



**North
Atlantic**

**DOCKET NUMBER
PROPOSED RULE 50
(66FR57001)**

DOCKETED
USNRC

January 23, 2002 (4:38PM)
OFFICE OF SECRETARY
RULEMAKINGS AND
ADJUDICATIONS STAFF

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The Northeast Utilities System

December 21, 2001

NYN-01103

Secretary, U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001
Attention: Rulemaking and Adjudications Staff
Mail Stop 0-16C1

Seabrook Station
Comments on Proposed Rule
Federal Register Volume 66, No. 220, Pages 57001 - 57002, Dated November 14, 2001

The following endorsement and comments are provided by North Atlantic Energy Service Corporation (North Atlantic) in response to a proposed rule published in the Federal Register on November 14, 2001, revising the requirements for Combustible Gas Control in 10CFR§50.44. North Atlantic appreciates the opportunity to comment on the proposed rule. We support the NRC Staff's efforts to "rebaseline" the requirements for current licensees, making the rule more performance based and risk-informed.

North Atlantic supports and endorses the revised 10CFR§50.44 as written with the following comments:

1. For paragraphs 50.44(c)(3) and 50.44(c)(6)(E), which request comments on the merits of each option and which is preferred, these options do not affect Seabrook Station and North Atlantic has no position on the options.
2. Concerning the staff's recommendations to eliminate paragraph (c)(3)(A) – (C) due to post-accident inerting never being implemented in existing plants and it is currently covered by 50.44(c)(3)(iv)(B), North Atlantic concurs with the staff's recommendation to eliminate the paragraphs. North Atlantic's position is that there is no need to have a regulation that is not used. Also, if a requirement is already covered by another part of the regulations, it is not necessary to repeat the requirement.

Template = SECY-067

SECY-02


7

U.S. Nuclear Regulatory Commission
NYN-01103 / Page 2

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

Very truly yours,

NORTH ATLANTIC ENERGY SERVICE CORP.



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cc: United States Nuclear Regulatory Commission
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