

DRAFT SUPPORTING STATEMENT FOR
EMERGENCY RESPONSE DATA SYSTEM

10 CFR 50.72(a) AND APPENDIX E, SECTION VI

DESCRIPTION OF THE INFORMATION COLLECTION

Each nuclear power reactor licensee is required to establish and maintain an Emergency Response Data System (ERDS) for all operating nuclear power reactor facilities except for exempt plants or those that are permanently or indefinitely shut down.

A. JUSTIFICATION

1. Need for and Practical Utility of the Collection of Information

The Emergency Response Data System is a direct electronic data link between operating reactor computer data systems and the NRC Operations Center (NRCOC) used during the declaration of an alert or higher emergency classification. The ERDS supplements the voice transmission of information over the currently installed Emergency Notification System (ENS) and is activated by a licensee when an alert or higher emergency occurs at a licensed nuclear power facility. ERDS provides NRC with a reliable and effective communication system that allows it to monitor critical parameters during an emergency at operating power reactors.

Section 50.72(a)ii(4) requires the licensee to activate the ERDS as soon as possible but not later than one hour after declaring an emergency class of alert, site area emergency, or general emergency.

Appendix E, VI

Section 1 requires that licensees test the ERDS periodically to verify system availability and operability. The frequency of ERDS testing is quarterly unless otherwise set by NRC based on demonstrated system performance.

Section 2.a requires that computer systems transmit in-plant data points for pressurized water reactors or boiling water reactors if the data points are resident in the in-plant computer.

Section 2.b requires the selected parameter sets of data to be transmitted at time intervals of not less than 15 seconds or more than 60 seconds.

Section 2.c requires all link control and data transmission be established in a format compatible with the NRC receiving system.

Section 3.a requires that any hardware or software changes that affect the transmitted data points identified in the ERDS Data Point Library (site specific data base residing on the ERDS computer) must be reported to the NRC within 30 days after changes are completed.

Section 3.b requires that NRC be notified as soon as practicable and at least 30 days prior to any changes to computer hardware or software, with the exception of data point modifications, that could affect the transmission format and the ERDS computer communication protocol.

Section 4.a requires the licensee to develop and submit an ERDS implementation program plan to the NRC by October 28, 1991.

2. Agency Use of Information

The real-time data transmitted utilizing the ERDS is used by NRC to fulfill its role to monitor plant conditions during an on-site alert or higher emergency at a nuclear power facility. In addition, information concerning any computer system hardware and software changes must be reported to the NRC to ensure system operational compatibility.

3. Reduction of Burden Through Information Technology

Codification of the ERDS rule reduces the burden on licensees for telephonic transmission of data to the NRC during an emergency by use of a real-time data link. Information concerning the system changes are unique to each licensee and are submitted infrequently under the requirements of this rule, and therefore, will not be adaptable to automated routine information technology.

4. Efforts to Identify Duplication and Use Similar Information

The Information Requirements Control Automated System (IRCAS) was searched for duplication, and none was found.

In the past, during an alert or higher emergency, the NRC would receive plant data from the licensee over telephone lines via the Emergency Notification System (ENS). The ERDS, which supplements the ENS, transmits plant data in a more accurate and timely manner than the ENS, allowing more efficient and accurate assessment of emergencies to protect public health and safety. During an emergency condition, ENS provides voice communication between the NRC and licensee personnel in the technical support center to obtain the status of plant equipment, while ERDS provides the NRC access to the plant computer to monitor process data (pressure, temperature, level, etc.) in real time.

5. Effort to Reduce Small Business Burden

These requirements do not impact small business. The respondents are nuclear power plant licensees.

6. Consequences to Federal Program or Policy Activities if the Collection is Not Conducted or is Conducted Less Frequently

Required reports are collected and evaluated on a continuing basis as events occur. If the information was not collected during an alert or higher emergency, the NRC would have to rely on less accurate and less timely means that could affect the protection of public health and safety. The schedule for collecting the information is the minimum frequency which will permit NRC to assure that public health and safety are adequately protected.

