

Let's protect our earth!



State of New Jersey  
DEPARTMENT OF ENVIRONMENTAL PROTECTION  
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PROPOSED RULE PA 50  
(55FR41095)

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Jill Lipoti, Ph.D., Assistant Director  
Radiation Protection Programs

OFFICE OF SECRETARY  
DOCKETING AND SERVICE  
BRANCH

December 18, 1990

The Secretary of the Commission  
U.S. Nuclear Regulatory Commission  
Attention: Docketing and Service Branch  
Washington, DC 20555

Gentlemen:

Subject: Emergency Response Data System Proposed Rule  
(10CFR Part 50 Proposal, 55FR 41095, October 9,  
1990)

The Bureau of Nuclear Engineering (BNE) staff of the New Jersey State Department of Environmental Protection has reviewed the proposed rule for the Emergency Response Data System (ERDS), published in the Federal Register dated October 9, 1990. The staff, as a result of this review, submits the following comments:

As an organization dedicated to the protection of the health and safety of the citizens of New Jersey, the BNE initiates offsite response activities at the Notification of Unusual Event (NUE) level. By law, the BNE performs both engineering and dose assessments in the formulation of protective actions. These assessments begin when a NUE emergency is declared. Plant conditions, meteorological data, and radiation levels are tracked to ensure that, if the event should escalate to the Alert level or higher, the State has sufficient data to make appropriate protective actions as warranted. In addition, by initiating offsite response at the NUE level, the BNE is able to anticipate and plan for any changes in plant condition.

The activation of the ERDS at the NUE would significantly improve the BNE's capability to fulfill its response role during an emergency. Information which is currently obtained verbally or by facsimile from the control room would be received in a more accurate and timely manner. This would allow the licensee, which is currently required to provide this information to the BNE at the NUE, to more effectively use its time and resources for event mitigation. In addition, activation of the ERDS at the NUE would decrease the amount of time spent by the BNE for required review and verification of questionable data. More attention would be

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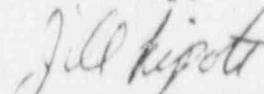
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directed at the event than toward the gathering of information. The NRC prototype test of ERDS supports this, concluding that response teams "functioned more efficiently and their assessments were more timely... major improvements in [their] ability to focus on significant factors and to predict the course of events were noted."

In order to ensure that State response to a nuclear event is timely and adequate, the BNE participates in at least two full exercises a year and as many as eight quarterly exercises. Additional training is held for primary responders (initial contact personnel for nuclear events) on a monthly basis. The BNE believes that ERDS can only be used to fullest advantage if it is available for use during these exercises. Scenarios developed to enhance assessment skills and to prompt the formulation of protective action recommendations would be invaluable to the New Jersey response program. Therefore, the BNE proposes that, through coordination with the utility and the NRC, ERDS be available for training at both designated exercises and for additional training.

If you have any further questions or need clarification on our comments, please contact staff representative Stephen Stasolla at (609) 987-2032.

Sincerely,



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Assistant Director

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