

**From:** Barry Zalcmann  
**To:** Allen Hansen  
**Date:** Wed, Aug 11, 1999 9:48 AM  
**Subject:** Re: turtles

Alan-

This plan may put NRC in jeopardy (please check w/ Ann on NRC's responsibilities under ESA and MMPA). I see only one reason to defer the action on the license amendment. If those involved in updating the BA are also involved in preparing the license amendment, then we should not distract them until the BA is available. Given our prior experience, the BO can some time. The licensee needs to adhere to the current ITS (and it will be given the actions to reinstate consultation). If the licensee moves promptly to incorporate the language that you proposed earlier into the license, then when the new ITS is in place, no further licensing action would be necessary.

>>> Allen Hansen 08/11 8:21 AM >>>

Kim (cc others) -

I requested Brunswick update BA and submit ... it is their plan to submit a license amendment application after NMFS and NRC agree on the final BO (?) and send it to them ...

Allen  
415-1390

>>> Kimberly Leigh 08/10 4:23 PM >>>

Allen-

OK- Brunswick needs to submit an updated Biological Assessment (BA) to the NRC containing the most recent turtle data ASAP, so NRC can pass it along to NMFS. Please tell your licensee this. NRC needs to make sure NMFS gets the most recent info so the take limit can be re-set and to maintain NRC compliance with ESA. The BA submitted Jan 26, 1998 by Brunswick, contains data up till 1997. Brunswick should submit the most recent turtle data so that we get this done right this time around!

Please notify the license amendment staff also that the ITS needs to be incorporated too.

Any questions- let me know.....

Kim

**CC:** Ann Hodgdon, Karen Cotton, Kimberly Leigh, Leon...