



**North Atlantic**

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The Northeast Utilities System

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**Seabrook Station**  
**"Comments on Draft Regulatory Guides DG-1091 and DG-1112"**

In December 2001, the Nuclear Regulatory Commission (NRC) issued Draft Regulatory Guides DG-1091 "Inservice Inspection Code Case Acceptability, ASME Section XI, Division 1" and DG-1112 "ASME Code Cases Not Approved For Use" and requested public comments. North Atlantic Energy Service Corporation (North Atlantic) has reviewed the subject draft regulatory guides and welcomes the opportunity to provide the following comments.

American Society of Mechanical Engineer's (ASME) Code Cases N-498-2, N-498-3 and N-498-4 "Alternative Rules for 10-Year System Hydrostatic Testing for Class 1, 2, and 3 Systems" are identified in Table 2 of DG-1091 as unacceptable Section XI Code Cases. It is the North Atlantic position that the subject ASME Code Cases should be included in Table 2 of DG-1091 as conditionally acceptable Section XI Code Cases with an appropriate hold time as provided for in ASME Code Case N-498-1. ASME Code Case N-498-1 was previously approved for general use by the NRC in Revision 12 of Regulatory Guide 1.147 "Inservice Inspection Code Case Acceptability, ASME Section XI, Division 1." Accordingly, the subject ASME Code Case should also be deleted from Table 2 of DG-1091 for consistency.

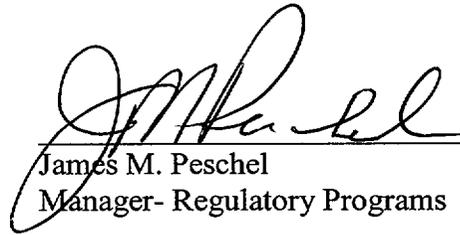
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Should you have any questions concerning the subject comments, please contact Mr. James M. Peschel, Manager - Regulatory Programs, at (603) 773-7194.

Very truly yours,

NORTH ATLANTIC ENERGY SERVICE CORP.



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James M. Peschel  
Manager- Regulatory Programs