

December 1, 1995

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

SUBJECT: ENVIRONMENTAL ASSESSMENT AND FINDING OF NO SIGNIFICANT IMPACT -
EXEMPTION FROM CERTAIN REQUIREMENTS OF 10 CFR 73.55, REQUIREMENTS
FOR PHYSICAL PROTECTION OF LICENSED ACTIVITIES IN NUCLEAR POWER
PLANT REACTORS AGAINST RADIOLOGICAL SABOTAGE, DONALD C. COOK NUCLEAR
PLANT, UNIT NOS. 1 AND 2 (TAC NOS. M93615 AND M93616)

Dear Mr. Fitzpatrick:

Enclosed is a copy of an "Environmental Assessment and Finding of No
Significant Impact" for the Donald C. Cook Nuclear Plant, Unit Nos. 1 and 2.
The assessment relates to your application for exemption dated August 17,
1995, 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 would
enable you to implement a hand geometry biometric system for site access
control at D.C. Cook.

The assessment 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: Environmental Assessment

cc w/encl: See next page

DISTRIBUTION:

Docket File JRoe WKropp, RIII
PUBLIC OGC EJordan
PDIII-1 R/F ACRS

DOCUMENT NAME: G:\WPDOCS\DCCOOK\C093615.ENV

To receive a copy of this document, indicate in the box: "C" = Copy without attachment/enclosure "E" = Copy with attachment/enclosure "N" = No copy

OFFICE	LA:PD31	E	PM:PD31	E	OGC	(A)PD:PD31	N
NAME	CJamerson		JHickman:db			BHolian	
DATE	11/17/95		11/20/95		11-27-95		12/1/95

OFFICIAL RECORD COPY

9512130053 951201
PDR ADOCK 05000315
P PDR

DFR

Mr. E. E. Fitzpatrick
Indiana Michigan Power Company

Donald C. Cook Nuclear Plant

cc:

Regional Administrator, Region III
U.S. Nuclear Regulatory Commission
801 Warrenville Road
Lisle, Illinois 60532-4351

Mr. S. Brewer
American Electric Power Service
Corporation
1 Riverside Plaza
Columbus, Ohio 43215

Attorney General
Department of Attorney General
525 West Ottawa Street
Lansing, Michigan 48913

Bill Franz (5)
Environmental Review Coordinator
77 West Jackson Boulevard
Environmental Protection Agency
Chicago, IL 60604-3590

Township Supervisor
Lake Township Hall
P.O. Box 818
Bridgman, Michigan 49106

Al Blind, Plant Manager
Donald C. Cook Nuclear Plant
1 Cook Place
Bridgman, Michigan 49106

U.S. Nuclear Regulatory Commission
Resident Inspector's Office
7700 Red Arrow Highway
Stevensville, Michigan 49127

Gerald Charnoff, Esquire
Shaw, Pittman, Potts and Trowbridge
2300 N Street, N. W.
Washington, DC 20037

Mayor, City of Bridgman
Post Office Box 366
Bridgman, Michigan 49106

Special Assistant to the Governor
Room 1 - State Capitol
Lansing, Michigan 48909

Nuclear Facilities and Environmental
Monitoring Section Office
Division of Radiological Health
Department of Public Health
3423 N. Logan Street
P. O. Box 30195
Lansing, Michigan 48909

UNITED STATES NUCLEAR REGULATORY COMMISSION
INDIANA MICHIGAN POWER COMPANY
DOCKET NOS. 50-315 AND 50-316
DONALD C. COOK NUCLEAR PLANT, UNIT NOS. 1 AND 2
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 10 CFR 73.55 for Facility Operating License Nos. DPR-58 and DPR-74, issued to Indiana Michigan Power Company, (the licensee), for operation of the D. C. Cook Nuclear Plant, Units 1 and 2, located in Berrien County, Michigan.

ENVIRONMENTAL ASSESSMENT

Identification of the Proposed Action:

The proposed action would exempt the licensee from certain requirements of 10 CFR 73.55, "Requirements for physical protection of licensed activities in nuclear power reactors against radiological sabotage." The proposed action would allow implementation of a hand geometry biometric system of site access control such that photograph identification badges can be taken off site.

This environmental assessment has been prepared to address potential environmental issues related to the licensee's application of August 17, 1995.

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.

Paragraph (1) of 10 CFR 73.55(d), "Access Requirements," 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 of 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 the protected areas of the Cook Nuclear Plant 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 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 retrievable at the entrance/exit location. In accordance with 10 CFR 73.55(d)(5), contractor individuals are not allowed to take badges off site. In accordance with the plant's physical security plans, neither licensee employees nor contractors are allowed to take badges off site.

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

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

Environmental Impacts of the Proposed Action:

The Commission has completed its evaluation of the proposed action and concludes that the proposed exemption would not increase the probability or consequences of accidents previously analyzed and the proposed exemption would not affect facility radiation levels or facility radiological effluents. 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 badges 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 stated that the false acceptance rate of the proposed hand geometry system is comparable to that of the current system. The licensee stated that the use of the badges with the hand geometry system would increase the overall level of 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 off site, 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 Plan for D.C. Cook 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 off 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. The proposed system is only for individuals with authorized unescorted access and will not be used for individuals requiring escorts.

The change will not increase the probability or consequences of accidents, no changes are being made in the types or amounts of any effluents that may be released off site, 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. As an alternative to the proposed action, the NRC staff considered denial of the proposed action. Denial of the application would result in no change in 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 for D.C. Cook, Units 1 and 2, dated August 1973.

Agencies and Persons Consulted:

In accordance with its stated policy, on November 20, 1995, the NRC staff consulted with the Michigan State official, Dennis Hahn, of the Michigan Department of Public Health, Nuclear Facilities and Environmental Monitoring, regarding the environmental impact of the proposed action. The State official had no comments.

FINDING OF NO SIGNIFICANT IMPACT

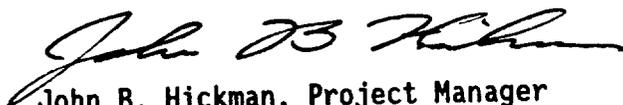
Based upon the environmental assessment, the Commission concludes that the proposed action will not have a significant effect on the quality of the human environment. Accordingly, the Commission has determined not to prepare an environmental impact statement for the proposed action.

For further details with respect to the proposed action, see the licensee's letter dated August 17, 1995, which is available for public inspection at the Commission's Public Document Room, The Gelman Building, 2120

L Street, NW., Washington, DC, and at the local public document room located at the Maud Preston Palenske Memorial Library, 500 Market Street, St. Joseph, Michigan 49085.

Dated at Rockville, Maryland, this 1st day of December 1995.

FOR THE NUCLEAR REGULATORY COMMISSION



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