

June 14, 1995

Mr. William T. Cottle
Group Vice-President, Nuclear
Houston Lighting & Power Company
South Texas Project Electric
Generating Station
P. O. Box 289
Wadsworth, TX 77483

SUBJECT: EXEMPTION FROM CERTAIN REQUIREMENTS OF 10 CFR 73.55, REQUIREMENTS FOR PHYSICAL PROTECTION OF LICENSED ACTIVITIES IN NUCLEAR POWER REACTORS AGAINST RADIOLOGICAL SABOTAGE, SOUTH TEXAS PROJECT UNITS 1 AND 2 (STP)(TAC NOS. M92010 AND 92011)

Dear Mr. Cottle:

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 March 27, 1995, to implement a hand geometry biometric system for site access control at STP to allow photograph identification badges to be taken offsite.

The Commission has granted this Exemption pursuant to 10 CFR 73.5. A copy of the Exemption is being forwarded to the Office of the Federal Register for publication.

Sincerely,

ORIGINAL SIGNED BY:
Thomas W. Alexion, Project Manager
Project Directorate IV-1
Division of Reactor Projects III/IV
Office of Nuclear Reactor Regulation

Docket Nos. 50-498 and 50-499

Enclosure: Exemption

cc w/encl: See next page

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Docket File	T. Alexion
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E. Adensam	A. Beach, RIV
P. Noonan	J. Mitchell
W. Beckner	

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OFFICE	PDIV-1/LA	PDIV-1/PM	PSGB	OGC	PDIV-1/D	DRPW/ADD
NAME	PNoonan	TAlexion	Cunningham	OPW	WBeckner	EAdensam
DATE	5/19/95	5/19/95	5/19/95	5/12/95	6/19/95	6/14/95
COPY	(YES/NO)	(YES/NO)	YES/NO	YES/NO	YES/NO	YES/NO

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system, the Commission hereby grants Houston Lighting and Power Company an exemption from those requirements of 10 CFR 73.55(d)(5) relating to their turning 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, can take their badges offsite.

Pursuant to 10 CFR 51.32, the Commission has determined that the granting of this exemption will have no significant impact on the quality of the human environment (60 FR 30117). This exemption is effective upon issuance.

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

FOR THE NUCLEAR REGULATORY COMMISSION

ORIGINAL SIGNED BY:

John N. Hannon, Acting Deputy Director
Division of Reactor Projects III/IV
Office of Nuclear Reactor Regulation

*See previous concurrence

OFFICE	PDIV-1/LA	PDIV-1/RM	PSGB*	OGC*	PDIV-1/D*	DRPW/KA/D
NAME	RNoonan	TAlexander	LCunningham	CWoodhead	WBeckner	EAdensam
DATE	6/14/95	6/14/95	5/22/95	5/23/95	6/9/95	6/14/95
COPY	YES/NO	YES/NO	YES/NO	YES/NO	YES/NO	YES/NO

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

June 14, 1995

Mr. William T. Cottle
Group Vice-President, Nuclear
Houston Lighting & Power Company
South Texas Project Electric
Generating Station
P. O. Box 289
Wadsworth, TX 77483

SUBJECT: EXEMPTION FROM CERTAIN REQUIREMENTS OF 10 CFR 73.55, REQUIREMENTS FOR PHYSICAL PROTECTION OF LICENSED ACTIVITIES IN NUCLEAR POWER REACTORS AGAINST RADIOLOGICAL SABOTAGE, SOUTH TEXAS PROJECT UNITS 1 AND 2 (STP)(TAC NOS. M92010 AND M92011)

Dear Mr. Cottle:

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 March 27, 1995, to implement a hand geometry biometric system for site access control at STP to allow photograph identification badges to be taken offsite.

The Commission has granted this Exemption pursuant to 10 CFR 73.5. A copy of the Exemption is being forwarded to the Office of the Federal Register for publication.

Sincerely,

A handwritten signature in cursive script that reads "Thomas W. Alexion".

Thomas W. Alexion, Project Manager
Project Directorate IV-1
Division of Reactor Projects III/IV
Office of Nuclear Reactor Regulation

Docket Nos. 50-498 and 50-499

Enclosure: Exemption

cc w/encl: See next page

Mr. William T. Cottle
Houston Lighting & Power Company

South Texas, Units 1 & 2

cc:

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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."

10 CFR 73.55(d), "Access Requirements," paragraph (1), specifies that "The licensee shall control all points of personnel and vehicle access into a protected area." 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." 10 CFR 73.55(d)(5) 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 March 27, 1995, 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 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.

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 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 STP, unescorted access into protected areas is controlled through the use of a photograph on a combination badge and keycard (hereafter referred to as a badge). 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), contractor 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.

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 in the access control system 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 and thus eliminate the process to issue, retrieve and store badges at the entrance stations to the plant. Badges do not carry any encoded 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 its experience with the current photo-identification system, the licensee concludes that the biometric access control system will provide the same high assurance objective regarding onsite physical protection that is achieved by the current system. The biometric system is now in use at other NRC-licensed nuclear generating facilities. The licensee will implement a process for testing the proposed system to ensure a continued overall level of performance equivalent to that specified in the regulation. The Physical Security Plans for STP 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, once inside the protected area, 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.

IV.

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. In addition, 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.

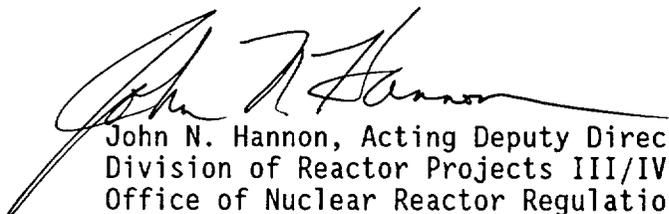
Accordingly, the Commission has determined that, pursuant to 10 CFR 73.5, an exemption is authorized by law, will not endanger life or property or common defense and security, and is otherwise in the public interest. Therefore, as long as the licensee uses the hand geometry access control

system, the Commission hereby grants Houston Lighting and Power Company 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, can take their badges offsite.

Pursuant to 10 CFR 51.32, the Commission has determined that the granting of this exemption will have no significant impact on the quality of the human environment (60 FR 30117). This exemption is effective upon issuance.

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

FOR THE NUCLEAR REGULATORY COMMISSION



John N. Hannon, Acting Deputy Director
Division of Reactor Projects III/IV
Office of Nuclear Reactor Regulation