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Duquesne Light Company

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DUCKETING
USNRC

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December 20, 1990

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U.S. NUCLEAR REGULATORY COMMISSION
DOCKETING & SERVICE
FRANKLIN

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

Subject: Proposed Rule, "Emergency Response Data System" 55FR 41095

Gentlemen:

In response to the Nuclear Regulatory Commission's (NRC) request for comments, the Duquesne Light Company (DLC) is submitting these comments for consideration. The proposed rule, "Emergency Response Data System" (55FR41095), would amend 10 CFR Part 50 to require licensees to participate in the Emergency Response Data System (ERDS) program and to set a definite schedule for its implementation.

DLC has agreed to participate in the ERDS program per NRC request in Generic Letter 89-15. However, there are several aspects of the proposed rule which need clarification.

Activation of the ERDS is to occur at the declaration of an alert or higher Emergency Preparedness Planning (EPP) classification. DLC would like this changed to activation of the Technical Support Center. This would permit placement of ERDS support equipment in an area other than the Control Room. Personnel are at a premium in the Control Room during the early stages of an accident. This would leave no one to address problems with the ERDS if they arise.


The NRC proposes that the ERDS system be tested quarterly. DLC would like this changed to semi-annual testing. Quarterly testing with all facilities involved would be time consuming. A change to semi-annual testing would reduce annual man-hours on the system.

The proposed ruling would permit the states within the Emergency Planning Zone (EPZ) to obtain ERDS data from the NRC after the system has been activated. This should be addressed to all states in the EPZ not merely to the host state as DLC has been told in discussions with the NRC.

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ERDS hardware should not be permitted to become a Category 1 system. DLC's current ERDS design will use "off the shelf" personal computers. This will keep the overall cost of the system within reason.

Sincerely,


J. D. Sieber
Vice President
Nuclear Group