

SAFEGUARDS INFORMATION



P.O. Box 14000, Juno Beach, FL 33408-0420

OCT 13 1993

L-93-248
10 CFR 73.5
10 CFR 73.55

Thomas E. Murley
Director, Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Subject: St. Lucie Units 1 and 2
Docket Nos. 50-335 and 50-389
Turkey Point Units 3 and 4
Docket Nos. 50-250 and 50-251
Additional Information - Biometrics Access Control

Dear Dr. Murley:

By letter L-93-178, dated August 18, 1993, Florida Power & Light Company (FPL) requested an exemption from certain requirements of 10 CFR 73.55, "Requirements for physical protection of licensed activities in nuclear power reactors against radiological sabotage." The purpose of this letter is to provide clarifications regarding FPL's request for exemption. These clarifications are a result of discussions held with members of the NRC's staff, and do not alter the intent of FPL's request.

For your convenience, Attachment 1 supersedes in its entirety the Attachment to FPL's Letter L-93-178, dated August 18, 1993. Attachment 2 provides details regarding changes to the St. Lucie and Turkey Point Physical Security Plans.

If you have any questions regarding this information, please contact us.

Very truly yours

W. H. Bohlke by D. N. Paduano
W. H. Bohlke
Vice President
Nuclear Engineering and Licensing

Attachments

WHB/msd

cc: Document Control Desk, USNRC
Stewart D. Ebnetter, Regional Administrator, Region II, USNRC
Senior Resident Inspector, USNRC, Turkey Point Plant
Senior Resident Inspector, USNRC, St. Lucie Plant

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ATTACHMENT 1

INTRODUCTION

Florida Power & Light Company (FPL) requests, in accordance with the provisions of Title 10 CFR Part 73.5, "Specific exemptions," an exemption from certain requirements of 10 CFR 73.55, "Requirements for physical protection of licensed activities in nuclear power reactors against radiological sabotage" for St. Lucie Units 1 and 2 and Turkey Point Units 3 and 4. Specifically, FPL requests an exemption from part of 10 CFR 73.55 (d) (5). This part states that, "An individual not employed by the licensee but who requires frequent and extended access to protected and vital areas may be authorized access to such areas without escort provided that he receives a picture badge upon entrance into the protected area which must be returned upon exit from the protected area..."

Title 10 CFR 73.55 states 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." Title 10 CFR 73.55 specifies that the Commission may authorize an applicant or licensee to provide measures for protection against radiological sabotage other than those required by 10 CFR 73.55. This can be accomplished if the applicant or licensee demonstrates that the measures have the same high assurance objective as specified in the regulation, and that the overall level of system performance provides protection against radiological sabotage equivalent to the regulation and meets the general performance requirements of the regulation.

This exemption is requested to allow the use of a hand geometry biometric system to control unescorted access into the protected areas of the St. Lucie and Turkey Point nuclear plants, in conjunction with taking the photograph identification badges offsite.

CURRENT SITUATION

Currently, unescorted access into St. Lucie and Turkey Point is controlled through the use of a photograph on a badge/keycard (during the remaining discussion, the term "badge" will be used to mean the combination of a picture badge and keycard). The security officers at each entrance station use the photograph on the badge to identify the individual requesting access. Under the current system, badges are not taken offsite and are issued, stored and retrieved at each entrance/exit location.

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SAFEGUARDS INFORMATION

SAFEGUARDS INFORMATION

L-93-248
Attachment 1
Page 2 of 5

PROPOSED SYSTEM

Under the proposed system, each individual who is authorized unescorted access will have the physical characteristics of their hand (hand geometry) registered with their badge number in the access control system. Since no one can use a badge to gain access except the individual whose hand geometry has been registered to that badge, individuals (this also includes individuals not employed by the licensee i.e., contractors) will be allowed to keep their badge with them when they depart the site. All other access processes, including search function capability, will remain the same except for elimination of the process to issue, retrieve and store badges at the entrance stations to the plants. At least one security officer will continue to be positioned within a bullet-resisting structure to be responsible for the last act of access control.

The hand geometry system is superior to the current process because it provides a nontransferable means of identifying people; unlike photographs on a badge. During the registration process, hand measurements are made. This forms a template of the user's hand which is stored for later use in the actual verification process. A registered user enters his/her badge into the card reader and places the hand on the measuring surface. The system detects when the hand is properly positioned and then records an image. The unique characteristics are extracted from this image and then compared with the previously stored template.

On June 2, 1993, FPL met with members of the NRC staff to discuss the use of a hand geometry system at its sites and provided at that meeting a copy of the SANDIA REPORT entitled, "A PERFORMANCE EVALUATION OF BIOMETRIC IDENTIFICATION DEVICES" (SAND91--0276 UC--906 Unlimited Release, Printed June 1991). Based on the results of this report regarding biometrics systems and on experience gained at our sites under the current photo-identification system, the false-accept rate for the hand geometry system is at least equal to the current system.

