

**UNITED STATES NUCLEAR REGULATORY COMMISSION  
BEFORE THE EXECUTIVE DIRECTOR FOR OPERATIONS**

*In the Matter of:*

**SAPRODANI ASSOCIATES,**

**DATE: 08 MAR 2016**

and

**THOMAS SAPORITO**

**Petitioner,**

v.

**FLORIDA POWER & LIGHT COMPANY  
ST. LUCIE NUCLEAR POWER PLANT - UNITS 1&2  
TURKEY POINT NUCLEAR POWER PLANT – UNITS 3&4**

and

**ALL NRC LICENSEES,  
(w/similarly designed commercial nuclear power stations)**

**Licensee.**

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**PETITION UNDER 10 C.F.R. §2.206  
SEEKING ENFORCEMENT ACTION AGAINST  
THE ABOVE-CAPTIONED NRC LICENSEES**

NOW COMES, SaproDani Associates, by, through and with, Thomas Saporito, Senior Consultant for SaproDani Associates (hereinafter "Petitioner") and submits a *Petition Under 10 C.F.R. §2.206 Seeking Enforcement Action Against The Above-Captioned NRC Licensees* related to operation of licensed commercial nuclear power stations – (hereinafter "Petition"). For the reasons stated below, the U.S. Nuclear Regulatory Commission (NRC) should grant the Petition as a matter of law:

**NRC HAS JURISDICTION AND AUTHORITY TO GRANT PETITION**

The NRC is the government agency mandated by the United States Congress to protect public health and safety - and the environment - related to operation of civilian