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March 19, 1998

Dr. C. W. Jameson
National Toxicology Program
Report on Carcinogens, MD EC-14
P.O. Box 12233
Research Triangle Park, NC 27709

Re: Comments of the Class of '85 Regulatory Response Group on the Proposed Listing of Nickel and Nickel Compounds as Known Human Carcinogens in the Report on Carcinogens, Ninth Edition

Dear Dr. Jameson:

The Class of '85 Regulatory Response Group respectfully submits these comments on the National Toxicology Program's ("NTP") proposed listing of nickel and nickel compounds as "Known to be a Human Carcinogen" in the Ninth Edition of the Report on Carcinogens. This proposal was published in the Federal Register on February 3, 1998, at 63 Fed. Reg. 5565.

The Class of '85 is a voluntary *ad hoc* coalition of 33 electric utilities from around the country that was formed in 1990 to address environmental issues affecting the electric utility industry. A list of the members of the Class of '85 is enclosed.

The Class of '85 does not believe that the proposed listing of nickel and nickel compounds as known human carcinogens is supported by the current scientific evidence and we support the comments filed by Florida Power & Light Company ("FPL") on this issue. A copy of FPL's comments are attached.

Given the lack of clear scientific evidence on the carcinogenicity of all nickel compounds, the Class of '85 urges the NTP not to list nickel and nickel compounds as "Known to be a Human Carcinogen" in the Ninth Edition of the Report on Carcinogens. We appreciate the NTP's consideration of these comments.

Sincerely,



Debra J. Jezouit
Counsel to the Class of '85
Regulatory Response Group

Enclosures

CLASS OF '85 REGULATORY RESPONSE GROUP

Arizona Public Service Company
Arkansas Electric Cooperative Corporation
Central Louisiana Electric Company
Central & South West Services
 Southwestern Electric Power Company
 Central Power and Light Company
 West Texas Utilities, Company
 Public Service Company of Oklahoma

City of Tallahassee
Consolidated Edison Company of New York
Cooperative Power
Dairyland Power Cooperative
The Dayton Power & Light Company
Duquesne Light Company
Entergy Services, Inc.
 Entergy Arkansas
 Entergy Gulf States
 Entergy Louisiana
 Entergy Mississippi
 Entergy New Orleans

Florida Municipal Power Agency
Florida Power & Light Company
Gainesville Regional Utilities
Houston Lighting & Power Company
IES Utilities, Inc.
Jacksonville Electric Authority
Lakeland Department of Electric and Water
Long Island Lighting Company
Niagara Mohawk Power Corporation
Northern States Power Company
Orlando Utilities
Pacific Gas & Electric Company
PP&L, Inc.
Public Service Electric & Gas Company
Wisconsin Power & Light Company