

October 24, 1983

Note to Jan Norris

SUBJECT: BRUNSWICK 1 CONTAINMENT LEAK TESTING SURVEILLANCE (OELD # 838 404)

The package isn't bad but the example you use is incorrect. The example in the Sholly rule applies to a situation where the Regulation has changed and you make minor modifications of the license to conform with the change in the Regulations. This does not appear to be that case. The Regulations hasn't changed as far as I can tell from this package - it doesn't result from any change in the Regulations that I can see. If there is in fact a change in the Regulations which causes this amendment then you have to do more describing of what that change is. If not, choose another example or do an analysis of the three criteria.

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