

July 31, 1997

Mr. Leon R. Eliason  
Chief Nuclear Officer & resident-  
Nuclear Business Unit  
Public Service Electric & Gas  
Company  
Post Office Box 236  
Hancocks Bridge, NJ 08038

SUBJECT: EXEMPTION FROM CERTAIN REQUIREMENTS OF 10 CFR 73.55, "REQUIREMENTS FOR PHYSICAL PROTECTION OF LICENSED ACTIVITIES IN NUCLEAR POWER REACTORS AGAINST RADIOLOGICAL SABOTAGE," SALEM NUCLEAR GENERATING STATION, UNITS 1 AND 2, AND HOPE CREEK GENERATING STATION (TAC NOS. M97782, M97783 AND M97784)

Dear Mr. Eliason:

The Commission has issued the enclosed 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. This exemption is related to your application dated January 17, 1997, to implement a hand geometry biometric system for site access control at Salem Nuclear Generating Station, Units 1 and 2, and Hope Creek Generating Station (Salem/Hope Creek) such that photographic identification badges may be taken offsite.

A copy of the exemption is being forwarded to the Office of the Federal Register for publication.

Within 60 days of issuance of this letter, in accordance with 10 CFR 50.54(p), please submit your revised Physical Security Plan for the Salem/Hope Creek site. To expedite our review process, please ensure that the revised security plan includes only those changes pertaining to the hand geometry biometric system. If you have any questions, please call me at (301) 415-1430.

Sincerely,  
/s/

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

Docket Nos. 50-272/311/354

Enclosure: As stated

cc w/encl: See next page

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UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D.C. 20555-0001

July 31, 1997

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Chief Nuclear Officer & President-  
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Public Service Electric & Gas  
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Sincerely,

A handwritten signature in cursive script that reads "John F. Stolz".

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

Docket Nos. 50-272/311/354

Enclosure: As stated

cc w/encl: See next page

Public Service Electric & Gas  
Company

Salem Nuclear Generating Station,  
Units 1 and 2, and  
Hope Creek Generating Station

cc:

Mark J. Wetterhahn, Esquire  
Winston & Strawn  
1400 L Street NW  
Washington, DC 20005-3502

Richard Hartung  
Electric Service Evaluation  
Board of Regulatory Commissioners  
2 Gateway Center, Tenth Floor  
Newark, NJ 07102

Richard Fryling, Jr., Esquire  
Law Department - Tower 5E  
80 Park Place  
Newark, NJ 07101

Regional Administrator, Region I  
U. S. Nuclear Regulatory Commission  
475 Allendale Road  
King of Prussia, PA 19406

Mr. D. F. Garchow  
General Manager - Salem Operations  
Salem Generating Station  
P.O. Box 236  
Hancocks Bridge, NJ 08038

Lower Alloways Creek Township  
c/o Mary O. Henderson, Clerk  
Municipal Building, P.O. Box 157  
Hancocks Bridge, NJ 08038

Mr. L. F. Storz  
Sr. V.P. - Nuclear Operations  
Nuclear Department  
P.O. Box 236  
Hancocks Bridge, New Jersey 08038

Mr. David R. Powell, Manager  
Licensing and Regulation  
Nuclear Business Unit  
P.O. Box 236  
Hancocks Bridge, NJ 08038

Mr. Charles S. Marschall, Senior  
Resident Inspector  
Salem Generating Station  
U.S. Nuclear Regulatory Commission  
Drawer 0509  
Hancocks Bridge, NJ 08038

Mr. David Wersan  
Assistant Consumer Advocate  
Office of Consumer Advocate  
1425 Strawberry Square  
Harrisburg, PA 17120

Dr. Jill Lipoti, Asst. Director  
Radiation Protection Programs  
NJ Department of Environmental  
Protection and Energy  
CN 415  
Trenton, NJ 08625-0415

