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North Atlantic Energy Service Corporation P.O. Box 300 Seabrook, NH 03874 (603) 474-9521

The Northeast Utilities System

March 18, 2002

Docket No. 50-443 NYN-02029

Mr. Samuel J. Collins, Director Office of Nuclear Reactor Regulation U.S. Nuclear Regulatory Commission Washington, D.C. 20555-0001 Secretary

Office of the Secretary of the Commission Attn: Rulemakings and Ajudications Staff Washington, D.C. 20555-0001

North Atlantic Energy Service Corporation (NAESCO) Answer To The Commission's Order Modifying Licenses (Effective Immediately) <u>And Request For Extension Of Time</u>

Pursuant to the Commission's Order Modifying Licenses (Effective Immediately) (the "Order"), dated February 25, 2002, North Atlantic Energy Service Corporation (North Atlantic) herein submits its Answer and a Request for an Extension of Time in which to further reply to certain requirements in Attachment 2 to the Order, and a comparable Extension of Time to decide whether to request a hearing.

Section III.A. of the Order required North Atlantic to comply with the requirements described in Attachment 2 to the Order, except to the extent that a more stringent requirement is set forth in the license's security plan. North Atlantic was further ordered to immediately start implementation of the requirements in Attachment 2 to the Order, and complete implementation no later than August 31, 2002. Section C.1 of the Order required North Atlantic to provide a schedule for achieving compliance. Enclosure 1 to this letter provides North Atlantic's Answer and schedule for compliance with the measures set forth in Attachment 2 to the Order, as required by Sections III C.1 and IV of the Order.

Sections B.1 and B.2 of the Order required North Atlantic to notify the Commission within twenty (20) days, if: (1) North Atlantic is unable to comply with any of the requirements described in Attachment 2 to the Order; (2) compliance is unnecessary under North Atlantic's specific circumstances; (3) implementation would cause North Atlantic to be in violation of any regulation or a Seabrook Station license condition; or (4) any requirement described in Attachment 2 would adversely impact safe operation of the facility. To the extent any of these circumstances apply to Seabrook Station relative to any requirement described in Attachment 2 to the Order, the required justification and supplemental information is also set forth in Enclosure 1 to this letter.

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In a few instances, as detailed in Enclosure 1 to this letter, North Atlantic is unable to complete the necessary evaluations to determine what actions are appropriate and what an appropriate schedule for implementation would be within the required response time. As specified in the Order, a request for an extension of time in which to submit an answer or request a hearing must be made in writing, including a statement of good cause for the requested extension. In Enclosure 1, North Atlantic has provided good cause for extending the time to supplement the Answer to the Order herein submitted relative to certain requirements set forth in Attachment 2 to the Order until June 17, 2002, and a comparable extension of time to decide whether to file a request for hearing under the Order. North Atlantic specifically requests, for the reasons set forth in Enclosure 1, an extension of time to file a supplement to this Answer and to decide whether to request a hearing until June 17, 2002. At that time, North Atlantic will be in a position to answer whether it consents to the Order or needs a hearing on one or more of the terms.

North Atlantic commitments pertaining to this letter are provided in Enclosure 2.

Any questions regarding this letter, and the enclosures therein, should be directed to Mr. James M. Peschel, Manager - Regulatory Programs, at (603) 773-7194.

Very truly yours,

NORTH ATLANTIC ENERGY SERVICE CORP.

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Ted C. Feigenbaum Executive Vice President and Chief Nuclear Officer

Enclosures:

1) Answer to Order

2) Commitments

cc: H. J. Miller, NRC Region I Administrator
R.D. Starkey, NRC Project Manager, Project Directorate I-2
G.T. Dentel, NRC Senior Resident Inspector
Assistant General Counsel for Materials Litigation & Enforcement

United States Nuclear Regulatory Commission Attention: Document Control Desk Washington, D.C. 20555-0001

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