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APPELLATE LAWYER JULIE H, LITTKY-RUEIN

January 18, 2005

VIA FACSIMILE (301) 415-5130

Applications Development Division Office of the Chief Information Officer U.S. Nuclear Regulatory Commission Washington, D.C. 20555-0001

Dear FOIA Officer: This is a request under the Freedom of Information Act (5U.S.C.552).

I request that a copy of the following documents be provided to me:

#1- Please provide all internal and external documentation for St. Lucie Unit 1, Docket No. 50-335, related to Violations issued to Florida Power and Light Company dated November 9, 1982. These violations discuss the failure of a licensee to comply with the requirements of:

- 1.1. 10CFR 20.301,
- 1.2. 10CFR 20.302,
- 1.3. 10CFR 20.106,
- 1.4. 10CFR 20,203 (e).

#2- Please include all the inspection reports including;

2.1. IE Inspection Report 82-33,

2.2. Survey Results,

2.3. Licensee Events Reports (LER) including LER's 82-045 and 82-016,

2.4. Follow-up Inspections with the licensee and the Fort Pierce Sewage Treatment Plant.

#3- Please include all analysis related to radiological surveys, quantification and identification of isotopes released from the plant from the time of initial criticality 1976 until the release path was terminated in 1982 conducted by:

3.1. the licensee,

3.2. the NRC,

3.3. EPA,

TRIAL LAWYERS LLP

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3.4. The State of Florida,3.5. and any other Federal or State Agencies,3.6. and/or Contractors.

#4- Please include all calculations and assessments related to the residual isotopic activity remaining at the disposal sites.

#5- Please provide all documents and notes pertaining to the disposal and/or removal of sludge from the Fort Pierce Sewage Treatment Plant including the location and analysis of any and all areas used by the Fort Pierce Sewage Treatment Plant for disposal of its sludge from 1976 to 1985.

#6- Where did St. Lucie Units 1 and 2 dispose of any radioactive water and what was recorded environmental input and impact from 1976 to 1985?

#7- Where did the Fort Pierce Sewage Treatment Plant dispose of any radioactive water and what was recorded environmental input and impact from 1976 to 1985?

#8- Please provide a list of all documents and all information contained therein pertaining to the present day land use of any and all areas used for the sludge disposal by the Fort Pierce Sewage Treatment facility for the disposal of sludge originating at the St. Lucie Units 1 and 2 from 1976 to present.

#9- Please provide estimates of the total volume of all discharges and estimates of the radioactivity discharge by each particular isotope for the entire period.

In order to help you determine my status for the purpose of assessing fees, you should know that I am affiliated with a law firm and I am seeking information for use in research.

I also included a telephone number at which I can be contacted at if necessary to discuss any aspect of my respect.

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January 18, 2005

TO:

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FAX TRANSMITTAL SHEET

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Applications Development Division Office of the Chief Information Officer U.S. Nuclear Regulatory Commission Washington, D.C. 20555-0001

FAX NUMBER: (301) 415-5130

FROM: Nancy La Vista, Esq.

RE: Finestone v. Florida Power & Light Co. OUR FILE NO: 01/0210

COMMENTS:

TOTAL NO. OF PAGES INCLUDING COVER SHEET: 3

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