



North Atlantic

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The Northeast Utilities System
September 21, 1999

NYN-99087

The Honorable Greta J. Dicus
Chairman
U.S. Nuclear Regulatory Commission
Mail Stop O-16 C1
Washington, DC 20555-0001

DOCKET NUMBER
PROPOSED RULE **PR** 50
(64FR22580)
(43)

Seabrook Station
10 CFR 50.55a Supplemental Proposed Rule (64 Fed. Reg. 22580)

North Atlantic Energy Service Corporation (North Atlantic) endorses the proposed rulemaking to eliminate the requirement for licensees to revise their inservice inspection (ISI) and testing (IST) programs beyond a baseline edition and addenda of the American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel Code. Reconsideration of this requirement is warranted because there is not a substantial increase in safety commensurate with the cost of implementation.

We understand that ASME, individuals from the industry, and some NRC staff involved in ASME activities have communicated views opposing the proposed rule. Nevertheless, completion of the proposed rulemaking, consistent with the provisions of the backfitting rule and a demonstrated threshold of safety improvement, represents sound regulatory policy.

In conclusion, North Atlantic supports the proposed rule to eliminate the 120-month update requirement in 10 CFR 50.55a, *Codes and Standards*.

Should you have any questions regarding this matter, please contact Mr. James M. Peschel, Regulatory Compliance Manager, at (603) 773-7194.

Very truly yours,

NORTH ATLANTIC ENERGY SERVICE CORP.

Ted C. Feigenbaum
Executive Vice President and
Chief Nuclear Officer

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