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BOSTON EDISON

Pilgrim Nuclear Power Station
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Secretary of the Commission
U.S. Nuclear Regulatory Commission
Docketing and Service Branch
Washington, DC 20555

License DPR-35
Docket 50-293

Proposed Rule - 10CFR50:
Emergency Response Data System (55FR41095)

Reference: NUREG-1394 "Emergency Response Data System (ERDS) Implementation"

Boston Edison has reviewed the above proposed rule and recommends the following change to 50.72(a)4:

The licensee shall activate the Emergency Response Data System (ERDS) for any condition that requires the declaration of an emergency class of alert, site area emergency, or general emergency within 60 minutes of the time that the NRC Operations Center is notified of the emergency class declaration.

Rational 9101030083 901210
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In all likelihood, the notification to the NRC of the declaration of an emergency (alert or higher) will be made from the plant control room. It is our contention that immediate initiation of the ERDS places an unnecessary burden on the control room personnel which could negatively impact their response to the event. The ERDS could be more appropriately initiated by personnel in another emergency response facility (the Technical Support Center).

The reasoning becomes more evident when considering potential problems with the ERDS. NUREG-1394 (Reference 1), Appendix B, page 3 discusses dealing with problems initiating ERDS:

- (a) ... "If more than five minutes elapses without a response, site personnel should notify the NRC before disconnecting the line."
- (b) ... "If the ERDS responds with the denial message, ..."
- (c) ... "If the ERDS does not send an initiate message ..."
- (f) "If the site is inadvertently terminated ... It is the responsibility of the site to monitor the outgoing line for loss of communication."

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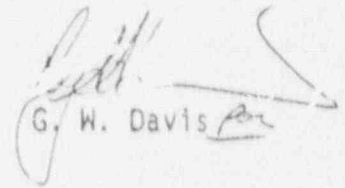
Secretary of the Commission

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Because the ERDS is a non-safety system, resolution of potential problems should not be part of the control room responsibilities. The proposed change will allow operation and maintenance of the ERDS from any emergency response facility.

Finally, it is reasonable to assume that responding NRC personnel may not arrive at their emergency response locations for up to 60 minutes after the emergency declaration. Therefore, initiation of the ERDS earlier should not be required.

Should you have any questions, please contact John S. Dietrich, Licensing Division Manger at (617) 849-8948.



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