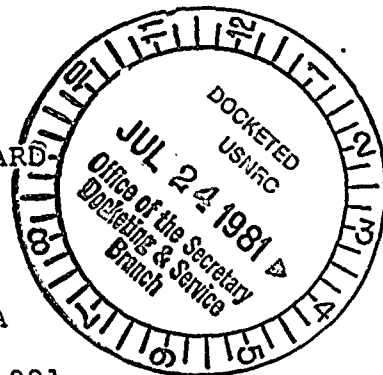


FPL - 7/24/81

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD



In the Matter of )  
FLORIDA POWER & LIGHT COMPANY )  
(St. Lucie Plant, Unit No. 2) )

Docket No. 50-389A

Dated: July 24, 1981

ANSWER OF FLORIDA POWER & LIGHT COMPANY  
TO PETITION TO INTERVENE  
BY METROPOLITAN DADE COUNTY, FLORIDA

On July 9, 1981, Metropolitan Dade County, Florida  
[Dade County] filed a late Petition to Intervene in the above  
identified proceeding. Dade County seeks intervention "only if  
the Commission permits RRD [Parsons & Whittemore's subsidiary]  
or any related company to intervene in the proceeding."  
Florida Power & Light Company respectfully opposes this Petition.

Dade County's sole expressed interest is in the matters  
raised by Parsons & Whittemore, Inc. and its subsidiaries  
[P&W]. Therefore, Dade County's Petition necessarily suffers  
from the same infirmities inherent in the late Petition of  
P&W, and FPL opposes the Petition on those grounds.

Moreover, it is plain that in its potential effect on  
this proceeding, Dade County's Petition amplifies these  
infirmities. The County states that its basis for seeking  
intervention is to "protect . . . its rights relating to a  
solid waste resource recovery project, pursuant to contracts  
between Dade County and [P&W's subsidiaries] . . . and a  
related agreement between Dade County and Florida Power & Light

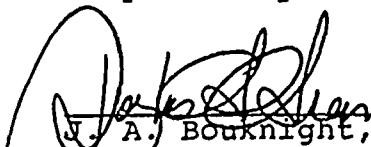
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Company." (Petition at 1). In other words, Dade County perceives that the admission of P&W into this proceeding to litigate the matters raised in its Petition could impinge upon the entire commercial relationship among Dade County, P&W and its subsidiaries, and FPL, and it wishes to make its factual and legal presentation regarding that dispute, too. FPL does not criticize the County for seeking to protect itself under these circumstances; its concern, in FPL's view, is quite understandable. However, the County's Petition above all serves to underscore the depth of the factual and legal complications inherent in the matter, and the manner in which those complications will proliferate upon the admission in this proceeding of P&W, Dade County, and other parties which may have a stake in what is essentially a commercial dispute -- one which has no connection whatever with either the construction or operation of St. Lucie Unit No. 2.

For these reasons and the reasons briefed and argued to the Board on July 20, the County's late Petition, and that of Parsons & Whittemore and subsidiaries, should be denied.

Respectfully submitted.



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UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of )  
 )  
FLORIDA POWER & LIGHT COMPANY ) Docket No. 50-389A  
(St. Lucie Plant, Unit No. 2) )

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing "Answer of Florida Power & Light Company to Petition to Intervene by Metropolitan Dade County, Florida" were served upon the following persons by hand delivery\* or by deposit in the U.S. Mail, first class postage prepaid, this 24th day of July, 1981:

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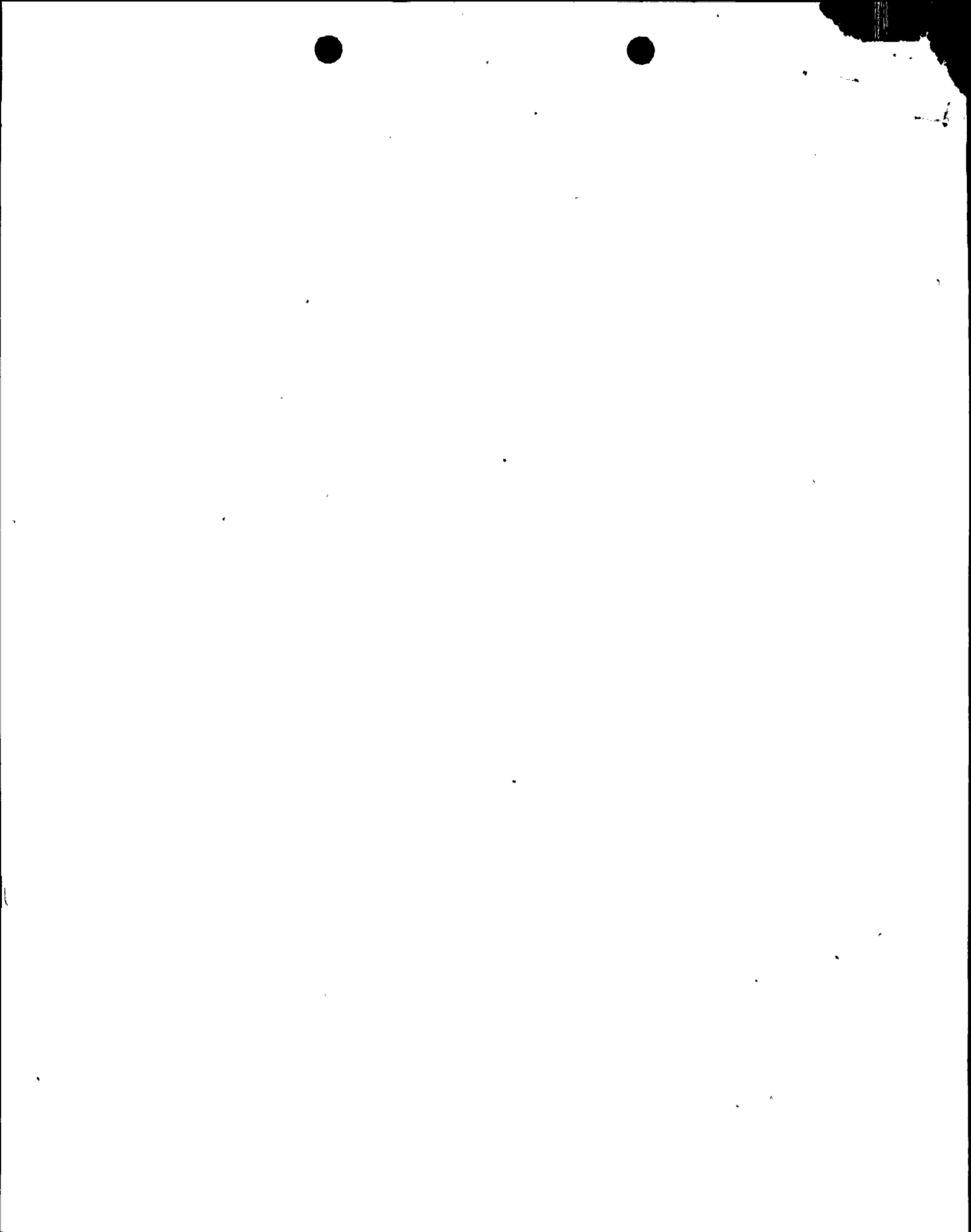
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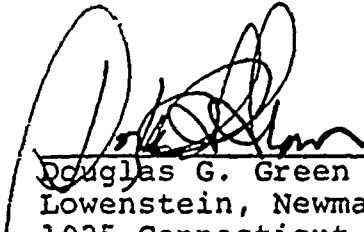
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DATED: July 24, 1981

