

North Atlantic

*DSO 9
J. Spagnoli
J. Segala*

RECEIVED

1998 APR -1 PM 3:09

RULES & DIR. BRANCH
US NRC

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

*63FR 9581
Feb. 25, 1998*

The Northeast Utilities System

March 27, 1998

(11)

Docket No. 50-443
NYN-98046

AR#98004733

United States Nuclear Regulatory Commission
Chief, Rules and Directives Branch
Division of Administrative Services
Office of Administration Mail Stop T6-D69
Washington, DC 20555-0001

Seabrook Station
Comments on Proposed Generic Letter
Laboratory Testing of Nuclear-Grade Activated Charcoal

On February 25, 1997, the NRC issued for comment, a proposed generic letter "Laboratory Testing of Nuclear-Grade Activated Charcoal," which would alert licensees that the NRC has determined that testing nuclear-grade activated charcoal to standards other than American Society for Testing and Materials (ASTM) D3803-1989, "Standard Test Method for Nuclear-Grade Activated Carbon," does not provide assurance for complying with their current licensing basis as it relates to dose limits.

North Atlantic Energy Service Corporation (North Atlantic), the operator of Seabrook Station, has reviewed the material within the proposed generic letter. North Atlantic would fall into category 2 of this generic letter as a plant in compliance with Technical Specifications that tests in accordance with a standard other than ASTM D3803-1989. North Atlantic has contacted our current test laboratory/supplier (NUCON) to discuss testing in service charcoal samples to ASTM D3803-1989. NUCON has indicated that they may not be able to meet the sixty day demand for testing services and supply new charcoal should existing charcoal fail to meet the requirements of ASTM D3803-1989, if this generic letter is issued as written to all licensees. North Atlantic has discussed this issue with representatives of the Nuclear Energy Institute (NEI) and has learned this is a common concern among the two major test laboratory/suppliers. The 60-day implementation schedule requested by the proposed generic letter does not permit sufficient time for licensees to test and submit results to the NRC.

9804030263 980327
PDR I&E
MISC PDR

A Deck

1/0

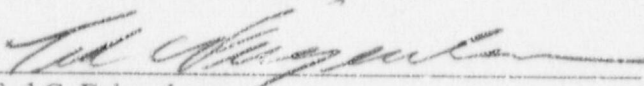
North Atlantic requests the NRC consider the impact and the feasibility for the industry to implement the requirements of this generic letter. An alternate approach may be to seek a phased in approach or expand the response period beyond 60 days. Either approach should be coordinated as a joint NRC-industry initiative to allow for a comprehensive discussion of NRC and industry concerns as they relate to charcoal test methodologies.

North Atlantic has reviewed the comments proposed by NEI and endorses those comments.

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

cc: Mr. Kurt Cozens
Nuclear Energy Institute
1776 I Street, NW
Suite 400
Washington, DC 20006-3708