



TENNESSEE DEPARTMENT OF CONSERVATION

T.E.R.R.A. Building
150 9th Avenue, North
Nashville, Tennessee 37243

April 7, 1992

Mr. Frederick J. Hebdon, Director
Division of Reactor Projects - I/II
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, DC 20555

Dear Mr. Hebdon:

Your letter of March 26, 1992, (Docket Nos. 50-259/260/296, 50-327/328, 50-390/391) caused me some consternation. In that letter you noted the approval of the proposal by the Tennessee Valley Authority to transmit ERDS data from the Central Emergency Control Center (CECC).

Without knowing all the details of the proposal it is difficult to assure that the intent of ERDS is being met. It appears that you are introducing an additional interface between the NRC and the reactor. Is the system proposed obtaining data directly from the reactor site and feeding it directly to the NRC via the CECC or is it being manipulated, delayed, or massaged by the CECC prior to being transmitted to the NRC.

Given our experience with TVA through the years I am very concerned with the potential for delay or manipulation of the data prior to being retransmitted when it is "processed" through the CECC. We have found it exceedingly difficult to maintain open technical level contacts since TVA established the CECC. At times information that should flow directly between personnel involved in technical assessments must be approved prior to transmittal. Obviously this creates terrific problems for the state in making timely decisions.

I would caution you prior to your final acceptance of this proposal to assure that no action at the CECC can interface with the instantaneous transfer of the ERDS information to the NRC. I am especially concerned since the Tennessee radiation control program is apparently going to be dependent on the ERDS system despite years of attempts to establish direct links between TVA's electronic information system and our technical evaluation group.

Sincerely,

Michael H. Mobley

Michael H. Mobley
Director, Division of Radiological Health
NRC State Liaison Officer

MMH/E5042097/D4/DRH

9204150210 920407
PDR ADOCK 05000259
F PDR

AL26 10