

## **PMTurkeyCOLPEm Resource**

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**From:** Comar, Manny  
**Sent:** Wednesday, July 12, 2017 9:32 AM  
**To:** TurkeyCOL Resource  
**Subject:** FW: Amended 2.206 Enforcement Petition  
**Attachments:** 2017.05.22 Amended Petition.pdf

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**From:** Thomas Saporito [mailto:[saprodani@gmail.com](mailto:saprodani@gmail.com)]  
**Sent:** Monday, May 22, 2017 4:41 PM  
**To:** Comar, Manny  
**Subject:** [External\_Sender] Amended 2.206 Enforcement Petition

Mr. Comar:

Please find the attached "Amended 2.206 Enforcement Petition" which was provided to the NRC EDO this date.

Best regards,

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Thomas Saporito

Email: [saprodani@gmail.com](mailto:saprodani@gmail.com)

Phone: (772) 678-0724

**Hearing Identifier:** TurkeyPoint\_COL\_Public  
**Email Number:** 1304

**Mail Envelope Properties** (ded7b4d2de6f4491b4fec99163a5ee6b)

**Subject:** FW: Amended 2.206 Enforcement Petition  
**Sent Date:** 7/12/2017 9:32:02 AM  
**Received Date:** 7/12/2017 9:32:03 AM  
**From:** Comar, Manny

**Created By:** Manny.Comar@nrc.gov

**Recipients:**  
"TurkeyCOL Resource" <TurkeyCOL.Resource@nrc.gov>  
Tracking Status: None

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UNITED STATES NUCLEAR REGULATORY COMMISSION  
BEFORE THE EXECUTIVE DIRECTOR FOR OPERATIONS

*In the Matter of:*

SAPRODANI ASSOCIATES,

DATE: 22 MAY 2017

and

THOMAS SAPORITO

Petitioner,

v.

FLORIDA POWER & LIGHT COMPANY  
(Turkey Point Units 6 & 7)

and

ALL OTHER NRC Licensees with an  
AP1000 reactor or reactor design

Licensee.

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**PETITION UNDER 10 C.F.R. §2.206 SEEKING ENFORCEMENT ACTION AGAINST  
THE FLORIDA POWER & LIGHT COMPANY AND ALL OTHER NRC LICENSEE WITH  
AN AP1000 REACTOR OR REACTOR DESIGN**

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* (hereinafter "Petition"). *Seeking Enforcement Action Against the Florida Power & Light Company ("FPL" or "Licensee")* related to the proposed construction and licensed operation of Turkey Point Units 6 & 7 in the south Florida area.

For the reasons stated below, the U.S. Nuclear Regulatory Commission (NRC) should grant the Petition as a matter of law:

**BACKGROUND**

On May 2<sup>nd</sup>, 2017, the undersigned petitioner requested – via the filing of a 2.206 enforcement petition - that the NRC take escalated enforcement action against the Florida Power & Light Company (FPL) related to the ongoing permitting and proposed construction of two AP1000 (Turkey Point Units 6&7 nuclear reactors in south Miami, Florida. The NRC project manager for the proposed Turkey Point Units 6&7 has acknowledged receipt of the 2.206 petition. To the extent that other NRC licensees have adopted the very same design of the AP1000 nuclear reactor - (Geogia Power) for example – petitioner hereby incorporates by this reference – all other NRC licensees with the AP1000 nuclear reactor design – and requests that the NRC take similar enforcement action against those licensees accordingly.

**REQUEST FOR ENFORCEMENT-RELATED ACTION TO MODIFY,  
SUSPEND, OR REVOKE A LICENSE AND ISSUE A NOTICE OF  
VIOLATION WITH A PROPOSED CIVIL PENALTY**

**A. Request for Enforcement-Related Action**

Petitioner respectfully requests that the NRC revoke and/or deny any requested NRC license requested by the licensee(s) to build or construct and/or conduct licensed operations of any nuclear reactor employing the AP1000 nuclear reactor design.

**B. Facts That Constitute the Basis for Taking the Requested Enforcement-Related Action Requested by Petitioner**

See – supporting facts and documents submitted to the NRC in support of the May 2<sup>nd</sup>, 2017 (2.206 petition).

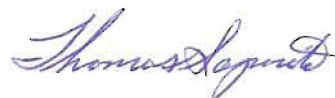
**C. There Is No NRC Proceeding Available in Which the Petitioner is or Could be a Party and Through Which Petitioner's Concerns Could be Addressed**

Petitioner avers here that there is no NRC proceeding available in which the Petitioner is or could be a party and through which Petitioner's concerns could be addressed.

**CONCLUSION**

FOR ALL THE ABOVE STATED REASONS, and because Petitioner has amply satisfied all the requirements under 10 C.F.R. §2.206 for consideration of the Petition by the NRC Petition Review Board (PRB), the NRC should grant Petitioner's requests made in the instant Petition as a matter of law.

Respectfully submitted,



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Thomas Saporito, Senior Consultant  
Saprodani Associates  
Email: [saprodani@gmail.com](mailto:saprodani@gmail.com)  
Telephone: (772) 678-0724