

August 8, 2006

Mr. Glenn O. Steiger, General Manager  
Massachusetts Municipal Wholesale Electric Company  
Moody Street, Post Office Box 426  
Ludlow, MA 01056

SUBJECT: RESPONSE TO YOUR LETTER CONCERNING ELECTRICAL LOAD  
CONTINGENCY PROTOCOL AND ITS IMPACT ON SEABROOK STATION

Dear Mr. Steiger:

I am responding to your letter dated May 24, 2006, concerning the repeated downpowering of Seabrook Station. In your letter, you expressed concerns about the design and operational impacts of these downpowers, and how the Town of Hudson, Light and Power Department (HL&PD), along with the Massachusetts Municipal Wholesale Electric Company (MMWEC), have a significant financial interest in the safe and reliable operation of Seabrook Station. You noted that between October 19, 2005, and April 20, 2006, the Independent System Operator, New England (ISO-NE) mandated downpowers of Seabrook Station from full power to levels at or below 1,200 Megawatts-Electric (MWe) on 27 separate occasions. The ISO-NE mandated these downpowers at the request of the New York Independent System Operator (NYISO) in response to reliability concerns in the New York Central East region.

The NRC's primary mission is to regulate the safe use of radioactive material for civilian purposes to ensure the protection of public health and safety and the environment. The NRC achieves its safety mission, in part, by licensing individuals and organizations to use radioactive materials for beneficial civilian purposes, and ensuring that the safety performance of these "licensees" meets acceptable levels.

To ensure that Seabrook operates safely, the licensee must comply with all conditions of its operating license, which includes the plant's Technical Specifications and design bases. The Technical Specifications include requirements relative to plant thermal transients and the offsite power source. The Seabrook Station Technical Specifications reference the number of times selected safety-related structures, systems, and components can be subject to thermal transients. The downpowers that you described in your letter were from a full output of about 1,250 MWe to about 1,200 MWe, a change of 4% rated thermal power. These changes in power are relatively minor and do not challenge the transient limits described in the Seabrook Technical Specifications or design bases. While undesirable from an economic standpoint for Seabrook, these small transients are fully within Seabrook's design bases, therefore, the NRC does not impose any restrictions or limits on such small power changes.

With respect to ensuring a reliable offsite power source, we must rely on other agencies and entities to govern and oversee safe grid operations due to our lack of regulatory authority in this area. In this respect, we would encourage Seabrook Station to continue to work with ISO-NE,

G. Steiger

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NYISO, and the U.S. Federal Energy Regulatory Commission (FERC) through established processes to try to eliminate the need for such frequent downpowers in the future.

Sincerely,

**/RA/** Marc Dapas signed for

Samuel J. Collins  
Regional Administrator

G. Steiger

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