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December 20, 1990

Secretary of the Commission
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555
Attn: Docketing and Service Branch

Re: Proposed Rule - Emergency Response Data System. (Fed. Reg. Vol. 55, 41095-41099; October 9, 1990.)

The Illinois Department of Nuclear Safety (IDNS) hereby submits its comments on the above proposed rule concerning the Emergency Response Data System (ERDS). IDNS is the lead agency in Illinois for furthering actions in cooperation with the Nuclear Regulatory Commission (NRC) which reduce the likelihood and severity of accidents at nuclear facilities.

IDNS believes that ERDS will become increasingly important to the NRC severe accident management and response programs. ERDS will improve the transfer of pertinent reactor information during accident conditions at nuclear power plant facilities. IDNS supports the ERDS program and its benefits for accident management.

The proposed ERDS is designed to supplement the voice transmission of information over the Emergency Notification System (ENS) by relaying data without relying upon station personnel. This relieves the licensee of the burden of maintaining a continuous voice link, relying instead upon the station's ability to transmit data over the ERDS network. IDNS is concerned about the reliability and availability of ERDS. The proposed rule does not provide the assurance that data will be available to NRC during accident conditions that can affect licensee data acquisition and transmission systems. IDNS urges NRC to strengthen the proposed rule by prescribing data availability and reliability requirements during system operation.

Sincerely,

Roy R. Wight, Manager
Office of Nuclear Facility Safety

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