

July 17, 1995

Mr. J. V. Parrish (Mail Drop 1023)
Vice President Nuclear Operations
3000 George Washington Way
Washington Public Power Supply System
P.O. Box 968
Richland, Washington 99352-0968

SUBJECT: EXEMPTION FROM CERTAIN REQUIREMENTS OF 10 CFR 73.55 FOR THE
WASHINGTON PUBLIC POWER SUPPLY SYSTEM (WPPSS) NUCLEAR PROJECT NO. 2
(WNP-2) (TAC NO. M91807)

Dear Mr. Parrish:

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 at WNP-2. This exemption is related to your application dated March 1, 1995, to implement a hand geometry biometric system for site access control at WNP-2 such that photographic identification badges may be taken offsite.

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

Sincerely,

ORIGINAL SIGNED BY:
James W. Clifford, Senior Project Manager
Project Directorate IV-2
Division of Reactor Projects III/IV
Office of Nuclear Reactor Regulation

Docket No. 50-397

Enclosure:

cc w/enclosure:
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UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

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Sincerely,

A handwritten signature in cursive script that reads "James W. Clifford".

James W. Clifford, Senior Project Manager
Project Directorate IV-2
Division of Reactor Projects III/IV
Office of Nuclear Reactor Regulation

Docket No. 50-397

Enclosure: Exemption

cc w/ encl: See next page

Mr. J. V. Parrish

- 2 -

cc w/encl:

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UNITED STATES OF AMERICANUCLEAR REGULATORY COMMISSION

In the Matter of)	
WASHINGTON PUBLIC POWER SUPPLY SYSTEM)	Docket No. 50-397
(WPPSS Nuclear Project No. 2))	

EXEMPTION

I.

On December 20, 1983, the Commission issued Facility Operating License No. NPF-21 to Washington Public Power Supply System (the licensee) for the WPPSS Nuclear Project No. 2. The license provides, among other things, that the licensee is subject to all rules, regulations, and orders of the Commission now or hereafter in effect.

II.

It is stated in 10 CFR 73.55, "Requirements for physical protection of licensed activities in nuclear power reactors against radiological sabotage," paragraph (a), that "the licensee shall establish and maintain an onsite physical protection system and security organization which will have 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."

It is specified in 10 CFR 73.55(d), "Access Requirements," paragraph (1), that "the licensee shall control all points of personnel and vehicle access into a protected area." Section 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." Section 73.55(d)(5) also states that an individual not employed by the licensee (e.g.,

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 the 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 personnel not employed by the licensee who have unescorted access to take their badges offsite instead of returning them when exiting the site. By letter dated March 1, 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 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.

Currently, unescorted access into the protected area of WNP-2 is controlled through the use of a photograph on a badge with a keycard attached (hereafter, these are referred to as "the badge"). The security officers at the entrance station use the photograph on the badge to visually identify the individual requesting access. The individual is then given the badge to allow access. The badges for both licensee employees and contractor personnel who have been granted unescorted access are issued upon entrance at the access point. Another security officer in the same control area collects the badges upon exit from the protected area. The badges are then placed in a badge rack located at the badge issue station and stored at the entrance until the individual again needs access into the protected area. In accordance with 10 CFR 73.55(d)(5), individuals not employed by the licensee (e.g., contractors) are not allowed to take badges offsite.

Under the proposed system, each individual who is authorized for unescorted entry into the protected area would have the physical characteristics of their hand (hand geometry) registered with their badge number in the access control computer. Access is then initiated by the individual requesting access by placing their badge up to the card reader and their hand on a measuring surface. The computer then compares the hand geometry to that registered for the badge number. If the characteristics of the hand geometry stored in the computer match the badge number, access is granted. If the characteristics of the hand geometry do not match the badge number, access is denied. This provides a non-transferable means of identifying that the individual processing the badge is the individual who was granted unescorted access. This method also provides a positive means of assuring that a stolen or lost badge could not be used to gain access, thus

eliminating the need to issue and retrieve the badges while maintaining the same high level of assurance that access is granted to only authorized individuals. All other access processes, including search function capability, would remain the same. The system will not be used for visitors requiring escorted access. The access process will continue to be under the observation of security personnel located within the hardened cubicle who have final control over the release of the entrance station turnstiles. A numbered badge identification system will continue to be used for all individuals who are authorized access to the protected areas. Badges will continue to be displayed by all individuals while inside the protected area.

The licensee will use hand geometry equipment that will meet the detection probability of 90 percent with a 95 percent confidence level. Testing evaluated by Sandia National Laboratory (Sandia report entitled, "A Performance Evaluation of Biometric Identification Devices," SAND91-0276 UC-906 Unlimited Release, printed June 1991), demonstrated that the proposed hand geometry system is capable of meeting the proposed detection probability and confidence level. Based on the results of the Sandia report and on the licensee's experience with photo-identification processes, the proposed system will have a false acceptance rate less than the current system.

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.

IV.

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 Washington Public Power Supply System an exemption from the requirements of 10 CFR 73.55(d)(5) relating to the returning of picture badges, by individuals not employed by the licensee who are authorized unescorted access to the protected area, upon exit from the protected area, such that these personnel can take their badges offsite.

Pursuant to 10 CFR 51.32, the Commission has determined that the granting of this exemption will not result in any significant adverse environmental impact (60 FR 35965).

This exemption is effective upon issuance.

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 17th day of July 1995

*For previous concurrences see attached ORC

OFC	PDIV-2/LA	TSGB*	PDIV-2/PM*	OGC*	PDIV-2/D
NAME	EPeyton	LCunningham	JClifford	AHodgdon	WBateman
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