Questions posed to FPL at the June 2, 1993 meeting were either resolved with no further follow-up necessary or have been responded to in this Attachment (Attachment 1 - Description and Basis for Exemption), or Attachment 2 (Proposed Physical Security Plan Revisions) of this submittal.

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SAFEGUARDS INFORMATION



SAFEGUARDS INFORMATION

L-93-248
Attachment 1
Page 3 of 5

Basis for Exemption

Florida Power & Light Company (FPL) requests, in accordance with the provisions of 10 CFR 73.5, "Specific exemptions," an exemption from certain requirements of 10 CFR 73.55, "Requirements for physical protection against radiological sabotage" for St. Lucie Units 1 and 2 and Turkey Points Units 3 and 4.

Currently, positive identification of personnel authorized and requesting access to the protected area is established by security personnel making a visual comparison of a picture badge and the individual requesting access. Under the current system, badges are not taken offsite and are issued, stored and retrieved at each entrance/exit location. FPL proposes to use a hand geometry biometric system, in conjunction with the existing card reader system, to control unescorted access into the protected area of the St. Lucie and Turkey Point nuclear plants. This system would eliminate the need to issue and retrieve badges at each entrance/exit location and would allow individuals to keep their badge with them when departing the site.

In order to implement this system, exemption is needed from just that part of 10 CFR 73.55 (d)(5) which states that, "An individual not employed by the licensee but who requires frequent and extended access to protected and vital areas may be authorized access to such areas without escort provided that he receives a picture badge upon entrance in the protected area which must be returned upon exit from the protected area..."

Title 10 CFR 73.5 states that, "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." Additionally, 10 CFR 73.55 (a) specifies that the Commission may authorize an applicant or licensee to provide measures for protection for radiological sabotage other than those required by 10 CFR 73.55. This can be accomplished if the applicant or licensee demonstrates that the measures have the same high assurance objective as specified in the regulation, and that the overall level of system performance provides protection against radiological sabotage equivalent to the regulation and meets the general performance requirements of 10 CFR 73.55.

Assurance Objective

As discussed in American National Standard, ANSI/ANS-3.3, "Security for Nuclear Power Plants," identification of individuals authorized access without escort can be accomplished by the use of "...a device that reads fingerprints, handprints, or some other unique physical feature." Under the proposed system, each individual who

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L-93-248
Attachment 1
Page 4 of 5

is authorized unescorted access will have the physical characteristics of their hand registered with their badge. Visual verification of a picture badge will be replaced with a hand geometry system which provides for a nontransferable means of identifying people, coupled with the use of a badge reader. All other access processes, including search function capability, will remain the same except for elimination of the process to issue, retrieve and store badges at the entrance stations to the plant. The current FPL access control process for identifying individuals meets the ANSI/ANS-3.3 criteria. The proposed hand geometry access control process, as well, meets the ANSI/ANS-3.3 identification criteria.

The biometric access control system will provide the same high assurance objective regarding onsite physical protection, and is not inimical to the common defense and security and does not constitute an unreasonable risk to the public health and safety.

System Performance

FPL proposes that the hand geometry equipment selected will meet the detection probability of 90% with a 95 % confidence level. Testing conducted by Sandia National Laboratories (Sandia Report, "A PERFORMANCE EVALUATION OF BIOMETRIC IDENTIFICATION DEVICES," SAND91--0276 UC--906 Unlimited Release, Printed June 1991) demonstrated that the hand geometry equipment possesses strong performance characteristics and is capable of meeting the proposed detection probability and confidence level. Based on the results of the Sandia report and on experience gained at our sites under the current photo-identification system, the false-accept rate for the hand geometry system is at least equal to the current system. FPL will have a process for testing the system. The Physical Security Plans for both Sites will be revised accordingly to include testing of the hand geometry access control system.

Implementation of the hand geometry access control system will continue to provide the overall level of performance equivalent to that which is called for in 10 CFR 73.55.

General Performance Requirement

The performance requirement of 10 CFR 73.55 (d)(1) is to ensure that the licensee controls all points of personnel access into a protected area. Under the proposed system, FPL will continue to control all points of personnel access into a protected area. FPL believes that the basis for the wording in 10 CFR 73.55 (d)(5), regarding individuals not employed by the licensee having to receive and return their badges at the entrance/exit, was to ensure that the badges could not be compromised or stolen by being taken offsite, and as a result, unauthorized persons could potentially enter the protected area. Under the proposed system, individuals not employed by the licensee and requiring frequent and extended access would be allowed to take their badges offsite. However,

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SAFEGUARDS INFORMATION

L-93-248
Attachment 1
Page 5 of 5

both the badge and hand geometry would be necessary for access into the protected area. FPL points out that even if a badge were to be compromised or stolen, access would not be provided without the hand geometry of the person registered to the badge. FPL maintains that the proposed system would continue to provide for a combination of identity verification processes.

