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OFFICE OF SECRETARY
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AEP:NRC:0508M

Mr. Samuel J. Chilk
Secretary of the Commission
U.S. Nuclear Regulatory Commission
Washington, DC 20555
Proposed Rule - Emergency Response Data System (ERDS)
10 CFR Part 50

Attention: Docket and Service Branch

December 21, 1990

Dear Mr. Chilk:

In response to the proposed rule on the emergency response data system (Federal Register Volume 55, Number 195, dated October 9, 1990), we offer the comments detailed in the attachment for the Donald C. Cook Nuclear Plant. Please note that we have discussed the proposed ERDS in previous correspondence (reference our letters dated May 25, 1989 and November 17, 1989).

Of particular concern to the Donald C. Cook Nuclear Plant are the extensive hardware modifications necessary for us to participate in the ERDS program. We are developing an implementation plan for ERDS, but because of the extensive hardware modifications necessary, we would not be able to meet the implementation schedule suggested in the proposed rule.

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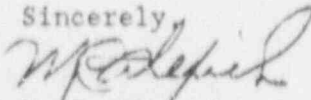
Mr. S. J. Chilk

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AEP:NRC:0508M

We appreciate the opportunity to comment on the proposed rule and would be pleased to discuss our position with appropriate NRC personnel.

Sincerely,



M. P. Alexich
Vice President

cc: D. H. Williams, Jr.
A. A. Blind - Bridgman
G. Charnoff
NRC Resident Inspector - Bridgman
A. B. Davis - NRC Region III
J. R. Padgett
NFEM Section Chief

Our specific comments concern the issues noted below.

1. When previously given the opportunity to volunteer for the ERDS project, we declined (at that time) to participate. This decision was based on several factors, such as the present inability of some of our computer systems to communicate with each other and the limited output capabilities of the systems. We informed the NRC that we planned to improve our capability to participate in the ERDS program as a long range objective as part of our ongoing computer development project.
2. The schedule suggested in the proposed rule will be extremely difficult for us to meet. Before we can participate in the program, significant modifications must be made. For example, we are presently replacing our plant process computers (PPC). This activity is not scheduled for completion for Unit 2 until the next refueling outage (anticipated to begin in February 1992).

In addition, the computer handling our safety parameter display system (the TSC computer) is not scheduled for update. This computer is the only system tracking many of the parameters needed for the ERDS. In order to upgrade the TSC computer, a fault tolerant processing unit would have to be installed. This must be done during an outage because of operability requirements. Although this upgrade is being viewed as a long term option for business reasons, it has been neither approved nor funded.

Software would then have to be developed to tie all of the ERDS parameters together. Data gathered by this software would have to be taken from the PPC, TSC, meteorological, and radiation monitoring system computers. The implementation and testing of this software, as well as some of its development, would have to take place after the computer system upgrades scheduled for the 1992 outages.

The computer display systems in both emergency response facilities will have to be upgraded so that the same data supplied to the control room is available in our emergency response facilities. This is necessary to ensure that the data available to each of the facilities is consistent and that data confirmed verbally to the NRC matches that given by the ERDS system.

3. Our interpretation of the NRC documentation was that ERDS was not supposed to drive plant modifications. To implement an emergency response data system as described, we will have to perform the above modifications.

A preliminary cost estimate of \$1.2 million dollars has been calculated for Cook Nuclear Plant to implement a functioning ERDS. This only includes reconfiguring input/output devices and developing software to transfer data to a central communications device. Computer upgrades (described earlier) that are necessary to provide consistent data to all emergency response facilities have not been included in this estimate. The financial and schedule impacts that these additional upgrades would require have not yet been determined.

4. We believe that management during an emergency is a potential problem given that both NRC and State of Michigan officials will be receiving and interpreting data. We feel this may lead to "overmanagement" in accident situations and possible misinterpretation of data.
5. Our simulator is used to drive our emergency preparedness exercises and drills. For this reason an ERDS connection to our simulator is needed. The additional connection will increase the cost of the program and require a longer implementation schedule. If an ERDS connection to our simulator is not made, we will not be able to practice using the system with exercise data.
6. We believe that an additional position is needed to supplement our control room staff to fulfill the operating requirements of ERDS. For this reason, we would prefer that the ERDS initiation be made from our Technical Support Center (TSC) rather than the control room. Since the NRC proposes that the ERDS link be operational "immediately, within one hour" following any Alert level or greater emergency classification, it would be more efficient and less burdensome on the operators to connect from the TSC, which is required to be activated within one hour. The additional manpower to operate the ERDS is more readily available in the TSC and no additional burden would be placed on a control room staff that is already deeply involved in mitigating the consequences of the accident.