

June 14, 1995

Mr. Ted C. Feigenbaum
Senior Vice President
and Chief Nuclear Officer
North Atlantic Energy Service Corporation
Post Office Box 300
Seabrook, NH 03874

SUBJECT: EXEMPTION FROM CERTAIN REQUIREMENTS OF 10 CFR 73.55: REQUIREMENTS FOR PHYSICAL PROTECTION OF LICENSED ACTIVITIES IN NUCLEAR POWER PLANT REACTORS AGAINST RADIOLOGICAL SABOTAGE - SEABROOK STATION, UNIT NO. 1 (TAC NO. M90560)

Dear Mr. Feigenbaum:

By letter dated October 17, 1994, North Atlantic Energy Service Corporation (North Atlantic) requested an exemption from the requirement of 10 CFR 73.55(d)(5) relating to issuance, storage, and retrieval of numbered picture badges for certain individuals who have been granted unescorted access to the protected area of a facility. North Atlantic supplemented this exemption request with additional information submitted February 13, 1995, April 26, 1995, and May 12, 1995. Specifically, the requested exemption would permit North Atlantic to allow individuals with unescorted access, but who are not employees of North Atlantic, to retain possession of their picture badges when leaving the protected area.

We have reviewed your request and the supplemental supporting information. Based on our review and as discussed in the enclosed Exemption, we have concluded that the request is justified, and an exemption is granted to authorize North Atlantic to permit nonemployees of North Atlantic who have unescorted access to the Seabrook protected area to retain possession of their picture badges when leaving the protected area.

We find that granting the Exemption from certain requirements of 10 CFR 73.55 is authorized by law, will not present an undue risk to public health and safety, is consistent with the common defense and security, and meets the special circumstances described in 10 CFR 73.5.

A copy of the Exemption is enclosed. The Exemption has been forwarded to the Office of the Federal Register for publication.

Sincerely,
Original signed by:
Albert W. De Agazio, Sr. Project Manager Project
Directorate I-4
Division of Reactor Projects - I/II
Office of Nuclear Reactor Regulation

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Docket No. 50-443
Serial No. SEA-95-012
Enclosure: Exemption
cc w/encls: See next page

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OFFICE	LA:PDI-3	PM:PDI-3	BC:TSGB	CD:PDI-3	OGC	D:DRPE
NAME	SNorris	ADeAgazio.bf	LCunningham	PMcKee	WDean	SVarga
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UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

June 14, 1995

Mr. Ted C. Feigenbaum
Senior Vice President
and Chief Nuclear Officer
North Atlantic Energy Service Corporation
Post Office Box 300
Seabrook, NH 03874

SUBJECT: EXEMPTION FROM CERTAIN REQUIREMENTS OF 10 CFR 73.55: REQUIREMENTS FOR PHYSICAL PROTECTION OF LICENSED ACTIVITIES IN NUCLEAR POWER PLANT REACTORS AGAINST RADIOLOGICAL SABOTAGE - SEABROOK STATION, UNIT NO. 1 (TAC NO. M90560)

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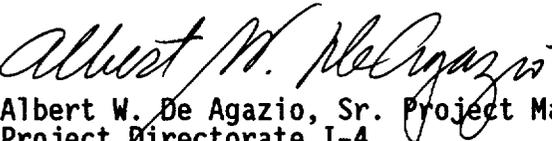
By letter dated October 17, 1994, North Atlantic Energy Service Corporation (North Atlantic) requested an exemption from the requirement of 10 CFR 73.55(d)(5) relating to issuance, storage, and retrieval of numbered picture badges for certain individuals who have been granted unescorted access to the protected area of a facility. North Atlantic supplemented this exemption request with additional information submitted February 13, 1995, April 26, 1995, and May 12, 1995. Specifically, the requested exemption would permit North Atlantic to allow individuals with unescorted access, but who are not employees of North Atlantic, to retain possession of their picture badges when leaving the protected area.

