



**North  
Atlantic**

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The Northeast Utilities System

December 22, 1999

LIC-99481

AR # 99010494

Ms. Patricia A. Kurkul  
Regional Administrator  
National Marine Fisheries Service  
Northeast Region  
One Blackburn Drive  
Gloucester, MA 01930-2298

Seabrook Station

Response to National Marine Fisheries Service on Seal Impact Mitigation Measures

North Atlantic Energy Service Corporation (North Atlantic) provides the enclosed response to the National Marine Fisheries Service (NMFS) in accordance with Paragraph 5(a) of the NMFS Letter of Authorization<sup>1</sup> to take a small number of seals incidental to intake Cooling Water System operations at Seabrook Station. The referenced paragraph states the following:

*The Holder of this Authorization is required to report, by January 1, 2000, to the Administrator, Northeast Region, National Marine Fisheries Service (NMFS), on possible mitigation measures effecting the least practicable adverse impact on the seals specified in Paragraph 4 (i.e. harbor seals, gray seals, harp seals and hooded seals). The report shall also include a recommendation of which measures, if any, the holder could feasibly implement. A description of any mitigation measures that Seabrook Station has considered, but determined would not be feasible, must be included as well. After submission of such report, NMFS shall determine whether the Holder of the Authorization must implement measures to effect the least practicable adverse impact on the seals. If NMFS determines that such measures must be implemented, then NMFS shall specify, after consultation with the Holder of the Authorization, the schedule and other conditions for implementation of the measures. Implementation of such measures must be completed no later than 42 months after the date of issuance of the final rule. Failure of the Holder of the Authorization to implement such measures in accordance with the NMFS specification may be grounds to invalidate the Authorization.*

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<sup>1</sup> National Marine Fisheries Service Letter of Authorization dated July 2, 1999, from H. Diaz-Soltero (NMFS) to T. Feigenbaum (North Atlantic)

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North Atlantic previously reported<sup>2</sup> on its plans to install a Seal Deterrent Barrier on Seabrook Station's three offshore intake structures during the summer of 1999, in order to preclude the entrapment of seals. This submittal also included a description of mitigation measures that North Atlantic considered and determined would not be feasible.

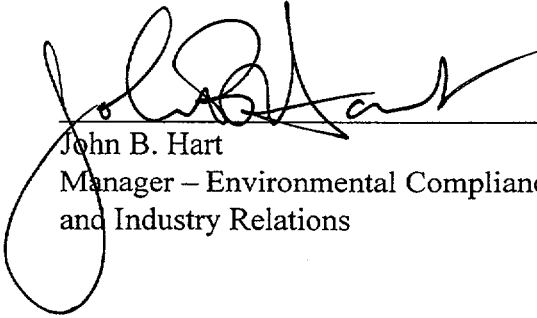
North Atlantic completed installation of Seal Deterrent Barriers on all three of Seabrook Station's offshore intake structures on August 18, 1999. The deterrent barriers are attached to the existing cooling water system intake structure bars and consist of pre-fabricated panels made out of the same copper-nickel alloy as the existing vertical intake bars. The barrier panels reduce the vertical bar spacing on each intake from about 14.5 inches to about 4-5 inches.

No seals have been entrapped since the installation was completed. This time frame corresponds with the peak seal entrapment period (late summer to mid-fall). As a result, North Atlantic believes that the Seal Deterrent Barrier is a fully effective mitigation measure for precluding the entrapment of seals into Seabrook Station's offshore intake structures and that the aforementioned requirements of the National Marine Fisheries Service Letter of Authorization have been satisfied.

If you have additional questions, please contact me at (603) 773-7762.

Very truly yours,

NORTH ATLANTIC ENERGY SERVICE CORP.



John B. Hart  
Manager – Environmental Compliance  
and Industry Relations

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<sup>2</sup> North Atlantic Letter dated May 25, 1999, "Seal Deterrent Barrier," from J. Hart (North Atlantic) to C. Deloi (EPA) and J. Rittgers (NMFS)

cc (with Enclosure)

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