



MASSACHUSETTS MUNICIPAL WHOLESAL ELEC TRIC COMPANY

May 24, 2006

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Mr. Samuel J. Collins, Regional Administrator
United States Nuclear Regulatory Commission
475 Allendale Road
King of Prussia, PA 19406-1415

Re: Single Largest Contingency Protocol (Seabrook impacts)

Dear Mr. Collins:

I am writing to you on behalf of the Seabrook Nuclear Unit's non-FPL Energy joint ownership group, which consists of Massachusetts Municipal Wholesale Electric Co. (MMWEC) and the Taunton and Hudson Municipal Light Departments. Through this letter, we are expressing full support for our operating agent, FPL Energy in its previously stated objection to the continued down powering of the Seabrook Station to a level below its full operating output.

On nineteen occasions¹ over the past eight months, ISO New England ("ISO-NE") Operations has required the Seabrook nuclear unit to down power from full operating output to a maximum of 1200 MW for brief periods of time in response to reliability concerns identified by the New York ISO ("NYISO") on its system. It is our understanding that in each of these incidents, NYISO Operations has identified a reliability concern on its system, has contacted ISO-NE Operations and requested that ISO-NE back down its single largest contingencies operating above 1200 MW to a maximum of 1200 MW. We have been advised that these actions stem from a reliability-based protocol (Single Largest Contingency). We also understand this protocol was drafted in 1984, between the two power pools to preserve system stability and reliability. We are concerned that a protocol which was developed to address transmission system reliability during the days of fully regulated, integrated electric service is subject to misuse in today's market-based paradigm.

These actions can create reliability impacts of their own to Seabrook and to the New England system. These incidents have been of very short duration, calling for the unit to quickly ramp down and, typically within a period of under an hour, to ramp back up to full output. Rapid ramping of nuclear units and their equipment can have operational impacts including premature maintenance which threaten the unit's availability to perform at full rated output. Seabrook performs an on-line maintenance protocol which requires steady state operations. Deviations from this operating requirement caused by down powering can, and generally are degrading from a maintenance planning perspective.

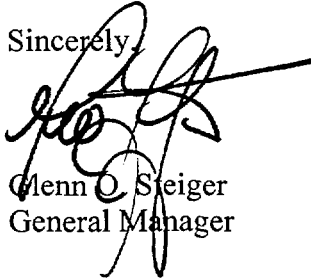
¹ October 19, 2005 at 18:39; February 5, 2006 at 17:34; February 18, 2006 at 20:19, February 21 at 08:10; and February 21 at 11:10; February 22 at 06:10

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Specifically, it is our concern that the Seabrook station may be suffering useful life and maintenance degradation beyond the norm. A mutually agreeable and workable solution must be crafted before any additional degradation occurs. We are asking that all cognizant parties be required to agree to an immediate cessation of this practice and prioritize the process toward finding the permanent solution.

Sincerely,



Glenn O. Steiger
General Manager

GOS:nab

cc: Shelton Cannon, Director, Office of Energy Markets and Reliability, FERC
Anna V. Cochrane, Director, Division of Tariffs and Market Development – East, FERC
Stephen G. Whitley – SVP and COO, ISO New England
Gordon van Welie, President and CEO, ISO New England
Michael C. Calimano, Vice President of Operations and Reliability – NYISO
Mark S. Lynch, President and CEO, NYISO
Joseph Blain, General Manager, Taunton Municipal Light Plant
Yakov Levin, General Manager, Hudson Municipal
John Aubrecht, Executive Director, FLP Energy