We have reviewed your request and the supplemental supporting information. Based on our review and as discussed in the enclosed Exemption, we have concluded that the request is justified, and an exemption is granted to authorize North Atlantic to permit nonemployees of North Atlantic who have unescorted access to the Seabrook protected area to retain possession of their picture badges when leaving the protected area.

We find that granting the Exemption from certain requirements of 10 CFR 73.55 is authorized by law, will not present an undue risk to public health and safety, is consistent with the common defense and security, and meets the special circumstances described in 10 CFR 73.5.

A copy of the Exemption is enclosed. The Exemption has been forwarded to the Office of the Federal Register for publication.

Sincerely,


Albert W. De Agazio, Sr. Project Manager
Project Directorate I-4
Division of Reactor Projects - I/II
Office of Nuclear Reactor Regulation

Docket No. 50-443
Serial No. SEA-95-012

Enclosure: Exemption

cc w/encls: See next page

Mr. Ted C. Feigenbaum
North Atlantic Energy Service Corporation

Seabrook Station, Unit No. 1

cc:

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UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

In the Matter of)	
)	
NORTH ATLANTIC ENERGY SERVICE CORPORATION)	Docket No. 50-443 (License No. NPF-86)
)	
(Seabrook Station, Unit No. 1))	

EXEMPTION

I.

North Atlantic Energy Service Corporation (North Atlantic or the licensee) is the holder of Facility Operating License No. NPF-86, which authorizes operation of Seabrook Station, Unit No. 1 (the facility or Seabrook), at a steady-state reactor power level not in excess of 3411 megawatts thermal. The facility is a pressurized water reactor located at the licensee's site in Rockingham County, New Hampshire. The license provides among other things, that it is subject to all rules, regulations, and Orders of the U.S. Nuclear Regulatory Commission (the Commission or NRC) now or hereafter in effect.

II.

Part 73 of Title 10 of the *Code of Federal Regulations* prescribes the requirements for the physical protection of plants and materials. Paragraph 10 CFR 73.55(a), *Requirements for physical protection of licensed activities in nuclear power reactors against radiological sabotage*, states, in part, "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."

Paragraph 10 CFR 73.55(d)(1), *Access Requirement*, specifies that "The licensee shall control all points of personnel and vehicle access into a protected area." Paragraph 10 CFR 73.55(d)(5) requires that "A numbered picture badge identification system shall be used for all individuals who are authorized access to protected areas without escort." Paragraph 73.55(d)(5) allows an individual not employed by the licensee to be authorized access to protected areas without escort provided, among other requirements, the individual receives a picture badge upon entrance into the protected area which must be returned upon exit from the protected area.

North Atlantic plans to implement a biometric 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 retain their badge when leaving the protected area.

An exemption from a requirement of 10 CFR 73.55(d)(5) is required to allow North Atlantic to permit individuals who have unescorted access but who are not employees of North Atlantic to retain their badges instead of returning them when leaving the protected area. By letter dated October 17, 1994, North Atlantic requested an exemption from a requirement of 10 CFR 73.55(d)(5) for this purpose. Supplemental information was submitted by North Atlantic by letters dated February 13, 1995, April 26, 1995, and May 12, 1995.

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 (1) authorized by law and will not endanger life or property or the common defense and security, and (2) are otherwise in the public interest.

Pursuant to 10 CFR 73.55, the Commission may authorize a licensee to provide alternative measures for protection against radiological sabotage provided the licensee demonstrates that the alternative measures have the same high assurance objective and that the overall level of protection of system performance provides equivalent protection against radiological sabotage as would otherwise be provided and meets the general performance requirements of the regulation.

Currently, unescorted access into the protected area of Seabrook is controlled through the use of a numbered picture badge and a separate keycard attached to the badge. The security personnel at the entrance to the protected area use the photograph on the badge to confirm visually the identity of the individual requesting access. The individual is then given the badge and keycard to allow access. The badge and keycard are returned for storage when the individual leaves the protected area. The same procedure is used for issuing and retrieving badges and keycards for both North Atlantic employees and individuals who are not North Atlantic employees who have been granted unescorted access. Thus, the requirement of 10 CFR 73.55(d)(5) that individuals not employed by the licensee are not allowed to take badges from the protected area is met in that no individual is allowed to take a badge or keycard from the protected area.

