January 19, 1984

Note to Darrell Eisenhut

SUBJECT: SUSQUEHANNA REPORTING REQUIREMENTS (OELD # 841 639)

Although this is okay to do, it strikes me that we should not be amending licenses to repeat in slightly different language, the requirements of the Regulations. When 50.73 was passed, it automatically superseded all existing license requirements for reporting. We can, if we want, go back and put more of the reporting requirements back in the tech specs but it strikes me that we are going to have the same problems we had that gave rise to the need for the changes in 50.72 and 50.73, that is, inconsistent requirements from license to license. I think we should delete the reporting requirements and simply say "report in accordance with the requirements of 50.72 and 50.73". We don't even need to say that much; however, that's my recommendation for what we should do. If you think you want to go back to the business of putting reporting conditions in all the licenses again, its okay with me, however, I think its a mistake to do that.

The reason I'm making this suggestion to you rather than specifically to the PM's is that it appears that you, perhaps in a Memorandum to all the PM's, should tell them not to make these changes, that 50.72 and 50.73 now supersede all licenses and we should not make any changes except to delete reporting requirements as an administrative change because they have in fact been superseded by 50.72 and 50.73.

Comis Scinto

cc: T. Novak B. Perch

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