Compliance Project		
Facility	CIO / Nuclear	**Investment Classification**	Regulatory
Project Level (Scalability)	D	**Financial Classification**	☐ OM&A ☒ Capital ☐ Capital Spare ☐ MFA ☐ CMFA ☐ Provision ☐ Others: [if applicable]
Release: Gate and Project Phase	☒ Full G0: Initiation ☒ Partial G1: Planning		☐ Full G2: Definition ☐ Choose an item. G3: Execution
Estimate Class (overall project)	Class 5	**Target Project Completion Date**	Dec 2025

Recommendation

We recommend a release of $1,000 K Capital, including $100 K of contingency. $500K of this release will be spent in 2020 and remaining $500K of this release will be spent in 2021. 2020 lockdown list contains sufficient spend to cover this release

This is an initial release for a multi-year program to bring OPG Nuclear stations into compliance with the new standard.

This release is to assess the new CSA N290.7-21 standard against OPG's current practice and identify the initiatives that need to be launched to be compliant with the new standard. The estimated total project cost range is to be determined for Gate 2 (Definition Phase) release.

Investment Cash Flows

$K	LTD	2020 CAP	2021 CAP	2022	2023	2024	2025	Future	Total
Previous releases	-	-							-
Current request	-	500	500						1,000
Total released to date	**-**	**500**	**500**	**-**	**-**	**-**	**-**	**-**	**1,000**
Future required	-		TBD	TBD	TBD	TBD	TBD	TBD	TBD
Total Project Cost									
Ongoing Costs	-			TBD	TBD	TBD	TBD	TBD	
					Gate:	**G1**	**OAR Approval:**		$1,000 K

Approvals	Signatures	Date
The recommendation, including the identified ongoing costs, if any, represents the best option to meet the validated business need.		
Recommended by: Project Sponsor David Rogalski Senior Manager, Computers and Control Design		August 2020
I concur with the business decision as documented in this BCS.		
Finance Approval: Suneethi Viswanathan Finance Controller		August 2020
I confirm that this investment/project, including the identified ongoing costs, if any, will address the business need, is of sufficient priority to proceed, and provides value for money.		
Line Approval per OAR 1.1: Kim Bosselle Director, IT Projects		August 2020

EXECUTIVE SUMMARY – Project Overview

The CSA N290.7 standard was first issued in 2014. Compliance to the standard by Nov. 2019 was made a condition of OPG's Operating License by the CNSC and was included in the License Condition Handbook for Pickering, Darlington and Nuclear Waste. The CIO initiated a program to assess our current state of compliance and the gaps that needed to be

EXECUTIVE SUMMARY – Project Overview

addressed to be compliant. These gaps were addressed and compliance achieved by the date necessary to meet our Operating License commitment.

The CSA has just released a new standard for public review (CSA N290.7-21) which OPG will be expected to comply with. This project will evaluate the new standard and the work that must be completed to bring OPG into compliance.

This initial BCS release will enable OPG to continue to leverage the resources from the original project to complete the assessment phase and address high priority gaps. This high priority work includes meeting specific commitments to the CNSC by the end of 2021 that resulted from a past Cyber Security Privileged and Confidential event.

Business Need For Project Level A or B

The CNSC has directed OPG to comply with the new CSA N290.7-21 standard. The scope will also include the review and dispositioning of recommendations arising from past Cyber Process Network Reviews, past CNSC directives, as well al any findings from the CNSC Type 2 Cyber Security inspection for Darlington in Q1 2021.

Past CNSC directives include:

- *Identify Cyber Essential Assets (CEAs) which contain IP addresses and assess the requirement for the removal of any IP addresses labeled directly on the assets.*
- *Perform an assessment of all files created by the CSA N290.7 Project and files associated with safety systems and emergency preparedness, to ensure appropriate classification, as per OPG-STD-0030, is applied.*
- *Assess classification of associated documents in accordance with OPG-STD-0030.*

Preferred Alternative: **[Input Summary Title for the Preferred Alternative]** For Project Level A, B or C

Description of Preferred Alternative

This project initiation release will assess the remediation work that is necessary to comply with the new standard and develop the alternatives / options to achieve compliance.