P. M. Goetz  
MGR. Joint Generation  
Atlantic Energy  
6801 Black Horse Pike  
Egg Harbor Twp., NJ 08234-4130

Maryland Office of People's Counsel  
6 St. Paul Street, 21st Floor  
Suite 2102  
Baltimore, Maryland 21202

Carl D. Schaefer  
External Operations - Nuclear  
Delmarva Power & Light Company  
P.O. Box 231  
Wilmington, DE 19899

Ms. R. A. Kankus  
Joint Owner Affairs  
PECO Energy Company  
965 Chesterbrook Blvd., 63C-5  
Wayne, PA 19087

Public Service Commission of Maryland  
Engineering Division  
Chief Engineer  
6 St. Paul Centre  
Baltimore, MD 21202-6806

Public Service Electric & Gas  
Company

Salem Nuclear Generating Station,  
Unit 1 and 2, and  
Hope Creek Generating Station

cc:

Hope Creek Resident Inspector  
U.S. Nuclear Regulatory Commission  
Drawer 0509  
Hancocks Bridge, New Jersey 08038

Mr. E. C. Simpson  
Sr. V.P. - Nuclear Engineering  
Nuclear Department  
P. O. Box 236  
Hancocks Bridge, New Jersey 08038

Mr. M. E. Reddemann  
General Manager - Hope Creek Operations  
Hope Creek Generating Station  
P.O. Box 236  
Hancocks Bridge, New Jersey 08038

Mr. Leon R. Eliason  
Chief Nuclear Officer & President-  
Nuclear Business Unit  
Public Service Electric Gas  
Company  
Post Office Box 236  
Hancocks Bridge, NJ 08038

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

In the Matter of	)	
PUBLIC SERVICE ELECTRIC AND GAS COMPANY	)	
PHILADELPHIA ELECTRIC COMPANY	)	
DELMARVA POWER AND LIGHT COMPANY	)	
ATLANTIC CITY ELECTRIC COMPANY	)	
SALEM NUCLEAR GENERATING STATION, UNITS 1 AND 2	)	Docket Nos. 50-272 and 50-311
AND	)	and
PUBLIC SERVICE ELECTRIC AND GAS COMPANY	)	
ATLANTIC CITY ELECTRIC COMPANY	)	
HOPE CREEK GENERATING STATION	)	Docket No. 50-354

EXEMPTION

I.

The Public Service Electric and Gas Company, et al. (PSE&G, the licensee), is the holder of Facility Operating License Nos. DPR-70, DPR-75 and NPF-57, which authorize operation of the Salem Nuclear Generating Station, Units 1 and 2, and Hope Creek Generating Station (Salem/Hope Creek). The licenses provide, among other things, that the licensee is subject to all rules, regulations, and orders of the Nuclear Regulatory Commission (the Commission) now and hereafter in effect.

The facilities consist of two pressurized water reactors, Salem Units 1 and 2, and a boiling water reactor, Hope Creek, located at the licensee's site in Salem County, New Jersey.

II.

It is stated in 10 CFR 73.55, "Requirements for physical protection of licensed activities in nuclear power reactors against radiological sabotage," paragraph (a), "General performance objective and requirements," that "The licensee shall establish and maintain an onsite physical protection system and security organization which will have as its objective to provide high assurance that activities involving special nuclear material are not inimical to the common defense and security and do not constitute an unreasonable risk to the public health and safety."

It is specified in 10 CFR 73.55(d), "Access Requirements," paragraph (1), that "The 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..."

The licensee proposed 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 badge with them when departing the site.

An exemption from 10 CFR 73.55(d)(5) is required to allow contractors who have unescorted access to take their badges offsite instead of returning them when exiting the site. By letter dated January 17, 1997, the licensee requested an exemption from certain requirements of 10 CFR 73.55(d)(5) for this purpose.

III.

