

November 3, 1994

Mr. George A. Hunger, Jr.  
Director-Licensing, MC 52A-5  
PECO Energy Company  
Nuclear Group Headquarters  
Correspondence Control Desk  
P. O. Box No. 195  
Wayne, PA 19087-0195

Dear Mr. Hunger:

SUBJECT: ENVIRONMENTAL ASSESSMENT OF REQUEST FOR EXEMPTION FROM CERTAIN REQUIREMENTS OF 10 CFR 73.55, REQUIREMENTS FOR PHYSICAL PROTECTION OF LICENSED ACTIVITIES IN NUCLEAR POWER PLANT REACTORS AGAINST RADIOLOGICAL SABOTAGE - LIMERICK GENERATING STATION, UNITS 1 AND 2 (TAC NOS. M90362 AND M90363)

Enclosed is a copy of an "Environmental Assessment and Finding of No Significant Impact" for your information. This assessment relates to your application dated August 10, 1994, as supplemented October 7, 1994, and October 13, 1994, which requested an exemption from certain requirements of 10 CFR 73.55 relating to the issuance, storage and retrieval of badges for personnel who have been granted unescorted access to the protected areas of the site. The proposed exemption will enable you to implement a hand geometry biometric system for site access control at the Limerick units to allow photograph identification badges to be taken offsite.

The assessment is being forwarded to the Office of the Federal Register for publication.

Sincerely,

Original signed by:  
Frank Rinaldi, Project Manager  
Project Directorat I-2  
Division of Reactor Projects - I/II  
Office of Nuclear Reactor Regulation

Docket Nos. 50-352/50-353

Enclosure: Environmental Assessment

cc w/encl: See next page

DISTRIBUTION w/encl:

Docket File JStolz ACRS(10)  
PUBLIC MO'Brien OPA  
PDI-2 Rdg. FRinaldi/TLiu EWenzinger, RI  
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JZwolinsky EJordan, D/AEOD  
\*See previous concurrence

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NAME	MO'Brien		TLiu:tlc	FRinaldi	*LCunningham		JStolz
DATE	10/21/94		10/24/94	10/24/94	10/21/94	10/21/94	10/7/94

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NAME	MO'Brien		TLiu:tlc	FRinaldi	*LCunningham		JStolz
DATE	10/19/94		10/24/94	10/24/94	10/21/94	10/21/94	10/21/94

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UNITED STATES  
NUCLEAR REGULATORY COMMISSION

WASHINGTON, D.C. 20555-0001

November 3, 1994

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Director-Licensing, MC 52A-5  
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The assessment is being forwarded to the Office of the Federal Register for publication.

Sincerely,

A handwritten signature in cursive script, appearing to read "Frank Rinaldi".

Frank Rinaldi, Project Manager  
Project Directorat I-2  
Division of Reactor Projects - I/II  
Office of Nuclear Reactor Regulation

Docket Nos. 50-352/50-353

Enclosure: Environmental Assessment

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Mr. George A. Hunger, Jr.  
PECO Energy Company

Limerick Generating Station,  
Units 1 & 2

cc:

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UNITED STATES NUCLEAR REGULATORY COMMISSIONPHILADELPHIA ELECTRIC COMPANYDOCKET NOS. 50-352 AND 50-353LIMERICK GENERATING STATION, UNITS 1 AND 2ENVIRONMENTAL ASSESSMENT AND FINDING OFNO SIGNIFICANT IMPACT

The U.S. Nuclear Regulatory Commission (the Commission) is considering issuance of an exemption from certain requirements of its regulations to Facility Operating License Nos. NPF-39 and NPF-85, issued to Philadelphia Electric Company (the licensee), for operation of the Limerick Generating Station (LGS), Units 1 and 2, located in Montgomery County, Pennsylvania.

ENVIRONMENTAL ASSESSMENTIdentification of Proposed Action:

The proposed action would allow implementation of a hand geometry biometric system of site access control such that photograph identification badges can be taken offsite.

The proposed action is in accordance with the licensee's application dated August 10, 1994 for exemption from certain requirements of 10 CFR 73.55, "Requirements for physical protection of licensed activities in nuclear power plant reactors against radiological sabotage."

The Need for the Proposed Action:

Pursuant to 10 CFR 73.55, paragraph (a), the licensee shall establish and maintain an onsite physical protection system and security organization.

"Access Requirements," of 10 CFR 73.55(d), paragraph (1), specifies that "licensee shall control all points of personnel and vehicle access into a protected area...." It is specified in 10 CFR 73.55(d)(5) that "A numbered

picture badge identification system shall be used for all individuals who are authorized access to protected areas without escort." It also states that an individual not employed by the licensee (i.e., contractors) may be authorized access to protected areas without escort provided the individual "receives a picture badge upon entrance into the protected area which must be returned upon exit from the protected area..."

