



North Atlantic

RECEIVED

'00 AUG 15 P 4:00

North Atlantic Energy Service Corporation

P.O. Box 300
Seabrook, NH 03874
(603) 474-9521

Rules and Directives Branch

The Northeast Utilities System

July 24, 2000

NYN-00065

Mr. David L. Meyer, Chief
Rules and Directives Branch
Division of Administrative Services
Office of Administration
Mail Stop: T6D59
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

DOCKET NUMBER

PETITION RULE PRM 50-70
(65FR 30550)

Seabrook Station
Response to Request for Comments on Petition for Rulemaking
Docket No. PRM-50-70
65 Fed. Reg. 30550, May 12, 2000

RECEIVED
20 AUG -1 AM 11:21
Rules and Directives Branch

This letter provides the North Atlantic Energy Service Corporation (North Atlantic) response to the request for comments on the Petition for Rulemaking, PRM-50-70, published in the Federal Register May 12, 2000 (65 Fed. Reg. 30550).

North Atlantic endorses the comments submitted by the Nuclear Energy Institute (NEI) on behalf of the nuclear industry. We believe that all co-owners of a nuclear power plant, as licensees, are required to adhere to the decommissioning funding requirements in the existing regulations. Therefore, there is no need for generic rulemaking to require licensees to comply with existing regulations. North Atlantic believes that the current NRC requirements for licensees are appropriate and adequate to ensure that decommissioning funds will be available. Accordingly, as the NRC considers the elements of the petition, we encourage the NRC to avoid changes to current financial assurance, reporting, or record keeping requirements that would impose additional requirements on nuclear power plant licensees that have no additional safety benefit.

Thank you for the opportunity to provide comments on this issue. Should you have any questions regarding this matter please contact Mr. James M. Peschel, Regulatory Programs Manager, at (603) 773-7194.

Very truly yours,

NORTH ATLANTIC ENERGY SERVICE CORP.



Ted C. Feigenbaum
Executive Vice President and
Chief Nuclear Officer

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