

Mr. E. E. Fitzpatrick Vice President  
 Indiana Michigan Power Company  
 c/o American Electric Power Service Corporation  
 1 Riverside Plaza  
 Columbus, OH 43215

December 15 1995

SUBJECT: DONALD C. COOK NUCLEAR PLANT, UNIT NOS. 1 AND 2 - EXEMPTION FROM CERTAIN REQUIREMENTS OF 10 CFR 73.55, REQUIREMENTS FOR PHYSICAL PROTECTION OF LICENSED ACTIVITIES IN NUCLEAR POWER REACTORS AGAINST RADIOLOGICAL SABOTAGE (TAC NOS. M93615 AND M93616)

Dear Mr. Fitzpatrick:

The Commission has issued the enclosed Exemption in response to your request dated August 17, 1995, to utilize an alternative access control system. This Exemption is from certain requirements of 10 CFR 73.55 relating to the issuance, storage, and retrieval of picture badges for individuals who have been granted unescorted access into the protected areas of the Donald C. Cook site.

The alternative system will require individuals with unescorted access to protected areas to not only have their picture badges to gain access, but also have their hand geometry confirmed. Upon implementation of the hand geometry biometric system at the entrance/exit to the protected area, the Exemption will allow all individuals not employed by the licensee (e.g., contractors), who have unescorted access, to keep their picture badges in their possession when departing the Donald C. Cook site.

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

Sincerely,

Original signed by

John B. Hickman, Project Manager  
 Project Directorate III-1  
 Division of Reactor Projects - III/IV  
 Office of Nuclear Reactor Regulation

Docket Nos. 50-315  
 and 50-316  
 Enclosure: Exemption  
 cc w/encl: See next page

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Indiana Michigan Power Company

Donald C. Cook Nuclear Plant

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EXEMPTION TO FACILITY OPERATING LICENSE NOS. DPR-58 AND DPR-74  
D. C. COOK PLANT, UNITS 1 AND 2

DATED: December 15, 1995

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In 10 CFR 73.55(d), "Access Requirements," paragraph (1), it specifies that "The licensee shall control all points of personnel and vehicle access into a protected area." Also, 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." It further states that individuals not employed by the licensee (e.g., contractors) may be authorized access to protected areas without escort provided that the individual, "receives a picture badge upon entrance into a protected area which must be returned upon exit from the protected area...."

The licensee proposes to implement an alternative unescorted access system which would eliminate the need to issue and retrieve picture badges at the entrance/exit location to the protected area and would allow all individuals, including contractors, to keep their picture badges in their possession when departing the Donald C. Cook site.

### 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 from the requirements of the regulations 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. According 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, that the proposed measures meet 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.

Currently, unescorted access into the protected area of Donald D. Cook, Units 1 and 2, for both employee and contractor personnel is controlled through the use of picture badges. Positive identification of personnel which are authorized and request access into the protected area is established by security personnel making a visual comparison of the individual requesting access and that individual's picture badge. In accordance with 10 CFR 73.55(d)(5), contractor personnel are not allowed to take their picture badges off site. In addition, in accordance with the plant's physical security plan, the licensee's employees are also not allowed to take their picture badges off site.

The proposed system will require that all individuals with authorized unescorted access have the physical characteristics of their hand (hand geometry) registered with their picture badge number in a computerized access control system. Therefore, all authorized individuals must not only have their picture badge to gain access to the protected area, but must also have their hand geometry confirmed. All individuals, including contractors, who have authorized unescorted access into the protected area will be allowed to keep their picture badges in their possession when departing the Donald C. Cook site.

All other access processes, including search function capability and access revocation, will remain the same. A security officer responsible for access control will continue to be positioned within a bullet-resistant structure. 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.

It should also be noted that the proposed system is only for individuals with authorized unescorted access and will not be used for those individuals requiring escorts.

Sandia National Laboratories conducted testing which demonstrated that the hand geometry equipment possesses strong performance characteristics. Details of the testing performed are in the Sandia report, "A Performance Evaluation of Biometric Identification Devices," SAND91--0276 UC--906 Unlimited Release, June 1991. Based on the Sandia report and the licensee's experience using the current photo picture identification system, the false acceptance rate for the proposed hand geometry system would be at least equivalent to that of the current system. To assure that the proposed system will continue to meet the general performance requirements of 10 CFR 73.55(d)(5), the licensee will implement a process for testing the system. The site security plans will also be revised to allow implementation of the hand geometry system and to allow employees and contractors with unescorted access to keep their picture badges in their possession when leaving the Donald C. Cook site.

#### IV.

For the foregoing reasons, 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 10 CFR 73.55. In addition, the staff has determined that the overall level of the proposed system's performance will provide protection against radiological sabotage equivalent to that which is provided by the current system in accordance with 10 CFR 73.55.

Accordingly, the Commission has determined that, pursuant to 10 CFR 73.5, this exemption is authorized by law, will not endanger life or property or the common defense and security, and is otherwise in the public interest.

Therefore, the Commission hereby grants the following exemption:

The requirement of 10 CFR 73.55(d)(5) that individuals who have been granted unescorted access and are not employed by the licensee are to return their picture badges upon exit from the protected area is no longer necessary. Thus, these individuals may keep their picture badges in their possession upon leaving the Donald C. Cook site.

Pursuant to 10 CFR 51.32, the Commission has determined that the granting of this exemption will not have a significant effect on the quality of the human environment (60 FR 64183).

FOR THE NUCLEAR REGULATORY COMMISSION

Original signed by

Jack W. Roe, Director  
Division of Reactor Projects - III/IV  
Office of Nuclear Reactor Regulation

Dated at Rockville, Maryland,  
this 15th day of December 1995

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