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Docket Numbers: 50-424
50-425

Director of Nuclear Reactor Regulation
U. S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, DC 20555

VOGTLE ELECTRIC GENERATING PLANT
10 CFR 73.55 (d)(5) EXEMPTION REQUEST FOR USE OF
BIOMETRICS IN PROTECTED AREA ACCESS CONTROL

Ladies and Gentlemen:

In accordance with the provisions of 10 CFR 73.5, "Specific Exemptions," Georgia Power Company (GPC) requests an exemption from a requirement in 10 CFR 73, "Physical Protection of Plants and Materials." The enclosed request is for exemption from the requirement in 10 CFR 73.55(d)(5) for an individual not employed by the licensee - GPC, who requires frequent and extended access to protected and vital areas (i.e., a contractor) be authorized access to protected and vital areas without escort if the individual receives a picture badge upon entrance into such areas and returns the picture badge upon exit from such areas (i.e., not allowed to take the picture badge offsite).

This requested exemption is to allow the use of a hand geometry biometrics access control system to control unescorted access into the protected areas of VEGP, and eliminate the need to issue badges daily. The enclosure provides a description of the relevant aspects of the current and proposed systems, and provides the basis for this exemption request. Exemptions from this requirement in 10 CFR 73.55(d)(5) have been approved by the NRC for Florida Power and Light Company, Arizona Public Service Company, Virginia Electric and Power Company, Baltimore Gas and Electric Company and Tennessee Valley Authority.

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This exemption request meets the criteria of a Cost Beneficial Licensing Action. Implementation of a biometrics access control system at VEGP will result in an annual savings of approximately $44,000 per year without a decrease in the effectiveness of the security plan and measures implemented by VEGP in defense of radiological sabotage. This annual savings assumes no additional commitments will be needed for NRC approval.

After issuance of the requested exemption and implementation of the biometrics access control system at VEGP, GPC will revise the VEGP Physical Security and Contingency Plan and provide the changes to the NRC in accordance with 10 CFR 50.54(p). GPC requests approval of this exemption by July 1, 1995, since the installation of the biometrics access control system is scheduled for a non outage work period during the late summer of 1995.

If there are any questions or if additional information is needed, please contact this office.

Sincerely,

C. K. McCoy

CKM/AFS

Enclosure: 10 CFR 73.55(d)(5) Rule Exemption Request

xc: Georgia Power Company
Mr. J. B. Beasley, Jr.
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U. S. Nuclear Regulatory Commission
Mr. S. D. Ebneter, Regional Administrator
Mr. D. S. Hood, Licensing Project Manager, NRR
Mr. B. R. Bonser, Senior Resident Inspector, Vogtle

ENCLOSURE

VOGTLE ELECTRIC GENERATING PLANT
EXEMPTION REQUEST FROM A REQUIREMENT OF 10 CFR 73.55(d)(5)

INTRODUCTION

Georgia Power Company (GPC) requests, in accordance with the provisions of 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," for Vogtle Electric Generating Plant (VEGP). Specifically, GPC requests an exemption from the requirement in 10 CFR 73.55(d), "Access Requirements," section (5), which requires in part: "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 ...."

10 CFR 73.55(a), "General Performance Objective and Requirements," states in part: "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." Additionally it states in part: "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 as specified in this paragraph and that the overall level of system performance provides protection against radiological sabotage equivalent to that which would be provided by paragraphs (b) through (h) of this section and meets the general performance requirements of this section."

This exemption request is to allow contractors to take their picture badge offsite in conjunction with the use of a hand geometry biometrics access control system to control unescorted access into the protected area of VEGP.

CURRENT MANUAL ACCESS CONTROL SYSTEM

Unescorted access into VEGP protected area is controlled through the use of a photograph on a picture badge attached to an automatic control access device (ACAD). Security personnel at the Plant Entry and Security Building (PESB), the primary entrance

to the PA, and the Alternate PESB, which is activated during refueling outages, use the photograph on the picture badge to identify the individual requesting access, and then issue the individual's picture badge from the applicable PESB badge island along with his or her ACAD to allow PA access.

Once an individual receives his or her picture badge/ACAD, the ACAD is activated by first placing the ACAD on the PESB entry card reader, entering the correct personal identification number (PIN) into a key pad, receiving verification by the security computer that the code entered matches the ACAD read, and a permissive is supplied by the security computer to unlock the PA entry turnstile. Once inside, VA entry is attained by utilizing the automated access control system.

