# UNITED STATES NUCLEAR REGULATORY COMMISSION COMMONWEALTH EDISON COMPANY DOCKET NOS. 50-237 AND 50-249 DRESDEN NUCLEAR POWER STATION. UNITS 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. DPR-19 and DPR-25, issued to Commonwealth Edison Company (ComEd, the licensee), for operation of the Dresden Nuclear Power Station, Units 2 and 3, located in Grundy County, Illinois.

## ENVIRONMENTAL ASSESSMENT

# Identification of the Proposed Action:

The proposed action is in accordance with the licensee's application dated November 20, 1995, for 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 requested exemption would allow the implementation of a hand geometry biometric system of site access control in conjunction with photograph identification badges and would allow the badges to be taken off site.

# The Need for the Proposed Action:

Pursuant to 10 CFR 73.55(a), the licensee is required to establish and maintain an onsite physical protection system and security organization.

In 10 CFR 73.55(d), "Access Requirements," it specifies in part that
"The licensee shall control all points of personnel and vehicle access into a
protected area." In 10 CFR 73.55(d)(5), it specifies in part that "A numbered
picture badge identification system shall be used for all individuals who are
authorized access to protected areas without escort." It further indicates
that an individual not employed by the licensee (e.g., contractors) may be
authorized access to protected areas without an 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 for both employee and contractor personnel into the Dresden Station. Units 2 and 3, is controlled through the use of picture badges. Positive identification of personnel who are authorized and request access into the protected areas is established by security personnel making a visual comparison of the individual requesting access and that individual's picture badge. The picture badges are issued, stored, and retrieved at the entrance/exit location to the protected area. In accordance with 10 CFR 73.55(d)(5), contractor personnel are not allowed to take their picture badges off site. In addition, in accordance with the plant's physical security plan, the licensee's employees are also not allowed to take their picture badges off site. The licensee proposes to implement an alterative unescorted access control system which would eliminate the need to issue and retrieve picture badges at the ... rance/exit location to the protected area. The proposal would also allow contractors who have unescorted access to keep their picture badges in their possession when departing the Dresden site. In addition, the site security plans will be revised to allow implementation of

the hand geometry system and to allow employees and contractors with unescorted access to keep their picture badges in their possession when leaving the Dresden site.

## Environmental Impacts of the Proposed Action:

The Commission has completed its evaluation of the proposed action. The Commission has completed its evaluation of the proposed action and concludes that the proposed exemption would not increase the probability or consequences of accidents previously analyzed and would not affect facility radiation levels or facility radiological effluents. Under the proposed system, all individuals with authorized unescorted access will have the physical characteristics of their hand (hand geometry) registered with their picture badge number in a computerized access control system in addition to their picture badges. Therefore, all authorized individuals must not only have their picture badges to gain access into the protected area, but must also have their hand geometry confirmed.

All other access process, including search function capability and access revocation, will remain the same. A security officer responsible for access control will continue to be positioned within a bullet-resistant structure. The proposed system is only for individuals with authorized unescepted access and will not be used for individuals requiring escorts.

The underlying purpose for requiring that individuals not employed by the licensee must receive and return their picture badges at the entrance/exit is to provide reasonable assurance that the access badges could not be compromised or stolen with a resulting risk that an unauthorized individual could potentially enter the protected area. Although the proposed exemption

will allow individuals to take their picture badges off site, the proposed measures require not only that the picture badge be provided for access to the protected area, but also that verification of the hand geometry registered with the badge be performed as discussed above. Thus, the proposed system provides an identity verification process that is equivalent to the existing process.

The change will not increase the probability or consequences of accidents, no changes are being made in the types of any effluents that may be released offsite, and there is no significant increase in the allowable individual or cumulative occupational radiation exposure. Accordingly, the Commission concludes that there are no significant radiological environmental impacts associated with the proposed action.

With regard to potential nonradiological impacts, the proposed action does involve features located entirely within the restricted area as defined in 10 CFR Part 20. It does not affect nonradiological plant effluents and has no other environmental impact. Accordingly, the Commission concludes that there are no significant nonradiological environmental impacts associated with the proposed action.

# Alternatives to the Proposed Action:

Since the Commission has concluded there is no measurable environmental impact associated with the proposed action, any alternatives with equal or greater environmental impact meed not be evaluated. The principal alternative to the proposed action would be to deny the requested action. Denial of the requested action would not significantly enhance the environment in that the

proposed action will result in a process that is equivalent to the existing identification verification process.

## Alternative Use of Resources:

This action does not involve the use of resources not previously considered in connection with the Nuclear Regulatory Commission's Final Environmental Statement dated November 1973, related to the operation of the Dresden Nuclear Power Station, Units 2 and 3.

## Agencies and Persons Consulted:

In accordance with its stated policy, on January , 1996, the NRC staff consulted with the Illinois State official, Mr. Frank Niziolek, Head, Reactor Safety Section, Division of Engineering, Illinois Department of Nuclear Safety, regarding the environmental impact of the proposed action. The State official had no comments.

### FINDING OF NO SIGNIFICANT IMPACT

Based upon the foregoing 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 November 20, 1995, which is available for public inspection at the Commission's Public Document Room, 2120 L Street, NW.,

Washington, DC, and at the local public document room located at the Morris Public Library, 604 Liberty Street, Morris, Illinois 60451.

Dated at Rockville, Maryland, this 3rd day of January 1996.

FOR THE NUCLEAR REGULATORY COMMISSION

George F. Dick Jr., Acting Director Project Directorate III-2

Division of Reactor Projects - III/IV

Office of Nuclear Reactor Regulation