

# WOLF CREEK

NUCLEAR OPERATING CORPORATION

Neil S. "Buzz" Carns  
Chairman, President and  
Chief Executive Officer

November 23, 1994

WM 94-0165

U. S. Nuclear Regulatory Commission  
ATTN: Document Control Desk  
Mail Station: P1-137  
Washington, D. C. 20555

Subject: Docket No. 50-482: 10 CFR 73 Exemption Request

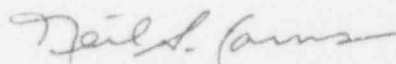
Gentlemen:

Pursuant to the provisions of 10 CFR 73.5, Wolf Creek Nuclear Operating Corporation (WCNOC) requests an exemption from the requirements of 10 CFR 73.55 regarding physical protection of licensed activities in nuclear power reactors against radiological sabotage. In particular, WCNOC requests an exemption from the requirement for authorized individuals not employed by the licensee to receive a picture badge upon entrance into the protected area and return the badge upon exit from the protected area. The attachment to this letter contains the exemption request with an evaluation justifying the requested exemption.

The exemption request is based on an alternative which utilizes a hand geometry biometrics system in the process of gaining unescorted access to the protected area at Wolf Creek Generating Station. The practice currently required is unnecessarily burdensome given the technology which is now available to ascertain the identity of authorized individuals.

If you have any questions concerning this matter please contact me at (316) 364-8831 extension 4000 or Mr. Richard D. Flannigan at extension 4500.

Very truly yours,



Neil S. Carns

NSC/jra

Attachment

cc: L. J. Callan (NRC), w/a  
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J. F. Ringwald (NRC), w/a  
J. C. Stone (NRC), w/a

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#### PROPOSED EXEMPTION

In accordance with the provisions of 10 CFR 73.5, "Specific exemptions," Wolf Creek Nuclear Operating Corporation (WCNOC) requests 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 request is submitted for Wolf Creek Generating Station (WCGS). Specifically, WCNOC requests exemption from the portion of 10 CFR 73.55(d)(5) which 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..."

10CFR 73.55(a), "General performance objective and requirements," states, "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...The Commission may authorize an applicant or licensee to provide measures for protection against radiological sabotage other than those required by this section if the applicant or licensee demonstrates that the measures have the same high assurance objective... and that the overall level of system performance provides [equivalent] protection against radiological sabotage..."

WCNOC seeks this exemption in order to allow the use of a hand geometry biometrics system to control unescorted access to the protected area located at WCGS. The required picture badge, which is also an access control card at WCGS, is called an Automated Controlled Access Device (ACAD) badge. The ACAD badges are to be retained by the individuals, to whom they were issued, upon exiting the protected area.

#### BACKGROUND

Currently, employee and contractor ACAD badges are issued and retrieved on the occasion of each entry to and exit from the protected area. Station security personnel are required to maintain control of the ACAD badges while the individuals are offsite. This policy has been in effect at WCGS since the operating license was issued. Security personnel retain each ACAD badge when not in use by the authorized individual, within appropriately designed storage receptacles inside a bullet resistant enclosure. An individual who meets the access authorization requirements is issued a ACAD badge which allows entry into preauthorized areas of WCGS. While entering the plant in the present configuration, an authorized individual is "screened" by the required detection equipment and by the issuing security officer. Having received the ACAD badge, the individual proceeds to the access portal, inserts the ACAD badge into the card reader and passes through the turnstile which unlocks if entry is authorized. This present procedure is labor intensive because security personnel are required to verify ACAD badges prior to issuance, ensure ACAD badge retrieval, and maintain the ACAD badges in orderly storage until the next entry, by the authorized individual, into the protected area.

### EVALUATION

Under the proposed system, individuals authorized to gain unescorted access will have the physical characteristics of their hand (hand geometry) recorded with their ACAD badge number. The hand geometry is unique to each individual and its application in the entry screening function would preclude unauthorized use of a ACAD badge. The requested exemption would allow employees and contractors to keep their ACAD badges at the time of exiting the protected area. The process of verifying ACAD badges prior to issuance, ensuring ACAD badge retrieval, and maintaining ACAD badges could be eliminated while the balance of the access procedure would remain intact. Firearm, explosive, and metal detection equipment and provisions for conducting searches will remain unchanged. Security personnel responsible for the last access control function (controlling admission to the protected area) will also remain isolated within a bullet-resisting structure in order to assure his or her ability to respond or to summon assistance.

Use of a hand geometry biometrics system exceeds the present verification methodology's capability to discern an individual's identity. Unlike the ACAD badge, hand geometry is nontransferable. During the initial access authorization or registration process, hand measurements are recorded and the template is stored for subsequent use in the identity verification process required for entry into the protected area. Authorized individuals insert their ACAD badge into the card reader and the biometrics system records an image of the hand geometry. The unique features of the newly recorded image are then compared to the template previously stored in the database. Access is ultimately granted based on the degree to which the characteristics of the image match those of the "signature" template.

### JUSTIFICATION

10 CFR 73.5 states that the Commission may grant exemptions from the requirements of the regulations contained in 10 CFR 73 provided that: (1) the exemption is authorized by law, (2) the exemption will not endanger life or property, (3) the exemption will not endanger the common defense and security, and (4) the exemption is otherwise in the public interest.

#### 1. The Requested Exemption is Authorized by Law

No law exists which would preclude the activities covered by this exemption request, thus the Commission is authorized to grant this exemption.

#### 2. The Requested Exemption Will Not Endanger Life or Property

The exemption from the requirement to issue and retrieve contractor ACAD badges upon entering and exiting protected areas at WCGS does not present an undue risk to the public health and safety. Addition of a hand geometry biometrics system will provide a significant contribution to effective implementation of the security plan at the site. Therefore, an exemption of this nature does not increase the risk to the public health and safety.

3. The Requested Exemption Will Not Endanger the Common Defense and Security

The common defense and security are not impacted by this exemption request. An exemption granted contingent upon the utilization of a hand geometry biometrics system will augment the process by which WCGS permits unescorted access to the protected area. The process for granting unescorted access to the protected areas at WCGS is not directly associated with the design, function, or operation of plant equipment described in the safety analysis report. Therefore, the probability of accident occurrence cannot be impacted by the elimination of the ACAD badge issue, collection, and storage functions. This exemption has no bearing on the consequences of an accident as analyzed in the safety analysis report.

4. The Exemption is Otherwise in the Public Interest

This exemption would allow company resources and management attention to be more focused on areas of nuclear safety significance. Generally, the public interest would be served by reducing the WCNOC resources presently dedicated to identity confirmation and ACAD badge issue, collection, and storage.

CONCLUSION

Granting the requested exemption from the requirement for contractors to return their ACAD badges when departing from the protected area is warranted based on the ability of a biometrics system to assure the identity of authorized individuals, the licensee's continuing capability to render an ACAD badge ineffectual, and reliance upon firearm, explosive, and metal detection equipment and provisions for conducting searches. In addition, security personnel responsible for the last access control function (controlling admission to the protected area) will also remain isolated within a bullet-resistant structure in order to assure his or her ability to respond or to summon assistance. Replacing the function required by the regulations with a superior identity verification device does not reduce the effectiveness of the overall security and access control programs in place at WCGS.