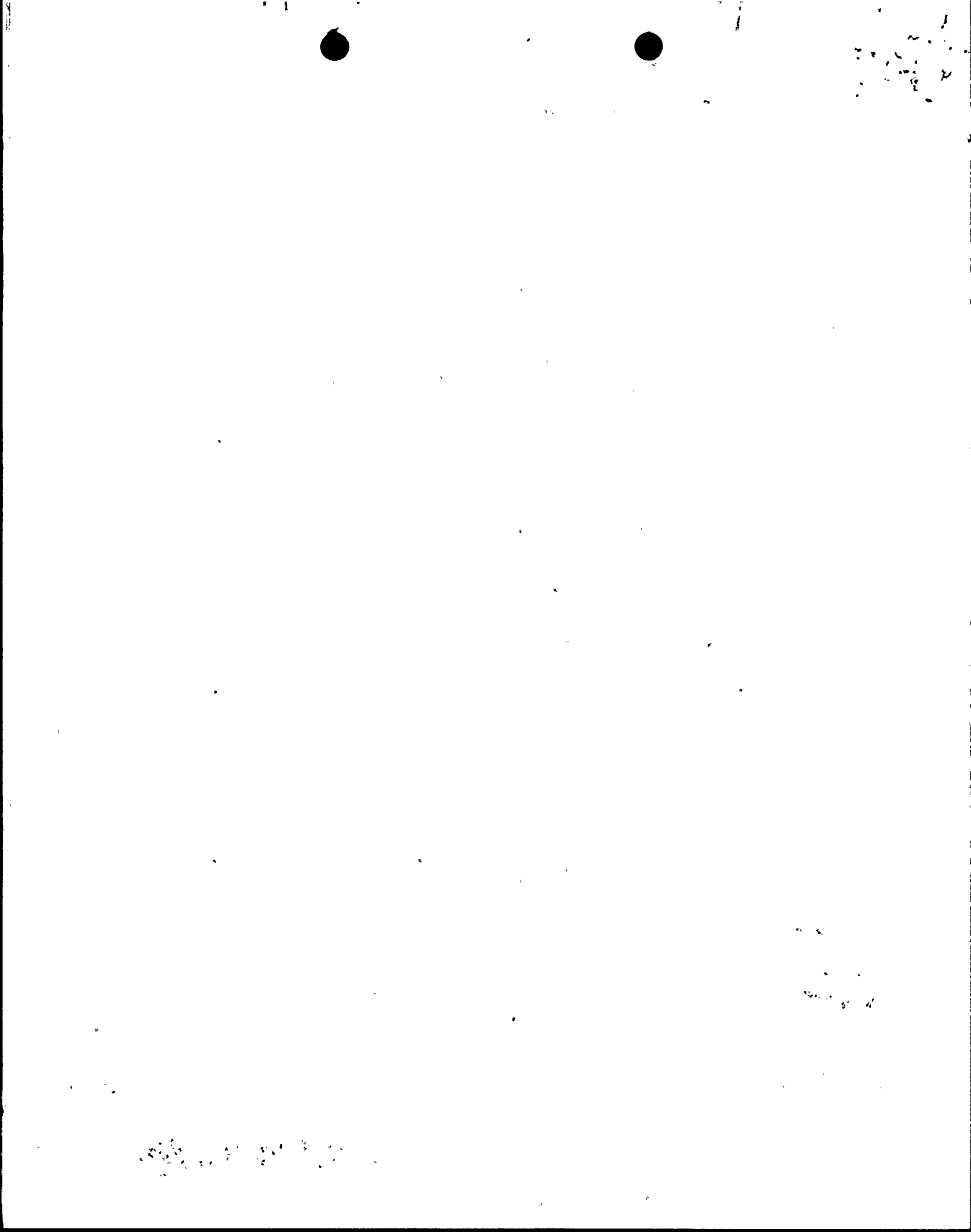
The access process will continue to be under the observation of security personnel located within a hardened cubicle who have final control over the release of the entrance station turnstiles. A numbered picture badge identification system will continue to be used for all individuals who are authorized access to protected areas without escorts. Badges will continue to be displayed by all individuals while inside the protected area.

Implementation of the biometric access control system will continue to meet the general performance requirements of 10 CFR 73.55 (d) (5).

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

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Division of Reactor Projects I/II

Enclosure:
As stated

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