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US NRC

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The Northeast Utilities System

February 27, 1998

Docket No. 50-443

NYN-98018

AR#98000687

United States Nuclear Regulatory Commission
Chief, Rules and Directives Branch
Division of Administrative Services
Office of Administration
Washington, DC 20555-0001

Seabrook Station
Draft Regulatory Guide DG-5008
(Proposed Revision 2 of Regulatory Guide 5.62)
Reporting Of Safeguards Events

In December, 1997, the NRC issued for comment, Draft Regulatory Guide DG-5008 (Proposed Revision 2 of Regulatory Guide 5.62) "Reporting of Safeguards Events" providing an NRC acceptable guidance on determining when and how safeguards events should be reported.

North Atlantic Energy Service Corporation (North Atlantic), the operator of Seabrook Station, has reviewed the material within DG-5008 and is enclosing two comments for your consideration. In general, we feel that this document will provide useful guidance and direction in several areas, however, prior guidance contained in NUREG-1304 and Generic Letter 91-04 should be incorporated.

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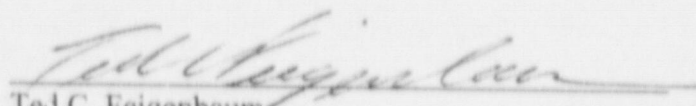
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If you have questions regarding our comments, please contact Mr. Anthony M. Callendrello,
Licensing Manager at (603) 773-7751.

Very truly yours,

NORTH ATLANTIC ENERGY SERVICE CORP.


Ted C. Feigenbaum
Executive Vice President and
Chief Nuclear Officer

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ENCLOSURE TO NYN-98018

The following comments are provided on the proposed Regulatory Guide 5.62.

1. While publishing this proposed regulatory guide, the NRC has provided no instruction on those of the interpretations that have been provided via NUREG 1304 and NRC Generic Letter 91-03. This guidance has not been incorporated either directly or indirectly in this document. We believe this guidance is particularly significant since it is based on the experience that has been gained over 10 years and deals with a number of subjects. It should be incorporated in the proposed Regulatory Guide.
2. Section 2.4, paragraph 13, page 11, deals with the loss of a weapon on site. Recommend that the term "on site" be changed to "within the Protected Area." to ensure consistency with the current interpretation used by licensees.