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OFFICE OF THE  
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U.S. NUCLEAR REGULATORY COMMISSION  
ADJUDICATIVE DIVISION

November 11, 1999

**VIA E-MAIL AND FIRST CLASS MAIL**

The Honorable Annette Vietti-Cook  
Secretary of the Commission  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555-0001  
(secy@nrc.gov)

Re: *Niagara Mohawk Power Corporation, et al.*  
(Nine Mile Point Nuclear Station, Units 1 and 2)  
Docket Nos. 50-220 and 50-410, - LT  
Notice of Consideration and Approval of Transfer of Facility Operating License

Dear Ms. Vietti-Cook:

On November 1, 1999, the Public Service Commission of the State of New York ("NYPS"), Oswego County and the Oswego City School District, and a group referred to as "Multiple Intervenors," submitted comments on the above-captioned license transfer proceeding related to the financial and technical qualifications of AmerGen Energy Company LLC ("AmerGen") to own and operate the Nine Mile Point Nuclear Station. These comments deal primarily with issues which are the same as, or similar to, issues raised in the Petition of Central Hudson Gas and Electric Corporation, Long Island Power Authority, and Rochester Gas and Electric Corporation for Leave to Intervene and Request for a Hearing, dated October 20, 1999 ("Co-Tenants' Petition").

In its November 1, 1999, Answer to the Co-Tenants' Petition, AmerGen addressed these issues and AmerGen's overall financial and technical qualifications in considerable detail. Additionally, AmerGen provided in its Application dated September 20, 1999, or incorporated by reference therein, information sufficient to demonstrate its technical and financial qualifications to own and operate the Nine Mile Point Nuclear Station. AmerGen, therefore, respectfully requests that the Commission consider AmerGen's November 1, 1999 Answer to the Co-Tenants' Petition as AmerGen's response to the Comments of NYPS, Oswego County and Oswego City School District, and Multiple Intervenors in accordance with 10 CFR § 2.1305(c).

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With regard to its technical qualifications, AmerGen wants to re-emphasize its commitment to the continued safe operation of the Nine Mile Point Nuclear Station, as well as the other nuclear units it is in the process of acquiring. AmerGen not only has the advantage of the skilled workforce and management expertise in place at Nine Mile Point, but will also have available to it the "best practices" and management expertise from its other nuclear units. Equally important is AmerGen's ongoing access to the significant nuclear operations expertise and experience of its parent companies, PECO Energy and British Energy.

With regard to its financial qualifications, the Application clearly demonstrates that AmerGen will have the financial resources necessary to ensure the continued safe operation of Nine Mile Point. In addition to the revenues that will be generated by the operation of Nine Mile Point and the other nuclear units AmerGen is acquiring, both PECO Energy and British Energy have made it clear that they are prepared to provide AmerGen with the financial support necessary to enable AmerGen to operate and maintain its nuclear units safely and have made a specific commitment to provide AmerGen with \$110 million in additional funding for this purpose.

Sincerely,



Paul J. Zaffuts  
Counsel for  
AmerGen Energy Company, LLC

cc: For the NRC:  
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