Mr. W. S. Orser Executive Vice President Nuclear Generation Carolina Power & Light Company Post Office Box 1551 Raleigh, North Carolina 27602

SUBJECT: ENVIRONMENTAL ASSESSMENT AND FINDING OF NO SIGNIFICANT IMPACT

REGARDING AN EXEMPTION FROM REQUIREMENTS OF 10 CFR PART 73 -

BRUNSWICK STEAM ELECTRIC PLANT, UNITS 1 AND 2; H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2; AND SHEARON HARRIS NUCLEAR POWER PLANT,

UNIT 1 (TAC NOS. M90063, M90069, M90070, M90071)

Dear Mr. Orser:

Enclosed is a copy of the Environmental Assessment and Finding of No Significant Impact for your information. This assessment relates to your letter dated July 29, 1994, as supplemented December 5, 1994, requesting an exemption from certain requirements of in 10 CFR 73.55(d)(5). The request relates to the issuance, storage, and retrieval of picture badges for contractors who have been granted unescorted access to the protected areas of the Brunswick Steam Electric Plant, Units 1 and 2; H. B. Robinson Steam Electric Plant, Unit No. 2; and the Shearon Harris Nuclear Power Plant, Unit 1. The proposed exemption would allow implementation of a hand geometry biometric system to control site access into the protected areas of the three plants so that photograph identification badges can be taken offsite.

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

Sincerely,

Original signed by:

Brenda L. Mozafari, Project Manager Project Directorate II-1 Division of Reactor Projects - I/II Office of Nuclear Reactor Regulation

Docket Nos. 50-261

50-325 and 50-324

50-400

Enclosure: Environmental Assessment

cc w/enclosure: See next page

<u>Distribution</u>: See next page

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cc: Carolina Power & Light Company

Mr. R. E. Jones General Counsel - Legal Department Carolina Power & Light Company Post Office Box 1551 Raleigh, North Carolina 27602

Karen E. Long Assistant Attorney General State of North Carolina Post Office Box 629 Raleigh, North Carolina 27602

U. S. Nuclear Regulatory Commission Resident Inspector's Office H. B. Robinson Steam Electric Plant 2112 Old Camden Road Hartsville, South Carolina 29550

Regional Administrator, Region II U. S. Nuclear Regulatory Commission 101 Marietta Street, N.W., Ste. 2900 Atlanta, Georgia 30323

Mr. Dale E. Young
Plant General Manager
Carolina Power & Light Company
H. B. Robinson Steam Electric Plant
3581 West Entrance Road
Hartsville, South Carolina 29550

Mr. Dayne H. Brown, Director
Department of Environmental,
Health and Natural Resources
Division of Radiation Protection
Post Office Box 27687
Raleigh, North Carolina 27611-7687

Mr. Robert P. Gruber
Executive Director
Public Staff - NCPUC
Post Office Box 29520
Raleigh, North Carolina 27626-0520

Resident Inspector
U. S. Nuclear Regulatory Commission
Brunswick Steam Electric Plant
Star Route 1, Post Office Box 208
Southport, North Carolina 28461

Mr. C. S. Hinnant Vice President Carolina Power & Light Company H. B. Robinson Steam Electric Plant Post Office Box 790 Hartsville, South Carolina 29551

Mr. Max Batavia, Chief Bureau of Radiological Health South Carolina Department of Health and Environmental Control 2600 Bull Street Columbia, South Carolina 29201

Mr. H. W. Habermeyer, Jr. Vice President Nuclear Services Department Carolina Power & Light Company Post Office Box 1551 - MCode OHS7 Raleigh, North Carolina 27602

Resident Inspector/Harris NPS Nuclear Regulatory Commission 5421 Shearon Harris Road New Hill, North Carolina 27562-9998

Mr. W. R. Robinson
Vice President - Harris Plant
Carolina Power & Light Company
Shearon Harris Nuclear Power Plant
P. O. Box 165, Mail Code: Zone 1
New Hill, North Carolina 27562

Mr. R. A. Anderson, Vice President Carolina Power & Light Company Brunswick Steam Electric Plant Post Office Box 10429 Southport, North Carolina 28461

Mr. Donald Warren, Chairman Brunswick County Board of Commissioners Post Office Box 249 Bolivia, North Carolina 28422

Mr. J. W. Donahue Plant Manager - Harris Plant Carolina Power & Light Company Shearon Harris Nuclear Power Plant Post Office Box 165, MC: Zone 1 New Hill, North Carolina 27562-0165 Mr. William Levis
Plant Manager - Unit 1
Carolina Power & Light Company
Brunswick Steam Electric Plant
Post Office Box 10429
Southport, North Carolina 28461

Mr. Clay C. Warren
Plant Manager - Unit 2
Carolina Power & Light Company
Brunswick Steam Electric Plant
Post Office Box 10429
Southport, North Carolina 28461

Mr. Mark S. Calvert Associate General Counsel Carolina Power & Light Company Post Office Box 1551 Raleigh, North Carolina 27602

