

VIRGINIA ELECTRIC AND POWER COMPANY  
RICHMOND, VIRGINIA 23261

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(55FR 41095)

January 16, 1991

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Secretary of the Commission  
United States Nuclear Regulatory Commission  
Attention: Documenting and Service Branch  
Washington, D. C. 20555

Serial No. 90-643  
NO/RFB R1

Gentlemen:

VIRGINIA ELECTRIC AND POWER COMPANY  
COMMENTS ON PROPOSED RULEMAKING  
EMERGENCY RESPONSE DATA SYSTEM

The NRC proposed rulemaking to require licensees to implement an Emergency Response Data System (ERDS). Comments were solicited from licensees on this proposed rulemaking in the Federal Register dated October 9, 1990.

We endorse the concept of an Emergency Response Data System and have voluntarily committed to participate in implementing the system at our plants. We believe that implementation of ERDS will facilitate the transfer of information on plant safety status during an emergency. ERDS should also represent an improvement over the manually operated Emergency Notification System. However, it needs to be reiterated that ERDS is only an informational system. Implementation of ERDS should not be the pretext for promoting an intervening regulatory function on the conduct of operations during an emergency. The licensee of a nuclear power facility should continue to be the sole responsible agency for operation of the plant during an emergency.

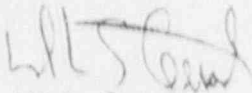
We submit the following additional comments for your consideration:

1. Access to ERDS should be specifically limited in the rulemaking to the NRC to ensure present communication interfaces and organizational relationships between the utility and other governmental agencies are not circumvented or degraded by their ability to directly access ERDS information. Information flow paths during an emergency need to be maintained and controlled as currently configured to ensure emergency information is properly managed and appropriately disseminated to avoid confusion.
2. The licensee should not be held responsible for the communication data link from the access point of the station computer system to the NRC operations center. Maintenance and repair of the system should be clearly defined in the rule as a NRC responsibility.

3. The ERDS should incorporate built in test equipment to identify potential equipment problems. Our Emergency Response Facility Data Acquisition System requires testing more frequently than quarterly. Based on our experience, system checks more frequent than quarterly will be required to achieve a system availability comparable to the transmitting system.

We believe that implementation of the NRC Emergency Response Data System will enable the licensee to better use its time and resources to effectively and efficiently deal with the transfer of information to the NRC during an emergency. We appreciate the opportunity to provide recommendations on the proposed rulemaking and request that these comments be considered in future deliberations concerning the proposed rule.

Very truly yours,



W. L. Stewart  
Senior Vice President - Nuclear