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DOCKETED
October 30, 2000

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

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In the Matter of)	
)	
Florida Power & Light Company)	Docket Nos. 50-250-LR
)	50-251-LR
(Turkey Point Units 3 and 4))	

FPL'S OPPOSITION TO REQUEST FOR EXTENSION BY JOETTE LORION

Florida Power & Light Company (FPL) hereby respectfully opposes Joette Lorion's request¹ to extend the date by which petitions to intervene must be filed on the license renewal application for Turkey Point Units 3 and 4. Ms. Lorion asks that the date for intervention petitions be extended until 30 days after a copy of the application is placed in a local public document room, but she makes no showing that she is unable to meet the current November 13 deadline – still two weeks away.

As the Federal Register notice (65 Fed. Reg. 60,693) informed all interested persons, FPL's application has been made available in the NRC's Electronic Reading Room, which can be accessed through the NRC web page. Moreover, the NRC staff notified Ms. Lorion by letter dated October 27, 2000 that, at her request, a copy of the application has been made available in the local library in Homestead, Florida.

A petition for leave to intervene is a fairly simple pleading that can easily be prepared by the deadline set in the notice of opportunity for hearing. This pleading is limited to the

¹ Ms. Lorion requested this extension by a letter dated October 13, 2000 addressed to the NRC Region II Administrator. Ms. Lorion did not serve FPL with a copy of this request.

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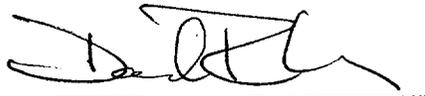
SECY-02

identification of petitioner's standing and the aspects of the subject matter on which the petitioner wishes to intervene (10 C.F.R. § 2.714(b)), and does not involve the identification of contentions. Therefore, an extended period of time to review the license renewal application for these purposes is unnecessary.

Ms. Lorion's hearing request is also inconsistent with the NRC Statement of Policy on Conduct of Adjudicatory Proceedings, CLI-98-12, 48 NRC 18 (1998), which advises that participants in NRC licensing proceedings should be expected to adhere to timeframes specified in the regulations and scheduling orders, and that extensions of time should be granted only when warranted by unavoidable and extreme circumstances. 63 Fed. Reg. 41,872, 41,874 (1998). It would seem sensible to apply this policy to a request such as that filed by Ms. Lorion, which seeks to delay a hearing at its inception with no real justification.

For all these reasons, Ms. Lorion's request for extension should be denied.

Respectfully Submitted,



David R. Lewis

Mitchell S. Ross

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Dated: October 30, 2000

October 30, 2000

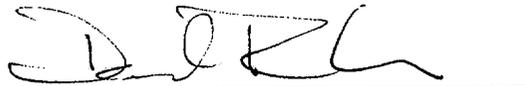
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(Turkey Point Units 3 and 4))

NOTICE OF APPEARANCE OF DAVID R. LEWIS

David R. Lewis, being an attorney at law in good standing admitted to practice before the courts of the District of Columbia, as well as various federal courts, hereby enters his appearance as counsel on behalf of Florida Power & Light Company, in any proceeding related to the above-captioned matter.

Respectfully submitted,



David R. Lewis

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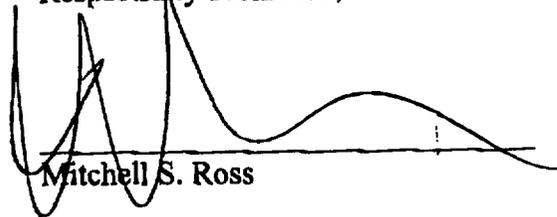
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NOTICE OF APPEARANCE OF MITCHELL S. ROSS

Mitchell S. Ross, being an attorney at law in good standing admitted to practice before the courts of the District of Columbia and Florida, as well as various federal courts, hereby enters his appearance as counsel on behalf of Florida Power & Light Company, in any proceeding related to the above-captioned matter.

Respectfully submitted,



Mitchell S. Ross

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CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing "FPL's Opposition to Request for Extension by Joette Lorion," "Notice of Appearance of David R. Lewis," and "Notice of Appearance of Mitchell S. Ross," dated October 30, 2000, were served on the persons listed below by deposit in the U.S. Mail, first class, postage prepaid, and where indicated by an asterisk by e-mail, this 30th day of October, 2000.

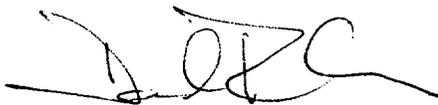
Secretary
Att'n: Rulemakings and Adjudications Staff
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Atomic Safety and Licensing Board Panel
Administrative File
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Ms. Joette Lorion
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Miami, FL 33176



David R. Lewis