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The Northeast Utilities System

February 11, 2000

NYN-00010

Mr. David L. Meyer
Chief, Rules and Directives Branch
Division of Administrative Services
Office of Administration
U. S. Nuclear Regulatory Commission
Washington, D.C. 20555-0001

DOCKET NUMBER
PETITION RULE PRM 26-2
(64FR67202)

Seabrook Station
Comments on Petition for Rulemaking; Request for Comments on Work Hour Limits
(64 Fed. Reg. 67202, December 1, 1999)

This letter provides the North Atlantic Energy Service Corporation (North Atlantic) response to the request for comment on the subject Petition for Rulemaking.

North Atlantic has reviewed the comments submitted separately by the Nuclear Energy Institute (NEI) on behalf of the nuclear energy industry and endorses those comments. North Atlantic encourages the NRC to deny this petition. In addition to recognizing that oversight of personnel is a fundamental aspect of safe plant operation, North Atlantic has procedures and programs in place to control personnel working hours within the requirements of Generic Letter 82-12, "Nuclear Power Plant Staff Working Hours", required by the Technical Specifications. North Atlantic believes that the NRC has ample authority to enforce the requirements of the Technical Specification without the need for additional rulemaking.

Thank you for the opportunity to comment on this important issue. If you have any questions regarding these comments, please contact Mr. James M. Peschel, Regulatory Programs 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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Mr. David L. Meyer
U.S. Nuclear Regulatory Commission
NYN-00010 / Page 2

cc: H. J. Miller, Regional Administrator
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