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UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

OFFICE OF SECRETARY
RULEMAKING AND
ADJUDICATIONS STAFF

BEFORE THE COMMISSION

In the Matter of)
)
North Atlantic Energy Service Corporation)
)
(Seabrook Station))

Docket Nos. 50-443-LA
50-443-LA-2

MOTION FOR LEAVE TO FILE REPLY

On October 15, 1998, pursuant to 10 C.F.R. 2.107(a), North Atlantic Energy Service Corporation ("NAESCO"), the applicant in the above-captioned proceedings, filed a motion requesting issuance of an order terminating these two proceedings. NAESCO also stated its position that the issues raised in the Commission's Order of September 17, 1998, CLI-98-18, are moot.

On October 26, 1998, Seacoast Anti-Pollution League ("SAPL") and New England Coalition on Nuclear Pollution ("NECNP"), the petitioners to intervene with respect to these matters, filed a response to NAESCO's motion, stating a qualified objection to termination of the proceeding. The petitioners oppose "mooting of this proceeding, unless the Commission provides another forum for development of policy guidance on how licensees should present requests to amend technical specifications so as to assure the Commission can review related changes to assure all safety issues are properly resolved in favor of the public health and safety."

The petitioners have raised a novel issue affecting this proceeding and the interests of NAESCO. Accordingly, NAESCO requests leave to file the attached reply to the petitioners'

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response. NAESCO believes this reply is necessary to assure that the Commission is fully aware of NAESCO's position on this matter.

Respectfully submitted,


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ATTORNEYS FOR NORTH ATLANTIC
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Dated in Washington, D.C.
this 30th day of October, 1998