



ENTERGY

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Operational Support

October 24, 1994

U.S. Nuclear Regulatory Commission
Mail Station P1-137
Washington, D.C. 20555

Attention: Document Control Desk

SUBJECT: Request For Exemption From 10 CFR 73.55

River Bend Station
Docket No. 50-458
License No. NPF-47

Grand Gulf Nuclear Station
Docket No. 50-416
License No. NPF-29

Arkansas Nuclear One
Units 1 & 2
Docket Nos. 50-313 & 50-368
License Nos. DPR-51 & NPF-6

Waterford 3 Steam Electric
Station
Docket No. 50-382
License No. NPF-38

CNRO-94/00019

Gentlemen:

Entergy Operations, Inc. is submitting by this letter, in accordance with the provisions of 10 CFR 73.5, "Specific exemptions", a proposed exemption to certain requirements of 10 CFR 73.55, "Requirements for physical protection of licensed activities in nuclear power reactors against radiological sabotage" for the above captioned Entergy facilities. The proposed exemptions will provide cost beneficial relief to Entergy facilities. It is expected that a cost savings of approximately \$150,000 per year will be realized at Grand Gulf. A similar savings is expected for the remaining three Entergy sites. Processing this exemption for all Entergy facilities at this time should also conserve NRC staff resources.

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We plan to begin implementing conversions to hand geometry based systems beginning in early 1995 (i.e., prior to the next refueling outage) at our Grand Gulf facility and subsequently at our other facilities. Consequently, Entergy Operations, Inc. requests favorable consideration of the proposed exemption in the fourth quarter of 1994.

Based on the guidelines in 10 CFR 73.5, Entergy Operations, Inc. has concluded the proposed exemption is justified based on the attached information. Entergy Operations, Inc. requests a permanent exemption in this regard which would apply throughout the remaining operating lives of Arkansas Nuclear One Units 1 & 2, River Bend Station, Grand Gulf Nuclear Station, and Waterford 3 Steam Electric Station. Subsequent to the receipt of the requested exemption and prior to the implementation of a new system at each facility, and in the interim, each Entergy facility will continue to meet the existing applicable regulations.

The attachment provides a detailed description of the proposed exemption and its justification.

Sincerely,



JGD/lac

attachment

cc:(w/a) (See next page)

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cc:(w/a) Mr. R. P. Barkhurst
 Mr. J. L. Blount
 Mr. L. J. Callan
 Mr. J. L. Colvin
 Mr. S. D. Ebnetter
 Mr. E. J. Ford
 Mr. C. R. Hutchinson
 Mr. E. V. Imbro
 Mr. G. Kalman
 Mr. H. W. Keiser
 Mr. J. R. McGaha
 Mr. R. B. McGehee
 Mr. P. W. O'Connor
 Mr. C. P. Patel
 Mr. N. S. Reynolds
 Mr. W. F. Smith
 Ms. L. J. Smith
 Mr. J. E. Tedrow
 Mr. F. W. Titus
 Mr. D. L. Wigginton
 Mr. J. W. Yelverton
 Central File (GGNS)
 DCC (ANO)
 Records Center (WF-3)
 SDC (RBS)
 Corporate File [10]

I. INTRODUCTION

Entergy Operations, Inc. requests, in accordance with the provisions of Title 10 CFR 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." This exemption is requested for Arkansas Nuclear One, Units 1 & 2, River Bend Station, Grand Gulf Nuclear Station, and Waterford 3 Steam Electric Station.

Title 10 CFR 73.55(a) 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 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.

This exemption is requested to allow individuals not employed by Entergy Operations, Inc. (e.g. contractors) to remove their photograph identification badges from the site, in conjunction with the use of a hand geometry biometrics system to control unescorted access into the protected areas of the above docketed facilities. An exemption is not required for licensee personnel to remove their photographic identification badges from the site, once the new system is implemented.

II. CURRENT SITUATION

Currently, unescorted access into Entergy facilities is controlled through the use of a photograph on a badge/keycard (hereafter "badge"). 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, retrieved and stored at each entrance/exit location.

III. PROPOSED CHANGES

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 security computer 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 e.g., contractors) will be allowed to keep their badges 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/exit locations of 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 with the results being retained. 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 their hand on the measuring surface. The system detects when the hand is properly positioned and then obtains an image. The unique characteristics are extracted from this image and are then compared with the previously stored template. Access is permitted if the characteristics match.

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Based on the results of the SANDIA REPORT entitled, "A PERFORMANCE EVALUATION OF BIOMETRIC IDENTIFICATION DEVICES " (SAND91--0276 UC--906 Unlimited Release, Printed June 1991), the false-accept rate for hand geometry systems is acceptably low.

