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(55FR 41095)

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Secretary of the Commission
U. S. Nuclear Regulatory Commission
Washington, DC 20555

Attention: Docketing and Service Branch

Gentlemen:

Subject: VIRGIL C. SUMMER STATION
PROPOSED RULE CHANGE TO
"EMERGENCY RESPONSE DATA SYSTEM" (ERDS)

Reference: 55FR41095

South Carolina Electric & Gas Company (SCE&G) has reviewed the subject proposed change to 10CFR50 which would require licensees to participate in the Emergency Response Data System (ERDS) program and to set a definite schedule for its implementation. The following comments are submitted:

- Contrary to the proposed change, which estimates 5 man-days per reactor year for a licensee staff to maintain the on-site ERDS configuration control program, it is estimated that it will require 15 man-days per reactor year; this is based upon the anticipated documentation which must be generated and submitted to the NRC as changes are made in plant computer systems supporting the ERDS.
- Since the information provided by the ERDS alone cannot convey a total understanding of plant activities, a potential may exist for the NRC to alter recommended protective actions to the detriment of the communities involved.
- Implementation of the ERDS would not allow a utility to redirect its resources to other tasks during an emergency since the voice channel to the NRC must be kept open. In addition, ERDS will require additional resources to verify and maintain the necessary equipment to ensure that the transmitted data is accurate.
- The NRC intends to make EPDS information available to state governments. If a state chooses to utilize the ERDS information, it would most likely require the licensee to pay for the equipment necessary to receive and process the data.

Several states, including South Carolina, have nuclear power plants with reactors provided by different vendors. The availability of the ERDS information at the state level implies that the state and local governments will provide their personnel with the necessary skills to read and interpret the information from varying reactor types. This will add to an already overtaxed system responsible for responding to emergencies at commercial nuclear reactors. Without adequate initial and continued requalification training, the information supplied by ERDS would only serve to add confusion to an emergency situation.

If there are any questions on this subject, please contact Mr. Hal Donnelly of my staff on 803-345-4722.

Very truly yours,



John L. Skolds

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