Currently, unescorted access into protected areas of the LGS is controlled through the use of a photograph on a combination badge and keycard. (Hereafter, these are referred to as badges). The security officers at each entrance station use the photograph on the badge to visually identify the individual requesting access. The badges for both licensee employees and contractor personnel who have been granted unescorted access are issued upon entrance at each entrance/exit location and are returned upon exit. The badges are stored and are retrievable at each entrance/exit location. In accordance with 10 CFR 73.55(d)(5), contractor individuals are not allowed to take badges offsite. In accordance with the plants' physical security plans, neither licensee employees nor contractors are allowed to take badges offsite.

The licensee proposes to implement an alternative unescorted access control system which would eliminate the need to issue and retrieve badges at each entrance/exit location and would allow all individuals with unescorted access to keep their badges with them when departing the site.

An exemption from 10 CFR 73.55(d)(5) is required to permit contractors to take their badges offsite instead of returning them when exiting the site.

The Commission has completed its evaluation of the proposed action.

Under the proposed system, each individual who is authorized for unescorted entry into protected areas would have the physical characteristics of their hand (hand geometry) registered with their badge number in the access control system. When an individual enters the badge into the card reader and places the hand on the measuring surface, the system would record the individual's hand image. The unique characteristics of the extracted hand image would be compared with the previously stored template to verify authorization for entry. Individuals, including licensee employees and contractors, would be allowed to keep their badge with them when they depart the site.

Based on a Sandia report entitled "A Performance Evaluation of Biometric Identification Devices" (SAND91--0276 UC--906 Unlimited Release, Printed June 1991), and on its experience with the current photo-identification system, the licensee demonstrated that the proposed hand geometry system would provide enhanced site access control. Since both the badge and hand geometry would be necessary for access into the protected area, the proposed system would provide for a positive verification process. Potential loss of a badge by an individual, as a result of taking the badge offsite, would not enable an unauthorized entry into protected areas. The licensee will implement a process for testing the proposed system to ensure continued overall level of performance equivalent to that specified in the regulation. The Physical Security Plans for both sites will be revised to include implementation and testing of the hand geometry access control system and to allow licensee employees and contractors to take their badges offsite.

The access process will continue to be under the observation of security personnel. A numbered picture badge identification system will continue to be

used for all individuals who are authorized access to protected areas without escorts. Badges will continue to be displayed by all individuals while inside the protected area.

Environmental Impacts of the Proposed Action:

The change will not increase the probability or consequences of accidents, no changes are being made in the types of any effluents that may be released offsite, and there is no significant increase in the allowable individual or cumulative occupational radiation exposure. Accordingly, the Commission concludes that there are no significant radiological environmental impacts associated with the proposed action.

With regard to potential nonradiological impacts, the proposed action involves features located entirely within the restricted area as defined in 10 CFR Part 20. It does not affect nonradiological plant effluents and has no other environmental impact. Accordingly, the Commission concludes that there are no significant nonradiological environmental impacts associated with the proposed action.

Alternatives to the Proposed Action:

Since the Commission has concluded there is no measurable environmental impact associated with the proposed action, any alternatives with equal or greater environmental impact need not be evaluated. The principal alternative to the action would be to deny the request. Such action would not change any current environmental impacts. The environmental impacts of the proposed action and the alternative action are similar.

Alternative Use of Resources:

This action does not involve the use of any resources not previously considered in the "Final Environmental Statement related to the operation of



Limerick Generating Station, Units 1 and 2," dated April 1984.

Agencies and Persons Consulted:

The NRC staff consulted with the State of Pennsylvania regarding the environmental impact of the proposed action. The State official had no comments.


FINDING OF NO SIGNIFICANT IMPACT

Based upon the environmental assessment, the Commission concludes that the proposed action will not have a significant effect on the quality of the human environment. Accordingly, the Commission has determined not to prepare an environmental impact statement for the proposed action.

For further details with respect to the proposed action, see the licensee's letters dated August 10, October 7, 1994, and October 13, 1994, which are available for public inspection at the Commission's Public Document Room, The Gelman Building, 2120 L Street, NW., Washington, DC 20555 and at the local public document room located at Pottstown Public Library, 500 High Street, Pottstown, Pennsylvania 19464.

Dated at Rockville, Maryland, this 3rd day of November 1994.

For the Nuclear Regulatory Commission



John F. Stolz, Director  
Project Directorate I-2  
Division of Reactor Projects - I/II  
Office of Nuclear Reactor Regulation