Pursuant to 10 CFR 73.5, "Specific exemptions," the Commission may, upon application of any interested person or upon its own initiative, grant such exemptions in this part as it determines are authorized by law and will not endanger life or property or the common defense and security, and are otherwise in the public interest. Pursuant to 10 CFR 73.55, the Commission may authorize a licensee to provide measures for protection against radiological sabotage provided the licensee demonstrates that the measures have "the same high assurance objective" and meet "the general performance requirements" of the regulation, and "the overall level of system performance provides protection against radiological sabotage equivalent" to that which would be provided by the regulation.

At the Salem/Hope Creek site, unescorted access into protected areas is controlled through the use of a photograph on a combination badge and keycard. (Hereafter, these are referred to as a "badge"). The security officers at the 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 the entrance/exit location and are returned upon exit. The badges are stored and are retrievable at the 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 plant's physical security plan, neither licensee employee nor contractors are allowed to take badges offsite.

Under the proposed system, each individual who is authorized for unescorted access 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 in the access control system to verify authorization for entry. Individuals, including licensee employees and contractors, would be allowed to keep their badges with them when they depart the site and thus eliminate the process to issue, retrieve and store badges at the entrance stations to the plant. Badges do not carry any information other than a unique identification number.

All other access processes, including search function capability, would remain the same. This system would not be used for persons requiring escorted access, i.e., visitors.

Based on a Sandia report entitled, "A Performance Evaluation of Biometric Identification Devices" (SAND91--0276 UC--906 Unlimited Release, Printed June 1991), and on the licensee's experience with the current photo-identification system, the licensee stated that the hand geometry system performance is comparable to, or superior to, that of the current system. The biometric system has been in use for a number of years at several sensitive Department of Energy facilities. 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 Plan for Salem/Hope Creek 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 licensee will control all points of personnel access into a protected area under the observation of security personnel through the use of a badge and verification of hand geometry. A numbered picture badge identification system will continue to be used for all individuals who are authorized unescorted access to protected areas. Badges will continue to be displayed by all individuals while inside the protected area.

Since both the badges and hand geometry would be necessary for access into the protected areas, the proposed system would provide for a positive verification process and the 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.

For the foregoing reasons, pursuant to 10 CFR 73.55, the NRC staff has determined that the proposed alternative measures for protection against radiological sabotage meet "the same high assurance objective," and "the general performance requirements" of the regulation and that "the overall level of system performance provides protection against radiological sabotage equivalent" to that which would be provided by the regulation.

#### IV.

Accordingly, the Commission has determined that, pursuant to 10 CFR 73.5, an exemption is authorized by law, will not endanger life or property or common defense and security, and is otherwise in the public interest. Therefore, the Commission hereby grants an exemption from those requirements of 10 CFR 73.55(d)(5) relating to the returning of picture badges upon exit from the protected area such that individuals not employed by the licensee, i.e., contractors, who are authorized unescorted access into the protected area, may take their picture badges offsite. This exemption is

granted on the condition that the licensee implements a process for testing the proposed system and revises the security plan for each site as discussed in Section III above.

Pursuant to 10 CFR 51.32, the Commission has determined that the granting of this exemption will have no significant effect on the quality of the human environment (62 FR 40551 ).

This exemption is effective upon issuance.

Dated at Rockville, Maryland, this 31st day of July 1997.

FOR THE NUCLEAR REGULATORY COMMISSION

**Original signed by  
Samuel J. Collins**

Samuel J. Collins, Director  
Office of Nuclear Reactor Regulation

\*SEE PREVIOUS CONCURRENCE

OFC	PDI-2/PM	PDI-2/PM	PDI-2/LA	TSGB*	PDI-2/D	OGC*
NAME	DJaffe:rb	LOlshan	MO'Brien	LCunningham	JSto	MYoung
DATE	7/18/97	7/18/97	7/18/97	06/18/97	07/25/97	07/10/97
OFFICE	DRPE/DD	DRPE/D	ADP	NRR/D		
NAME	JZwolinski	BBoger	RZimmerman	SCollins		
DATE	7/22/97	7/24/97	7/20/97	7/30/97		

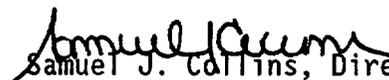
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