7. Circumstances which Justify Variation from OMB Guidelines

Contrary to the OMB guidelines in 5 CFR 1320.6(b), these sections of Part 50 require that licensees submit reports and transmit real-time data to the NRC.

The requirements of 50.72(a)(4) provide for electronic real-time transmittal of data to the NRC via ERDS during an alert or higher emergency at a nuclear power facility so that NRC has information needed to fulfill its role for protection of public health and safety.

Appendix E, Section VI, paragraphs 3.a and 3.b require a report within 30 days of any hardware or software changes that affect the transmitted data point identified in the Emergency Response Data System Data Point Library (data base) and changes that could affect the transmission format and communication protocol. This information is needed by the NRC to ensure that any system changes will not affect the ability to transmit critical parameters of a limited set of data to NRC so that NRC can fulfill its role to monitor a nuclear power reactor during an on-site alert or higher emergency to protect public health and safety.

8. Consultations Outside the NRC

Notice of opportunity for public comment on this information collection has been published in the Federal Register.

9. Payment or Gift to Respondents

Not applicable.

10. Confidentiality of Information

None, except for proprietary information.

11. Justification for Sensitive Questions

The subject information collections do not involve sensitive information.

12. Estimated Industry Burden and Burden Hour Cost

There are 104 licensees affected by this rule; however, except for quarterly testing, only a small percentage of licensees are expected to submit a response each year. The table below reflects this and is based on staff's best estimate.

INDUSTRY BURDEN AND BURDEN HOUR COST

Annualized Requirement	Responses Annually	Burden per Response (Staff Hour)	Total Amount of Burden (Staff Hour)	Annual cost at \$156/Hour
50.72(A)(4)	7	4	28	\$4,368
Appendix E, VI.1 Periodic Testing	412	4	1648	\$247,088
Appendix E, VI: 2.a, 2.b, & 2.c	(Detail requirements of 50.72(a)(4))			
Appendix E, VI.3.a	14	12	168	\$26,208
Appendix E, VI.3.b	2	12	24	\$3,744
Appendix E, VI.4.a	Complete			
Totals	435	4.3*	1868	\$291,408

* Average burden - Staff Hours

Staff estimates that of the total burden reflected above, 10 percent (187 hours) is attributable to recordkeeping associated with the requirement, and 90 percent (1681 hours) is reporting.

13. Estimate of Other Additional Costs

None.

14. Estimated Annualized Cost to the Federal Government

ANNUALIZED BURDEN AND COST TO THE FEDERAL GOVERNMENT

Annualized Requirement	Responses Annually	Burden per Response (Staff Hour)	Total Amount of Burden (Staff Hour)	Annual cost at \$156/Hour
50.72 (a)(4) Review of Transmitted Data	7	100	700	\$109,200
Appendix E, VI.1 Periodic Testing	412	4	1,648	\$257,088
Appendix E, VI.3.a Review Changes Affecting Data Points	14	16	244	\$34,944
Appendix E, VI.3.b Review Changes Affecting Transmission & Protocol	2	16	32	\$4,992
Appendix E, VI.4.a Review of ERDS Implementation Plan	Complete			
Totals	435	6*	2604	\$406,224

* Average burden - Staff Hours

This cost is fully recovered through fee assessments to NRC licensees pursuant to 10 CFR Parts 170 and/or 171.

15. Reasons for Changes in Burden or Cost

Estimated licensee burden has been reduced from 2152 to 1868 hours. The estimated cost for the Federal Government has been increased from \$381,264 to \$406,224. The primary reasons for this are:

- a. System maturity has resulted in fewer modifications.
- b. Increase in the number of declared emergencies at alert or higher level.

16. Publication for Statistical Use

The collection of information under this provision is not published for statistical use.

17. Reason for Not Displaying the Expiration Date

The requirement is contained in a regulation. Amending the Code of Federal Regulations to display information that, in an annual publication, could become obsolete would be unduly burdensome and too difficult to keep current.

18. Exceptions to the Certification Statement

None.

B. COLLECTIONS OF INFORMATION EMPLOYING STATISTICAL METHODS

Not applicable.