

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

Before the Atomic Safety and Licensing Board
Administrative Law Judges:
Michael M. Gibson, Chairman
Dr. Michael F. Kennedy
Dr. William W. Sager

In the Matter of)
)
Florida Power & Light Company) Docket No. 50-250-LA
) and 50-251-LA
(Turkey Point Units 3 and 4))
) ASLBP No. 15-935-02-LA-BD01

November 3, 2015

CASE MOTION REQUESTING SUBPOENAS FOR EXPERT
WITNESSES FOR JANUARY, 2016 EVIDENTIARY HEARING

BACKGROUND

On May 8, 2015 this Board issue an INITIAL SCHEDULING ORDER
(Order) in the subject matter. At 9, the Order states,

C. List of Witnesses
By December 4, 2015, each party shall file its final list of the
witnesses on whose testimony it intends to rely at hearing, in
accordance with 10 C.F.R. § 2.336(a)(1).

REQUEST FOR SUBPOENAS

As provided in 10 CFR 2.702 and 2.1208 , Citizens Allied for Safe
Energy (CASE) hereby requests that subpoenas be issued by registered

mail for the individuals listed below to provide sworn written testimony and to appear in person, unless the Board decides that personal appearance is not necessary for one or more individuals. CASE requests that witnesses be requested to provide written responses to CASE'S questions within a specified time period, if that is possible.

WITNESSES TO BE SUBPOENAED

Dr. Philip Stoddard, Biologist, 6820 SW 64 Court, South Miami FL 33143-3209, 305-663-7357

Brian Carlstrom, Director, Biscayne National Park (BNP), 9700 SW 328th Street, Homestead, FL 33033 (305) 230-7275

Sarah Bellmund, Ecologist, Biscayne National Park (BNP), 9700 SW 328th Street, Homestead, FL 33033 (305) 230-7275

Lee N.Hefty, Director, Miami-Dade County, Division of Environmental Resources Management, (DERM) 701 NW 1st Ct, Miami, FL 33136 (305) 372-6789

Craig Grossenbacher, Geologist, Miami-Dade County, Division of Environmental Resources Management (DERM) 701 NW 1st Ct, Miami, FL 33136 (305) 372-6789

AREAS OF EXPERTISE

Dr. Philip Stoddard. Biology. Specifically regarding the consequences of the migration of water from the CCS of cyanobacteria, hypersaline and polluted water on crocodiles and other wildlife, toxicity, ecology, plant life, reduction in freshwater, short and long term residual concerns.

Director Brian Carlstrom and Geologist Sarah Bellmund, BNP: Impact of the migration of water from the CCS on Biscayne National Park and the Biscayne Bay Estuary. Hypersalinity and reduction of freshwater

regarding reproduction and survival of hatchling and juveniles. Impact of using modeling instead of field testing at Turkey Point is of particular concern to them.

Director Lee N. Hefty and Geologist Craig Grossenbacher. The ecology, geology, water resources and chemistry of the CCS and the area surrounding it and, actually, all of Miami-Dade County. are the direct responsibility of these individuals. They and their associates, based on FPL data, compiled and analyzed INT-002, *Units 3 & 4 Uprate Implementation Water Quality Impacts*. They have documented and traced saltwater intrusion in the entire county.

In seeking sworn written testimony CASE will indicate for each witness exactly which CASE positions they should address.

CASE UNAVAILABILITY OF FUNDS FOR PERSONAL APPEARANCES

CASE, as a Florida Not-For-Profit Corporation, all volunteer organization, has no funds to pay for pre diem and transportation for expert witnesses. It is our understanding that, in the past, the NRC has provided funds for non-profits for such expenses. CASE would attempt to have employers wave reimbursement but, if that is not forthcoming, perhaps the expenses could be covered by the NRC.

CERTIFICATION

I certify that I have made a sincere effort to contact the other parties in this proceeding, to explain to them the factual and legal issues raised in this motion, and to resolve those issues, and I certify that my efforts have been unsuccessful.

Executed in Accord with 10 CFR § 2.304(d).

Respectfully submitted,

/S/ (Electronically) Barry J. White

Barry J. White
Authorized Representative
Citizens Allied for Safe Energy, Inc.
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305-251-1960

Dated at Miami, Florida
this 3rd day of November, 2015