All other access processes will remain the same except for elimination of the process to issue, retrieve and store badges at the entrance/exit stations to our plants. A numbered picture badge identification system will continue to be used for all individuals who are authorized unescorted access to protected and vital areas. This system would not be used for persons requiring escorted access, i.e., visitors. A process for testing the proposed system to ensure continued overall level of performance equivalent to that specified in the regulation will be implemented. Upon exemption approval, and implementation of the new system, each facility would update its physical security plans in accordance with 10 CFR 50.54(p).

The exemption request is applicable to Arkansas Nuclear One Units 1 & 2, River Bend Station, Grand Gulf Nuclear Station, and Waterford 3 Steam Electric Station. The proposed changes are as follows:

Current Regulation:

10 CFR 73.55(d) (5) requires that "A numbered picture badge identification system shall be used for all individuals who are authorized access to protected areas without escort." 10 CFR 73.55(d) (5) also states "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 .."

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Proposed Exemption:

Exempt Entergy Operations, Inc. from those requirements of 10 CFR 73.55(d) (5) relating to the returning of picture badges upon exit from the protected area such that individuals not employed by the licensee, i.e., contractors, who are authorized unescorted access into the protected area, can take their badges offsite.

IV. EXEMPTION REQUIREMENTS

Under 10 CFR 73.5, the Commission may grant specific exemptions from the requirements of this regulation provided certain standards are met. These are that the exemptions: (1) are authorized by law, (2) will not endanger life, property, or the common defense and security, and (3) are otherwise in the public interest.

Entergy Operations Inc. has evaluated the requested exemption in accordance with the above criteria. The request meets the requirements of 10 CFR 73.5 and should therefore be granted. The following analyses are in support of this application for exemption:

A. Exemption Criteria

1. "Authorized by law":

Entergy Operations, Inc. is currently authorized to operate Arkansas Nuclear One Units 1 & 2, River Bend Station, Grand Gulf Nuclear Station, and Waterford 3 Steam Electric Station pursuant to licenses issued in accordance with the Atomic Energy Act as amended. The NRC is empowered to grant an exemption to a regulation it has promulgated, and since no other prohibition of law exists to preclude the activities which would be permitted by this exemption, the exemption is authorized by law.

2. "Will not endanger life, property, or the common defense and security":

The requested exemption presents a special circumstance, in that application of the regulation in this particular circumstance would not serve the underlying purpose of the rule or is not necessary to achieve the underlying purpose of the rule.

The underlying purpose of 10 CFR 73.55(d) is to control all points of personnel access into a protected area. Entergy Operations, Inc. believes that the basis for the wording in 10 CFR 73.55(d) (5) was to ensure that unauthorized access to the protected area could not be obtained as a result of compromise or theft of badges taken off site. Under the proposed system, the badges would be taken offsite. However, both the badge and the hand geometry would be necessary for access into the protected area. Entergy Operations, Inc. points out that even if a badge could be compromised or stolen, access would not be granted without the hand geometry of the person registered to the badge. Entergy Operations, Inc. maintains that the proposed system would continue to provide for a combination of identity verification processes and, in fact, would strengthen the access controls at its plants.

Based on the above, application of the regulation in this circumstance is not necessary to achieve the underlying purpose of the rule and the overall level of system performance will provide protection against radiological sabotage equivalent to the regulation.

This exemption allows for continued safe operation of Arkansas Nuclear One Units 1 & 2, River Bend Station, Grand Gulf Nuclear Station, and the Waterford 3 Steam Electric Station. Thus, Entergy concludes that the exemption is consistent with the common defense and security.

3. "In the public interest":

Entergy Operations, Inc. is committed to achieving and advancing standards of world-class safety and operating performance and to producing electrical energy in the most effective and cost-efficient manner. This request is in the public interest because it promotes more efficient and effective use of resources while providing sufficient measures to ensure the security of the facility.

V. CONCLUSION

Pursuant to 10 CFR 73.55, the Commission may authorize a licensee to provide alternative measures for protection against radiological sabotage provided the licensee demonstrates that the alternative measures have "the same high assurance objective" and meet "the general performance requirements" of the regulation, and "the overall level of system performance provides protection against radiological sabotage equivalent" to that which would be provided by the regulation. Entergy concludes that, pursuant to 10 CFR 73.5, an exemption is authorized by law, will not endanger life or property or compromise defense and security, and is otherwise in the public interest. Pursuant to 10 CFR 51.32, Entergy concludes that the granting of this exemption will not result in any significant adverse environmental impact.