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The Northeast Utilities System

December 29, 1999

NYN-99121

Mr. David L. Meyer
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U. S. Nuclear Regulatory Commission
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Seabrook Station
Comments on the Pilot Program for the New Regulatory Oversight Program
(64 Fed. Reg. 40394, July 26, 1999)

This letter provides the North Atlantic Energy Service Corporation (North Atlantic) response to the request for comment on the Pilot Program for the New Regulatory Oversight Program published in the Federal Register on July 26, 1999 (64 Fed. Reg. 40394).

North Atlantic has reviewed the comments submitted separately by the Nuclear Energy Institute (NEI) on behalf of the nuclear energy industry. We endorse the NEI comments and provide the following specific comments.

The application of 10 CFR 50.9 to inadvertent errors in the performance indicator data requires resolution prior to implementation of the program. We endorse NEI's position regarding the use of enforcement discretion until all questions related to the definition of the performance indicators have been resolved and the NRC has had experience validating the performance indicators at all plants. In addition, we believe that the proposed 14-day submittal period for the performance indicators is not adequate to ensure the quality of the data. North Atlantic believes, that given the importance of the performance indicators, the time frame for submittal should be consistent with the time frame for issuance of an inspection report, given that the NRC will not be taking prompt action based upon the data submitted. The Resident Inspectors will be aware of plant performance with regard to the performance indicators and will be capable of providing insights to NRC management on a real time basis if any action by the agency should be required.

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U.S. Nuclear Regulatory Commission
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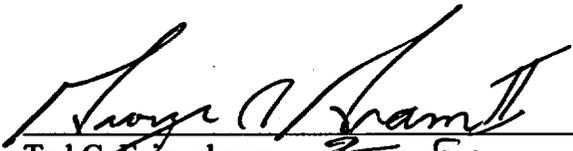
A reasonable time frame, such as the time required to prepare an inspection report, will allow the NRC to meet its goals and will allow the licensees to effectively utilize their resources and will minimize the potential for submittals providing corrections.

With resolution of NEI's and our comments, we believe the New Regulatory Oversight Program will allow the NRC and licensees to more effectively focus their resources on safety significant issues and allow the NRC to achieve its goals regarding the program.

Thank you for the opportunity to comment on this important program. If you have any questions regarding these comments, please contact Mr. James M. Peschel, Manager - Regulatory Programs, at (603) 773-7194.

Very truly yours,

NORTH ATLANTIC ENERGY SERVICE CORP.



Ted C. Feigenbaum *for*
Executive Vice President and
Chief Nuclear Officer

cc: H. J. Miller, Regional Administrator
R. M. Pulsifer, NRC Project Manager, Project Directorate 1-2
R. K. Lorson, NRC Senior Resident Inspector