


PECO ENERGYPECO Energy Company
Nuclear Group Headquarters
965 Chesterbrook Boulevard
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August 10, 1994

Docket Nos. 50-352
50-353License Nos. NPF-39
NPF-85Mr. William T. Russell
Director, Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, DC 20555Subject: Limerick Generating Station, Units 1 and 2
Request for Exemption from 10CFR73.55
Use of Biometrics Access Control System

Dear Mr. Russell:

This letter is being submitted in accordance with the requirements of 10CFR73.5, "Specific Exemptions," to request an exemption from certain specific 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 (ID) badges at Limerick Generating Station (LGS), Units 1 and 2. Currently, PECO Energy Company utilizes numbered picture ID badges for monitoring/controlling unescorted personnel access to protected and vital areas at LGS. PECO Energy is in the process of implementing a hand geometry biometric access control system at LGS, Units 1 and 2, such that photograph ID badges can be taken offsite. Therefore, we are requesting an exemption from the requirements of 10CFR73.55(d)(5) which stipulates the use of a numbered picture badge identification system for individuals who are authorized access to protected areas without escort. We are requesting that the NRC grant this exemption by October 26, 1994, in order to facilitate implementation of the biometrics access control system.

If you have any questions or require additional information, please do not hesitate to contact us.

Very truly yours,

G. A. Hunger, Jr.
Director - Licensing

Attachment

cc: T. T. Martin, Administrator, Region I, USNRC (w/ attachment)
N. S. Perry, USNRC Senior Resident Inspector, LGS (w/attachment)
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**Limerick Generating Station
Units 1 and 2
(Docket Nos. 50-352 and 50-353)
Request for Exemption - Biometric Access Control**

Introduction

PECO Energy Company is requesting an exemption, in accordance with the requirements of 10CFR73.5, "Specific exemptions," from certain specific 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 (ID) badges at Limerick Generating Station (LGS), Units 1 and 2. Specifically, we are requesting an exemption from the requirements of 10CFR73.55(d)(5) which stipulates that individuals who require access to protected and vital areas be authorized access to such areas without escort, provided that he/she receives a picture ID badge upon entrance into the protected area which must then be returned upon exit from the protected area.

10CFR73.55 states that each licensee shall establish and maintain an on-site 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. 10CFR73.55 specifies that the NRC may authorize an applicant or licensee to provide measures for protection for radiological sabotage other than those required by 10CFR73.55. 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.

We are requesting this exemption to allow photograph ID badges to be taken offsite in conjunction with the use of a hand geometry biometrics access control system for controlling unescorted access into the protected areas at LGS.

Existing Circumstances

Currently, unescorted access into LGS is controlled through the use of a photograph ID badge keycard (note: during the remaining discussion, the term "badge" will refer to the combination of a picture badge and keycard). The security force members at the protected area entrance guard station at LGS 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 the entrance/exit guard station.

Proposed Access System

We are in the process of implementing a hand geometry biometric access control system for use at LGS. With this 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 will be allowed to keep their badge with them when they leave the site. This proposed access control system will also be utilized for individuals not employed by PECO Energy (e.g., contractors). All other access processes, including search function capability, will be unchanged except for eliminating the process of issuing, retrieving, and storing badges at the protected area entrance/exit guard station at LGS. At least one security force member will continue to be positioned within a bullet-resisting structure at the guard station to be responsible for the last act of access control.