



**Northeast
Nuclear Energy**

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DEC 29 1999

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Mr. David L. Meyer
Chief, Rules and Directives Branch
Division of Administrative Services
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Millstone Nuclear Power Station
Comments On The Pilot Program For The New Regulatory Oversight Program

These comments are submitted on behalf of Northeast Nuclear Energy Company's Millstone Station in response to the *Federal Register* notice concerning the Pilot Program for the New Regulatory Oversight Program, (64 *Federal Register* 40394 of July 26, 1999). Northeast Nuclear Energy Company (NNECO) endorses the comments provided by the Nuclear Energy Institute (NEI) on behalf of the nuclear industry and those submitted by the Shadow Plant Program as well. NNECO also commends the progress made by the NRC Staff with its continuing efforts in developing the new Regulatory Oversight Process, which is a substantial improvement from the previous methodology.

NNECO also reiterates the concerns raised by NEI regarding the applicability of 10 CFR 50.9 for inadvertent errors in the submittal of performance indicator data, the short time interval for reporting performance indicators to the NRC, and the overly conservative Green-White threshold for the Security Equipment Performance Index indicator. NNECO believes that alternatives proposed by NEI in public meetings will further improve the program such that the new oversight process can be successful in achieving its goals to:

- Ensure that nuclear power plants continue to operate safely
- Improve NRC efficiency by focusing resources
- Reduce unnecessary regulatory burden on licensees
- Enhance public confidence in the safe operation of nuclear power plants

There are no regulatory commitments contained in this letter.

If you have any questions regarding these comments, please contact Mr. Paul Willoughby at (860) 447-1791, extension 3655.

Very truly yours,

NORTHEAST NUCLEAR ENERGY COMPANY

A handwritten signature in cursive script, reading "L. J. Olivier". The signature is written in black ink and is positioned above a horizontal line.

L. J. Olivier
Senior Vice President and
Chief Nuclear Officer

cc: H. J. Miller, Region I Administrator
D. P. Beaulieu, Senior Resident Inspector, Millstone Unit No. 2
R. B. Eaton, NRC Senior Project Manager, Millstone Unit No. 2
A. C. Cerne, Senior Resident Inspector, Millstone Unit No. 3
J. A. Nakoski, NRC Senior Project Manager, Millstone Unit No. 3