

**North
Atlantic**

DOCKETED
USNRC

PETITION RULE PRM 50-60
(59 FR 17499)

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NYN- 94072

OFFICE OF SECRETARY
DOCKETING & SERVICE
RJ 4402

Ted C. Feigenbaum
Senior Vice President &
Chief Nuclear Officer

June 29, 1994

Secretary of the Commission
United States Nuclear Regulatory Commission
Washington, DC 20555

Attention: Docketing and Service Branch

Subject: Virginia Power; Filing of Petition for Rulemaking, Docket No. PRM-50-60

Gentlemen:

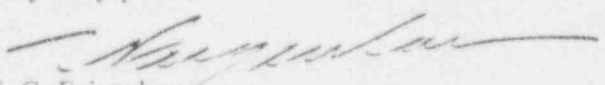
On April 13, 1994 a Petition for rulemaking filed by Virginia Power was noticed in the Federal Register (59 FR 17499). That petition requested that the NRC change the frequency that a licensee conducts independent reviews of its emergency preparedness program from annually to biennially. North Atlantic Energy Service Corporation (North Atlantic), operator of Seabrook Station Unit 1, endorses the subject proposed rule change and agrees with the reasons cited in the petition.

Overall industry performance to date indicates effective implementation of emergency preparedness programs. Given this demonstrated level of performance and the existence of other regulatory oversight methods, a biennial independent review of the emergency preparedness program would be sufficient to verify continued program effectiveness. A biennial audit schedule would allow licensees to have increased flexibility in concentrating available audit resources in areas of observed weakness based on performance, rather than conducting a mandatory annual audit of marginal safety significance.

North Atlantic also supports the proposal that the independent audit be conducted in alternating years with the onsite emergency preparedness exercise, and as such would integrate well with another Virginia Power petition for rulemaking that requests a change in onsite exercise frequency from annual to biennial (58 FR 12339). The alternating schedule for exercises and audits would provide for an annual review of the performance of the emergency preparedness program.

If you have any questions concerning these comments, please contact Mr. Anthony M. Callendrello, Licensing Manager, at (603) 474-9521, extension 2751.

Very truly yours,


T. C. Feigenbaum

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United States Nuclear Regulatory Commission
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