Deliverables:	Associated Milestones (if any):	Target Date:
Current release:		
Definition Phase BCS (G2) Approved	Gate 2	Nov. 1, 2021
All IP Address labels removed from Assets	CNSC Commitment	Dec.30, 2021
Assessment and cleanup of Project documents per OPG STD-0030 is complete	CNSC Commitment	Dec.30, 2021
High priority remediation's in-service	In-Service	Dec.30, 2021

Key Risk Assessment For Project Level A, B or C

Risk Class	Description of Risk	Response Type/ Actions/Final TCD	For Additional Review	Residual Ranking
Cost	The anticipated cost to complete necessary mitigations is estimated to be 30-50M, well outside of OPG's current IT funding envelope.	Accept: • The definition phase will fully quantify the cost to OPG to meet the standard. • Consider implementing projects between CCD and CIO to achieve compliance. **Final TCD: [Dec-2021]**	No	Low
Physcial/ Personnel Security	The resources that were engaged and trained by the CSA N290.7-14 Project are at risk of departing for other engagements.	Mitigate: • Early initiation of this project with early targeted remediation's will enable OPG to retain trained resources. **Final TCD: [June - 2021]**	No	Low
Regulatory	The scope of mitigation requirements is extensive and may require many	Avoid:	No	Low

Key Risk Assessment				For Project Level A, B or C
Risk Class	**Description of Risk**	**Response Type/ Actions/Final TCD**	**For Additional Review**	**Residual Ranking**
	years to achieve compliance. The value to undertake this work for Pickering, if it is to be decommissioned, is questionable.	• Open communications with the Steering Committee and Reg. Affairs over the approach for Pickering will ensure an informed recommendation to the CNSC on what Compliance looks like for Pickering. **Final TCD: [Dec-2021]**		

Financial Evaluation					For Project Level A, B (with multiple feasible alternatives) or Value-Enhancing
$K	Preferred Alternative	Base Case (No Project)	Delay work	Alternative 4	Alternative 5
Project Cost					
NPV					
Other: (e.g., IRR)					

Analysis of Financial Evaluation – Key Assumptions and Key Results:

- The Financial Evaluation will be completed for the Definition Phase BCS once an accurate understanding of the cost and benefits is available.

Qualitative Factors	For Project Level A or B

List any qualitative factors provided by the Preferred Alternative. These factors may include:

- N/A – this is a D level project.

Post Implementation Review (PIR) Plan (refer to OPG-PROC-0056)			
Type of PIR Report	Project Closure Report (PCR)	**PIR Completion Date**	Dec. 2024

☐ Detailed PIR KPIs will be provided in future BCS(s) when Definition Phase BCS release is requested.

PIR KPIs	**Current Baseline**	**Target Result**	**How to measure?**	**Who will measure?**

APPENDICES

Appendix A1: Summary of Estimate	Choose an item.									
Project Number:	**ICISE055**									
Project Title:	**CSA N290.7-21 Compliance Project**									
$K	**LTD**	**2020**	**2021**	**2022**	**2023**	**2024**	**2025**	**Future**	**Total**	**%**
Project Mgmt		10	50						60	6%
Inspection									-	0%
Engineering		435	390						825	83%
Procurement									-	0%
Construction									-	0%
Commissioning									-	0%
Closeout									-	0%
Subtotal	-	445	440	-	-	-	-	-	885	89%
Outside WBS									-	0%
Contingency		50	50						100	10%
Subtotal w/ Contingency	-	495	490	-	-	-	-	-	985	99%
Interest		5	10						15	2%
Other									-	0%
Total	**-**	**500**	**500**	**-**	**-**	**-**	**-**	**-**	**1,000**	**100%**
Removal Costs (incl. above)									-	0%

Appendix A2: Summary of Estimate – Notes			
Escalation Rate	2%	**Interest Rate (going-forward)**	3%

Appendix A3: Summary of Estimate – In-Service Estimates				
$K	In-Service amount and target dates will be included in the Definition phase BCS.			
Project #	**Date (YYYY-MM-DD)**	**Description**	**Amount**	**%**
ISE86251	12/30/2021	Remidiation Complete	TBD	100%
				0%
Total			-	0%

Prepared by:	Reviewed and Endorsed by:
Greg Payne Project Manager Date	Jennifer Lafferty Nuclear IT Program Manager Date