



WASHINGTON PUBLIC POWER SUPPLY SYSTEM

P.O. Box 968 • 3000 George Washington Way • Richland, Washington 99352

March 1, 1995
GO2-95-043

U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Mail Station P1-37
Washington, D.C. 20555

Dear Sirs:

Subject: **WNP-2 OPERATING LICENSE NPF-21
REQUEST FOR EXEMPTION FROM CERTAIN REQUIREMENTS OF
10CFR 73.55(D)(5); REQUIREMENTS FOR PHYSICAL PROTECTION
AGAINST RADIOLOGICAL SABOTAGE**

In accordance with the provisions of 10CFR 73.5, "Specific Exemptions," the Washington Public Power Supply System (Supply System) is requesting an exemption to the requirement in 10 CFR 73.55(d)(5) which states that each person with unescorted access to the protected area, who is not employed by the licensee (i.e., contractors), "receive a picture badge upon entrance into the protected area which must be returned upon exit from the protected area. . . ." Granting this request would allow implementation of a biometric access control system. The system provides an alternative measure for protection against radiological sabotage; meets the same high assurance objective and the general performance requirements of the regulation; and provides a level of system performance equivalent to that which would be provided by the regulation.

The proposed biometric access control system would require each individual who is authorized for unescorted access into the protected area to have the physical characteristics of their hand (hand geometry) registered with their badge number in the access control computer system. When an individual presents the badge to the card reader and places his 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

**ENCLOSURE CONTAINS INFORMATION EXEMPT
FROM PUBLIC DISCLOSURE (10CFR2.790)**

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REQUEST FOR EXEMPTION

control computer system to verify authorization for entry. Both the badge and the unique hand geometry of the individual registered to the badge would be necessary for access into the protected area. In the event a badge is lost by an individual, as a result of taking the badge offsite, unauthorized entry into the protected area with the badge alone would be prohibited without the hand geometry of the individual to whom the badge is registered.

This identification process eliminates the need to issue and retrieve badges at each entrance/exit and allows all individuals with unescorted access to retain their badges upon departing from the site.

Approval of this exemption is requested to reduce costs associated with elements of site security which are otherwise routinely performed as part of the Supply System's Physical Security Plan. The practice currently required is unnecessarily burdensome given the technology which is now available to ascertain the identity of authorized individuals.

The attachment to this request provides the background and justification for the proposed exemption. This exemption request is consistent with the exemption requests granted to Florida Power and Light Company and Arizona Power Company. The Supply System estimates that granting this request will provide an annual savings of approximately \$190K per year by reducing the staff required to issue and collect badges. This request is being submitted as part of our Cost Beneficial Licensing Actions (CBLA) program and complies with NRC guidelines for consideration as a CBLA submittal. The Supply System is prepared to implement the biometric access control system no later than September 1, 1995 and respectfully request approval of this exemption by August 1, 1995. An earlier approval would permit acceleration of the Plan implementation.

For these reasons, we conclude that the requested exemption is authorized by law and will not endanger life or property or the common defense and security, and is otherwise in the public interest as provided for in 10 CFR 73.5. The appropriate security plan changes will be submitted to the NRC under separate cover pending approval of this exemption.

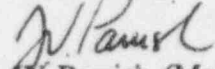
Furthermore, an enclosure to this submittal should be withheld from public disclosure in accordance with the provisions of 10 CFR 2.790. An Affidavit supporting this request is enclosed.

**ENCLOSURE CONTAINS INFORMATION EXEMPT
FROM PUBLIC DISCLOSURE (10CFR2.790)**

REQUEST FOR EXEMPTION

Should you have any questions concerning this matter, please contact DA Swank at (509) 377-4563.

Sincerely,



W Parrish (Mail Drop 1023)
Vice President, Nuclear Operations

JVP/mky
Attachment

cc: LJ Callan, NRC-RIV
KE Perkins, Jr., NRC-RIV, Walnut Creek Field Office
NS Reynolds, Winston & Strawn
DL Williams - BPA/399
NRC Sr. Resident Inspector - 927N

STATE OF WASHINGTON)

Subject:

Submittal of Request for Exemption from
Certain Requirements of 10CFR73.55(D)(5);
Requirement for Physical Protection Against
Radiological Sabotage

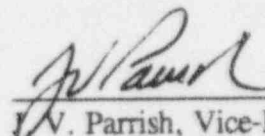
COUNTY OF BENTON)

I, J. V. Parrish, being duly sworn, subscribe to and say that I am the Vice-President, Nuclear Operations for the WASHINGTON PUBLIC POWER SUPPLY SYSTEM, the applicant herein; that I have the full authority to execute this oath; that I have reviewed the foregoing; and that to the best of my knowledge, information, and belief the statements made in it are true.

Attached to this submittal are proposed revisions to sections of the WNP-2 Physical Security Plan, which is considered by the Washington Public Power Supply System to contain proprietary information.

The Washington Public Power Supply System treats the subject submittal as proprietary information on the basis that the submittal contains sections of the WNP-2 Physical Security Plan. In submitting this information to the NRC, the Supply System requests that the subject submittal be withheld from public disclosure in accordance with 10 CFR 2.790.


DATE 31 March, 1995



J. V. Parrish, Vice-President, Nuclear
Operations

On this date personally appeared before me, J. V. Parrish, known to me to be the individual who executed the foregoing instrument, and acknowledged that he sign the same as his free act and deed for the uses and purposes herein mentioned.

GIVEN under my hand and seal this 1st day of March 1995.



Notary Public in and for the
STATE OF WASHINGTON

Residing at Nichols, wa
Benton Co.

My Commission Expires June 30, 1998