

February 21, 1984

Note to Don Sells

SUBJECT: ST LUCIE 1 - RELOAD MARGIN REQUIREMENTS (OELD # 842 099)

I'm returning, for some additional work, the package on the St. Lucie reload. You should work with Bill Paton to satisfy the comments he made. I have a separate comment in which there's nothing, I think, that you can do anything about. NRR has to decide what it wants to do on these reload packages. The problem with the reload packages is reflected in the St. Lucie package and its a similar problem in other packages. The Sholly notices are all based on reloads with use of the previously-approved models. When we get to the amendment package, the review of the model changes isn't complete; we have all kinds of comments about their questioning the model capabilities and that's the way the package goes out - with all kinds of holes in it. The SER for the issued amendment attached to this package is inconsistent with the reason we gave for no significant hazards in the original Sholly notice. No one asked for a hearing but for you guys at some point in time, your conscience should bother you with respect to putting out notices giving descriptions of no significant hazards amendments. Then when you finally do the evaluation, the thing shows that the assertions you made in the Sholly notice were unfulfilled wishes. No one's asked for a hearing yet but if anyone did this package would be unacceptable and if anyone finds a way to request a hearing or to challenge this thing, this package has very little to suport the action.

*AMB*  
for Joe Scinto

cc: G. Lainas  
B. Paton  
W. Olmstead