

DOCKET NUMBER
PROPOSED RULE **PR 50** (55FR41095)
TENNESSEE VALLEY AUTHORITY

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CHATTANOOGA, TENNESSEE 37401

DOCKETED
USNRC

5B Lookout Place

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OFFICE OF SECRETARY
DOCKETING & SERVICE
BRANCH

Mr. Samuel J. Chilk
Secretary of the Commission
U.S. Nuclear Regulatory Commission
ATTN: Docketing and Service Branch
Washington, D.C. 20555

Dear Mr. Chilk:

NUCLEAR REGULATORY COMMISSION (NRC) NOTICE OF PROPOSED RULEMAKING: 10 CFR PART 50, EMERGENCY RESPONSE DATA SYSTEM (ERDS)

The Tennessee Valley Authority (TVA) has reviewed and is pleased to provide comments on the advance notice of proposed rulemaking posted in the October 9, 1990, Federal Register (55 FR 41095-91099) regarding ERDS.

TVA does not support participation in the ERDS program. This program, if put in place, could allow a significant volume of outside interaction into plant activities already in progress that could potentially detract from the licensee's emergency response activities. In addition, with ERDS not only available to NRC but also to State and local agencies, licensees could be subjected to a significant amount of second guessing of plant actions which could compound problems already being worked. TVA is also concerned that utilities could incur the cost for state and local agencies interaction with the NRC from the standpoint of communications hardware, related equipment, operational expenses, and maintenance. This could also lead to the licensee having to ensure expertise is available to these agencies for interpretation of ERDS.

TVA appreciates the opportunity to comment on this notice of a proposed rule.

Very truly yours,

TENNESSEE VALLEY AUTHORITY

Mark J. Buszynski
E. G. Wallace, Manager
Nuclear Licensing and
Regulatory Affairs

cc: See page 2

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U.S. Nuclear Regulatory Commission

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