



Northeast Nuclear Energy

Rope Ferry Rd. (Route 156), Waterford, CT 06385

Millstone Nuclear Power Station
Northeast Nuclear Energy Company
P.O. Box 128
Waterford, CT 06385-0128
(860) 447-1791
Fax (860) 444-4277

40

99 OCT 12 9 3 29

The Northeast Utilities System

OCT - 6 1999

Docket Nos. 50-336
50-423
B17891

DOCKET NUMBER
PROPOSED FILE # 50
(64FR 22580)

Re: 10 CFR 50.55a

Secretary of the Commission
U.S. Nuclear Regulatory Commission
Attention: Rulemakings and Adjudications Staff
Washington, D.C. 20555

Millstone Nuclear Power Station, Unit Nos. 2 and 3
Comments On Supplemental Proposed Rule Change To 10 CFR 50.55a
Industry Codes and Standards

On April 27, 1999, the Nuclear Regulatory Commission (NRC) issued a Federal Register Notice (Volume 64, Number 80, pages 22580-22588) requesting public comment on an amendment to a proposed rule change regarding the use of the requirements cited in 10 CFR 50.55a concerning the American Society of Mechanical Engineers (ASME) references with respect to the Edition and Addenda of the ASME Boiler and Pressure Vessel (B&PV) Code and the currently required 120 month updates to the Inservice Inspection (ISI) and Inservice Test (IST) Programs.

The proposal under consideration was put forth by the Nuclear Energy Institute on behalf of the industry. The proposal would modify the existing regulatory requirements under 10 CFR 50.55(a) to allow licensees the option of either adopting the referenced ASME B&PV Code editions or to continue to submit updates to their respective ISI/IST program descriptions in the future. The proposal does not restrict the NRC's mandate to safeguard the public health and safety in any way nor does it impose a requirement on licensees to implement the change. For these reasons, Northeast Nuclear Energy Company (NNECO) endorses the NEI proposal and commends the NRC for its support of this and similar regulatory burden reduction initiatives.

NNECO would like to suggest that additional significant burden reduction could be achieved under these regulations by rescinding the requirement that prevents a licensee's implementation, without prior staff review and approval, of those ASME Code Cases, Addendum, and Editions which have been issued in their final form. It is our

1/0

DS10

9910130143 991006
PDR PR
50 64FR22580 PDR

belief that this proposed change would have no significant result on overall plant safety and that reliance on existing requirements such as those embodied in 10 CFR 50.59 would provide an appropriate threshold for determining when prior NRC Staff review should be applied.

There are no regulatory commitments contained within this letter.

If the NRC Staff should have any questions or comments regarding this submittal, please contact Mr. David Smith at (860) 437-5840.

Very truly yours,

NORTHEAST NUCLEAR ENERGY COMPANY



Raymond P. Necci
Vice President - Nuclear Oversight and
Regulatory Affairs

cc:

The Honorable Nils J. Diaz, Commissioner, NRC
The Honorable Edward M^cGaffigan Jr., Commissioner, NRC
The Honorable Jeffrey S. Merrifield, Commissioner, NRC
Dr. William D. Travers, Executive Director for Operations, NRC
H. J. Miller, Region I Administrator
R. B. Eaton, NRC Senior Project Manager, Millstone Unit No. 2
D. P. Beaulieu, Senior Resident Inspector, Millstone Unit No. 2
J. A. Nakoski, NRC Project Manager, Millstone Unit No. 3
A. C. Cerne, Senior Resident Inspector, Millstone Unit No. 3