Upon exit from the PA, the ACAD is required to be read by a card reader and deactivated by the security system computer. Once deactivated, the badge is turned into the Security personnel for storage in the PESB badge island. To assure badges are not inadvertently taken offsite and therefore not deactivated, an "anti-shoplifting" device alarms to alert an individual to return his or her badge/ACAD to the badge island. The picture badge/ACADs are collected at the PA exit location in the PESB and stored by Security in the badge island until the individual needs access again. Therefore picture badge/ACADs for all individuals are issued, activated, deactivated, stored, and retrieved at each entrance/exit location for the protected areas, and are not taken offsite.

PROPOSED BIOMETRICS ACCESS CONTROL SYSTEM

Each individual who is authorized unescorted access will have the physical characteristics of one of his or her hands assigned to his or her unique ACAD in the security computer data base. Access is then controlled when the individual requesting PA access first presents the correct ACAD to the card reader and when requested, applies the matching hand print to the biometrics hand geometry reader. If the characteristics of the hand geometry being read equal or exceed a predefined score of the geometry stored in the security computer assigned to the ACAD presented, access is granted by unlocking the entry turnstiles. If the ACAD and hand geometry characteristics do not equal or exceed the predefined score, access is denied by the security computer. This eliminates the need to issue, store, and retrieve picture badges/ACADs at the PESBs for employees and contractors while maintaining the same high level of assurance that access is granted to only authorized individuals.

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Upon immediate exit from the protected area exit turnstiles, the individual will place his or her ACAD to the PA exit card reader, which will deactivate his or her badge/ACAD and unlock the final electrically controlled turnstile to exit out of the PESB. There are no biometrics hand geometry readers necessary at any of the PA exits. Once an ACAD is deactivated, the security computer will designate the individual ACAD as no longer active, within the PA. Since picture badges/ACADs will be made inactive upon PA exit, there is no need for their storage and retrieval, and therefore will be allowed to be taken offsite. Even if an inactive picture badge/ACAD is stolen while offsite, it is of no benefit to an individual because they will be unable to defeat the biometrics hand geometry reader which is necessary to activate the ACAD for PA and VA access. Also any attempt at VA access without first activating the ACAD at the PESB entry turnstile will result in a security system alarm.

Visitors will not use the biometrics access control system, but will be granted access based on existing procedures requiring them to remain under the control and surveillance of an escort granted unescorted authorized access. There will be no change in the method of processing, controlling or escorting visitors within the PA or VA as a result of the implementation of the biometrics access control system.

Issuing, storing, and retrieving picture badges/card keys at the entrance locations will be the only access control process eliminated in the current access control process. Other access control processes will remain the same, e.g., search function capability and metal detectors. The security person responsible for the last access control function shall continue to be isolated within a bullet-resisting structure, to assure the individual's ability to respond or to summon assistance. Also, a numbered picture badge/ACAD will continue to be used for all individuals who are authorized unescorted access to PA and/or VAs, and picture badges shall continue to be displayed by all individuals while inside the PA and VA.

BIOMETRICS ACCESS CONTROL SYSTEM FEATURES

The biometrics access control system provides a nontransferable means of identifying that the individual possessing the badge/ACAD is the individual who was granted unescorted access. Sandia National Laboratories conducted testing which demonstrated that the hand geometry equipment possesses strong performance characteristics, and demonstrated that the system can meet a detection probability of 90 percent with a 95 percent confidence level. Details of the testing performed are in the Sandia report, "A Performance Evaluation of Biometric Identification Devices," SAND91--0276 • UC--906, Unlimited

Release, June 1991. A process for testing the system in accordance with vendor guidelines will be developed to ensure continued performance of the system to meet the general performance requirements of 10 CFR 73.55(d)(5).

BASIS FOR EXEMPTION

As discussed above, implementation of the hand geometry biometrics access control system at VEGP is an acceptable alternative measure for protection against radiological sabotage that meets the same high assurance objective and the general performance requirements of the regulation. Also, the overall level of the biometrics access control system performance provides protection against radiological sabotage equivalent to that which is currently being used. In fact, since a unique ACAD, matching hand geometry, and a picture badge will all be necessary for access into a protected area, the level of access control at VEGP will be improved over the existing manual ACAD distribution and personal recognition access control system currently being used for access to the protected area.

CONCLUSION

GPC has determined that implementing the biometrics access control system at VEGP is authorized by law, will not endanger life or property or the common defense and security, is in the public interest, and is a Cost Beneficial Licensing Action. Therefore, GPC requests the NRC to grant an exemption for the requirement in 10 CFR 73.55(d)(5) relating to returning picture badges upon exit from the protected area such that individuals not employed by GPC, i.e., contractors, who are authorized unescorted access into the protected area can take his or her picture badges/ACADs offsite.