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The Northeast Utilities System

April 25, 2000

Docket No. 50-443 NYN-00039

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

PETITION RULE PRW 50-69
(65FR 6044)

Seabrook Station

Comments on Petition for Rulemaking by Westinghouse Electric Company LLC, on 10 CFR 50, Appendix G, Fracture Toughness Requirements (65 Fed. Reg. 6044, February 8, 2000)

This letter provides the North Atlantic Energy Service Corporation (North Atlantic) response to the request for comment on the Petition for Rulemeking for 10 CFR 50, Appendix G, Fracture Toughness Requirements. Notice of the opportunity to comment was published in the Federal Register (65 Fed. Reg. 6044, February 8, 2000).

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 believes that the petition provides the technical basis that the reactor pressure vessel temperature requirements are overly conservative and can be eliminated.

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