

August 5, 1994

Docket Nos. STN 50-528, STN 50-529,
and STN 50-530

Mr. William L. Stewart
Executive Vice President, Nuclear
Arizona Public Service Company
P.O. Box 53999
Phoenix, Arizona 85072-3999

Dear Mr. Stewart:

SUBJECT: ENVIRONMENTAL ASSESSMENT - PALO VERDE NUCLEAR GENERATING STATION
(TAC NOS. M89510, M89511, AND M89512)

Enclosed is a copy of the Environmental Assessment and Finding of No Significant Impact related to your application for an exemption dated April 29, 1994. The proposed exemption would allow implementation of a hand geometry biometric system to control site access into the protected area of Palo Verde Nuclear Generating Station, Units 1, 2, and 3, 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:

Linh N. Tran, Project Manager
Project Directorate IV-2
Division of Reactor Projects - III/IV
Office of Nuclear Reactor Regulation

Enclosure:
Environmental Assessment

cc w/enclosure:
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Mr. William L. Stewart
Arizona Public Service Company

Palo Verde

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UNITED STATES NUCLEAR REGULATORY COMMISSION
ARIZONA PUBLIC SERVICE COMPANY
DOCKET NOS. STN 50-528, STN 50-529, AND STN 50-530
PALO VERDE NUCLEAR GENERATING STATION, UNITS 1, 2, AND 3
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. NPF-41, NPF-51, and NPF-74, issued to Arizona Public Service Company, (the licensee), for operation of the Palo Verde Nuclear Generating Station, Units 1, 2, and 3 (Palo Verde), located in Maricopa County, Arizona.

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 dated April 29, 1994, for exemption from certain requirements of 10 CFR 73.55, "Requirements for physical protection of licensed activities in nuclear power reactors against radiological sabotage."

The Need for the Proposed Action:

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

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control all points of personnel and vehicle access into a protected area." Title 10 of the *Code of Federal Regulations*, 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 Palo Verde units is controlled through the use of a photograph on a combination badge and keycard (hereafter, these are referred to as the 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), 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.

Environmental Impacts of the Proposed Action:

The staff has completed its evaluation of the licensee's application. 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 Palo Verde 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. Accordingly, the Commission concludes that this proposed action would result in no significant radiological environmental impact.

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.

Alternatives to the Proposed Action:

As an alternative to the proposed action, the 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 the Palo Verde Nuclear Generating Station, Units 1, 2, and 3.

Agencies and Persons Consulted:

The NRC staff consulted with the Arizona State official 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 April 29, 1994, which is 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 room located at the Phoenix Public Library, 12 East McDowell Road, Phoenix, Arizona 85004.

Dated at Rockville, Maryland, this 5th day of August 1994.

FOR THE NUCLEAR REGULATORY COMMISSION



Steven D. Bloom, Acting Director
Project Directorate IV-2
Division of Reactor Projects - III/IV
Office of Nuclear Reactor Regulation