



STATE OF TENNESSEE
DEPARTMENT OF ENVIRONMENT AND CONSERVATION
Division of Radiological Health
150 Ninth Avenue, North
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May 5, 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:

This will serve to clarify my letter of April 7, 1992 to you concerning the ERDS data transmission proposal discussed in your letter of March 26, 1992 (Docket Nos. 50-259/260/296, 50-327/328, 50-390/391).

Our intent in that letter was to express our concern regarding the proposal because of problems we have experienced in immediately getting technical data from the CECC. Based on the feedback we are getting, several people who received my April 7, 1992 letter are concerned by the words "manipulate", "massage", or "delayed". My intent in the use of these words was to indicate that once the TVA assessment personnel receive this data at the CECC they begin to work with it (just as we do in Nashville once we receive it). They put it through various modeling programs, pose scenarios for releases, etc. The processed or developed information is then forwarded to their management for use and review. Our statement should not be understood to imply that those or any other personnel are changing the data to something it isn't. They are doing what they are suppose to do, with the exception that in some situations there is a failure to immediately forward data, calculations, etc. to our dose assessment personnel. It is our position that the raw data, working information and conjectural scenarios should be shared at the technical working level on an as received, as generated basis, and not await approval prior to transmission or discussion.

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It is absolutely necessary that we receive information as soon as possible if we are to make informed decisions in a timely manner. We believe the degree of change that has occurred from the early days of reacting to field team data to today's anticipation of plant situations has created a much greater need for plant status information than in the past. It has significantly changed the nature of our information requests as well as made us totally dependent on the resources of TVA for the plant data.

This is an important issue to us, one that we believe requires a continuing effort. Given that the population around the Sequoyah plant has significantly increased as has the anticipated length of time to evacuate the potentially affected areas, it becomes an increasingly more important issue to ensure availability of plant status data on an immediate basis.

While this situation has received considerable attention the problem has not been totally resolved. We continue to work with TVA and believe that remaining problem areas can be resolved over time.

Sincerely,



Michael H. Mobley
Director

MHM/jmp

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