Evaluation of ISA 99 in a Real-World Power Plant Security Assessment

Ragnar Schierholz, ABB Corporate Research Sebastian Obermeier, ABB Corporate Research Luca Guidi, ENEL Daniela Pestonesi, ENEL Giorgio Carpi, ENEL

ISA 99 – Brief intro



ANSI/ISA-99: "Security for Industrial Automation and Control Systems"

Broad scope, covering (according to current plans)

- Policies and procedures for secure operations
- System design (e.g. network segregation)
- Technical requirements for systems and products
- Product development lifecycle
- Metrics for measuring security assurance

Partially completed, partially work in progress, partially planned Plans for co-publishing as IEC 62443 for broader international acceptance

ISA 99 – Work products



Background

ESCORTS EVITOR CONTROL AND REAL TIME SYSTEM

ESCoRTS – Enhanced Security for Control and Real-Time Systems is a Coordination and Support Action funded by the European Commission – Framework Programme 7

Main objectives are

- disseminating best practice on security of Supervisory Control and Data Acquisition (SCADA) systems
- Driving and ensuring convergence of SCADA standardisation processes worldwide
- paving the way to establishing cyber security testing facilities in Europe

See more at http://www.escortsproject.eu/

Targeted Experiments



Objectives

- Evaluation of existing standard applicability
- Impact on security methods and actions
- Focus on electricity generation

Standard as reference

• ISA-99



Efforts

- ~ one person week preparation
- 3 days on-site assessment with between 8 and 13 participants from ENEL (asset owner) and ABB (vendor)
- ~ one person week for report generation

Setup



Location: Operating combined cycle power plant in Italy (redesigned in 2003)

Participants: Cross-functional team

- Research organizations (both asset owner & vendor)
- Asset owner's enterprise security organization
- Asset owner's enterprise ICT
- Asset owner's plant operations
- Vendor's product responsible unit
- Vendor's system unit (project engineers)

Three focus areas of the assessments

- ISA-99 applicability, usability and utility
- ENEL plant security in light of ISA-99
- ABB product capability in light of ISA-99





Enel Assessment workflow IN THRE WITH YO ENEL ABB Selection of Gathering of System Information **Experiment Scope** ABB & ENEL (Workshop) Definition of Zones and Conduits Definition of Target Security Assurance Level Determination of Security Controls Required Determination of Achieved Security Assurance Level • Gap Analysis Derive Recommendations **ESCORTS** Reflection on Applicability, Usability and Utility of the ISA 99 Standard

Assessment "tools"



Standard does not provide assessment templates Custom checklist spreadsheet for assessment documentation

| | 00 | | | | |
|---------|----|-----------|---|---------------------|-------------------------|
| | 67 | | Physical and evironmental security | | |
| + | 78 | | | | |
| | 79 | | Network segmentation | | |
| Γ | | 4.3.3.4.1 | Develop the network segmentation | | |
| Ι. | 80 | | architecture | | |
| | | 4.3.3.4.2 | Employ isolation or segmentation on high-risk | | |
| · · · | 81 | | IACS | | |
| | | 4.3.3.4.3 | Block non-essential communications with | | |
| | 82 | | barrier devices | | |
| Ξ Γ. | 83 | | | | |
| | 84 | | Access control: Account administration | | |
| | | 4.3.3.5.1 | Access accounts implement authorization | Assessment comments | |
| | 85 | | security policy | | 3 = Fully addressed |
| · | 86 | 4.3.3.5.2 | Identify individuals | Example Ratings> | 2 = Partially addressed |
| · | 87 | 4.3.3.5.3 | Authorize account access | | 1 = In preparation |
| 1 | 88 | 4.3.3.5.4 | Record access accounts | | 0 = Not addressed |
| | 89 | 4.3.3.5.5 | Suspend or remove unneed accounts | | |
| · | 90 | 4.3.3.5.6 | Review account permissions | | |
| · | 91 | 4.3.3.5.7 | Change default passwords | | |
| • | 92 | 4.3.3.5.8 | Audit account administration | | |
| | 93 | | | | |
| | 94 | | Access control: Authentication | | |



General approach of ISA well targeted to control systems

- Reflects and links risk assessment to security planning
- Operational security requirements (policies, procedures, ...) comprehensive and easy to evaluate
- ISA-99 well structured

Identification of "zones" and "conduits" difficult

- ISA-99 imposes several requirements for zone definitions, but leaves a lot of discretion for asset owners
- Detailed requirements in terms of security controls for each zone are present, but difficult to use

Determination of System Security Assurance Levels (SAL) is difficult, as the link between "impact" and "SAL" is missing



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Suggestion for ISA 99 revision

 SAL definition overly formal, e.g. mandates classifications which are not used later on

More guidance on compensating security controls desirable

ISA 99.03.02 paragraph 5.2

Detailed fine-tuning of requirements would be helpful. Examples:

 "Expiration of accounts after a period of inactivity" (on-site maintenance accounts vs. hardly used supervisor accounts)

Existing mapping of roles and responsibilities (in ISA99 03.02 Annex C) is helpful and important. It should also be included in other parts, but content of matrix is not yet mature. ICSJWG 2010 Spring Conference

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To implement, maintain and document ISA99 compliance requires significant effort for a power generation utility:

- several devices/systems, complex infrastructure, many people involved
- different organization units must cooperate, creation of new organization units could be necessary, entire life cycle requires continuous effort, etc.

To implement, maintain and document ISA99 compliance requires significant effort for an IACS vendor:

- embed security in the design of the IACS system
- IACS integration in a customer owned infrastructure challenging

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Cross-Function teams are necessary:

Experts for several domains were present

Time for discussions should not be underestimated - only a part of ISA 99 could be considered in the experiment

- Impact analysis ("what happens if...") is time consuming
- Complete ISA 99 assessment expensive and time-consuming

Additional effort in creating templates and reporting tools

Compliance metrics monitoring (ISA-99.01.03) is important for auditing, but the value of certification is considered controversial. Risk assessment guidelines and vulnerability tests seem to be necessary, too.

Thank you!

Dr. Ragnar Schierholz

Principal Scientist Industrial Software Systems



ABB Switzerland Corporate Research Segelhofstr. 1K CH-5405 Baden 5 Dättwil Phone +41 58 586 82 97 Mobile +41 79 733 67 47 E-Mail ragnar.schierholz@ch.abb.com

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