



**North Atlantic**

DOCKETED  
USNRC

PETITION RULE PRM 50-60  
(59 FR 17499)

17

North Atlantic Energy Service Corporation  
P.O. Box 300  
Seabrook, NH 03874  
(603) 474-9521, Fax (603) 474-2987

'94 JUL -5 AIC:45

The Northeast Utilities System

NYN- 94072

OFFICE OF SECRETARY  
DOCKETING & SERVICE  
BRANCH

Ted C. Feigenbaum  
Senior Vice President &  
Chief Nuclear Officer

June 29, 1994

Secretary of the Commission  
United States Nuclear Regulatory Commission  
Washington, DC 20555

Attention: Docketing and Service Branch

Subject: Virginia Power; Filing of Petition for Rulemaking, Docket No. PRM-50-60

Gentlemen:

On April 13, 1994 a Petition for rulemaking filed by Virginia Power was noticed in the Federal Register (59 FR 17499). That petition requested that the NRC change the frequency that a licensee conducts independent reviews of its emergency preparedness program from annually to biennially. North Atlantic Energy Service Corporation (North Atlantic), operator of Seabrook Station Unit 1, endorses the subject proposed rule change and agrees with the reasons cited in the petition.

Overall industry performance to date indicates effective implementation of emergency preparedness programs. Given this demonstrated level of performance and the existence of other regulatory oversight methods, a biennial independent review of the emergency preparedness program would be sufficient to verify continued program effectiveness. A biennial audit schedule would allow licensees to have increased flexibility in concentrating available audit resources in areas of observed weakness based on performance, rather than conducting a mandatory annual audit of marginal safety significance.

North Atlantic also supports the proposal that the independent audit be conducted in alternating years with the onsite emergency preparedness exercise, and as such would integrate well with another Virginia Power petition for rulemaking that requests a change in onsite exercise frequency from annual to biennial (58 FR 12339). The alternating schedule for exercises and audits would provide for an annual review of the performance of the emergency preparedness program.

If you have any questions concerning these comments, please contact Mr. Anthony M. Callendrello, Licensing Manager, at (603) 474-9521, extension 2751.

Very truly yours,

T. C. Feigenbaum

TCF:AMC/sm

9407140001 940629  
PDR PRM PDR  
50-60

DS10

United States Nuclear Regulatory Commission  
Attention: Docketing and Service Branch

June 29, 1994  
Page two

cc: Mr. Thomas T. Martin  
Regional Administrator  
United States Nuclear Regulatory Commission  
Region I  
475 Allendale Road  
King of Prussia, PA 19406

Mr. Albert W. De Agazio, Sr. Project Manager  
Project Directorate I-4  
Division of Reactor Projects  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555

Mr. Antone C. Cerne  
NRC Senior Resident Inspector  
P.O. Box 1149  
Seabrook, NH 03874

Nuclear Energy Institute  
1776 I Street  
Suite 400  
Washington, DC 20006-3708