Public Service Commission State of South Carolina Post Office Drawer 11649 Columbia, South Carolina 29211

Mr. Norman R. Holden, Mayor City of Southport 201 E Moore Street Southport, North Carolina 28461

Mr. Dan E. Summers
Emergency Management Coordinator
New Hanover County Department of
Emergency Management
Post Office Box 1525
Wilmington, North Carolina 28402

Hartsville Memorial Library 147 W. College Hartsville, SC 29550

Mr. W. S. Orser Executive Vice President Nuclear Generation Carolina Power & Light Company Post Office Box 1551 Raleigh, North Carolina 27602

Chairman of the North Carolina Utilities Commission Post Office Box 29510 Raleigh, North Carolina 27626-0510 Mr. R. M. Krich
Manager - Regulatory Affairs
Carolina Power & Light Company
H. B. Robinson Steam Electric Plant,
Unit No. 2
Post Office Box 790
Hartsville, South Carolina 29551

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cc: Plant Service List EPA Regional Environmental Review Coordinator (5)

UNITED STATES NUCLEAR REGULATORY COMMISSION

CAROLINA POWER & LIGHT COMPANY

DOCKET NOS. 50-325, 50-324, 50-400 AND 50-261

BRUNSWICK STEAM ELECTRIC PLANT, UNITS 1 AND 2

H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2

SHEARON HARRIS NUCLEAR PLANT, UNIT NO. 1

ENVIRONMENTAL ASSESSMENT AND FINDING OF

NO 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. DPR-71, DPR-62, DPR-23, NPF-63, issued to the Carolina Power & Light Company (the licensee) for the operation of the Brunswick Steam Electric Plant, Units 1 and 2 (Brunswick), H. B. Robinson Steam Electric Plant, Unit No. 2 (Robinson), and Shearon Harris Nuclear Power Plant, Unit 1 (Harris).

The facilities consist of two boiling water reactors at the Brunswick site in Brunswick County, North Carolina; a pressurized water reactor at the Robinson site in Darlington County, South Carolina; and a pressurized water reactor in Wake County and Chatham County, North Carolina.

### ENVIRONMENTAL ASSESSMENT

### Identification of the Proposed Action:

The exemption would allow implementation of a hand geometry biometric system of site access control so that photograph identification badges can be taken offsite. The proposed action is in accordance with the licensee's application for exemption dated July 29, 1994, as supplemented December 5, 1994.

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# The Need for the Proposed Action:

The proposed action would give an exemption from certain requirements of 10 CFR 73.55, "Requirements for physical protection of licensed activities in nuclear power reactors against radiological sabotage."

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

Paragraph 1 of 10 CFR 73.55(d), "Access Requirements," specifies that the "licensee shall control all points of personnel and vehicle access into a protected area." Title 10 of the <u>Code of Federal Regulations</u>, paragraph 73.55(d)(5), specifies 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) also states that an individual not employed by the licensee (i.e., a contractor) 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 Brunswick and Robinson units is controlled through the use of a photograph on a combination badge and keycard (hereafter, these are referred to as the badge). At the Harris unit unescorted access into protected areas is controlled through the use of a photograph on a badge and a separate keycard. 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), contract 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.

Under the proposed system, individuals who are 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 the licensee's 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 the protected area. 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 the Brunswick, Robinson, and Harris 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 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.

With regard to potential nonradiological impacts, the proposed change does not affect nonradiological plant effluents and has no other environmental impact. Therefore, the Commission concludes that there are no significant nonradiological environmental impacts associated with the proposed action.

# Environmental Impacts of the Proposed Action:

The Commission has completed its evaluation of the proposed action and concludes that this proposed action would result in no significant radiological environmental impact.

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 does involve 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 have no effect on the environmental impact, would not enhance the protection of the environment, and would result in an unjustified loss of cost savings to the licensee.

#### Alternative Use of Resources:

This action does not involve the use of any resources not previously considered in the Final Environmental Statements for the Brunswick, Robinson, and Harris units.

### Agencies and Persons Consulted:

The NRC staff consulted with the North and South Carolina State officials regarding the environmental impact of the proposed action. The State officials 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 July 29, 1994, as supplemented December 5, 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 rooms for Brunswick Steam Electric Plant, Units 1 and 2, at the University of North Carolina at Wilmington, William Madison Randall Library, 601 S. College Road, Wilmington, North Carolina 28403-3297; for the H. B. Robinson Steam Electric Plant, Unit No. 2, at Hartsville Memorial Library, 147 West College, Hartsville, South Carolina 29550; and for the Shearon Harris Nuclear Power Plant, Unit 1, at the Cameron Village Regional Library, 1930 Clark Avenue, Raleigh, North Carolina.

Dated at Rockville, Maryland, this 14thday of December 1994.

FOR THE NUCLEAR REGULATORY COMMISSION

Michael L. Boyde, Acting Director

Project Directorate II-1

Division of Reactor Projects - I/II Office of Nuclear Reactor Regulation