

# SAFEGUARDS INFORMATION



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Ref. # 10CFR73.5  
10CFR73.55(d)(5)

C. Lance Terry  
Group Vice President

January 16, 1995

William T. Russell, Director  
Office of Nuclear Reactor Regulation  
U. S. Nuclear Regulatory Commission  
Washington, DC 20555

SUBJECT: COMANCHE PEAK STEAM ELECTRIC STATION (CPSES)  
DOCKET NOS. 50-445 AND 50-446  
REQUEST FOR EXEMPTION FROM PORTIONS OF 10CFR73.55  
USE OF HAND GEOMETRY BIOMETRICS ACCESS CONTROL SYSTEM

Dear Mr. Russell:

This letter is submitted in accordance with 10CFR73.5, "Specific Exemptions," to request 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 picture badge identification at CPSES.

TU Electric currently uses numbered key card badges with individual photographs for monitoring/controlling access to the protected and vital areas at CPSES. The non-employee picture key card badges are distinguished from the employee picture key card badges.

TU Electric is in the process of implementing a hand geometry biometrics access control system at CPSES, such that picture key card badges may be taken offsite and there will no longer be a distinction between employee and non-employee picture key card badges.

Therefore, TU Electric requests an exemption from the requirements of 10CFR73.55(d)(5) which stipulates that individuals not employed by the licensee, who are authorized unescorted access, must return their picture badges upon exiting the protected area and that their badges must identify them as non-employees. Additional detailed information explaining this requested exemption is provided in Attachment 1 to this letter. Attachment 2 provides the corresponding proposed change to the CPSES Physical Security Plan which will be made effective subsequent to NRC approval of the requested exemption and upon implementation of the hand geometry biometrics access control system.

TU Electric requests that this exemption be granted by February 17, 1995, in order to facilitate a timely implementation of the biometrics access control system prior to the CPSES Unit 1 refueling outage scheduled for March 2, 1995.

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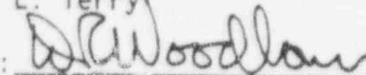
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If you have any questions regarding this exemption request, please contact  
Mr. Connie Wilkerson at (214) 812-8819.

Sincerely,

C. L. Terry

By:



D. R. Wordlan

Docket Licensing Manager

CLW/grp  
Attachment

- c - Mr. L. J. Callan, Region IV w/Attachment 1 & 2
- Mr. D. D. Chamberlain, Region IV w/Attachment 1 only
- Resident Inspectors w/Attachment 1 only
- Document Control Desk w/Attachment 1 & 2 ✓
- Mr. T. J. Polich, NRR w/Attachment 1 only

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