



PECO ENERGY

PECO Energy Company  
Nuclear Group Headquarters  
965 Chesterbrook Boulevard  
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October 7, 1994

Docket Nos. 50-352  
50-353  
License Nos. NPF-39  
NPF-85

U. S. Nuclear Regulatory Commission  
ATTN: Document Control Desk  
Washington, DC 20555

SUBJECT: Limerick Generating Station, Units 1 and 2  
Use of Biometrics Access Control System  
Response to Request for Additional Information

Gentlemen:

By letter dated August 10, 1994, PECO Energy Company requested an Exemption from certain requirements stipulated in 10CFR73.55, "Requirements for Physical Protection of Licensed Activities in Nuclear Power Reactors Against Radiological Sabotage," regarding the use of photograph identification badges at Limerick Generating Station, Units 1 and 2.

At a September 28, 1994 meeting with the NRC's Limerick Project Manager, additional information was requested in support of this exemption request. This additional information is provided in Attachments 1 and 2.

If you have any questions, please do not hesitate to contact us.

Very truly yours,

G. A. Hunger, Jr.,  
Director - Licensing

Attachments

Enclosure

cc: T. T. Martin, Administrator, Region I, USNRC (w/ attachments and enclosure)  
N. S. Perry, USNRC Senior Resident Inspector, LGS (w/attachments and enclosure)  
R. R. Janati, PA Bureau of Radiological Protection (w/attachments and enclosure)

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*Frank Rinaldi removed Attachment 2 due to copyright material.*

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On Wednesday, September 28, 1994, at a meeting between the NRC's Limerick Project Manager and PECO Energy Licensing Representative at the NRC's Headquarters in Rockville, Maryland, the NRC requested additional information in support of an exemption request involving the Biometrics Access Control System. The response to this request for additional information follows.

- (1) What does PECO propose to do with the badges?  
Will personnel still wear the badges?  
If the badges are taken offsite, who can do so (employees and/or contractors)?

**Response:**

The security plan change associated with biometrics hand geometry will allow the site badges to be issued to authorized individuals and these badges may be taken off-site.

The implementation of the biometrics hand geometry system is currently planned to be implemented in three stages. The action plan at Limerick is to complete stage two of the process according to a scheduled transition plan and to be positioned to implement stage three when and if business needs dictate.

The first stage of the process will enroll all personnel authorized for access to the site in the hand geometry system. Under this stage badges will continue to be issued under the current process, however, the biometrics hand geometry will replace the use of the personal identification number (PIN) at the entrance turnstiles.

The second stage of the implementation process for biometrics hand geometry will delete the current requirement for the badges being issued and controlled by the security organization. The process will be replaced by "self serve" type badge holding racks that will be located in the main guard station between the personnel search train equipment and the entrance turnstiles. These badge racks will be completely self service with the security organization not being responsible for issuing or storing the badges.

The third stage of the implementation of biometrics hand geometry will delete the self service badge storage racks and issue badges directly to all personnel authorized for access to the site. In the last stage each person (both PECO and contractors) issued a badge will be responsible for keeping it and returning it when necessary.

In all stages of this process all personnel who are granted access to the site will be required to wear their badges when they are inside the Protected Area boundary.

- (2) Please provide a brief description of how the Biometrics System works.

**Response:**

Please see Attachment 2 which provides brief summaries on how the biometrics hand geometry system works.

(3) What is the basis for changing the access control system?

**Response:**

The basis for changing the access control system is that hand geometry biometrics identification provides a mechanism for identifying personnel that is equal to or better than the existing system of badge issuance controls and PIN number utilization at the entry point. The use of the biometrics will allow more efficient utilization of the site guard force to perform other security duties.

(4) What is the process to ensure that the proposed system will meet the performance requirements equivalent to that specified in the regulations (e.g., routine testing/periodic surveillance)?

**Response:**

The testing of the biometrics hand geometry equipment will be done in conjunction with the associated verification tests that are performed on a weekly or return to service basis. The biometrics hand geometry units will be tested to verify that they are operating properly and do not allow access using an unauthorized hand.

(5) Will site visitors be using the biometrics access control system?

**Response:**

No. Visitors will continue to utilize visitor badges.

(6) Will the licensee 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?

**Response:**

Yes. A member of the security force inside a bullet resisting enclosure can observe personnel entry at the turnstiles.