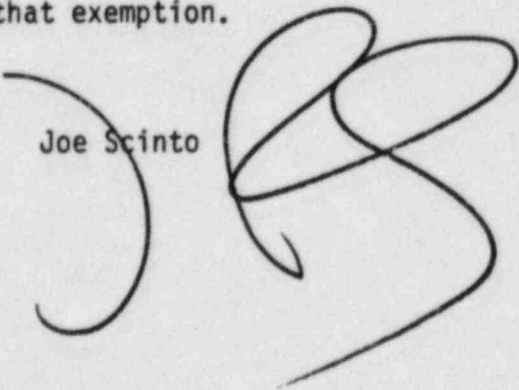December 15, 1983

Note to John Suermann

SUBJECT: OCONEE 1 REQUEST FOR EXEMPTION (840 227)

I don't have any problems with what you really want to do in this package but I think it is too ambiguous in the way its phrased. I do not know from reading this exactly what they are exempted from. Their incoming request is somewhat ambiguous. I think, some place in this package, you should explicitly set forth the requirement of the Regulation that they are being allowed not to comply with and explicitly set forth at what deviation from that Regulation you are in fact authorizing. In addition, it strikes me that this commitment to support the State exercises should in fact be made a condition of the exemption, so I think it needs to be rewritten in form just to make it very clear as to what the scope of this exemption is. You can't simply refer to their incoming; their incoming is even more vague than our exemption. In this exemption, probably at "III" or "IV" you should explicitly say what it is that we're exempting them from and the scope of that exemption.

Joe Scinto