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North Atlantic

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OFFICE
FILE
ADJUDGE

The Northeast Utilities System
December 20, 1999

Docket No. 50-443

NYN-99118

Ms. Annette L. Vietti-Cook
Secretary of the Commission
Attention: Rulemaking and Adjudications Staff
U. S. Nuclear Regulatory Commission
Washington, D.C. 20555-0001

DOCKET NUMBER
PROPOSED RULE PR 20
(64FR35090)

Seabrook Station

Comments on Release of Solid Materials at Licensed Facilities: Issues Paper, Scoping Process
for Environmental Issues, and Notice of Public Meetings
(64 Fed. Reg. 35090, June 30, 1999)

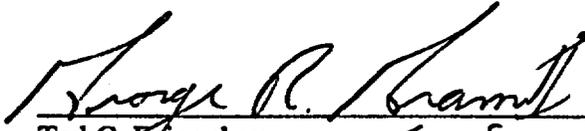
This letter provides the North Atlantic Energy Service Corporation (North Atlantic) response to the request for comment on the subject issues paper and scoping process, and notice of public meetings.

North Atlantic has reviewed the comments submitted separately by the Nuclear Energy Institute (NEI) on behalf of the nuclear energy industry and endorses those comments. North Atlantic commends this NRC initiative and recommends the development of a practical and measurable dose-based standard to account for the true radiological characteristics of the released material. The standard should be developed in a formal rulemaking process with full opportunity for stakeholder involvement. Thank you for the opportunity to comment on this important issue.

If you have any questions regarding these comments, please contact Mr. James M. Peschel, Manager - Regulatory Programs, at (603) 773-7194.

Very truly yours,

NORTH ATLANTIC ENERGY SERVICE CORP.



Ted C. Feigenbaum
Executive Vice President and
Chief Nuclear Officer

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cc: H. J. Miller, Regional Administrator
R. M. Pulsifer, NRC Project Manager, Project Directorate 1-2
R. K. Lorson, NRC Senior Resident Inspector