Under the biometric access control system, the physical characteristics of the hand (hand geometry) of each individual who is authorized for unescorted entry into the Seabrook protected area will be registered with the individual's badge number and keycard number in the access control computer. Access is controlled by placing the individual's keycard into the card reader causing the access control computer to retrieve the hand geometry template registered with the keycard. Next, the hand of the individual requesting access is placed on a measuring surface; the computer then compares the measured hand geometry to the hand geometry template registered with the keycard. If the characteristics of the measured hand geometry match the template stored in the computer, access is granted. If the characteristics do not match, access is denied. This provides a nontransferable means of identifying that the individual possessing the keycard is the individual who was granted unescorted access. It also provides a positive means of assuring that a lost or stolen badge and/or keycard could not be used to gain access, thus eliminating the need to issue and retrieve the badges and keycards while maintaining the same high level of assurance that access is granted to only authorized individuals. All other access processes, including search function capability, would remain the same. The system will not be used for persons requiring escorted access. The access process will continue to be under the observation of security personnel located within a hardened cubicle who have final control over the release of the station entrance turnstiles. A numbered picture badge visual identification system will continue to be used for all individuals who are authorized unescorted access to the protected area. Badges will continue to be displayed by all individuals while inside the protected area.

North Atlantic will use hand geometry equipment which will meet the detection probability of 90 percent with a 95 percent confidence level. Testing evaluated by Sandia National Laboratory (Sandia Laboratory report, "A Performance Evaluation of Biometric Identification Devices," SAND91-0276 UC-906 Unlimited Release, Printed June 1991), demonstrated that the proposed hand geometry system is capable of meeting this detection probability and confidence level. Based upon the results reported in the Sandia report and on North Atlantic's experience with the current photo-identification system, North Atlantic asserts that the biometric access control system will increase reliability above that of the current system. North Atlantic will implement a testing program to ensure that the biometric access control system will maintain the expected level of system performance. The Physical Security Plans for the site will be revised to include implementation and testing of the biometric access control system and to allow North Atlantic employees and other individuals authorized unescorted access to retain their badges and keycards when leaving the protected area.

IV.

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 have the same high assurance objective and meets 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.

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 North Atlantic Energy Service Corporation an exemption from the requirement of 10 CFR 73.55(d)(5) relating to the returning of picture badges upon exit from the protected area such that individuals who are authorized unescorted access into the protected area but who are not employed by North Atlantic, can take their badges from the protected area.

Pursuant to 10 CFR 51.32, the Commission has determined that the granting of this exemption will not result in any significant adverse environmental impact (60 FR 30118).

This exemption is effective upon issuance.

FOR THE NUCLEAR REGULATORY COMMISSION

Original signed by:

Steven A. Varga, Director
 Division of Reactor Projects - I/II
 Office of Nuclear Reactor Regulation

Dated at Rockville, Maryland
 this 14th day of June 1995 .

need to hold pending publication of EA.

DOCUMENT NAME: G:\DEAGAZIO\90560EXM

OFFICE	LA:PDI-3	PM:PDI-3	BC:TSGR	D:PDI-3	OGC	D:BRPE
NAME	SNorris	ADeAgazio:bf	LCunnamingham	PMcKee	UPW	SVarga
DATE	05/30/95	05/20/95	06/1/95	05/16/95	05/10/95	05/17/95

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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 North Atlantic Energy Service Corporation an exemption from the requirement of 10 CFR 73.55(d)(5) relating to the returning of picture badges upon exit from the protected area such that individuals who are authorized unescorted access into the protected area but who are not employed by North Atlantic, can take their badges from the protected area.

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